



**Series:** 1200 Human Resources

**Policy Name:** Fair Credit Reporting Act Compliance (FCRA)

**Policy Number:** 1218

**Origination Date:** 11/01/2013

**Revision Date:** July 1, 2018

**Regulation:** FCRA, 15 U.S.C. 1681-1681a

**Policy:** It is the policy of Communities Connected for Kids to ensure that the appropriate steps are taken to comply with the Fair Credit Reporting Act.

**Procedure:**

1. For all applicants extended an offer of employment and new hires, Communities Connected for Kids will provide a written disclosure to the applicant or employee that a consumer report will be obtained. Additionally, Human Resources will obtain the applicant/employee's signature specifically authorizing Communities Connected for Kids to obtain a consumer report concerning the applicant/employee. The Disclosure and Release Form (attached) will be used for this purpose and will be maintained in the employee's personnel file.
2. Before taking **any adverse action**, which includes a denial of employment or any other decision for employment purposes that adversely affects any current or prospective employee, based on the information in the consumer report, Communities Connected for Kids must provide to the employee the **completed** "Disclosure of Credit Report" form, the consumer report (i.e. MVR), and the Federal Trade Commission's notice entitled "A Summary of Your Rights Under the Fair Credit Reporting Act".
3. After taking any adverse action, in whole or in part, on the information obtained in the consumer report, Communities Connected for Kids is required to provide an additional notice. Human Resources department personnel must provide written notice to the applicant/employee of the following:
  - a) the adverse action that was taken;
  - b) the name, address and telephone number of the consumer reporting agency that furnished the consumer report (including a toll-free number established by the agency if the agency compiles and maintains files on consumers on a nationwide basis);
  - c) a statement that the consumer reporting agency did not make the decision to take the adverse action and is unable to provide the applicant/employee the specific reasons why the adverse action was taken; and



- d) the applicant/employee's right to obtain a free copy of the consumer report from the consumer reporting agency and right to dispute accuracy or completeness of any information in the report with the agency that furnished the credit report.
4. The **completed** "Notice of Adverse Employment Action" and the Federal Trade Commission's notice entitled "A Summary of Your Rights under the Fair Credit Reporting Act" must be used for purposes of this required notice. For current employees, Human Resources department personnel shall provide this information at the time the employee is first told of the adverse action. With respect to applicants, Human Resources department personnel shall mail this information to the applicant as soon as the decision not to hire or the decision to withdraw a previously extended offer has been made. Information pertaining to the name, address, and telephone number of the Consumer Reporting Agency can be obtained from Human Resources.

Approved: Carol Deloach

Carol Deloach, CEO

July 1, 2018