



Brandeis University

Verifying Identity in Consumer Reports

Policy Statement

Brandeis University is committed to the prevention of identity theft. In furtherance of this commitment and in accordance with rules published by the Federal Trade Commission regarding the duties of users of consumer reports, this Policy sets forth procedures for verifying the identity of an individual when the University receives a notice of address discrepancy from a consumer reporting agency.

Applicability

This Policy applies to any individual for whom Brandeis receives a consumer report. The term "consumer report" means any written, oral, or other communication of any information by a consumer reporting agency bearing on a consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living, which is used by the University in making an employment decision or a decision to extend credit. Consumer reports include credit rating analyses and criminal background checks.

Guidelines

When a supervisor or other authorized individual receives a notice of address discrepancy from a consumer reporting agency regarding a consumer report, the supervisor must take steps to reasonably confirm that the consumer report relates to the individual about whom the supervisor requested the report. This may be done by:

1. Comparing the information in the consumer report provided by the consumer reporting agency with information the University:
 - A. Obtains and uses to verify the individual's identity in its normal course of business;
 - B. Maintains in its records, such as applications, change of address notifications, or other account records; or
 - C. Obtains from third-party sources; or
2. Verifying the information in the consumer report provided by the consumer reporting agency with the subject individual.

In the event that the supervisor is able to reasonably confirm that the consumer report relates to the subject individual, he/she must take steps to reasonably confirm the correct address for the individual. This may be done by:

1. Verifying the address with the individual about whom he/she has requested the report;
2. Reviewing the University's records to verify the address of the individual; or
3. Verifying the address through third-party sources.

In the event that the supervisor is able to reasonably confirm the correct address for the individual, such manager shall report that address to the consumer reporting agency that furnished the original consumer report.

This policy is for general guidance only. It does not create an employment contract or any right to continued employment at Brandeis University. Brandeis University reserves the right to modify, revoke, suspend, terminate and/or change any and all policies and procedures at any time, with or without notice.

Office of Human Resources
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