



SecurTest Background Screening User Guide FDIC Background Check 21 and Background Screening



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SecurTest Website Login Instructions

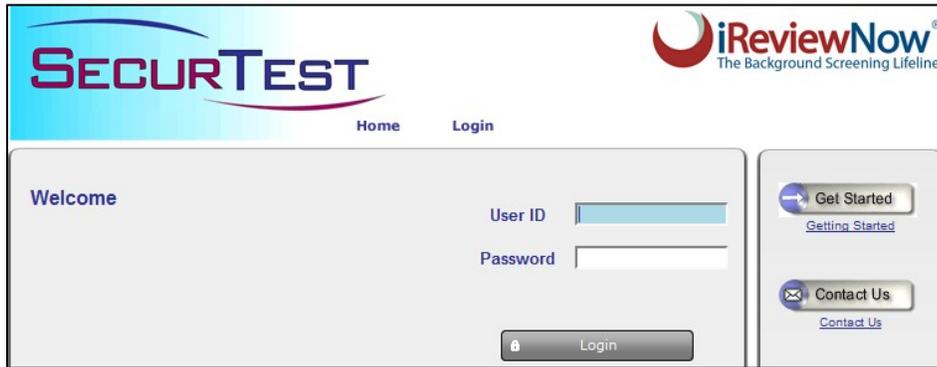
Important Notice: You will receive a User ID and Password via email for the SecurTest website to order and view background reports. Passwords can be changed after your initial login, but should be changed every 30 days for security purposes. Please maintain the security of your User ID and password.

PII (personal identifiable information) such as SSNs or DOB will never be transmitted through email or sent in background reports.

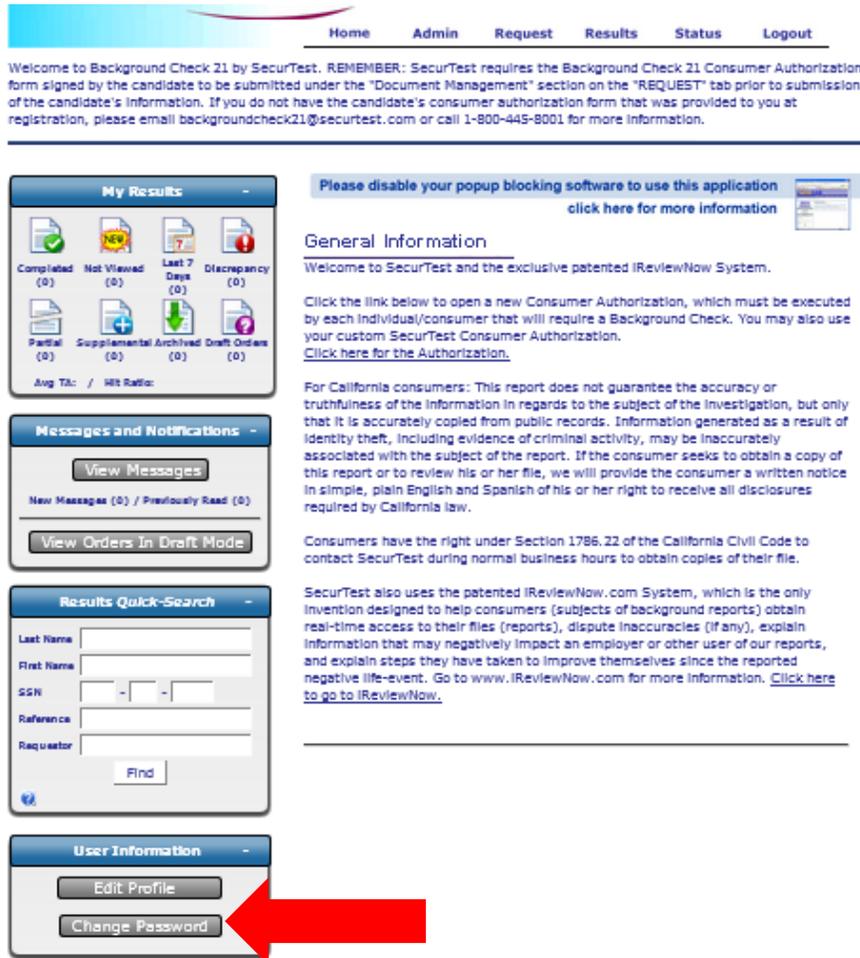
1. Go to www.securtest.com
2. Click "See Reports" in the top right corner.



Enter your case-sensitive User ID and password on the login page. When finished, click "Login."



3. You can create a password of your choice by selecting “Change Password” under “User Information” at the bottom of the home page



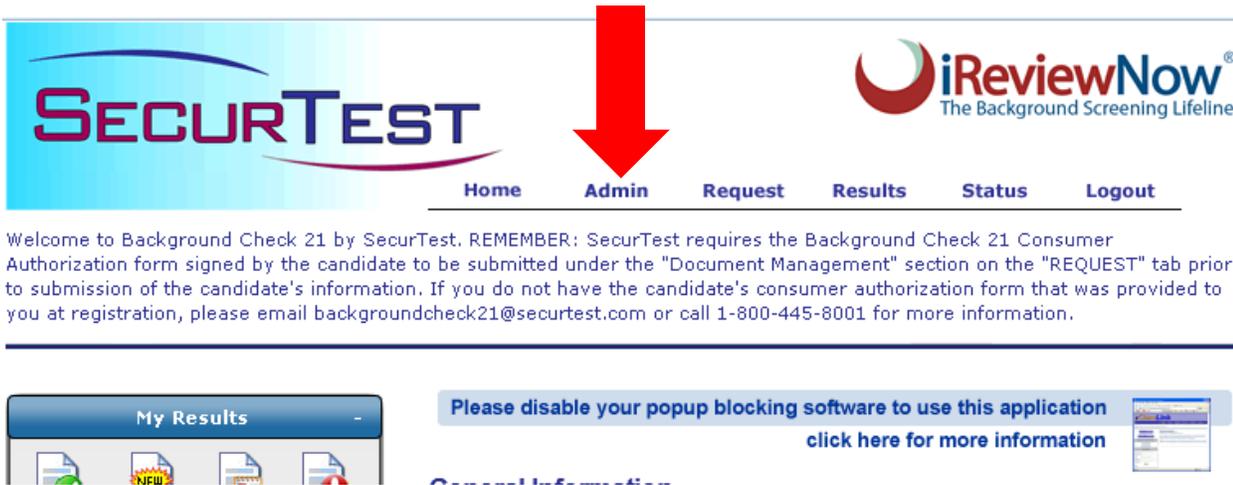
Please Note: If you have issues with your User ID and/or Password, please email backgroundcheck21@securtest.com or call 1-800-445-8001 (International Toll Free) for assistance.

Saving Payment Information to Your Account

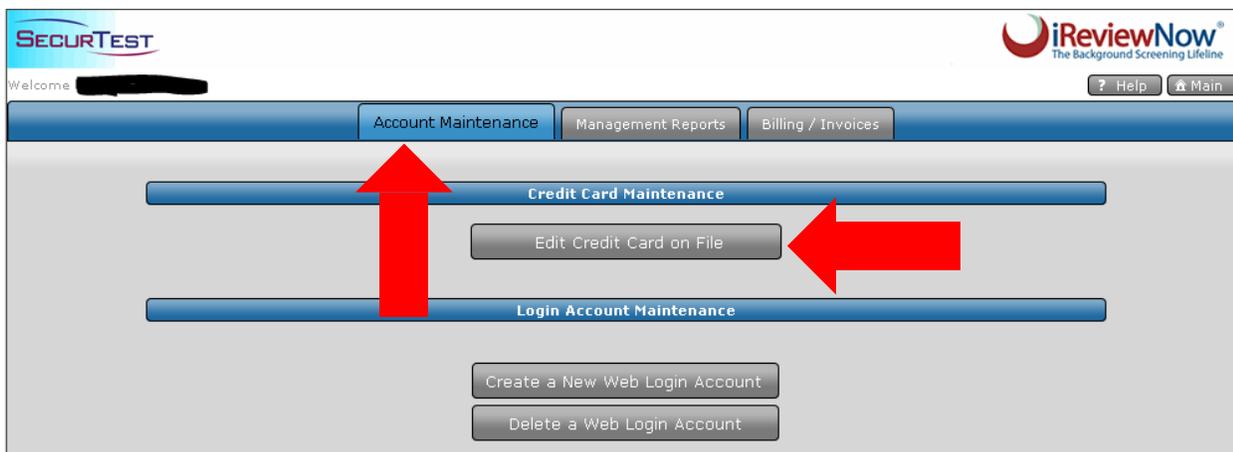
If you will be making multiple orders, you may wish to save your payment information before submitting requests to save time in the future.

NOTE: WE ARE UNABLE TO PROCESS AMERICAN EXPRESS THROUGH THE WEBSITE. IF YOU NEED TO SET UP ALTERNATE PAYMENT METHODS, PLEASE CONTACT A MEMBER OF OUR BACKGROUND CHECK 21 TEAM.

1. To save payment information to your account, first go to the “Admin” tab



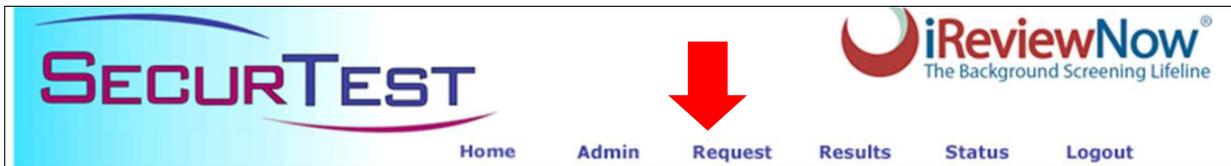
2. Next, select the “Account Maintenance” tab, followed by “Edit Credit Card on File.” You will be taken to the Credit Card Maintenance page which will let you save the information.



3. If you do not wish to save your payment information at this time, you can do so while ordering reports.

Ordering a Background Check 21 or General HR Background Report

1. Before ordering a background report, be sure the candidate has completed and signed the Disclosure and Authorization form, as this **MUST** be uploaded when ordering. You will not be required to upload these forms if you have executed the Certification Agreement that you will maintain these important notices and consent.
2. You will need the following information from the candidate to submit a background request.
 - A. Name
 - B. Address
 - C. Date of Birth
 - D. Social Security Number (or government issued ID if the candidate does not have a SSN)
 - E. **Contact Telephone Number** (preferably a cell phone number)
 - F. **Email Address (THIS IS IMPORTANT)**
 - G. Disclosure and Authorization Form (“iReviewNow Agreement”) (completed and signed by the candidate)
3. Save the completed forms as PDFs (.pdf) or images and upload them through the Document Management feature (described below). PDF files help expedite your request, as other delivery methods may delay processing the report.
4. Log in to the SecurTest website and click “**Request**” near the top of the page to order reports.



5. Select **Background Check 21C, Background Check 21C with MVR, or Non-Background Check 21 – Other Candidates** depending on your company’s requirements.

Please Select a Package Below to Begin this Order. Background Check 21 eligibility is determined by FDIC and/or Financial Institution criteria. Note: We cannot accept American Express for Background Check 21 web orders.

- Background Check 21-C
- Background Check 21C with MVR
- Non Background Check 21 Check - Other Candidates

Continue

The Non-Background Check 21 Check package is for candidates, employees, applicants, or vendors that you need to screen for hiring or placement purposes that do not require an FDIC regulated background check.

6. Enter the candidate's information in the appropriate fields.

The screenshot shows the SECURTEST Applicant Information form. The form is titled "Applicant Information" and is part of a larger process. The "Demographic Information" section is expanded, showing fields for Last Name, First, Middle, Current Address, City, State, Zip, Date of Birth, Social Security #, and Gender/Race. A note indicates that fields with an asterisk must be completed. Below this section is the "Alias (AKA) Information" section, which is currently collapsed.

SECURTEST
Welcome [REDACTED]

Applicant Information | Enter Search Request Details

Demographic Information

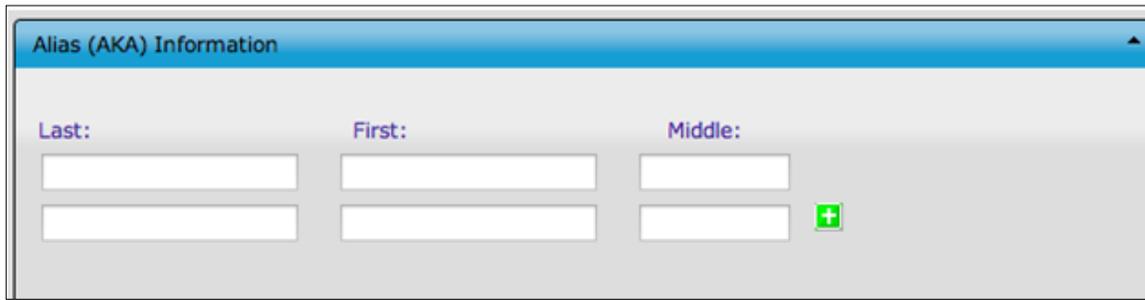
Last Name: * | First: * | Middle: |
Current Address: * | City: * | State: * | Zip: *
Date of Birth: * (ex. MM/DD/YYYY) | Social Security #: * | Gender/Race: (M/W for Male/White)

Fields with a "*" Must be Completed

Alias (AKA) Information

7. Alias (AKA) Information

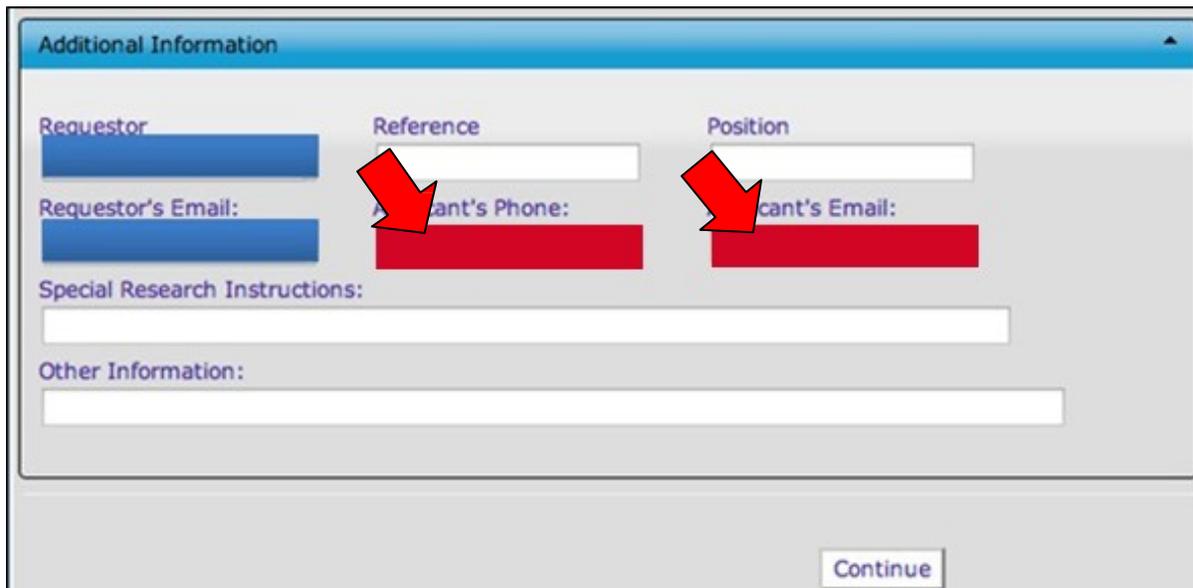
Enter maiden names or other aliases the candidate has provided on the Consumer Authorization form into the "**Alias (AKA) Information**" section. Leave these fields blank if you do not know of any alternate names. Click the Green button to enter additional names.



The screenshot shows a form titled "Alias (AKA) Information". It contains three columns of input fields labeled "Last:", "First:", and "Middle:". Each column has two text input boxes. To the right of the second row of input boxes, there is a small green square button with a white plus sign (+).

8. Additional Information **Important******

It is extremely important that the candidate's **phone #** and **email** are entered in the "Additional Information" section as they will allow us to notify the candidate that his or her report is ready for viewing. Free email addresses can be obtained from providers such as www.gmail.com, www.yahoo.com, and many others.



The screenshot shows a form titled "Additional Information". It contains several input fields: "Requestor", "Requestor's Email", "Reference", "Candidate's Phone:", "Position", "Candidate's Email:", "Special Research Instructions:", and "Other Information:". Two red arrows point to the "Candidate's Phone:" and "Candidate's Email:" fields, which are highlighted in red. A "Continue" button is located at the bottom right of the form.

9. Click "Continue"

10. Uploading the Disclosure and Authorization Form

The Disclosure and Authorization Form must be submitted before any research can be conducted for a candidate. This form gives us the candidate’s permission to conduct a Background Check.

File Upload

File Attachments

Click the **Browse** button to select a file for upload.

File 1 :	<input type="button" value="Browse..."/>	No file selected.	Description 1 :	<input type="text"/>
File 2 :	<input type="button" value="Browse..."/>	No file selected.	Description 2 :	<input type="text"/>
File 3 :	<input type="button" value="Browse..."/>	No file selected.	Description 3 :	<input type="text"/>
File 4 :	<input type="button" value="Browse..."/>	No file selected.	Description 4 :	<input type="text"/>
File 5 :	<input type="button" value="Browse..."/>	No file selected.	Description 5 :	<input type="text"/>

Total files you can upload: **5**
Total allowed upload size: **10 MB.**

Instructions

Note: You are required to select at least one valid file and enter an associated description to successfully complete the attachment process and submit the form.

Files not containing an extension, or with an extension that appear to be potentially dangerous will not be uploaded.

[List of Blocked Extensions](#)

b. Click “Click Here to Upload Files Associated with this Applicant” under “Document Management”

The screenshot shows the SecurTest application interface. At the top, there is a navigation bar with 'Applicant Information' and 'Enter Search Request Details'. Below this is a 'Demographic Information' section with fields for Applicant, SS#, DOB, Reference, Address, and Internat. Govt ID. An 'Estimated Price' of \$0.00 is shown. The 'Criminal Court Searches' section indicates no searches have been requested yet. The 'Document Management' section is highlighted with a red arrow pointing to the link 'Click Here to Upload Files Associated with this Applicant'. Below this is the 'Order Authorization and Submission' section, which includes a certification statement and three buttons: 'Agree and Submit Order', 'Save As Draft', and 'Do Not Agree and Cancel Order'. A red warning message states: 'ATTENTION: Please Click the "Agree and Submit Order" Button Above Only Once ... Multiple Clicks may Result in Duplicate Orders ... An Order May Take 1 to 2 Minutes to Process'. At the bottom, it notes 'Fields with a "*" Must be Completed'.

c. This will take you to the File Upload page. Click “Browse” to locate the candidate’s Authorization on your computer or server.

- d. Once you have attached the Authorization form, enter a brief Description (i.e. "John Smith's Consumer Authorization")
 - e. Click "Submit" to attach the form directly to the candidate's report
-
- 11. If you already have payment information saved, you just have to select "Use credit card on file" and click "Agree and Submit Order."
 - 12. If you do not have a credit card on file, or if you would like to pay using a card other than the one saved to your account, you can enter payment information by selecting "Use alternate credit card for this payment."
 - 13. If you have been approved by SecurTest for monthly invoicing, you must have submitted a Purchase Order and PO Number

Optional Additional Searches

If you are interested in ordering additional searches such as motor vehicle records, education verifications, reference checks, or credit reports, please contact SecurTest at 1-800-445-8001 as these are not standard for the Background Check 21 Packages.

Viewing and Printing Reports

- Pending Reports:** After you submit a request, you can view a summary of reports that have been ordered, but are not yet complete, using the **“Status”** tab near the top right of the screen.
NOTE: Completed reports will not show up in this feature. It will only show you reports that are currently being processed.



- Completed Reports:** After logging into the website, completed reports may be viewed by utilizing the **“Results”** tab near the top of the screen. If you know the name or other identifiers of an individual candidate, you can also use the **“Results Quick-Search”** on the left.





3. Under the “Results” tab you will see a list of reports that have been added to the website for your review under the “**View Results**” tab.



Search for Results View Results (7) Archived Results (0)									
Show 100 entries Display All Results									
<input checked="" type="checkbox"/>	Name	Reference	Requestor	Requested	Posted	Alert	Status		
<input type="checkbox"/>	[REDACTED]				8/1/2013		Complete	View	
<input type="checkbox"/>	[REDACTED]				8/9/2013		Complete	View	
<input type="checkbox"/>	[REDACTED]				8/9/2013		Complete	View	

4. Click “**View**” on the right side of the screen to view and/or print the full report in a PDF format. You may also print the background report by selecting the box to the left of the Name and then clicking “**Print All Selected**” below the list results.

NOTE: POPUP BLOCKERS WILL SOMETIMES PREVENT OPENING REPORTS. BE SURE securtest.secure-screening.net IS ALLOWED TO OPEN POPUPS

Search for Results View Results (11) Archived Results (890)									
Show 100 entries Display All Results									
<input checked="" type="checkbox"/>	Name	Reference	Requestor	Requested	Posted	Completed	Alert	Status	
<input type="checkbox"/>	BYRD, MICHAEL B	4161177474114854117	Shena Campbell	2018-10-10	2018-10-23	2018-10-23		Complete	View
<input type="checkbox"/>	CENEDELLA, MICHAEL		Mary Valentine	2018-10-23	2018-11-01	2018-11-01		Complete	View
<input type="checkbox"/>	CLARK, EZELL	4162222764111921198	Shena Campbell	2018-10-24	2018-10-26	2018-10-26		Complete	View
<input type="checkbox"/>	GOSNELL, JONATHAN	4172519214111773103	Mary Valentine	2018-11-01	2018-11-05	2018-11-05		Complete	View

Reminder: Reports will not contain full Social Security Numbers or Dates of Birth.

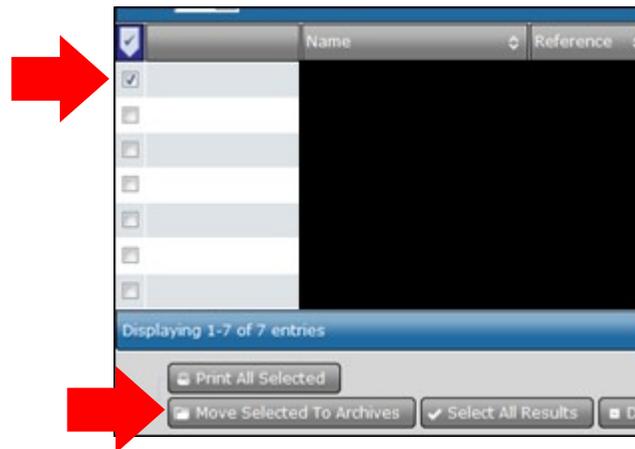
5. Click on the **Paper Clip Icon** to view and/or print any records or documents that have been uploaded for your review.

Search for Results View Results (2) Archived Results (7)									
Show 100 entries Display All Results									
<input checked="" type="checkbox"/>	SSN	Name	Reference	Requestor	Requested	Posted	Alert	Status	
<input type="checkbox"/>	[REDACTED]	[REDACTED]				6/14/2013	7/26/2013		Complete
<input type="checkbox"/>	[REDACTED]	[REDACTED]				7/17/2013	7/26/2013		Complete

Displaying 1-2 of 2 entries

6. If you are unable to view reports using the “View” button, you can click the [+] next to the candidate’s name to view the entire report as plaintext.
7. Once you have reviewed the report and no longer need to view it, you can click on the box to the left of the candidate’s name and then select “**Move Selected Report to Archives.**” This will remove the report from the main screen to the archived results database.

NOTE: ARCHIVED REPORTS CAN NO LONGER BE VIEWED BY ANY USERS ON THE WEBSITE. IF YOU ARCHIVE A REPORT BY MISTAKE, PLEASE CONTACT US TO RE-POST IT TO THE WEBSITE.



Using the Correct Authorizations and Notices

Compliance Forms and Resources Page

We created a user-friendly forms page, which has the consumer authorizations and notices for you to review with legal counsel. Also, you will find education verification, employment verification, MVR, and credit check forms, among other resources. **Click here** to go to the Forms Page. The link is <https://www.securtest.com/2012/forms/compliancedocuments.php>.

On January 30, 2019, the Ninth Circuit Court of Appeals held that statutory language, whether derived from the FCRA or ICRAA, prohibits employers from including *any* superfluous information in the disclosure document and confirms previous opinions about stand-alone forms. Read Seyfarth Shaw's update by [Clicking Here](#).

FAQ: What is the Background Check Authorization?

The FCRA and various state and local laws require that you provide exact notices to candidates, employees, applicants, and consumers. Though it is your responsibility to ensure that specific forms and notices are provided to candidates (consumers) and maintained, we require the precise completed and signed forms be uploaded when ordering a SecurTest Background Report to help us have a record of your compliance.

FAQ: Conflicts between Federal FDIC and State laws (Background Checks for a Bank or Financial Institution).

Many clients order a Background Check 21, which is for access to an FDIC regulated facility. Section 19 of the Federal Deposit Insurance Act (12 U.S.C. § 1829) is the specific law that must be applied when using a SecurTest Background Report for FDIC purposes. The federal supremacy clause generally supersedes state laws. Importantly, though some candidates may not be qualified to work in an FDIC regulated facility, they may be employable in other positions, jobs, or locations. Apply the FCRA, EEOC, state and local laws, rules, and regulations before taking adverse action.

FCRA Summary of Your Rights Form

The Federal Trade Commission has revised the “Summary of Your Rights” that all employers must now provide to candidates at various stages when obtaining and using a SecurTest Background Report. This new form is mandated by the 2018 Federal Economic Growth, Regulatory Relief, and Consumer Protection Act. The new form has been amended to include a notice that, free of charge to consumers, nationwide consumer reporting agencies must provide a “national security freeze” that restricts prospective lenders from obtaining access to the consumer’s background report. Though you may not order a credit check as part of your SecurTest Background Report, this new notice, as written, is now the law.

Stand-Alone FCRA Disclosures

Employers must also comply with the FCRA’s “stand-alone” disclosure and affirmative authorization requirements.

Pursuant to the Fair Credit Reporting Act and various state and municipal laws and regulations, we are providing various consumer authorization forms for you to review with your legal counsel.

Pursuant to these laws and regulations, you are responsible for ensuring that you use the proper consumer authorizations. The next section will explain these important notices and forms.

State and City Notices and Authorizations

Various states and cities have their own unique laws. You must provide the candidate with a unique stand-alone disclosure forms when the candidate is a current resident of that state or city. Here is a list of applicable states and cities that have their own notices and authorizations: California, New York, New Jersey, Washington, Wisconsin, Vermont, Minnesota, Massachusetts, Los Angeles, San Francisco, and New York City.

Using Your Background Report Results

Please use the following steps and guidelines upon receiving the results of a background check. All terms, such as pass, eligible, HR review, fail, or ineligible are based on your authorized grading criteria or that established by the FDIC for access to a banking or financial institution. You should not use these terms or grading criteria as the reason for a hiring, retention, or access decision.

1. Pass or Eligible Results:

- If a candidate receives a pass or eligible result for a report, you do not need to take any further action. The terms “Pass” and “Eligible” simply mean no criminal records were found that are prohibited offenses in accordance with FDIC regulations and Wells Fargo Internal Standards. The terms “Fail” or “Ineligible” means criminal records were found that either must be report pursuant to FDIC regulations or Wells Fargo Internal Standards. **Remember, a Background Check 21 Report is not to be used for Employment Purposes, which is regulated by the FCRA and state laws. ALL HIRING, RETENTION, AND PLACEMENT DECISIONS ARE YOUR RESPONSIBILITY.**

2. HR Review Results:

- Candidates with a status of HR Review meet the criteria established by Wells Fargo for the Background Check 21 Program. **HOWEVER**, information located during the course of our research that do not disqualify a candidate for FDIC purposes is reported as HR Review.
- We recommend that HR or senior management review these reports to determine if adverse action should be taken against the candidate based on the information contained in the report. **Though a person may be ineligible to work in an FDIC facility or bank, you may still hire the candidate for other positions.**
- If you determine that a candidate on HR Review is to be deemed eligible (updated to a green status), you can email your decision to backgroundcheck21@securtest.com.

3. Fail/Ineligible or HR Review Results:

- If a candidate receives a derogatory, adverse, or potentially adverse result from a background check that negatively impacts your hiring, retention, FDIC placement, or access control decisions, you must follow the below **Pre-Adverse Action and Post-Adverse Action** sections as well as the iReviewNow section to ensure compliance with the SecurTest User Agreement, FCRA, EEOC, and other federal, state, and municipal laws. Examples of the following action letters can be found under the “**Results**” tab after you login to the SecurTest website.

4. Pre-Adverse Action:

- Before making an adverse decision, you must ensure that a copy of the background report, a pre-adverse action letter, and a copy of FCRA rights are given or transmitted to the candidate, along with various state notices or documentation. Do

- not make an adverse decision until following these steps. Please select one of the following options to complete this step:

Option 1: SecurTest can transmit the pre-adverse action information through iReviewNow only where the candidate provides an email address for an additional fee.

Option 2: You may mail all pre-adverse information or call the candidate to have them return to your HR department to receive a hand-delivered copy.

B. Adverse Action:

- Once a reasonable amount of time has expired (typically 5 business days), you may make a final decision. It is recommended that you utilize the information the candidate provides in iReviewNow and your own Individualized Assessment. You must send an adverse action letter to the candidate if you decide to not hire, retain, or place the candidate.

You must either mail or email all post-adverse information or call the candidate to have them return to your HR department to receive a hand-delivered copy.

Pre-Adverse and Adverse Action Steps

The Fair Credit Reporting Act (FCRA) requires you to take certain steps before taking adverse action based on a background report. Your legal counsel can help guide you on these mandates. You can use our standard notices by clicking on the paper icon beside the pencil icon on the View Resources Page.

Here is a brief summary of the rules to discuss with legal counsel. You can generate these forms on the link beside the candidate's name after logging in. (Refer to the user-friendly User Guide.)

Pre-Adverse:

1. Before deciding whether to take any adverse action based on our report, have the applicant complete iReviewNow. iReviewNow is our patented solution that will help you evaluate the report while considering the candidate's feedback. It also helps you comply with EEOC and various state and local laws.
2. Send the candidate a Pre-Adverse Letter, a copy of his or her background report, FCRA Rights, and other state or local notices that may be required.

Adverse:

1. Before making an adverse action, such as not hiring the candidate, ensure that you have sent the candidate the pre-adverse letter, a copy of the SecurTest Report and applicable notices, such as the FCRA Summary of Rights. This is required by law.

2. Send a letter explaining your adverse action (decision) if you are not hiring or retaining the candidate.

Generating Pre and Adverse Action Letters

- The SecurTest Website can generate pre and post-adverse action letters based on your account set-up. Your legal counsel should review these letters. Please use the following steps to generate action letters:

Pre-Adverse Action Letters

A. Log-in to the SecurTest website and click “**Results**” in the top right corner.

Display All Results				
Alert	Status			
	Partial	✓	View	
	Complete		View	
	Complete		View	

B. Find the candidate’s name and click on the **Adverse Action Icon** on the right side of the page.

C. Click “**Self-Service Adverse Action Letter Generation**” to generate Adverse Action letters and mandated documents required by the FCRA. Note: Do not select “**Request**



Adverse Action Letter Service” unless this has been added to your contract with SecurTest.



D. Select **“Pre-Adverse Action Letter”** and **“Submit.”**

Self-Service Adverse Action Letter Generation

Applicant: [REDACTED]

Requesting: Pre-Adverse Action Letter Adverse Action Letter

Delivery Method: Print and Send by Standard Mail

Applicant's Mailing Address: [REDACTED]

E. Scroll to the bottom of the page and select each of the following attachments:

- **“Include a Copy of the Results Reports”**
- **“Include the FCRA Summary of Rights”**
- **“iReviewNow”**
- **And any additional required State notices or forms.**

You will also have the option to receive an email reminder to send the Post-Adverse Action Letter. Please be sure to list the correct email address.

Attachments:

Include a Copy of the Results Report

Include the FCRA Summary of Rights

iReviewNow

Future Letters:

Save any changes to this Letter text for future Pre-Adverse Action Letters

Follow-Up Letter:

Send Me an Email Reminder to Generate the Follow-Up Adverse Action Letter

Reminder E-mail Address

F. When you are finished, click "**Generate**" to create the Pre-Adverse Action Letter and the Attachments to be hand delivered or mailed to the candidate. We recommend a return receipt if the documents are mailed to ensure delivery.

Post-Adverse Action Letters

G. Please use the following steps when you have decided to not hire or retain a candidate based on the background check 21 results, review of the iReviewNow information from the candidate, and your individualized assessment.

- Follow steps A-C above. On step D, click "**Adverse Action Letter**" and then "**Submit**." This will generate the Post-Adverse Action letter to be hand delivered or mailed to the candidate.

Self-Service Adverse Action Letter Generation

Applicant: [REDACTED]

Requesting: Pre-Adverse Action Letter Adverse Action Letter

Delivery Method: Print and Send by Standard Mail

Applicant's Mailing Address: [REDACTED]
[REDACTED]

Submit



iReviewNow – The Missing Piece of the Background Screening Puzzle

New FCRA and EEOC mandates along with other federal and state laws or regulations make using iReviewNow a critical aspect of your background screening program. iReviewNow is the only patented background screening solution that will help ensure you are compliant with these rules. The following section will help you understand iReviewNow, how to use it, and how to use the iReviewNow Individual Assessment Feature.



TRANSPARENT

iReviewNow is the only system that allows candidates to see their report (pass or fail) at the same time as you. This step allows candidates the crucial opportunity to dispute any inaccuracies before adverse hiring decisions are made or provide context and rehabilitation history in accordance with the EEOC mandates.

ACCURATE

When background reports identify adverse or potentially derogatory information, candidates are able to see exactly what has been found as our system notifies them through text messages and emails to review their results. They can then dispute any inaccuracies or misidentification of criminal records securely online at ireviewnow.com/go

Reporting mistakes often lead to a candidate being passed over for a job in favor of other candidates. These unfair and now illegal hiring practices have led to the new EEOC and FCRA guidelines and multi-million-dollar lawsuits against employers and their background screening providers.



The iReviewNow process is interactive with candidates as they are able to add details in the report to explain any potentially negative information. This allows the candidate to give context to their past by telling their side of the story and demonstrating what self-rehabilitative steps they have taken since the event occurred.

RELIABLE

When you have the 360-degree view of the candidate, you can make fully informed hiring decisions. This mitigates, if not eliminates, your risk of making discriminatory



hiring decisions and negligently hiring unfit candidates that do not meet your criteria. SecurTest's quality background screening programs, with Accuratized® reporting powered by iReviewNow, protect candidates' legal rights and ensure employers' hiring practices comply fully within EEOC and FCRA regulations.

HOW IREVIEWNOW WORKS

The iReviewNow Agreement found on the Consumer Authorization form is filled out by the candidate prior to the background check request. After the request has been processed, a copy of the report is made available to the candidate at iReviewNow.com and he or she will receive a text message, email notification, or will be notified by you that the report is complete. The candidate can then login to the SecurTest website with a unique User ID and password to review the report and answer the user-friendly iReviewNow questions ensuring transparency, fairness, and accuracy. If he or she does not create an online login account, we will transmit a copy of the background report to the candidate's provided email address. The report will not contain any PII information such as Social Security Numbers or Dates of Birth which mitigates misuse of the report or identity theft concerns.

If the candidate would like to dispute any item in the report, iReviewNow will instantly alert you and will instantly trigger our reinvestigation of the disputed item(s). Though the FCRA provides 30 days to complete the investigation, SecurTest finds this unacceptable as positions are usually filled during this period. Our average reinvestigation time is one business day which will allow you time to wait for our results before making any final decisions regarding the position. This will also help to eliminate claims of damages by the candidate. We will instantly transmit the reinvestigation results to the subject upon completion.

iReviewNow allows the subject to provide context for the adverse information. The EEOC guidelines expect employers to allow candidates to present themselves in the most favorable light. iReviewNow also allows the candidate or employee to provide what the EEOC and FCRA define as "self-rehabilitation" information and evidence. Candidates can explain the proactive steps taken to rehabilitate themselves since the derogatory event such as changing their behavior and improving their qualifications thus giving you a 360-degree view of the "whole person."

Though you have the final authority to determine the best and most qualified candidate for the position, you will have more than a stark black- and-white background report—you have additional information, often known only by the candidate.

Example: A person with a conviction for writing a bad check can explain the circumstances that resulted in the conviction. A person can tell you what he or she have done to improve themselves since the conviction such as completing or continuing their education, community service, or other positive behaviors that demonstrate their efforts toward rehabilitation. Candidates can upload documents that may help support their commentary.

Your applicants are often your existing customers and your best advocate in your community and beyond. We treat your applicants with respect and dignity and allow them to see their report at the same time as you. This ensures that candidates and employees continue to see your organization as being fair, transparent, and committed to reporting the highest standards. Clients that use iReviewNow are using the only patented solution that ensures compliance with state and federal laws, guidelines, and mandates. iReviewNow is the solution that protects your organizational brand by ensuring accuracy and transparency.

IREVIEWNOW INDIVIDUALIZED ASSESSMENT TOOL – OPTIONAL TOOL

Part of the iReviewNow patent is our 360-degree Individualized Assessment Tool. Recent EEOC mandates require you to perform an individualized assessment of a candidate with adverse history (i.e. conviction records) to help prevent discrimination of protected groups. Our tool will help you evaluate the candidate and have supporting documentation for each hiring decision.

When an individualized assessment is necessary, you will be directed to <http://www.ireviewnow.com/ireviewnowassessment> or you may Click [Here](#). This tool will help you evaluate each background report that contains negative, derogatory, or potentially derogatory information before making a final decision.

Best Practices

- Take reasonable steps to be consistent in your hiring, retention, and access decisions.
 - Establish policies and procedures that you and your legal counsel review on an annual basis or more frequently as needed.
 - Follow the FCRA, EEOC and other federal and state laws and use iReviewNow, pursuant to our agreement.
 - Assess your risk by position, level of supervision, and qualifications of each candidate.
 - Documentation is your best friend. Always document both hire and no-hire decisions.
 - Audit your internal procedures.
 - Audit SecurTest to ensure we are meeting your needs and following your procedures.
 - Communicate with your SecurTest Team, as we are always available to answer your questions and exceed your expectations.
 - Call our Senior Executive Team, including our CEO, Steven C. Millwee, to ask questions. Take advantage of our expertise and training.
 - Do not ignore your FCRA obligations as the law requires these steps to be followed.
-

FDIC Regulations

Background Check 21 reports are regulated by Section 19 of the Federal Deposit Insurance Act (12 U.S.C. § 1829).

See: <https://www.fdic.gov/regulations/laws/rules/1000-2100.html>
<https://www.fdic.gov/regulations/laws/rules/4000-9010.html>
<https://www.fdic.gov/news/news/financial/2018/fil18042.html>
<https://www.fdic.gov/regulations/laws/rules/5000-1300.html>

Applying for Special FDIC Consideration

The federal law allows you to petition the FDIC Regional Director for special consideration. Section 19 of the Federal Deposit Insurance Act prohibits individuals that are convicted of certain criminal offenses from participating in the affairs of an insured depository institution without the written consent of the FDIC. Individuals or banks can seek the FDIC's written consent by filing Section 19 Application Form 6710-07, *Application Pursuant to Section 19 of the Federal Deposit Insurance Act*. This form distinguishes between applications that are bank-sponsored and applications that are for individual waivers.

[Section 19 Application Form 6710-07](#) – PDF ([PDF Help](#))

[Section 19 Application Form 6710-07](#) – Word ([MS Word Help](#))

In addition to completing Form 6710-07, applicants **must** contact the appropriate FDIC regional or area office to request supplemental materials that **must** be completed and submitted with the completed application form. These supplemental materials are not available on the FDIC website or electronically (e.g., fingerprint cards), and will be mailed to the applicant by the appropriate regional or area office.

Appropriate FDIC office listings are located on page 2 of Form 6710-07. Also, each FDIC regional or area office has Section 19 contacts available to answer questions about the application process. An applicant **must** file with the appropriate FDIC office for his/her application to be processed. The appropriate FDIC office is determined by the applicant's current state or territory of residence, and not by the state where the conviction or prosecution occurred. Failure to submit **all** required information (application and supplemental materials) to the **appropriate** FDIC office will delay the processing of your application.

See <https://www.fdic.gov/regulations/laws/forms/section19.html> for this Application.

Crimes of dishonesty (Dishonesty involves a crime where a person acts directly or indirectly to cheat or defraud for monetary gain or wrongfully takes property that belongs to someone else. Dishonesty also includes acts involving lack of integrity or intent to distort, cheat or act deceitfully or fraudulently.)

Breach of trust (Breach of trust occurs when a person who has been entrusted with the money or property of another uses or takes that money or property for his or her own gain.)

Background Checks

What Employers Need to Know About the FCRA and EEOC

You are required to follow the FCRA regarding the use of our background reports. The FTC and EEOC prepared important guidance, which can be found at https://www.eeoc.gov/eeoc/publications/background_checks_employers.cfm. The following information is provided as it relates to hiring and retention decisions.

A joint publication of the Equal Employment Opportunity Commission and the Federal Trade Commission

When making personnel decisions - including hiring, retention, promotion, and reassignment - employers sometimes want to consider the backgrounds of applicants and employees.

For example, some employers might try to find out about the person's work history, education, criminal record, financial history, medical history, or use of social media. Except for certain restrictions related to medical and genetic information (see below), it's not illegal for an employer to ask questions about an applicant's or employee's background, or to require a background check.

However, any time you use an applicant's or employee's background information to make an employment decision, regardless of how you got the information, you must comply with federal laws that protect applicants and employees from discrimination. That includes discrimination based on race, color, national origin, sex, or religion; disability; genetic information (including family medical history); and age (40 or older). These laws are enforced by the Equal Employment Opportunity Commission (EEOC).

In addition, when you run background checks through a company in the business of compiling background information, you must comply with the Fair Credit Reporting Act (FCRA). The Federal Trade Commission (FTC) enforces the FCRA. This publication explains how to comply with both the federal nondiscrimination laws and the FCRA. It's also a good idea to review the laws of your state and municipality regarding background reports or information because some states and municipalities regulate the use of that information for employment purposes.

Before You Get Background Information

EEOC

In all cases, make sure that you're treating everyone equally. It's illegal to check the background of applicants and employees when that decision is based on a person's race, national origin, color, sex, religion, disability, genetic information (including family medical history), or age (40 or older). For example, asking only people of a certain race about their financial histories or criminal records is evidence of discrimination.

Except in rare circumstances, don't try to get an applicant's or employee's genetic information, which includes family medical history. Even if you have that information, don't use it to make an employment decision. (For more information about this law, see the EEOC's publications explaining the Genetic Information Nondiscrimination Act, or GINA.) Don't ask any medical questions before a conditional job offer has been made. If the person has already started the job, don't ask medical questions unless you have objective evidence that he or she is unable to do the job or poses a safety risk because of a medical condition.

FTC

If you get background information (for example, a credit or criminal background report) from a company in the business of compiling background information, there are additional procedures the FCRA requires beforehand:

- Tell the applicant or employee you might use the information for decisions about his or her employment. This notice must be in writing and in a stand-alone format. The notice can't be in an employment application. You can include some minor additional information in the notice (like a brief description of the nature of consumer reports), but only if it doesn't confuse or detract from the notice.
- If you are asking a company to provide an "investigative report" - a report based on personal interviews concerning a person's character, general reputation, personal characteristics, and lifestyle - you must also tell the applicant or employee of his or her right to a description of the nature and scope of the investigation.
- Get the applicant's or employee's written permission to do the background check. This can be part of the document you use to notify the person that you will get the report. If you want the authorization to allow you to get background reports throughout the person's employment, make sure you say so clearly and conspicuously.
- Certify to the company from which you are getting the report that you:
 - notified the applicant and got their permission to get a background report;
 - complied with all of the FCRA requirements; and
 - won't discriminate against the applicant or employee, or otherwise misuse the information in violation of federal or state equal opportunity laws or regulations.



EEOC

Any background information you receive from any source must not be used to discriminate in violation of federal law. This means that you should:

- Apply the same standards to everyone, regardless of their race, national origin, color, sex, religion, disability, genetic information (including family medical history), or age (40 or older). For example, if you don't reject applicants of one ethnicity with certain financial histories or criminal records, you can't reject applicants of other ethnicities because they have the same or similar financial histories or criminal records.
- Take special care when basing employment decisions on background problems that may be more common among people of a certain race, color, national origin, sex, or religion; among people who have a disability; or among people age 40 or older. For example, employers should not use a policy or practice that excludes people with certain criminal records if the policy or practice significantly disadvantages individuals of a particular race, national origin, or another protected characteristic, and does not accurately predict who will be a responsible, reliable, or safe employee. In legal terms, the policy or practice has a "disparate impact" and is not "job related and consistent with business necessity."
- Be prepared to make exceptions for problems revealed during a background check that were caused by a disability. For example, if you are inclined not to hire a person because of a problem caused by a disability, you should allow the person to demonstrate his or her ability to do the job - despite the negative background information - unless doing so would cause significant financial or operational difficulty.

FTC

When taking an adverse action (for example, not hiring an applicant or firing an employee) **based on background information obtained through a company in the business of compiling background information**, the FCRA has additional requirements:

- Before you take an adverse employment action, you must give the applicant or employee:
 - a notice that includes a copy of the consumer report you relied on to make your decision; and
 - a copy of "A Summary of Your Rights Under the Fair Credit Reporting Act," which you should have received from the company that sold you the report.

By giving the person the notice in advance, the person has an opportunity to review the report and explain any negative information.

- After you take an adverse employment action, you must tell the applicant or employee (orally, in writing, or electronically):
 - that he or she was rejected because of information in the report;
 - the name, address, and phone number of the company that sold the report;

- that the company selling the report didn't make the hiring decision, and can't give specific reasons for it; and
- that he or she has a right to dispute the accuracy or completeness of the report, and to get an additional free report from the reporting company within 60 days.

EEOC

Any personnel or employment records you make or keep (including all application forms, regardless of whether the applicant was hired, and other records related to hiring) must be preserved for one year after the records were made, or after a personnel action was taken, whichever comes later. (The EEOC extends this requirement to two years for educational institutions and for state and local governments. The Department of Labor also extends this requirement to two years for federal contractors that have at least 150 employees and a government contract of at least \$150,000.) If the applicant or employee files a charge of discrimination, you must maintain the records until the case is concluded.

FTC

Once you've satisfied all applicable recordkeeping requirements, you may dispose of any background reports you received. However, the law requires that you dispose of the reports - and any information gathered from them - securely. That can include burning, pulverizing, or shredding paper documents and disposing of electronic information so that it can't be read or reconstructed. For more information, see "*Disposing of Consumer Report Information? Rule Tells How*" at <http://www.business.ftc.gov/documents/alt152-disposing-consumer-report-information-rule-tells-how>.

EEOC

To find out more about federal antidiscrimination laws, visit www.eeoc.gov, or call the EEOC toll-free, 800-669-4000 (voice); TTY: 800-669-6820. The EEOC is responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability, or genetic information. The EEOC investigates, conciliates, and mediates charges of employment discrimination, and also files lawsuits in the public interest. For specific information on:

- **Preemployment medical inquiries:** see *Preemployment Disability-Related Questions and Medical Examinations* at www.eeoc.gov/policy/docs/preemp.html.
- **Medical inquiries during employment:** see *Questions and Answers: Enforcement Guidance on Disability-Related Inquiries and Medical Examinations of Employees Under the Americans with Disabilities Act (ADA)* at www.eeoc.gov/policy/docs/qanda-inquiries.html.
- **Genetic inquiries, including inquiries about family medical history:** see *Background Information for EEOC Final Rule on Title II of the Genetic Information Nondiscrimination Act of 2008* at www.eeoc.gov/laws/regulations/gina-background.cfm.
- **EEOC recordkeeping requirements:** see *Summary of Selected Recordkeeping Obligations in 29 C.F.R. Part 1602* at www.eeoc.gov/employers/recordkeeping_obligations.cfm.

- **Using arrest and conviction records to make employment decisions:** see *Questions and Answers about EEOC's Enforcement Guidance on the Consideration of Arrest and Conviction Records in Employment Decisions Under Title VII* at www.eeoc.gov/laws/guidance/qa_arrest_conviction.cfm.
- **Whether arrest and conviction records act as an automatic bar to all employment:** see *Reentry Myth Buster: On Hiring/Criminal Records Guidance* at csgjusticecenter.org/wp-content/uploads/2012/11/Reentry_Council_Mythbuster_Employment.pdf.
- **Background on the EEOC for small businesses:** see Get the Facts Series: Small Business Information, www.eeoc.gov/eeoc/publications/smallbusiness.cfm.

To find out more about federal laws relating to background reports, visit www.business.ftc.gov, or call the FTC toll-free, 1-877-FTC-HELP (1-877-382-4357); TTY: 1-866-653-4261. For specific information on employment background reports, see:

- **Using Consumer Reports: What Employers Need to Know** at www.business.ftc.gov/documents/bus08-using-consumer-reports-what-employers-need-know
- **The Fair Credit Reporting Act & social media: What businesses should know** at www.business.ftc.gov/blog/2011/06/fair-credit-reporting-act-social-media-what-businesses-should-know
- **Background screening reports and the FCRA: Just saying you're not a consumer reporting agency isn't enough** at www.business.ftc.gov/blog/2013/01/background-screening-reports-and-fcra-just-saying-youre-not-consumer-reporting-agency-i
- **Reentry Myth Buster: Criminal Histories and Employment Background Checks** at

Additional Material:

<https://www.ftc.gov/news-events/blogs/business-blog/2017/04/background-checks-prospective-employees-keep-required>

<https://www.ftc.gov/news-events/press-releases/2016/05/new-ftc-business-guidance-employment-background-screening>



Ordering MVR (Driving), Employment References and Education Verifications

Separate authorizations are required for these requests. Please contact management@securtest.com for these forms. Some states have unique forms that also must be signed by the subject for MVR checks.

Welcome SecurTest Internal For: HEADCO - Headco Industries, Inc. ? Help ← Cancel

Applicant Information **Enter Search Request Details**

Demographic Information

Last Name: * First: * Middle:

Current Address City State * Zip

Date of Birth: * (ex. MM/DD/YYYY) Social Security #: * - - Gender/Race: (M/W for Male/White)

International Address: International Govt ID:

Fields with a "*" Must be Completed

Select Searches to be Performed

- Criminal Court Searches
- Motor Vehicle Records
- Social Trace
- Credit Report
- Education Verification
- Employment Verification
- Professional License
- Workers Compensation

Once your account is setup to order these searches, you will notice the box on the left of the Applicant Information screen. Check the boxes for Motor Vehicle Records, Education, and/or Employment Verification. (See bottom of previous page.)

You will be prompted to enter additional information, such as the driver's license number, college or university, and employment references. Complete all fields, as this will help us perform these important searches.

Motor Vehicle Records

Enter the Driver's License Number and State it was issued. **Click on the+ Save Keyed Information and Add to Order.**

Motor Vehicle Records

Drivers License Number: * State Issued: *

(Do Not Enter Hyphens or Spaces)

+ Save Keyed Information and Add To Order

Education Verification

Enter the College or University. You will notice that as you type you will see the correct name for the institution. Do not enter high school, as we do not verify secondary education. It is important to enter the subject's name used at the time of graduation if different. **Click on the+ Save Keyed Information and Add to Order**

Education Verification
i ↗

College Lookup

Institution Name: *	<input type="text"/>	Major:	<input type="text"/>
Campus Location: *	<input type="text"/>	Grades/GPA:	<input type="text"/>
Attendance Dates:	<input type="text"/>	Credits:	<input type="text"/>
Degree/Diploma:	<input type="text"/>	Additional Information:	<input type="text"/>
Date Received:	<input type="text"/>		
Accomplishments:	<input style="width: 100%; height: 100%;" type="text"/>		
Email Address:	<input type="text"/>	Name Used While Attending (LFM):	<input type="text"/> , <input type="text"/>
			<input type="text"/>

+ Save Keyed Information and Add To Order

Employment Verification

Enter the Company Name, Location, and Phone number for the first employer. Complete as many fields possible. or University. You will notice that as you type you will see the correct name for the institution. Do not enter high school, as we do not verify secondary education. It is important to enter the subject's name used at the time of employment if different. **Click on the+ Save Keyed Information and Add to Order.** Click Add another employer for the next employer and save each entry.

Employment Verification
i ↗

Company Name: *	<input type="text"/>	Phone: *	<input type="text"/>
Location (City/State): *	<input type="text"/>	Fax:	<input type="text"/>
Supervisor:	<input type="text"/>	Supervisor Title:	<input type="text"/>
Dates Employed:	<input style="width: 100%; height: 100%;" type="text"/>		
Starting Title:	<input type="text"/>	Ending Title:	<input type="text"/>
Starting Pay:	<input type="text"/>	Ending Pay:	<input type="text"/>
Starting Duties:	<input type="text"/>	Ending Duties:	<input type="text"/>
Reason for Leaving:	<input type="text"/>	Employer's Website:	<input type="text"/>
Employer's Email Address:	<input type="text"/>	Name Used While Employed (LFM):	<input type="text"/> , <input type="text"/>
			<input type="text"/>

+ Add the Keyed Employer to this Order

Note: If you do not want us to contact the applicant's **CURRENT** employer, please do not include that employer

Ordering Drug Testing

Most employers wait for the criminal history background report to be completed before ordering a drug test as a cost savings. Here are the steps to order drug testing from SecurTest. First, contact SecurTest to add drug testing to your menu options.

1. Click on the Results Screen.

<input type="checkbox"/>	Name	Reference	Requestor	Requested	Posted	Alert	Status	
<input type="checkbox"/>	LEAR, JODY D	TW111401-18		2018-11-14	2018-11-14		Complete	View
<input type="checkbox"/>	SAYOC, CESAR	STI-102618		2018-10-26	2018-10-29		Complete	View
<input type="checkbox"/>	ROJAS, KATHIR L	STI-101918-1		2018-10-19	2018-10-19		Complete	View

2. You will notice a purple colored lab flask on the right side of the screen.
3. Click on this icon for the candidate that you wish to order a drug test.
4. A window will appear with the candidate's information.



You will need to make sure that the candidate's Phone Number (all numbers, no dashes) and email are filled in, as the Medical Review Officer (MRO) may need to speak to the candidate about the results.

5. Select the 5-Panel or 10-Panel option from the drop-down box, "Screening Type."
6. You will then be directed to locations to schedule an appointment for the drug test.

Schedule a Drug Screening ✕

Screening Type: 5 PANEL/DOT EXAM/NON-DOT (Urine Test) ▾

First Name: KATHIR

Last Name: ROJAS

SSN: *****0116

Phone Number:

Email Address:

Street Address: 300 Cabana Blvd. Unit 3103

City: Panama City Beach

State: FL

Zip: 32407

Changing or Updating Your Decision Online Using – Yellow to Green

SecurTest does not make hiring decisions. Our clients make the decision. A frequently asked question is, "Why does the report read Review or HR Review", and the color is Yellow when I log in to view a report?

The term HR Review or Review means we found criminal records that you should review. The Yellow color flags your attention that the report contains convictions for your review. The records may be low-level offenses that do not impact your hiring decision.

When you are ordering a Background Check 21, remember this is to meet the FDIC and Wells Fargo standards. However, a Background Check 21 Report will be flagged Yellow to alert you that records were found outside the scope of the Background Check 21 Program. You should review the records and determine if the candidate meets your internal hiring or employment standards and applicable laws and regulations.

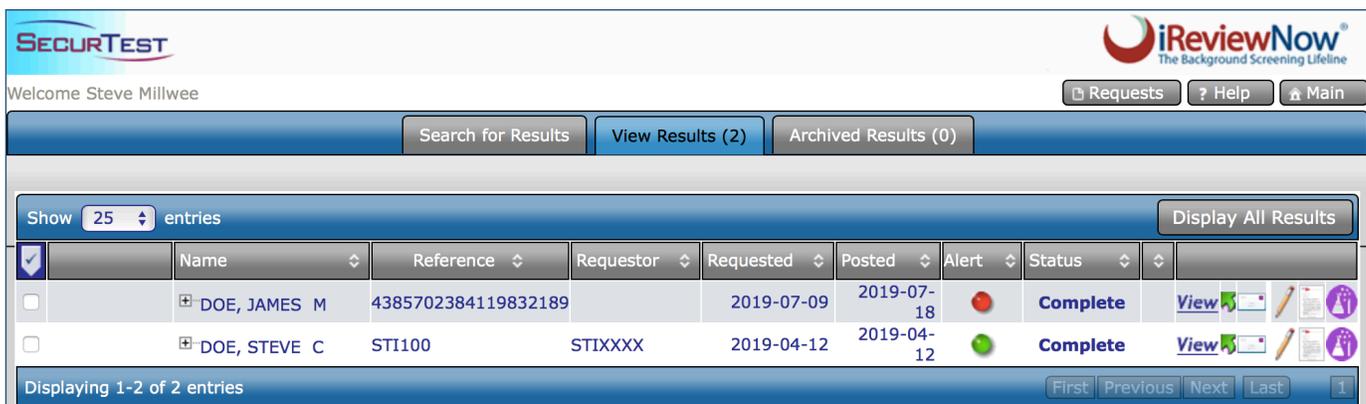
The next most common request is for us to change a report from REVIEW or HR Review, meaning Yellow to Green. This request generally stems from a client's concern that their customers may object to having the employee at their facilities. Others believe that a Yellow report can come back to haunt them if they make a favorable hiring decision. This customer concern may be resolved if they read the report. You can have your applicants and employees sign a release allowing you to provide a copy of the report to your customers. Contact us if you need a sample release.

The content of a Background Check 21 Report explains that a Yellow, HR Review, or Review flagged report provides essential information. The report reveals that reportable records were found outside the scope of the FDIC regulations and Background Check 21 Program. The report also explains that the candidate is eligible under these program requirements. Thus, you can leave the color Yellow or change it to Green. You can change the color to Green from Red as it relates to using the report for employment purposes. However, SecurTest reports to Wells Fargo the eligibility status as Eligible or Ineligible based on their Background Check 21 Program and FDIC criteria.

Please use the following steps and guidelines upon receiving the results of a background check. All terms, such as pass, eligible, HR review, fail, or ineligible are based on your authorized grading criteria established by the FDIC for access to a banking or financial institution. You should not use these terms or grading criteria as the reason for a hiring, retention, or access decision.

Here's how to change the color to Green, as you can use this color to reflect your hiring decision. Please remember that changing the color to Green does not alter the content of the report or delete the criminal records reported.

Step 1: Click on View Results

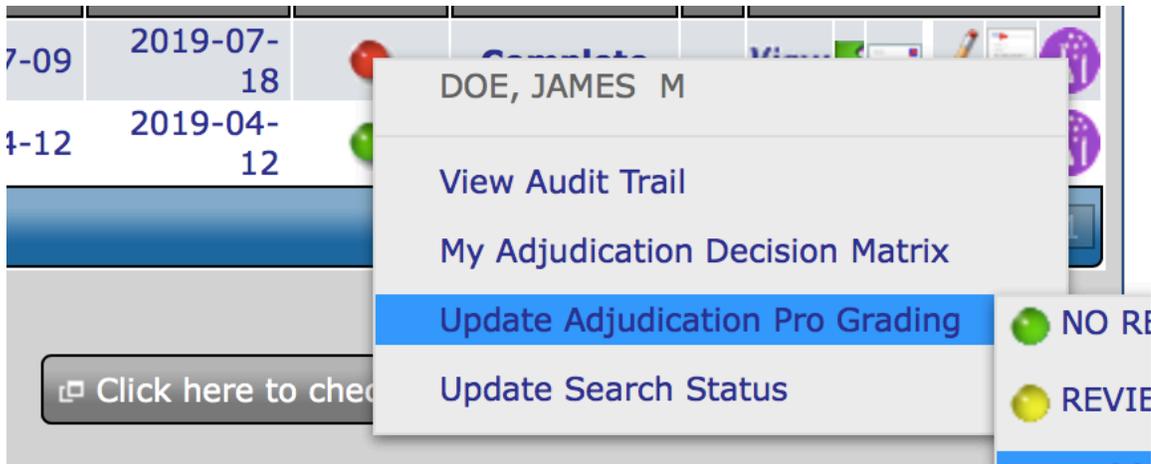


The screenshot shows the SecurTest iReviewNow web application interface. At the top left is the SecurTest logo, and at the top right is the iReviewNow logo with the tagline "The Background Screening Lifeline". Below the logos, there is a welcome message "Welcome Steve Millwee" and navigation buttons for "Requests", "Help", and "Main". A search bar is present with buttons for "Search for Results", "View Results (2)", and "Archived Results (0)". Below the search bar, there is a "Show 25 entries" dropdown and a "Display All Results" button. The main content area displays a table of results with columns for Name, Reference, Requestor, Requested, Posted, Alert, and Status. Two entries are visible: one for "DOE, JAMES M" with a red alert and "Complete" status, and one for "DOE, STEVE C" with a green alert and "Complete" status. Each entry has a "View" button and a pencil icon. At the bottom, there is a "Displaying 1-2 of 2 entries" message and navigation buttons for "First", "Previous", "Next", "Last", and "1".

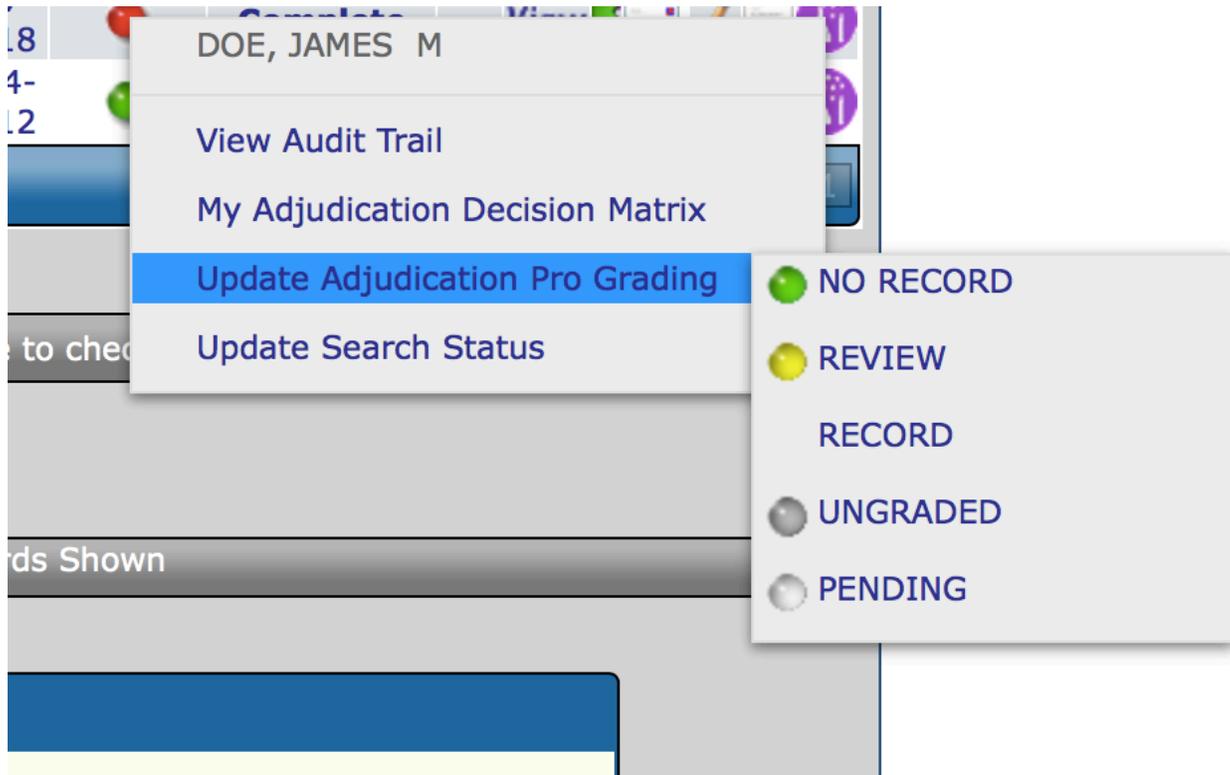
	Name	Reference	Requestor	Requested	Posted	Alert	Status	
<input type="checkbox"/>	DOE, JAMES M	4385702384119832189		2019-07-09	2019-07-18	Red	Complete	View
<input type="checkbox"/>	DOE, STEVE C	STI100	STIXXX	2019-04-12	2019-04-12	Green	Complete	View

Step 2: Right click on the color button of the subject that you wish to change the color.

Step 3: A white box will appear with the subject's name. "Click on Update Adjudication Pro Grading." The color will change in a few seconds.



Step 4: Click on the Color, such as Green, if you have decided to hire the individual or take no adverse action.



A different situation can occur, where you decide to take adverse action. You may want to change the color to Red. Always remember that you must comply with the

FCRA and various state and local laws when taking adverse employment action. See the sections in this guide for assistance and consult with your legal counsel.

When can SecurTest Change a Report?

SecurTest can only change a report when the following occurs:

1. We amend the report when we find that information was reported incorrectly.
2. The candidate disputes the accuracy of the report and we find on reinvestigation that the report requires updating. A new report is generated regardless of the re-investigative findings, as we are required to explain the steps we took and our finds.

Our Customer Service and Compliance Team is available to answer your questions and train your team in using SecurTest and iReviewNow.

(800) 445-8001

compliance@securtest.com

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