

Pre-Employment Screening Checklist

A step-by-step operational checklist for running a compliant, consistent background screening program — from job-level scoping through adverse action and recordkeeping.

Stage 1 — Before you post the role

- Define a written screening scope for the position based on duties, access, supervision, and risk.
- Confirm which searches are required by law, contract, customer requirement, or accreditation.
- Confirm ban-the-box / fair chance rules in every jurisdiction where the role will be posted or performed.
- Remove criminal history questions from the application where prohibited.
- Document the screening matrix so the same package is applied to every candidate for the position.

Stage 2 — Disclosure and authorization

- Provide the standalone FCRA disclosure — not embedded in the application or any other document.
- Obtain written authorization before ordering the report.
- Provide A Summary of Your Rights Under the FCRA.
- Provide state and local disclosures (for example, California ICRAA, New York GBL §380-c, Washington, Minnesota, Maine, Massachusetts, New Jersey).
- Provide the investigative consumer report disclosure if interviews may be conducted.
- Provide MVR, CDLIS, or FMCSA PSP consents for driving and DOT-regulated roles.
- Confirm the candidate received a copy of everything they signed.

Stage 3 — Ordering the check

- Order only after a conditional offer, unless an earlier point is permitted.
- Verify candidate identity data — full legal name, date of birth, SSN, and address history.
- Select the package that matches the documented scope; avoid one-off additions that create inconsistency.
- Set expectations with the hiring manager on realistic turnaround by search type and jurisdiction.
- Confirm any required drug or alcohol testing is ordered separately from the consumer report.

Stage 4 — Reviewing results

- Restrict report access to reviewers with a legitimate need to know.
- Verify identifiers before treating any record as the candidate's.
- Apply jurisdictional lookback limits and record-type restrictions before considering a record.
- Perform and document an individualized assessment for any criminal record.

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- Escalate ambiguous or borderline results to HR or counsel rather than the hiring manager.

Stage 5 — Adverse action

- Send the pre-adverse action notice with a copy of the report and the Summary of Rights.
- Allow a reasonable waiting period — five (5) business days is the SafestHires recommendation; longer where required.
- Consider any dispute, correction, or rehabilitation evidence the candidate submits.
- Send the final adverse action notice identifying the consumer reporting agency and the 60-day free-copy right.
- Log both send dates and retain copies with the requisition file.

Stage 6 — Records, security, and audit

- Store reports separately from personnel files with role-based access controls.
- Retain records per applicable law and contract, then dispose of them securely (16 C.F.R. Part 682).
- Audit the program at least annually: disclosure forms, adverse action timing, scope consistency, and vendor performance.
- Re-review the policy whenever federal, state, or local screening law changes.
- Train every user who orders or reviews reports, and re-train after any policy change.

Sign-off

Candidate: _____ Requisition: _____ Reviewer: _____ Date: _____
