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## Background Check Requirements

All Church Personnel are required to successfully undergo a criminal background check conducted by the Archdiocese of Seattle every three years.

This includes:

- All clergy, seminarians, deacons in formation and religious
- All Employees of all parishes, schools and agencies of the Archdiocese of Seattle
- All Volunteers with ongoing unsupervised contact with minors or vulnerable adults

Some volunteers are also required to complete a background check every three years, including:

- Any volunteer driving on behalf of the parish, school or agency
- Any volunteer with access to money including money counters and fundraisers
- Ushers who transport money from the Church to safe or other secure location, or handle money other than the regular collection
- All non-parents wishing to volunteer in a Catholic School

**Background checks must be completed before beginning service.** Any offers of employment are contingent on a completed criminal background check.

All volunteers under the age of 18 may not have unsupervised contact with minors or vulnerable adults and must be supervised by someone 21 years or older. Background Checks are required for youth volunteers and employees under the age of 18 working with children.

## **Background Check Renewals**

All employees and applicable volunteers must have their TRAK-1 background checks renewed every three years.

There are two ways you may coordinate renewals.

1. Upon registering for Virtus, an individual will be asked to fill out a background check directly into TRAK-1 if their ministry requires such. Every three years, TRAK-1 will automatically conduct a renewal background check. However, it is the responsibility of the local Safe Environment Coordinator to ensure that all church personnel are up to date via the compliance report.
2. Although background checks are automated into each Virtus profile, you may also go into TRAK-1 with your administrator log-on information and request background checks for any unique circumstances.

## **Getting Started: Your TRAK-1 Account**

All background checks must be performed through TRAK-1. Every parish, school and, agency must have an account established with TRAK-1. Every parish and school is encouraged to use the individual account assigned to their location. The Safe Environment Coordinator was sent this information in 2014. Call the Safe Environment Office if you do not know the User ID and Log-in information.

If you are a new Safe Environment Coordinator call the SEP office so that we may set up your account. Call TRAK-1 if you need assistance with your password at (800) 600-8999. The system will prompt you to change your password if it is the first time you are logging in or when it is time to change your password. If you share the background check account, notify everyone in your location who runs background checks of the new password.

## **Background Check Forms**

Before an individual submits a background check, they must complete the appropriate Background Check Authorization Form and the Background Check Request Form.

Any participant who undergoes a background check will sign this form through their Virtus profile.

- The Background Check Authorization Form grants permission to conduct the background check
- The Background Check Request Form collects the information necessary to process the background check
- There is a specific form for each applicant: Employee, Volunteer, and Pre-Employment
- All forms can be found on the Safe Environment Website in the Coordinator's Toolkit under the "forms" tab

All background check paperwork must be kept in the personnel/volunteer file in perpetuity. Please see "Safe Environment Program Overview" for more information about Record Keeping.

## **Important Things to Know about the Background Check Process**

### **Social Security Number**

TRAK-1 does not require a Social Security Number. They run background checks off of date of birth and name.

### **Credit Reports**

Our background checks do not include credit reports. Background check companies are considered consumer-reporting agencies. These are third party vendors that provide consumer's credit, insurance, and personal information for employment purposes. For our purposes, we use consumer-reporting agencies for background check screening to help us evaluate whether a person is suitable for a given ministry.

### **Privacy**

Be careful with any paperwork that includes personal information. All information should be retained in personnel/volunteer files and kept in a locked cabinet. Respect the privacy of your applicants at all times. Background check results and final determinations are confidential information and should not be shared.

## Submitting Background Checks

All background checks will be performed through TRAK-1.

Likewise, the **majority** of people will enter their own background through their Virtus profile. If for some reason, you need to enter a background check manually please follow the instructions below.

1. Log-in to the account for your parish, school, or agency via the TRAK-1 website (<https://trak-1.com>).
2. Enter the USER ID and PASSWORD.
3. Click on the "Application" tab located at the top and enter all of the following information
  - Email
  - First, middle, and last name
  - Gender
  - Date of Birth
  - Salary (you may default to no salary which will indicate you are submitting on behalf of a volunteer)
  - Enter their street address
  - Enter the zip code (the state will automatically populate)
4. Clicks on the "Next" button.
5. Once you have verified all of the information, click the "Submit" button.

If you would like to submit an international background check, you must receive approval from the SEP office (206-274-3188).

## **Background Check Results**

Once a background check has been cleared and is ready to be viewed, TRAK-1 will send a notification email to the account holder. As the local coordinator, you will need to print the cleared background check and add that document to the personnel/volunteer file.

You may view all backgrounds by logging into your TRAK-1 account and clicking on the "Reports" tab located at the top of your home page.

If a background check has been flagged, TRAK-1 will send a notification email that the decision will be given to you from the Archdiocese of Seattle within 10 business days.

### **Flagged Background Checks**

A flagged background check does not automatically make the applicant ineligible for service. A flagged background check simply calls for further review.

The findings of the background check may result in restrictions being placed on an employee or volunteer. For example:

- No driving as a part of employment or volunteer work until XXXX year and a clear background check
- No access to cash, checks, or other negotiables
- No unsupervised access to minors or vulnerable adults

### **Pre-adverse Action Letter/ Post- adverse Action Letter**

Before we make a decision about an individual's suitability for service, the Fair Credit Reporting Act (FCRA) requires us give the individual notice that their background check has been flagged. The Safe Environment Office will send a pre-adverse action letter that includes a copy of the individual's background check and a copy of "A Summary of Your Rights under the Fair Credit Reporting Act."

Legally, we must give that individual five business days to take action.

Once the five business days have passed, a decision is made about the individual's suitability to work or volunteer. At that point, the individual is sent a post-adverse action letter informing them of the decision that has been made about their suitability to work or volunteer within the Archdiocese of Seattle.

At the same time, the local parish or school is faxed or emailed the results containing the employment or volunteering restrictions.



## **Appeal Process**

In some circumstances, the background check results pulled on an individual may be incorrect.

- If the decision made about the applicant is based on inaccurate records, it is the burden of the applicant to clear any issues that may affect the decision. The individual will need to supply TRAK-1 with further identification to prove his or her identity. Once the issue or discrepancy is removed, a new background check will be submitted on behalf of the individual and the school or parish will be notified of the change.
- If the decision is based on accurate criminal records, but the applicant would like to appeal by explaining any extenuating circumstances, they may do so in writing. A letter and any supporting documentation from the courts may be sent to the Safe Environment Office.

## Receiving Background Check Results via Email

Each location will receive the results of a flagged background via fax by default. If your location would like to receive results via email, review the following.

### A. Guidelines for Establishing Background Checks via Email

1. All parishes who elect to receive background check results via email must establish a separate email account for the sole use of receiving background check results.
2. The email address must be established as follows:  
[backgroundchecksXXXX@yourprovider.com](mailto:backgroundchecksXXXX@yourprovider.com) with XXXX representing the school or parish identification number. For example,  
[backgroundchecks0001@comcast.net](mailto:backgroundchecks0001@comcast.net)
3. All parishes must submit an original *Agreement to Receive Background Check Results via Email* form stating the email address and bearing authorized signatures stating all policies have been read and will be enforced. A blank form can be found under the section "Forms."

### B. Expectations and Responsibilities

1. The Designated Background Check Email shall be checked regularly. In case of authorized personnel absence, a plan to ensure the email is checked each business day should be established.
2. The background check email account shall not be used for any type of transmissions with anyone outside of the Safe Environment Office. This email shall be used for nothing other than the receiving of background check results.

### C. Termination of Authorized Use

1. When an authorized user changes status (e.g., terminates employment, retires, and/or changes positions or responsibilities within the parish), the user's supervisor must communicate the change to appropriate administrators and the Safe Environment Office to ensure that access and authorization privileges reflect that status change.
2. Change all passwords immediately following this status change.

### D. Records Maintenance and Archiving

1. All background check result forms received via email shall be printed out and a 'hard copy' must be kept following current Archdiocesan and SEP policies on confidential record keeping.
2. Printed result forms must be kept on-site in a locked cabinet or drawer. Archiving shall follow the methods established by the Archives Office.