

Background Screening Policy Appendix D:

The university is committed to maintaining a safe and secure environment for students, employees, volunteers, and visitors on our campuses and those entrusted to our care, including patients, students, and minors. A requirement for all USC positions is the ability to interact with members of our community, in a thoroughly safe, professional, and respectful manner, consistent with our unifying values. To that end, the university conducts background screening, including screening for criminal convictions, on all applicants after a conditional offer of employment and as a condition of employment.

The [background screens](#) may include checks on criminal history, licenses or credentials, drug tests, medical exams, employment history, education, social media, driving records, and credit history, depending on the role's requirements and applicable legal requirements. Below is a non-exclusive list of examples of job groups that have additional duties requiring specific background screens.

Keck Medicine of USC Roles

State and federal laws and regulations mandate thorough employment screens to protect patients and ensure the integrity of our healthcare system. Compliance with these regulations is crucial not only for patient safety, but also for meeting legal standards and maintaining our eligibility for federal funding and accreditation. Examples of state and federal programs, laws and regulations requiring background screens and/or impacting the employment of individuals with certain criminal histories, include:

- Centers for Medicare & Medicaid Services Conditions of Participation (42 CFR § 482.13)
- The U.S. Department of Health and Human Services' OIG Exclusions (Social Security Act)
- California Health and Safety Code § 1265.5

Examples of positions that fall in this category include (but are not limited to): Assistant – Patient Care, Case Manager, Pharmacist, Coordinator-Imaging, Echo Cardiogram Technologist, Environmental Services Worker, LVN/LPN, RN, Medical Assistant, Monitor Tech, Nurse Practitioner, Occupational Therapist, Physical Therapist, Physician Assistant, Radiation Therapist, Resident/Fellow Physician, Registered Nurse, Social Worker, Speech Therapist, Staff Physician, Tech – Surgical.

Roles Working with Minors

The university is committed to providing safe environments for minors participating in university-run or -affiliated activities, programs, and events, both on and off campus. To uphold this commitment and comply with applicable laws, the university has established mandatory youth protection protocols, including certain background and criminal screens. Examples of state and federal programs, laws and regulations requiring background screens and/or impacting the employment of individuals with certain criminal histories, include:

- California Business and Professions Code §18975 (Youth Services Organizations)
- The Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017
- Head Start Program Performance Standards (45 CFR§1302.90)

Examples of positions that fall in this category include (but are not limited to): Lead Specialized Service Student Program Advisor, Residential College Community Coordinator, Support and Intervention Coordinator, Head Coach, Student Program Manager, Student Services Advisor, Public Safety Officer, Customer Service Officer, Dental Assistant, Child Care Teacher, Child Care Manager, and Residential Area Supervisor.

Department of Public Safety Roles

The USC Department of Public Safety's (DPS) primary mission is to provide a safe and secure environment on campus and in the local USC community that allows students, faculty, staff, and campus visitors to realize their academic and social pursuits. Given their critical role in ensuring campus safety and to comply with state and

federal laws, DPS roles require specific background screening. Examples of state and federal programs, laws and regulations requiring background screens and/or impacting the employment of individuals with certain criminal histories include:

- California Government Code Section 1031 (Standards for employees declared by law to be peace officers)

Examples of positions that fall in this category include (but are not limited to): Chief of Safety, Deputy Chief, Captain, Lieutenant, Sergeant, Public Safety Officer (PSO), and Customer Service Officer (CSO).

DOT Safety Sensitive Roles

Safety is critical for university positions involving transportation at the university, including driving university vehicles with patients, students, staff/faculty and vulnerable populations, as well as transport hazardous materials. Examples of state and federal programs, laws, and regulations requiring background screens and/or impacting the employment of individuals with certain criminal histories, include:

- US Department of Transportation (DOT) 49 CFR Part 40

Examples of positions that fall in this category include (but are not limited to): Shuttle Driver, Hazardous Materials Supervisory, Hazardous Materials Technician, and Hazardous Waste Technician.

Credit Union Roles

To protect the financial assets of the university and members of the university community, all positions at USC Credit Union are subject to criminal employment screening and credit checks. In addition, all positions that are potentially engaged in mortgage loan originations will be subject to additional background checks through the NMLS. Examples of state and federal programs, laws, and regulations that may require background screens and/or impact the employment of individuals with certain criminal histories, include:

- Federal Credit Union Act
- FFIEC Guidelines
- SAFE Act

Examples of positions that fall in this category include (but are not limited to): Financial Advisor, Consumer loan Processor, Credit Union Collector, Real Estate Funder, Fraud Risk Analyst, Strategic Business Development Administrator, Operations Manager, Branch Manager, and Member Relationship Specialist.

Executive Roles

Executive-level positions require comprehensive additional screening to ensure our institution's safety, security, and integrity. Background checks are essential in mitigating risks associated with compliance, financial responsibility, fraud prevention, conflict of interest, cultural alignment, and protecting the safety and security of our students, faculty, and staff, as well as safeguarding the reputation of the university.

Examples of positions in this category include (but are not limited to): President, SVP, VP, AVP, Executive Director, Chief of Staff, Chief Financial Officer, Chief Information Officer, Chief Investment Officer, University Controller, Special Advisor, and Director of Athletics.

Financial Roles

To protect the financial assets of the university and members of the university community, roles involving access to university, employee, student, or patient finances require a criminal background screen.

Examples of positions in this category include (but are not limited to): Finance Manager, Accounting Supervisor, Procurement Manager, Investment Operations Manager, Financial Analyst, Manager Accounts Payable, Payroll Supervisor, Senior Business Officers, Treasury Manager, and Department Business Manager.

Roles with Access to Sensitive Information

To protect the assets, privacy, and security of the university and members of the university community, roles involving access to university, employee, student, or patient sensitive or confidential information require a criminal background screen.

Examples of positions that fall in this category include (but are not limited to): Senior Benefits Specialist, Employee and Labor Relations Specialist, Case Resolution Specialist, Equity and Inclusion Specialist, Intake, Outreach, and Care Manager, Investigator, HR Generalist, Compensation Manager, Talent Acquisition Specialist, HR Partner, Student Records Specialist, Student Health Leave Coordinator, Psychiatrist, University Counsel, and IT Security Architect.