



## PROCEDURES FOR EMPLOYEE BACKGROUND CHECKS

*Please see separate document for procedures for volunteer background checks*

This document updates the procedures that were developed to implement the requirements of the Clergy Bulletin Supplement (Volume XVIII, Number 5A), Requirements for Background Checks on Certain Church Personnel (dated June 1, 2002). Please also refer to Clergy Bulletin (Volume XVIII, Number 5), Requirements for Background Checks on Certain Church Personnel (dated March 1, 1993). This document also follows requirements of the Charter for the Protection of Children and Young People (dated 2002 and 2005) from the U.S. Conference of Catholic Bishops. **In addition, this document reflects changes in archdiocesan background check procedures required by changes in Minnesota law effective September 1, 2008 (Minnesota Statutes §123B).**

In order to protect those we serve and employ, all employees (full-time, part-time, regular, temporary) of the Archdiocese, and of parishes, elementary and secondary schools located within the Archdiocese, as well as of related institutions shall have a background check.

An employee's background check should be received, reviewed, and accepted before an employee begins working.

### A. GENERAL PROCEDURES:

1. If your location has not done so already, contact The McDowell Agency, Inc. at 651-644-3880 to set up an account and receive the necessary training, manual and forms to conduct background checks.
2. Indicate in the job qualifications of position descriptions that a background check is required. Indicate in the job offer letter that the offer is contingent on an acceptable background check. *Electronic or paper versions of samples of a position description and offer of hire letter may be obtained by contacting PCYI (Protection of Children and Youth Initiative) staff at [pcyi@archspm.org](mailto:pcyi@archspm.org) or 651-290-1622 or 651-251-7742.* Initiate paperwork for the background check as soon as the hiring decision is made and before the employee starts work. Normally, The McDowell Agency completes the report within three days.
3. Keep information related to the employee's background check in a file separate from the employee's personnel records (salary history, benefit information, etc.) As with all personnel-related information, background check records should be kept confidential and in a locked file. The background check records should only be available to members of the management team who have a specific need for the information.
4. An employee should not obtain his or her own background check. In the case where the employee running background checks needs to undergo a background check, the responsibility for obtaining a background check should be delegated to another employee, for example the parish business administrator or pastor.
5. If you have questions about volunteer or employee background checks, please contact Protection of Children and Youth Initiative staff at [pcyi@archspm.org](mailto:pcyi@archspm.org) or 651-290-1622 or 651-251-7742.

B. EMPLOYEE PROCEDURES:

**IMPORTANT CHANGE EFFECTIVE SEPTEMBER 1, 2008:**

**As of September 1, 2008, all parish and school employees will be background checked using the same employee background check package from The McDowell Agency. There is now no separate background check required to be submitted directly to the Minnesota Bureau of Criminal Apprehension (BCA) for teachers. All parish and school employees will be screened using the 123B statutory search through the BCA, which is required for certain groups under recent changes in Minnesota law. This 123B statutory search yields adult convictions, adult arrests less than one year old with no disposition and juvenile adjudications.**

1. FOR ALL EMPLOYEES OVER 18 YEARS OLD

Request the Employee Package from The McDowell Agency. This package includes a 123B statutory search of BCA records, a criminal history check in all counties of residence and employment within the last seven years, a national sex offender registry search and a social security number verification.

- a. Have the employee read and complete FORMS A-F, listed below. Keep copies of FORMS A-F in the employee's background and investigation file.
- b. Submit the data from FORM A: PRE-EMPLOYMENT SCREENING QUESTIONNAIRE AND RELEASE via internet, fax or mail to The McDowell Agency.
- c. Submit FORM B: 123B.03 INFORMED CONSENT to the McDowell Agency via scan, fax or mail.

Please contact The McDowell Agency directly at 651-644-3880 if you have questions about form submission.

www.mcdowellagency.com  
 The McDowell Agency  
 1714 University Ave W  
 St Paul, MN 55104  
 FAX (651) 644-3877

- d. Mail one copy of FORM D: PREVIOUS EMPLOYER BACKGROUND INFORMATION RELEASE form (completed by employee) to each of the employee's former employers for the past seven years. Be sure to include a stamped, self-addressed envelope with each mailing. If the previous employer was a parish, school or other affiliated organization within the Archdiocese, follow-up with a phone call if you do not receive a response to your mailing.

EMPLOYEE FORMS:

FORM A: PRE-EMPLOYMENT SCREENING QUESTIONNAIRE AND RELEASE  
 FORM B: 123B.03 INFORMED CONSENT  
 FORM C: TENNESSEN WARNING  
 FORM D: PREVIOUS EMPLOYER BACKGROUND INFORMATION RELEASE  
 FORM E: A SUMMARY OF YOUR RIGHTS UNDER THE FAIR CREDIT REPORTING ACT.  
 FORM F: CONSUMER REPORT/INVESTIGATIVE CONSUMER REPORT DISCLOSURE AND RELEASE OF INFORMATION AUTHORIZATION

*Electronic or paper versions of FORMS A-F may be obtained by contacting PCYI staff at [pcyi@archspm.org](mailto:pcyi@archspm.org) or 651-290-1622 or 651-251-7742.*

NOTE: all applicants must receive a copy of FORM E: A SUMMARY OF YOUR RIGHTS UNDER THE FAIR CREDIT REPORTING ACT and sign a copy of FORM F: CONSUMER REPORT/INVESTIGATIVE CONSUMER REPORT DISCLOSURE AND RELEASE OF INFORMATION AUTHORIZATION. These forms are required under the federal Fair Credit Reporting Act to be reviewed and accepted by anyone submitting to any type of consumer report. Consumer reports include, but are not limited to, criminal background checks as well as credit reports and driving record reports.

## 2. FOR EMPLOYEES WHO RECENTLY MOVED TO MINNESOTA

If an employee applicant has resided for less than 1 year in Minnesota, please contact PCYI staff at [pcyi@archspm.org](mailto:pcyi@archspm.org) or 651-290-1622 or 651-251-7742 for assistance. Do not accept background check reports from other dioceses or organizations outside the Archdiocese of St. Paul and Minneapolis.

## 3. FOR EMPLOYEES YOUNGER THAN 18

Because there usually are no criminal records available on those younger than 18 years of age, hire only those on whom you can check references. Good young employee candidates are those for whom you can obtain written statements from trustworthy adults attesting to their character, lack of misconduct and dependability for the job considered. A written statement and recommendation from the young applicant's current principal, counselor or teacher should also be obtained. The written statements should be kept on file in the same manner as background checks for adult employees.

## 4. FOR EMPLOYEES WHO WILL HANDLE MONEY

If the employee will handle a large amount of money (\$250 or more on a regular basis), request a credit report from The McDowell Agency.

## 5. FOR EMPLOYEES WHO DRIVE AS PART OF JOB

If the employee will drive for work purposes or operate organizational vehicles, request a report of the applicant's driving record from The McDowell Agency. In addition, have the employee complete FORM G: DRIVER'S INFORMATION FORM.

### FORM G: DRIVER'S INFORMATION FORM

*An electronic or paper version of FORM G may be obtained by contacting PCYI staff at [pcyi@archspm.org](mailto:pcyi@archspm.org) or 651-290-1622 or 651-251-7742.*

## 6. FOR SUBSTITUTE TEACHERS

Substitute teachers are employees. Follow guidelines for employees, above.

## 7. FOR EMPLOYEES WHOSE JOB REQUIRES ACADEMIC ACHIEVEMENTS OR PROFESSIONAL LICENSES

Verify that the applicant has the necessary academic credentials and/or professional licenses using a source independent of the applicant. Ideally, check with the organization or institution that issued the credentials or licenses. The McDowell Agency may also be used to verify academic credentials or licenses, for an additional fee.

## 8. IF YOU WISH TO HIRE AN APPLICANT WITH A QUESTIONABLE RECORD

Consult with the pastor and the archdiocesan Chancellor for Civil Affairs to assist you in making such a hiring decision.

#### 9. SHARING BACKGROUND CHECKS BETWEEN PARISHES/SCHOOLS

If a person is employed or volunteers at more than one parish or school within the Archdiocese, the parishes/schools may share the employee background check if, 1) if the location that has the background check report on file ran that background check through The McDowell Agency and is willing to share the report; 2) if the location that needs a background check is willing to accept the previous background check; 3) if the applicant agrees to release the report; 4) and if the background check report is no more than one year old. If the above conditions are met, have the employee applicant complete FORM I: PRE-SERVICE APPLICANT RELEASE STATEMENT FOR BACKGROUND CHECK REPORT SHARING and return it to you. You would then send a copy of this form with a written request for the employee applicant's background check to the parish or school where the employee applicant has a background check on file. File this background check sharing form with the background check report.

#### FORM I: PRE-SERVICE APPLICANT RELEASE STATEMENT FOR BACKGROUND CHECK REPORT SHARING

*An electronic or paper version of FORM I may be obtained by contacting PCYI staff at [pcyi@archspm.org](mailto:pcyi@archspm.org) or 651-290-1622 or 651-251-7742.*

Because of liability issues and varying scopes of background checks run by other organizations, do not share background check reports with entities other than parishes and schools within the Archdiocese.