



BACKGROUND SCREENING POLICY FOR VOLUNTEERS AND STAFF

(Rev. 1.1)

PURPOSE:

The primary purpose of this policy is to preserve the safety and well-being of all persons who choose to participate in programs offered by Firewheel STEM Institute (FSI). FSI is committed to the protection of all persons associated with FSI, including staff, volunteers, and guests and shall conduct criminal background checks on all volunteers and staff. FSI will carry out this requirement in a fair, consistent, and non-discriminatory manner, complying with applicable state and federal laws and guidelines, including the Fair Credit Reporting Act (FCRA).

BACKGROUND CHECK COMPANY SELECTION:

FSI has selected Sterling Volunteers to conduct background checks on all volunteers and staff. Sterling Volunteers is a corporation specializing in conducting criminal background checks for volunteers and staff in full compliance of FSI's standards and expectations.

BACKGROUND CHECK REQUIREMENTS:

All individuals who wish to serve as a volunteer or staff, who are at least 18 years of age or older, and if their duties include working with or around minors under the age of 18 will be subject to a criminal background check. Minors, individuals under the age of 18, who wish to serve as a volunteer will not be subject to a criminal background check. Individuals will be screened at least every 2 years.

BACKGROUND SCREENING PROCESS:

- Every candidate is required to complete a background screening and must read and acknowledge the Employee and/or Mentor's Handbook to volunteer or work with FSI if their duties include working with or around minors under the age of 18.
- The candidate will be directed to Sterling Volunteers to register for their background screening.
- Sterling Volunteers will conduct the screening that will entail the following:

Social Security Trace

Social Security Verification verifies the applicant's name and date-of-birth against the social security number provided. This is utilized to help eliminate the possibility of false names and/or information.

Government Watch List Search

The Office of Foreign Asset Control (OFAC) search finds those individuals identified as threats to the United States, or who are ineligible to conduct business with the U.S. Federal Government. This search is utilized to help protect from serious threats on an international basis.

Nationwide Sex Offender Database

Search of the National Sex Offender Registry which aggregates data from all 50 states, including Puerto Rico, Washington D.C., and Guam, along with tribal registries.

National Criminal Record Search

The national database search provides access through the National Background Directory to criminal data from all 50 states, the District of Columbia, Guam, Puerto Rico, and the Office of Foreign Assets Control (OFAC) history. (Over 900 million criminal records.)

- Results will be available within 24 hours. FSI will cross-reference the screening results with the 'Criteria for Exclusion' listed in this policy and assign a **pass/fail** grade for everyone: a **pass** grade for any candidate that has zero disqualifying crime matches, a **failure** grade for any candidate that has one or more disqualifying crime matches.

- All information pertaining to the background check will remain with Sterling Volunteers, subject to applicable laws subject to disclosure.
- In the event of a **failure/disqualification**, the individual shall not be eligible to volunteer or work in any role at FSI. The prospective volunteer or employee will be notified immediately of such by written notice (email). The prospective volunteer or employee may contact Sterling Volunteers and request to receive a copy of the background check report, a copy of the "Summary of Your Rights under the Fair Credit Reporting Act (FCRA)" and information on how to dispute the results of the profile if he or she so chooses.
- If the candidate should choose to appeal the contents of the report, they are responsible for taking appropriate action with Sterling Volunteers to have the results of the criminal background check report corrected if they believe information was reported in error. The candidate is responsible for providing all documentation to support his or her claim. They will not be allowed to volunteer or work with FSI until the appeal process has been completed.

Any person who willfully fails to comply with the background screening process or procedures shall be automatically disqualified. FSI will not allow an individual to volunteer or work who refuses to consent to the background screening policy and procedures.

PROPER DOCUMENTATION:

The background check records on all individuals who both pass and fail the screening procedures will remain with Sterling Volunteers. No records will be kept by FSI other than the candidate's name and the date of a pass or fail.

CONFIDENTIALITY:

In respect of the individual and their privacy, all personal information is closely protected, not disclosed outside of FSI, shared within FSI only on a need-to-know basis, and used solely for the purpose of conducting the background check.

The Operations Director will administer the process of background checks. He/she will be responsible for providing the volunteer an invitation to Sterling Volunteers. All information received because of the screening will be kept confidential.

CRITERIA FOR EXCLUSION:

A person who wishes to volunteer or work for FSI may be disqualified and prohibited from doing so if they have been found guilty* of any of the following crimes:

* For purposes of this policy, "guilty" shall mean that a person was found guilty following a trial, entered a guilty plea, entered a no contest plea accompanied by a court finding of guilt (regardless of adjudication), or received court directed programs in lieu of conviction.

SEX OFFENSES

- All Sex Offenses – Regardless of the amount of time since offense.
Examples include: child molestation, rape, sexual assault, sexual battery, sodomy, prostitution, solicitation, indecent exposure, etc.

FELONIES

- All Felony Violence – Regardless of the amount of time since offense.
Examples include: murder, manslaughter, aggravated assault, kidnapping, robbery, aggravated burglary, etc.
- All Felony offenses other than violence or sex within the past 10 years.
Examples include: drug offenses, theft, embezzlement, fraud, child endangerment, etc.

MISDEMEANORS

- All misdemeanor violence offenses within the past 7 years.
Examples include: simple assault, battery, domestic violence, hit & run, etc.
- All misdemeanor drug & alcohol offenses within the past 5 years or multiple offenses in the past 10 years.
Examples include: driving under the influence, simple drug possession, drunk and disorderly, public intoxication, possession of drug paraphernalia, etc.
- Any other misdemeanor within the past 5 years that would be considered a potential danger to children or is directly related to the functions of that volunteer or employee.
Examples include: contributing to the delinquency of a minor, providing alcohol to a minor, theft – if person is handling monies, etc.

PENDING CASES:

Anyone who has been charged for any of the disqualifying offenses or for cases pending in court will not be permitted to volunteer or work with FSI until the official adjudication of the case.

Should an approved individual subsequently have any criminal charges brought against him/her that are listed in our Criteria for Exclusion during their term of service to FSI, they will be required to immediately disclose the nature of the charges to FSI and voluntarily terminate their duties until a determination is made by the FSI staff regarding the effect of the pending charges on the individual's functions within the program.

SUMMARY CHECKLIST:

- ✓ FSI sends invitation to candidate instructing them to set up a Sterling Volunteers account.
- ✓ FSI pays the fee for the background screening. Candidates are asked if they would like to cover the cost of the screening, but it is not required.
- ✓ Sterling Volunteers provides information to FSI and FSI makes the decision on if the candidate is approved or not.
- ✓ If candidate is approved by FSI, they are notified via email by Sterling Volunteers they are eligible and FSI will setup onboarding next steps.
- ✓ If screening results in a failure grade, the candidate will receive a Pre-Adverse Action notification email from Sterling Volunteers and/or FSI. If the candidate does not contact Sterling Volunteers with more information or otherwise dispute the background screening, then a decision will be made based on information currently available.
- ✓ If FSI denies a candidate, Sterling Volunteers and/or FSI sends an Adverse Action Notification email to the individual.