

Harvard University Pre-Employment Screening Checklist

Job Title _____

Req. number _____

Identity

Required for all new hires

- Consists of an active Social Security Number and address verification
- Validates an association between an individual, his/her SSN#, and recent address(es)

In certain cases, additional screens are required. Please review and check any boxes that apply to this job.

Education

Does this position:

- Require a particular degree (e.g., Bachelor's degree, Master's degree, Ph.D.) or other educational credential as a basic qualification, as identified in the job posting.

Criminal

Will the employee:

- Have unsupervised access to dorms or other residential housing, valuable artifacts, significant amounts of cash, drugs, radiological materials, or animal care facilities;
- Serve as a "Responsible Adult" as defined by Harvard's Policy for the Safety & Protection of Minors (See <http://youthprotection.harvard.edu/>);¹
- Have the ability to disrupt or disable highly sensitive or confidential data or systems, including core infrastructure systems. Such positions include those with responsibility for information security and/or database or storage administration, or access to network routers, switches, servers and/or management systems (e.g. LANDesk);
- Have access to aggregate credit card data² and/or High Risk Confidential Information (HRCI)³, as defined in Harvard's Information Security Policy, or other data classified as Level 4 or Level 5 information (See <http://policy.security.harvard.edu/view-data-security-level>).

- Have the ability to authorize and/or approve financial transactions of \$50,000 or more.
- Any other position for which a criminal record check is job related and consistent with business necessity, i.e., there is a demonstrable relationship between criminal conduct and the risks inherent in the duties of the particular position and circumstances under which the job is performed (e.g., level of supervision, interaction with vulnerable individuals).

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1. Note that after initial screening, the Minors Policy requires that Responsible Adults be rescreened at least every three years.
 2. This requirement does not apply to positions where the employee will have access to only one credit card number at a time while processing a transaction, and then no longer has access to the card number.
 3. High Risk Confidential Information (HRCI) means an individual's name together with any of the following data about that individual: social security number, bank or other financial account numbers, credit or debit card numbers, driver's license number, passport number, other government-issued ID numbers, biometric data, health and medical information, or data about the individual obtained through a research project.

Credit (*provides a detailed report of an individual's credit history as prepared by a credit bureau*)
Will the employee:

- Have access to aggregate credit card data (as defined in footnote 2)
- Have the ability to authorize and/or approve transactions of \$50,000 or more.

(NOTE: Covered Positions that require a credit record check also require a criminal record check.)

License Verification

Does this position require a specific license?

- Yes. Please specify required license (drivers, professional or technical) _____
- No






Drug Screening




Does this position:

- Require a commercial driver's license, as required by U.S. Department of Transportation regulations.

*If you have any questions, please contact your FAS Recruitment Services Consultant.
Please return this form to FAS Recruitment Services recruitment@fas.harvard.edu*

Harvard Information Security Policy - Data Security Levels

<p style="text-align: center;"><u>Level 1</u></p> <p style="text-align: center;">Directory Information</p>	<p>Public information</p> <p>Information that is considered public.</p> <p>Examples:</p> <ul style="list-style-type: none"> • Research data that has been de-identified in accordance with applicable rules; • Published research data; published information about the University; • Course catalogs; • Directory information about students who have not requested a FERPA block; • Faculty and staff directory information.
<p style="text-align: center;"><u>Level 2</u></p> <div style="text-align: center;">  <p>Unpublished Intellectual Property</p> </div> <div style="text-align: center; margin-top: 20px;">  <p>Maps and Building Layouts</p> </div>	<p>Level 2 is information the University has chosen to keep confidential but the disclosure of which would not cause material harm.</p> <p>Level 2 information includes unpublished research work and intellectual property not in Level 3 or 4. Level 2 also includes information classified as Level 2 by an Institutional Review Board (IRB).</p> <p>Examples:</p> <ul style="list-style-type: none"> • Patent applications and work papers • Drafts of research papers • Building plans • Information about the University physical plant <p>Level 2 Requirements View detailed requirements for users, devices, servers, and paper records.</p>
<p style="text-align: center;"><u>Level 3</u></p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Harvard ID (HUID)</p> </div> <div style="text-align: center;">  <p>University Financial Information</p> </div> <div style="text-align: center;">  <p>Student Information</p> </div> </div>	<p>Level 3 information could cause risk of material harm to individuals or the University if disclosed.</p> <p>Level 3 information includes individually identifiable information which if disclosed could reasonably be expected to be damaging to reputation or to cause legal liability. Level 3 also includes research information classified as Level 3 by an Institutional Review Board (IRB).</p> <p>Examples:</p>

	<ul style="list-style-type: none"> • Information protected by the Family Educational Rights and Privacy Act (FERPA), to the extent such information is not covered under Level 4, including non-directory student information and directory information about students who have requested a FERPA block • HUIDs when associated with names or any other information that could identify individuals; • Harvard personnel records • Harvard institutional financial records • Individual donor information • Other personal information protected under state, federal and foreign privacy laws and not classified in Level 4 or 5 <p>Data use agreements, research consent forms and other contracts under which Harvard personnel receive confidential information from outside parties often state specific data use and protection requirements. Harvard personnel working with such information must comply with such requirements. Use of such information must also comply with the applicable Harvard data security requirements if the contract calls for lesser levels of protection than the Harvard rules.</p> <p><i>Harvard's Confidential Information policy does not restrict or limit the rights of employees to discuss terms and conditions of their employment, including salary and benefits, with each other or with third parties.</i></p> <p>Level 3 Requirements View detailed requirements for users, devices, servers, paper records, and working with vendors.</p>
<p style="text-align: center;"><u>Level 4</u></p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Credit Card Numbers</p> </div> <div style="text-align: center;">  <p>Social Security Numbers</p> </div> <div style="text-align: center;">  <p>Personally Identifiable Genetic Information</p> </div> </div>	<p>Level 4 information would likely cause serious harm to individuals or the University if disclosed.</p> <p>Level 4 information includes High Risk Confidential Information (HRCI), as defined below, and research information classified as Level 4 by an Institutional Review Board (IRB). Level 4 also includes other individually identifiable information which if disclosed would likely cause risk of serious social, psychological, reputational, financial, legal or other harm to an individual or group.</p> <p>“High Risk Confidential Information” means an individual’s name together with any of the following data about that individual: social security number, bank or other financial account numbers, credit or debit card numbers, driver’s license number, passport number, other government-issued identification numbers, biometric data, health and medical information, or data</p>



Personally Identifiable Healthcare Information



Human Research Data



Student Financial Information

about the individual obtained through a research project.

Examples:

- Individually identifiable financial or medical information
- Information commonly used to establish identity that is protected by state, federal or foreign privacy laws and regulations, such as Massachusetts law protecting personal information, and not classified in Level 5
- Individually identifiable genetic information that is not in Level 5
- National security information (subject to specific government requirements)
- Passwords and PINs that can be used to access confidential information.

* Note on Medical Records and HIPAA: Harvard units or programs that are so-called "covered entities" under the Health Insurance Portability and Accountability Act (HIPAA) must comply with HIPAA's data security rules. As of the effective date of this policy, the covered entities are University Health Services, Harvard Dental Services, and certain University benefits plans. Other units or programs may be required to comply with HIPAA data security rules for limited purposes under the terms of specific contracts, such as a business associate agreement. See [HIPAA Advisory](#).

Level 4 Requirements

View detailed requirements [for users](#), [servers](#), [paper records](#), and [vendors](#).

Level 5

Level 5 information would cause severe harm to individuals or the University if disclosed.

Level 5 information includes individually identifiable information which if disclosed would create risk of criminal liability, loss of insurability or employability, or severe social, psychological, reputational, financial or other harm to an individual or group.

Level 5 includes research information classified as Level 5 by an Institutional Review Board (IRB).

Examples:

- Information covered by a regulation or agreement that requires that data be stored or processed in a high security environment and on a computer not connected to the Harvard data networks
- Information required to be handled in the same manner as the University's most sensitive data

- Certain individually identifiable medical records and identifiable genetic information categorized as extremely sensitive

Note: Due to the unique level of risk associated with Level 5, special precautions are required. Download the standalone set of [Level 5 Requirements](#).