

Augusta University Policy Library

Supplier Employee Background Check Policy

Policy Manager: Office of Finance

INTRODUCTION

Augusta University (AU) is committed to protecting the safety and security of the people, property, and information within our campus locations.

POLICY STATEMENT

To mitigate risks associated with work performed by non-employees and in accordance with the Board of Regents (BOR) Policy Manual, Section 7.7.5 entitled “Background Checks of Supplier and Contractor Employees” and the Board of Regents of the University System of Georgia Business Procedures Manual (BPM), Section 3.1.3 entitled “Background Checks of Supplier Employees,” AU must review purchases to assess the risk of services provided to the institution by any supplier when the services require regular interaction with students, employees, monies, sensitive/confidential data, and/or regular access to secured facilities containing critical institutional-level infrastructure.

In instances when it is determined that the scope of work being performed by a supplier’s employee is such that a background check should be required, AU must seek appropriate contractual protections, including requiring the supplier to obtain appropriate background checks for all such supplier employees. All suppliers are fully responsible for obtaining and enforcing all appropriate background check requirements as described in the Augusta University Supplier Employee Background Check Certification and shall defend, indemnify, and hold harmless the university for the actions of the suppliers’ employees.

AFFECTED STAKEHOLDERS

Indicate all entities and persons within the Enterprise that are affected by this policy:

- Alumni Faculty Graduate Students Health Professional Students
 Staff Undergraduate Students Vendors/Contractors Visitors
 Other:

DEFINITIONS

- **Background Check** – An investigation comprised of a criminal background check (including social security number check and for positions with access to or responsibility for money a credit check); confirmation of credentials; confirmation of employment history; and verification that an individual is not an excluded party pursuant to federal restrictions. Background investigations must be conducted within the 12 months prior to the supplier’s employee being assigned to any AU facility.
- **Departmental Approver** – Individuals with the authority to approve requests impacting departmental budgets are required to evaluate internal purchasing requests against the provisions of this policy based on the needs of the department and the resources available to direct departmental purchasing activity.

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Executive Sponsor: Executive Vice President of Finance/Chief Business Officer

Next Review: 3/2025

- **Departmental Requester** – Individuals who directly engage in purchasing activities at the direction of others within colleges or administrative units are responsible for collaborating with their departmental colleagues to identify and specify their procurement needs, recommend a purchasing method to their Departmental Approver, and execute purchasing activity in compliance with this policy as directed.
- **Purchasing Activity** – The effort associated with the procurement of goods or services on behalf of AU.
- **Purchasing Staff** – Employees within the AU Purchasing Department who administer purchasing activities on behalf of the university, including processing routine purchase orders, conducting bids for goods and services, agency contract administration, training for departmental requestors, maintaining the Augusta University Purchasing Manual, and communicating legal, regulatory, and policy updates to staff and faculty.
- **Supplier** – External entity (vendor/contractor) engaged to provide services to AU for fees or other remuneration.

PROCESS & PROCEDURES

All purchasing activities made on behalf of Augusta University must be done in accordance with the Procurement of Goods and Services Policy and the procedures documented in the Augusta University Purchasing Manual. Procurement of services requiring regular interaction with students, employees, monies, sensitive/confidential data, and/or regular access to secured facilities containing critical institutional-level infrastructure require certification from Suppliers that all involved employees have passed applicable background check requirements. In order to retain such services from Suppliers, Departmental Requesters must initiate a purchase requisition. The Purchasing card (P-Card), petty cash, or payment (check) request process and procedures are not permitted when retaining such services.

Roles & Responsibilities

Departmental Requesters are required to include appropriate documentation in the preparation and submission of purchase requests for services, including the completed Augusta University Checklist for All Services form. The Augusta University Checklist for All Services form assists in the departmental review of purchases to assess the risk of services.

Departmental Approvers are required to ensure that the documentation provided is current, accurate, and complete.

Purchasing Staff are required to verify through evaluation of the documentation supplied with purchase requests or through consultation with the departmental approvers that the provisions of this policy have been appropriately considered and documented prior to formally ordering goods or services on behalf of AU. Based on the information and documentation submitted by the departmental requesters and approvers, the purchasing staff are responsible for including the appropriate provisions for supplier background checks in the contract, agreement, and purchase order.

Suppliers are required to implement and enforce all appropriate background check requirements and to maintain documentation thereof. Suppliers also maintain full responsibility for the actions of their employees and, pursuant to contractual provisions included by AU, shall defend, indemnify, and hold harmless the Board of Regents of the University System of Georgia for the actions of the suppliers' employees. The university requires that suppliers not place or assign any employee, subcontractor, or agent with certain types of criminal convictions to work in an AU facility. Suppliers must make documentation of compliance with this policy available to Augusta University on request. If the university discovers that a supplier is out of compliance, their failure to meet this requirement will be considered a breach of contract. AU Purchasing Staff, in its sole discretion, may provide notice with time to cure, or terminate, the agreement depending upon the severity and nature of the breach of contract.

REFERENCES & SUPPORTING DOCUMENTS

- AU Supplier Employee Background Check Certification
- [BOR Policy 7.7.5 Background Checks of Supplier and Contractor Employees](#)
- [BPM 3.1.3 Background Checks of Supplier Employees](#)
- [Federal Acquisition Regulation \(FAR\)](#)
- [Georgia Security and Immigration and Compliance Act](#)
- [AU Delegation of Contract Signatory Authority](#)
- Delegated Authority Memo/List
- Augusta University Purchasing Manual
- AU Checklist for All Services

RELATED AU POLICIES

- Procurement of Goods and Services
- [Negotiation and Execution of Contracts](#)

APPROVED BY:

Executive Vice President for Academic Affairs and Provost, Augusta University

Date: 3/4/2022

President, Augusta University

Date: 3/5/2022