



Background Check Policy

Approved: By College Officers

Date Revised: January 1, 2020

Date Established: June 16, 2011

Policy Statement:

Mount Holyoke is committed to providing a safe and secure environment, supported by qualified employees that will allow all of its students, faculty, staff and those associated with them to successfully carry out the mission of the college. As a condition of employment, the College will conduct appropriate background checks for all new hires.

Mount Holyoke College has designated the Office of Human Resources as the office responsible for ensuring that background checks are completed and utilized in the hiring process and Five College Office of Compliance and Risk Management as the office responsible for facilitating background checks as articulated in this policy.

Scope / Responsibilities:

This policy shall apply to all departments at Mount Holyoke.

Policy

CORI/SORI Checks

Criminal Offender Record Information (CORI) and Sexual Offender Record Information (SORI) checks will be conducted as part of the hiring (including promotion) process for all new employees.

Credit Background Checks

Credit checks will be conducted as part of the hiring (including promotion) process for Public Safety Officers and for individuals holding positions which allow significant access to College funds, including but not limited to the following positions:

- President, Vice Presidents for Finance and Administration, Advancement and Enrollment
- Chief Investment Officer
- Comptroller
- Assistant Treasurer
- Cashier (Financial Services)
- Back-up Cashier (Financial Services)

- Human Resources or Payroll employees who have authorization to establish automated clearing house (ACH) transactions
- Other positions as may be determined from time to time

Background Check Process

As Five College Office of Compliance and Risk Management has been designated the office to facilitate background checks, Mount Holyoke College will abide by the [Five College Background Check Process Policy](#).

CORI checks will only be conducted as authorized by law and only after a CORI Acknowledgement Form has been completed. A background check begins with an authorized person’s submission of 1.)a completed CORI Authorization form for the individual to be checked, and 2.)a Background Check Request Fax Coversheet. All individuals who are required to have a background check must complete this process prior to the start of their Service Activity. It is the responsibility of the supervisor or authorized person to ensure that an individual who is required to have a background check in accordance with this procedure does not commence their Service Activity until the background check has been completed by the office.

Determining Suitability

If a determination is made, that the criminal record belongs to the subject, and the subject does not dispute the record’s accuracy, then the determination of suitability for the position or license will be made. Unless otherwise provided by law, factors considered in determining suitability may include, but are not limited to, the following:

- Relevance of the record to the position sought;
- The nature of the work to be performed;
- The amount of time since the conviction;
- Age of the candidate at the time of the offense;
- Seriousness and specific circumstances of the offense;
- The number of offenses;
- Whether the applicant has pending charges;
- Any relevant evidence of rehabilitation or lack thereof; and
- Any other relevant information, including information submitted by the candidate or requested by the organization.

The decision regarding suitability will be made by the respective individuals (“Decision Team”) noted below:

	Minor Protection	Employment
Mount Holyoke College	AVP Human Resources or designee in consultation with Dean of Faculty’s office, Chief Diversity Officer, Director of	AVP Human Resources or designee in consultation with Dean of Faculty’s office, Chief Diversity Officer, Director of

	Compliance and Risk Management as needed	Compliance and Risk Management as needed
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In connection with any decision regarding a Service Activity, the individual shall be provided with a copy of the background check prior to questioning them about the information in the report.

The individual will be notified of the decision and the basis for it in a timely manner.

Appeals

If an individual wishes to dispute and/or explain the information contained in the background check report, the individual must do so in writing. The written explanation, and any other documents the individual wishes to submit, must be received by the Decision Team within fourteen (14) days of receipt of the above notice that the College intends to make an adverse decision. The appeal submission must include a written explanation demonstrating why the negative information does not affect their ability to perform the functions of the Service Activity. The applicant is not permitted to be employed or conduct any activities on behalf of the College during this appeal process. Such information shall be reviewed by the Decision Team in conjunction with counsel.

Related Policies:

- [Five Colleges, Inc. Background Check Process Policy](#)
- [Mount Holyoke College Health and Safety of Minors Policy](#)
- [Mount Holyoke College Export Control Policy](#)
- [Five College, Inc. Driver Credentialing Policy](#)