

UUCF Background Investigation Procedures for the Refugee Resettlement Project

Requirement

It is a requirement of the refugee sponsoring agency, Lutheran Social Services (LSS), that any member of the co-sponsor(s) who will have interaction with the refugee family have a background investigation. The investigations are normally conducted through LSS at the per person cost of \$30; therefore it was decided that it would be easier and less costly to have the investigations obtained through the auspices of the Unitarian Universalist Congregation of Fairfax (UUCF).¹

Screening Vendor

UUCF retains the services of a commercial screening vendor, Trusted Employees, to perform background investigation for all persons who volunteer for the Religious Exploration program at UUCF. The company is recommended by the UUCF insurance company, Church Mutual, and by the Unitarian Universalist Association (UUA). UUCF will use this same company to conduct background investigations for volunteers for the Refugee Resettlement project.

Elements of the Background Investigation

1. **Social Security Trace:** The trace verifies the volunteer's Social Security Number (SSN), past and present addresses and possible aliases or maiden names used. This search establishes the time frame of when the SSN was issued and put into use. The trace shows whether the SSN is valid, state of issue, and is actually registered to the volunteer. It is needed for uncovering a possible criminal record. The applicant must supply his/her full legal name, date of birth, and social security number.
2. **Criminal history:** This is a search for a criminal history in jurisdictions beyond an applicant's known address history.² It also includes a search of driving and motor vehicle violations.
3. **National Sex Offender Public Registry:**

Summary of Personal Identification Information

Supplied by Applicant

- Name (and aliases)
- Address(s)
- Telephone number
- Social security number
- Date of birth
- E-mail address

Shown on Report

- Name (and aliases)
- Address(s)
- Last 4 digits of social security number

¹ LSS has stated that it will accept background investigation reports conducted under the auspices of UUCF.

² Every state has an agency that is the official state repository for criminal records. The responsible agency, as designated by state statute, receives and maintains records of arrests and criminal convictions from local jurisdictions throughout the state. State repositories in turn feed criminal history records to a federal database maintained by the FBI. As all FBI checks are based upon fingerprints, it is believed that no check of the FBI database is made.

Procedure

1. The volunteer agrees to be a member of a Refugee Resettlement Team and agrees that his/her name be submitted to the UUCF Director of Administration via E-mail to have a background investigation.

If the volunteer wishes to submit a background investigation report conducted by another organization, he/she must submit it to the UUCF Director of Administration. If approved, it can then be forwarded by the applicant to LSS.

2. The Director of Administration generates a URL link that is sent via E-mail to the applicant.
3. The applicant invokes the link and connects to the screening vendor's website and completes the application. The application for the background investigation consists of about four screens. The first three screens provide a description of the applicant's rights under the Fair Credit Report Act (see below). The required data to be input by the applicant is very limited as described above. The applicant may terminate at anytime during the procedure if he/she so wishes.
4. The investigation is accomplished by the screening vendor by interrogating the general categories of databases cited above. A report is generated and the applicant and the Director of Administration are notified via E-mail.
5. The applicant and the Director of Administration review the report on the screening vendor's website.
6. Possible Outcomes

- a. No Records Found: If the report states no reasons for possible rejection of the volunteer, the applicant downloads a PDF version of the report and forwards it to LSS as an attachment to an E-mail.
- b. Records Found:
 - i. Withdrawal: If the report states reasons for possible rejection, the volunteer may choose to have his/her name withdrawn from consideration as a volunteer by notifying the Director of Administration. No report is retained by UUCF nor LSS.
 - ii. Records Found: If an applicant believes that there are inaccuracies in their report, the applicant can dispute inaccuracies online or by mail to: Trusted Employees, 701 5th Street South, Hopkins, MN 55343. Disputes are promptly investigated but may take up to 30 days to be resolved, as provided for in the FCRA.
 - iii. Records Found: If the volunteer still wishes to be considered for participation in the project involving contact with the refugee family, he/she notifies the Director of Administration of his/her desire to participate.

The Director of Administration considers the request; he may consult the Senior Minister. If the applicant is rejected, he/she is notified by E-mail. The applicant may appeal to have an in-person meeting. If the volunteer is accepted, the applicant forwards the report to LSS and the decision is left to LSS.

7. Storage of Background Investigation Reports:

- a. UUCF: Reports are not retained by the UUCF Administrative Office but are accessible to authorized persons on the screening vendor's website.
- b. LSS: Reports will be maintained the UUCF and UUCS "groups file for the duration of ... co-sponsorship commitment.

Evaluation of UUCF Background Investigation Procedure according to the Fair Credit Reporting Act

Criteria ³	Description	Determination
Notice and consent prior to the background check	Volunteer allows name to be submitted; volunteer accepts or declines information that he/she enters.	Yes
A right to receive a copy of the report	Volunteer receives report after being received by the Administrative Office regardless of the information found.	Yes
Notice of negative information before an adverse action is taken (such as refusing a volunteer's application)	Volunteer is notified of the information that may disqualify him/her. The volunteer may claim that the information is incorrect in which case he/she must rectify the matter with the repository.	Yes
A right to appeal an adverse decision by UUCF	Volunteer has the right to appeal the decision of the Director of Administration to the UUCF officials.	Yes
A right to appeal an adverse decision by LSS	LSS does not have a procedure for appeal. ⁴	No
UUCF: Proper disposal of information included in a report	The paper report is disposed/shredded after one year (end of project/support for that family)	Yes
LSS: Proper disposal of information included in a report	"The background check results can be scanned and emailed directly to me, and I keep them in your groups file for the duration of your co-sponsorship commitment."	Yes
Assurance that personal data and information collected from the background screening will not be used for other purposes		Yes
Assurance that personal information will be securely stored, and access available to only to those who have a need to know		Yes

³ Fact Sheet 16d: Volunteer Background Checks: Giving Back Without Giving Up on Privacy, Privacy Rights Clearing House, Copyright © 2008-2016, Posted April 2008, Revised February 2016.
<https://www.privacyrights.org/volunteer-background-checks-without-giving-up-privacy>

⁴ E-mail from Kiersten Rossetto Nassar, Outreach and Engagement Coordinator, LSS to Rod Paolini, General Coordinator, UUCF July 27, 2016: "The only thing that would prohibit anyone from being able to interact with the family would be if they have committed a felony/violent crime or if they are on the national sex offender registry. That we are pretty strict about as we must ensure the safety of the family. If there are any speeding tickets from the past year, they may be asked not to drive the family but they are still more than welcome to be a part of the team."