JDP | RISK MITIGATION SPECIALISTS

BACKGROUND SCREENING SEARCH SCOPES & PROTOCOLS, AND TYPES

This information is to provide clients with general information regarding JDP's search scopes and protocols. However, please note that a general document of this kind cannot account for every type of reporting situation or circumstance, and will be updated at JDP's discretion based on changing law or JDP business practices. In all situations, JDP will comply with applicable federal, state, and local laws. Thus, if JDP determines that applicable law requires JDP to report more narrowly than what is contemplated in this document, JDP will report more narrowly. Additionally, changes at the source or court level may also necessitate changes to be made in reporting.

TYPES OF CRIMINAL HISTORY INFORMATION

- **Criminal Convictions:** JDP will report criminal misdemeanor and felony convictions that have a disposition date within the last seven years. Should a client wish for records to be reported for a longer period of time, subject to where applicable by law, readily accessible and/or economically reasonable, then separate contractual arrangements must be made with JDP. Note that even if a client arranges for a longer search scope, JDP will typically not report records beyond seven years from the disposition date where the subject of the report resides in a state that limits this reporting, which currently includes: California, Colorado, Kansas, Maryland, Massachusetts, Montana, New Hampshire, New Mexico, New York, Texas, and Washington. These states place limitations on how long a consumer reporting agency can report conviction information.

- **Pending Criminal Charges:** JDP typically reports pending criminal charges unless they are more than seven years old, or no current proceedings appear to be underway.

- **Deferred Adjudications, Adjudications Withheld, and Pre- and Post-Trial Diversions**: As a general rule, JDP reports these types of records if the case was filed within the last seven years and if the deferred adjudication process did not culminate in a dismissal of the charge(s) or expungement. Certain states and localities do not allow the reporting of this information, and such JDP will not report these records at all in light of certain restrictions under state law. Currently these states based on consumer residence include California, New York, New Mexico, Colorado, and Kentucky.

- **Probation Violations/Contempt of Court/Failures to Appear, Parole Violations.** Unless they are classified as a separate criminal conviction by the court of record, JDP typically reports violations of probation, contempt of court, failures to appear, and parole violations when they are readily available for strictly a seven-year period preceding the issuance of the report.

- **Active Warrants:** As a general rule, JDP reports active warrants.

- **Dismissals/Acquittals/Dropped Charges:** Because it is increasingly controversial for clients to consider dismissals, acquittals, and dropped charges, and because CRAs face limitations on the situations in which they can report such matters, especially given EEOC guidance, JDP has a general practice of NOT reporting these types of matters. Should a client wish to receive such items, if legally permissible, separate contractual arrangements must be worked out with JDP.

- **Expungements/Sealed Records:** JDP does not report expunged or sealed records under any circumstances.

- **Infractions/Ordinance Violations**: Sometimes criminal searches will uncover ordinance violations or infractions. JDP does not report infractions or ordinance violations because they are typically minor and do not fall within the scope of "criminal information" and are considered less than misdemeanor.

- **Searching Parameters**: Current provided name and Current provided location of residence are searched, unless agreement or SOW indicate additional name and history location requirements. Note that additional parameters will affect the package or a la carte charges.

BACKGROUND SCREENING REPORT SEARCHES

CRIMINAL SEARCH TYPES	
National Criminal Search / US Criminal Search	JDP National Criminal Search contains data from: ○ Criminal Records (600 million +) ○ Sex Offender Registries as available ○ OFAC ○ FBI Terrorist List ○ Department of Public Safety (DPS) ○ Administrative Offices of the Courts (AOC) ○ Department of Corrections (DOC) ○ Federal/State/Local Wanted Fugitive Lists This information is housed in a proprietary database that is continually updated from sources across the US. It is a great option for conducting a broad search designed to identify potentially relevant information about an individual. However, to be clear, available records do not include all cases from all jurisdictions across the country. In other words, they do not encompass all criminal records nationwide. This search is completed with the subject's current name as provided to JDP. Additionally, to ensure appropriate levels of accuracy, JDP follows the industry-wide best practice of requiring that all potential reportable records found in the National Criminal Search be validated through subsequent verifications (e.g., by reviewing public records at the relevant courthouse). Clients will be separately charged for such follow-up confirmations and additional fees.
County Criminal Search:	JDP searches Felony and/or Misdemeanor criminal records, based upon provided identifiers, that are readily available at a specific county. By utilizing a proprietary court researcher data network, records are sourced through a combination of in-person searches, electronic access to court or that court's data. This method allows JDP to provide completed searches in an average of 1-3 business days.
Federal Court Criminal Search	JDP searches criminal records at the federal level held at one of the US District Courts. Each state houses one or more federal judicial districts and in each district, there is a federal court. Criminal records at the Federal level are acts that have been made criminal by federal law, and include tax evasion, instate transportation of illegal substances, interstate kidnapping, crimes involving federally insured institutions as examples.
Statewide Criminal Search	JDP searches Felony and/or Misdemeanor criminal records, based upon provided identifiers, that are readily available at a specific central criminal repository for selected states where available. Statewide information is often updated from local law enforcement agencies or courts and may not be inclusive of all criminal information.
National Sex Offender Records Search	The JDP National Sex Offender Records Search, searches all sources included in the Department of Justice Sex Offender Registry, including all 50 States, Washington DC, US Territories and Native American Tribe registries listings of registered sex offenders.

Civil Records Search	Provides information consisting of civil filings. May include dollar amount, plaintiff, defendant, cause of action, disposition, case number, file date, divorces, domestic or family law, child support actions, etc.
Federal Civil Records Search	Searches the record of civil suits where the applicant was either a plaintiff or defendant. It usually reveals the nature of the complaint, status of the suit, date of filing, names of plaintiffs and defendants and whether or not a judgement was entered and for whom.

Social Media	
AI Social Media Report	A powerful FCRA compliant report driven by artificial intelligence, machine learning, image recognition and natural language processing that abides by all applicable local, state and federal regulations. The report highlights online behaviors that are relevant to your organization found on social media, web results and online databases.

MOTOR VEHICLE RECORD REPORTING

Although each driving report will vary in content, an MVR Report may include the following types of information (if available and located by JDP):

1. Validity of the license
2. Endorsements
3. Restrictions
4. Accidents
5. Suspensions

JDP cannot report driving record information that exceeds seven years. However, the exact amount of information JDP can locate and make available varies based on the state DMV practices.

CREDIT HISTORY REPORTING

JDP offers its clients access to credit reports generated by one of the third-party credit bureaus. This section is designed to provide clients with general information regarding credit searches.

Although each credit report will vary in content, they may include the following types of information:

1. Subject Name
2. Previous Addresses
3. Partial SSN
4. File Dates
5. Account Types
6. Collections activities
7. Current/previous negative accounts
8. High credit/credit limit/balance/past due/monthly payment

Note: Employment-related credit reports do not include credit scores.

Due to limitations under federal reporting laws, credit reports will only include negative information within a seven-year time period. Anything older than seven years will not be included in a credit report.

In order to access credit reports, clients must first complete additional paperwork and facilitate an on-site inspection.

DRUG TESTING REPORTING

Lab-based Urine Drug Screen	Collection, Lab, and MRO. One of the most common screening methods, is an accurate and reliable way to detect drug use that occurred within the past 72 hours. Testing is performed at Substance Abuse and Mental Health Services Administration (SAMHSA) certified laboratories. JDP offers a variety of drug test panels and cutoff levels in addition to the federally mandated SAMHSA / U.S. Department of Transportation (DOT) 5-drug panel.
Lab Based Urine Drug Screen - In Network 5-10 Panel (verify 5, 7, 9 or 10 panel)	Includes collection, lab, and MRO services along with online scheduling for this lab based drug screening. In network drug screening requires site match to investigate availability for in network locations.
Lab Based Urine Drug Screen - Out of Network 5-10 Panel (verify 5, 7, 9 or 10 panel)	Includes collection, lab, and MRO services along with online scheduling for this lab based drug screening. Out of network drug screening requires site match to investigate availability prior to pricing being offered.
Lab-based Hair Follicle Drug Screen	Collection, Lab, and MRO. Hair testing analyzes for drugs within the hair shaft, rather than body fluids like urine or saliva, to determine whether drugs of abuse are present. Compared to analysis of body fluids, hair testing is highly resistant to evasion by adulterating or substituting samples, or by simply abstaining from drug use for a few days.
Instant Testing Drug Screens	JDP offers a variety of instant drug screening devices either with self collect urine or saliva. Many different panels and products are available. Please consult the operations team to determine the best possible solution. JDP recommends lab testing of non-negatives and has this service available.
Self Collection - Lab Based Testing Drug Screen	JDP offers a variety of self collection drug screening devices either with self collect urine or saliva to be sent to a lab by the client. Kits include the device and shipping supplies to send the sample to the appropriate lab. Many different panels and products are available. Please consult the operations team to determine the best possible solution.
Breath Alcohol Testing	Clinic administered, breath test for alcohol. Provides specific level of alcohol present.

- 5-panel testing includes tests for: Amphetamines, Cocaine, Marijuana, Opiates, and Phencyclidine (PCP).
- 7-panel testing includes tests for: Amphetamines, Barbiturates, Benzodiazepines, Cocaine, Marijuana, Opiates, and Phencyclidine (PCP).
- 9-panel testing includes tests for: Amphetamines, Barbiturates, Benzodiazepines, Cocaine, Marijuana, Methadone, Opiates, Phencyclidine (PCP), and Propoxyphene.
- 10-panel testing includes tests for: Amphetamines, Barbiturates, Benzodiazepines, Cocaine, Marijuana, Methadone, Methaqualone, Opiates, Phencyclidine (PCP), and Propoxyphene.

All initial positive test results will be reviewed by an MRO (Medical Review Officer). If an MRO determines the presence of any of the drugs in the panel is attributable to a prescription, a positive test will not be returned to the client. The MRO will reach out to the tester to confirm any additional prescriptions prior to releasing the report.

HEALTH SCREENING

Hepatitis B Vaccine	The vaccine is used to prevent from an infection with the hepatitis B virus. This immunization vaccine is administered in a series of three vaccines with the second dose given 4 weeks after the first and the third dose 5 months after the second.
Hep B Titers	The Hep B titer is used to verify immunity to Hepatitis B.
MMR Titer	MMR stands for Measles, Mumps and Rubella (German Measles). The MMR Titer is a blood test that checks if you are immune to Measles, Mumps and Rubella.
MMR Vaccine	The MMR vaccine is an immunization shot against measles, mumps and rubella (German measles).
PPD	Tuberculosis Skin Test (PPD): Skin test used to determine if someone has developed an immune response to the bacterium that causes Tuberculosis.
QuantiFERON Gold TB	The QuantiFERON-TB Gold test (QFT-G) is a whole-blood test for use as an aid in diagnosing Mycobacterium tuberculosis infection, including latent tuberculosis infection (LTBI) and tuberculosis (TB) disease.
TDAP Vaccine	Tdap vaccine can protect adolescents and adults from tetanus, diphtheria, and pertussis. A single dose of Tdap is routinely given at age 11 or 12. Individuals who did not get Tdap at that age should get it as soon as possible. Tdap is very important for health care professionals anyone having contact with infants to 12 months.
T-Spot	The T-SPOT.TB test is a blood test for tuberculosis (TB) screening performed in one visit, using one blood collection tube. The T-SPOT.TB test is an in vitro diagnostic test for the detection of effector T cells that have been specifically activated by Mycobacterium tuberculosis antigens and is intended for use as an aid in the diagnosis of Mycobacterium tuberculosis infection (both latent and active disease).
Varicella Titer	The Varicella Titer, also known as the Varicella Zoster Titer and VZV Titer, is a blood test that checks if your immune to Varicella. The Varicella titer antibody level helps assess whether your immune system can respond to an infection with this disease.
Varicella Vaccine	The varicella vaccine protects against the viral disease commonly known as chickenpox, Herpes zoster, and Postherpetic neuralgia.
Chest X-Ray	A positive TB skin test or TB blood test only tells that a person has been infected with TB bacteria. It does not tell whether the person has latent TB infection (LTBI) or has progressed to TB disease. Other tests, such as a chest x-ray, are needed to see whether the person has TB disease.
Respirator Mask Fit Test	There are two types of fit tests: qualitative and quantitative. Qualitative fit testing is a pass/fail test method that uses your sense of taste or smell, or your reaction to an irritant in order to detect leakage into the respirator facepiece. Qualitative fit testing does not measure the actual amount of leakage. The OSHA Respirator Medical Evaluation Questionnaire is designed to identify general medical conditions that could place a worker at risk of serious medical consequences, if a respirator is used. Sometimes a physical is required if specific questions are answered with a 'Yes' response.
Color Blind Test	A color blind test is a device your eye doctor uses to determine if you have a color vision deficiency, commonly known as color blindness.

Physicals	An exam conducted by a physician to determine the applicant's ability to perform work related duties.

VERIFICATIONS

EDUCATION VERIFICATIONS

JDP will endeavor to verify certificates, diplomas, degrees, and dates of attendance at one or more schools selected by the client. If a client makes separate contractual arrangements with JDP, JDP may also attempt to verify other information. JDP will make a minimum of three attempts on each verification. JDP does not guarantee that it will be able to obtain information in all areas requested by the client. A verification will be considered complete if at least three attempts have been made by JDP.

EMPLOYMENT VERIFICATIONS

JDP will endeavor to verify an individual's dates of employment and job title. If a client makes separate contractual arrangements with JDP, JDP may also attempt to verify certain other information. JDP will make a minimum of three attempts on each verification. JDP does not guarantee that it will be able to obtain information in all areas requested by the client. A verification will be considered complete if at least three attempts have been made by JDP.

LICENSE VERIFICATIONS

JDP will endeavor to verify a consumer's professional license. Although each licensing verification report will vary in content, it will typically include the following types of information (if available and located by JDP):

1. Current status Of license (Active, Expired, Lapsed, Valid)
2. Type Of license
3. License number
4. Any licensure actions within the last seven years or pending actions

REFERENCE CHECKS

JDP will contact one or more references provided by the subject of the report. References will be contacted and standard questions will be asked of each reference.

Standard Questions include:

1. How long have you known the applicant?
2. What was the applicant's job and the nature of his/her duties?
3. When he/she begins a task, would you say that he/she carries it through to completion?
4. What would you say is his/her greatest strength?
5. What could he/she do to improve their job performance?
6. How did he/she show initiative or leadership in his/her job?

7. Is he/she dependable?
8. How did he/she get along with his/her Associates?
9. In your opinion, has he/she ever shown a propensity for violence or dishonesty in the workforce?
10. In your opinion, if you were responsible for the hiring process, would you consider him/her eligible for rehire?

JDP will make a minimum of three attempts as to each reference. JDP cannot guarantee that it will be able to obtain substantive responses from references in all instances. A reference check will be considered complete if at least three attempts have been made by JDP. Reference questions that are outside of the standard, can be discussed with JDP and will be addressed within contract.

INTERNATIONAL

International Criminal Records Search - Country Dependent:

Provides a translated report of available criminal history derived from credible, officially maintained sources within the country. This information is obtained primarily from local courts, national police forces, and law enforcement authorities. International criminal search cost and availability varies by country and region.

International ID Search:

International search that confirms a candidate's identification. International ID Search cost and availability varies by country and region.

International Employment Verification:

International search that confirms the candidate's employment history. Each employer will be charged an la carte rate. International Employment Verification search cost and availability varies by country and region.

International Education Verification:

International search that confirms the candidate's education history. Each education institute will be charged by a la carte rate. International Education Verification search cost and availability varies by country and region.

International Reference (Professional/ Personal) Verification:

International search that contact's the candidate's professional or personal reference. Each reference will be charged by a la carte rate. International Reference Verification search cost and availability varies by country and region.

HEALTHCARE

JDP Healthcare Sanctions Search:

The JDP Healthcare Sanctions Search includes OIG, SAM and other Federal exclusion data. Additionally includes state Medicaid exclusion data on both individuals and organizations. This search provides the Medicaid exclusion information required for state compliance. This search provides compliance for both the Federal and state levels.

JDP Healthcare Sanctions Search Plus:

The JDP Healthcare Sanctions Plus Search includes the best practice requirements recommended for compliance by the U.S. Department of Health & Human Services, OIG, SAM and more. The JDP Healthcare Sanctions Plus Search includes all information found in the JDP Healthcare Sanctions Search plus board action data for Medical Doctors, Nurses, and other licensed medical professionals, including state abuse registries where available.

FACIS(TM) Level IM:

Fraud and Abuse Control Information System. A current and historical database of sanctions, exclusions, debarments and disciplinary actions for all provider types at federal and state levels.

* General Services Administration (GSA)
* Office of the Inspector General (OIG)
* Food and Drug Administration (FDA)
* Drug Enforcement Administration (DEA)
* TriCare
* Other state and federal agencies

FACISTM Level 1M is all federal level data (all that is contained in a FACISTM Level 1) and all state level FHEP related data. This includes information such as state offices of the Med- icaid Inspector General or equivalent (33 states), state's Attorneys General, the Medicaid task force ("HEAT") content and any state level contractor or procurement debarment data.

FACIS(TM) Level 3:

Fraud and Abuse Control Information System. A current and historical database of sanctions, exclusions, debarments and disciplinary actions for all provider types at federal and state levels.

* General Services Administration (GSA)
* Office of the Inspector General (OIG)
* Food and Drug Administration (FDA)
* Drug Enforcement Administration (DEA)
* TriCare
* Other state and federal agencies

FACISTM Level 3 is all federal level data (all that is contained in a FACISTM Level 1), all state level FHEP related data (all that is contained in FACISTM Level 1M) and all state disciplinary findings from every

publishing jurisdiction in the United States from all publishing disciplinary and licensing boards for all published professions within those jurisdictions. Over 2,000 sources.

OIG:

Searches OIG for records with appended screenshot in candidate profile for auditing purposes. Office of Inspector General's (OIG) mission is to protect the integrity of Department of Health and Human Services (HHS) programs as well as the health and welfare of program beneficiaries.

SAM:

Searches System for Award Management for records with appended screenshot in candidate profile for auditing purposes. SAM is the portal to register to do business with the US Government and check the state of an entity registration, this search includes entities and individuals that have exclusion records.

National Abuse Registry:

National Abuse Registry (NAR): The National Abuse Registry is both an aggregated database of abuse registry records from public sources (28) and an online single search portal for those data sets that are not published. An online single search is the only means to obtain a potential result (this requires a state-by-state search) in 26 jurisdic- tions. Abuse data is collected at the state level on individuals against whom complaints, investigations or adverse actions have been taken for physical, mental or financial abuse of patients, adults, the disabled (physical and developmental) and/or the elderly.

EMPLOYMENT ELIGIBILITY

I-9 Verification:

The I-9 Form is required to be completed for all employees in the United States hired after November 6, 1986. Though it appears to be a simple form, we have found that over 50% of employer I-9 Forms contain errors – that's why we created an error-detecting electronic I-9.
Our online I-9 incorporates hundreds of business rules associated with the completion of the Form into a simple web-based I-9 Form that can be accessed by anyone with an Internet connection. It allows for simple management of the I-9 process regardless of how many employees or locations you have. Everyone in your organization can do it quickly and correctly the first time around - and you can manage it all.
Why Should You Use Our Electronic I-9?
* Your I-9s will be complete and correct.
* Your I-9s will be organized and searchable.
* You can centrally manage all records at every location.
* Never lose a paper document again.
* Automated expiring document alerts.
Simple one click E-Verify submission directly from the I-9.

E-Verify:

You no longer have to go through the time consuming process of manually submitting E-Verify requests through the government site – now you can E-Verify an employee with one click of a button from the electronic I-9. We have simplified the process and provided you with the ability to manage all of your E-Verify records at every location.

Why Should You Use Our E-Verify Solution?

* Faster than using the government's site directly.
* Centralized management for all E-Verify records at every location.
* Simple E-Verify submission directly from the Form I-9.
* Comprehensive reporting of all records at all locations.
* Better management and reporting than accessing the government's site directly.

E-Verify is an Internet-based system that allows an employer, using information report- ed on an employee's Form I-9, to determine if an employee has the right to work in the United States. It is mandatory for employers with federal contracts or subcontracts that contain the Federal Acquisition Regulation (FAR) E-Verify clause and employers in certain states.

While E-Verify is currently voluntary for all other employers, increasing state and federal regulations are clearly pointing toward E-Verify being required for all U.S. employers in the near future. It is the best option for employers to ensure that they have a workforce that is legally able to work in the U.S.

Disclosures, Forms & Other Services

Pre Adverse Action	There are two notice requirements under the FCRA. First, Section 604 of the FCRA requires that employers provide to the consumer, before taking any adverse action based on a consumer report, a copy of the report and a summary of consumer's rights under the FCRA. This is referred to as the Pre- Adverse Action letter, since it must be sent before the adverse action is taken. In other words, if an employer has a report and believes that the information contained in the report may impact the hiring decision, then at that time the employer must send the Pre-Adverse Action letter.
Adverse Action	The second notice must be sent after the employer takes adverse action. In the Adverse Action letter (the second notice) the employer must notify the consumer of the fact that adverse action has been taken based on a consumer report, and include in that disclosure the following: (1) the name, address, and phone number of the consumer reporting agency that furnished the report, (2) a statement that the consumer reporting agency did not decide to take the adverse action and is unable to provide the consumer with specific reasons for the action, (3) a notice of a consumer's rights to obtain another free copy of his or her report from the consumer reporting agency within 60 days, and (4) the individual has the right to dispute the accuracy or completeness of any information in the report." FCRA §615

Scoring / Grading	Client provides detailed matrix, along with detailed instructions for use and JDP will utilize to convey the client determined decision.

PRE-INVESTIGATIVE TOOLS (NOT INCLUDED IN REPORTS)

SOCIAL SECURITY ADDRESS LOCATOR TOOL

JDP's social security address locator tool is a research tool that can find possible: alias names, mailing addresses, and other personally identifiable information associated with the subject of the report. The information gathered from a social security address locator tool can help JDP to identify additional jurisdictions in which to conduct criminal background checks and also ensure that a greater number of potentially meaningful records are associated with the subject of a report. Note that social security address locator information is compiled credit header information only and from millions of non-validated sources, so only credible names and addresses will be included. Note that social security address locator tool results are NOT returned to clients within consumer reports or otherwise. They are solely used behind-the-scenes by JDP to provide a more robust investigation for clients.

JDP may utilize this information to develop possible: address history including possible dates of residence and alternate names associated with an individual.

This tool is not a validator of name, date of birth, aliases, social security issuance or validation, addresses or other information. Identity verification tools should be used to support maximum accuracy related to social security number validity and accuracy of name and date of birth provided.

vID ASSESSMENTS

vID is a technology-based assessment that can be ordered solely as a preliminary tool to analyze whether certain personal identifiers supplied by the subject of the background investigation, and used to facilitate a background check, are accurate or need to be double-checked with the subject of the background investigation. In the event that vID is unable to confirm the accuracy of certain identifiers supplied by the subject of the background investigation, the background investigation shall be halted until the client can validate the correct personal identifiers with the subject of the background investigation. In such a scenario, JDP shall not proceed with preparing a consumer report about the individual in question unless and until the client places a new order with JDP. Clients may not use any feedback from the vID process in any employment decision or for any other purpose covered by the Fair Credit Reporting Act.