

COMMERCIAL INVESTIGATIONS LLC

# CI TIMES



## PRIMARY SOURCE VERIFICATION

Conducting criminal record searches is a large part of the Background Investigations services that Commercial Investigations LLC offers. As a “consumer reporting agency” under the Fair Credit Reporting Act (FCRA), Commercial Investigations LLC provides its clients with compliance assistance. Most importantly Commercial Investigations LLC (CI) conducts its operations with the best compliance processes.

One of the least understood compliance initiatives CI undertakes stems from section 613 of the FCRA. This section gives background screening companies a choice when it comes to how they will handle the reporting of certain information about a subject. Such certain information being public record (e.g. a criminal record), of which the information is likely to have an adverse bearing on employment sought by the subject. The two choices for compliance are referred to in the background screening industry as “simultaneous notice” and “primary source verification”.

The simultaneous notice option allows for the reporting of such information to the user (employer), if at the same time the information is reported to the subject. What this ultimately means is that the information found in a criminal record database is not validated, it is relayed to both the user and subject at the same time regardless of accuracy. This process is undertaken by the large data brokers in the background screening industry. Imagine being John Smith and having a national sex offender registry search run on you. Then the results being relayed with out further verification of other identifiers besides name match. And, with no verification of the information through the primary source of the information (e.g. the county court).

The primary source verification option allows for the reporting of such information to the user (employer) once the background screening company follows procedures to make sure the information that will be reported is complete and up to date. What this ultimately means is that information found is

compared to the subject against all available identifiers (e.g. date of birth, Social Security Number, address, etc.). Those matches are then researched again at the primary source of the data (e.g. the county court that actually heard the criminal case). So, if you’re John Smith and had a number of name matches in the national sex offender registry, with primary source verification additional identifiers in the database are compared to the subject’s and any matches are researched again at the primary source of the data (e.g. the state or local sex offender registry).

CI complies with section 613 by applying the primary source verification option. This part of our compliance processes closely follows our main differentiator — background investigations with human intervention and an investigative approach. Because of all the different ways identifiers are relayed in the various data searches of a background investigation, human intervention is absolutely necessary to make a positive correlation between the subject and the person the data ultimately relates to. Our investigative approach is looking at data from many angles and through many searches. Thus, the reevaluating of data found from one source with the primary source makes sense to CI.

Another differentiator of CI is that we will not jeopardize quality for turnaround time. With simultaneous notice turnaround time is quick and not affected because there is no additional verification or research. With primary source verification there will be a slight delay while the information is validated and re-verified.

CI’s clients don’t have to conduct additional research on their own after getting an adverse report. CI makes positive identification and obtains the primary source results for adverse data. This is a great example of the added value of utilizing CI’s background investigations services.

To learn more about primary source verification and CI’s compliance processes contact a CI Representative at 800-284-0906 or [info@commercialinvestigationllc.com](mailto:info@commercialinvestigationllc.com).

### INSIDE THIS ISSUE:

<b>PRIMARY SOURCE VERIFICATION</b>	<b>1</b>
<b>CLIENT CLUE: ONLINE CONSENT FORM</b>	<b>1</b>
<b>DUE DILIGENCE: ACADEMY FOR EXCELLENCE WORTHY?</b>	<b>2</b>
<b>MEET DUE DILIGENCE: LAST “SCENE” FROM DUE</b>	<b>2</b>
<b>CAPITAL EAP PARTNERSHIP</b>	<b>3</b>
<b>INQUIRY SPOTLIGHT: FEDERAL CRIMINAL</b>	<b>3</b>

## CLIENT CLUE

### Online Consent Form

Quietly in 2011 CI launched its online consent form as part of its employment screening solutions and volunteer screening solutions. We are proud to have released it from beta this month.

Our online consent form allows subjects to complete their consent form online. The information entered by the subject is imported into Clware. Our clients can then initiate the background investigations with a few clicks and no data entry.

Our Volunteer Screening Solutions also contains the online consent form. Along with that there is an option for our clients to have the subjects actually pay for their own background investigation via credit card charge.

We greatly encourage our clients and anyone else interested to reach out to us for more information. So, to learn more and see a demo, please contact Commercial Investigations LLC today at 800-284-0906 or [info@commercialinvestigationllc.com](mailto:info@commercialinvestigationllc.com).

## DUE DILIGENCE: ACADEMY FOR EXCELLENCE WORTHY?

It's been awhile since we last encountered Due Diligence as he's been laying low since he was denied a position with Tech Valley Medical Center. Due appeared to be a great prospective employee. He seemed to have the charisma and vision to turn the hospital into a world class organization. However, once CI conducted a Full Due Diligence Background Investigation they learned some things about Due's character and history that was very troubling. The report revealed that he was a career criminal with a fraudulent degree from Purdue University and his credit history was very concerning. In the end, the Board of Directors at Tech Valley Medical Center found a more qualified and honest candidate and Due Diligence, once again, returned to square one in his job search.

Due was fascinated with the Board of Directors at Tech Valley Medical Center. He decided he would turn his attention to working for non-profit organizations and specifically, get hired on the Board of Directors. Thus, The Wind Beneath My Wings Academy For Excellence, entered his sights. Due saw it as a tremendous opportunity to get some experience in leadership on his resume and he was granted an interview. Due interviewed well and he laid out a 21<sup>st</sup> century view on how the Academy could update it's IT department. The Academy for Excellence decided that Due was up to the position. The Academy conducts its background checks through Bargain Basement Backgrounds Incorporated, a national data broker. Unfortunately, The Academy received a sub-par background check consisting of a national criminal search only. The Academy went on to appoint Due to The Board of Directors.

Had the Wind Beneath My Wings Academy for Excellence contacted CI for its background investigations services, CI would have assisted in developing a thorough background investigation policy to prevent criminals like Due from slipping through the cracks. The Wind Beneath My Wings Academy For Excellence would have learned about Due's extensive criminal history through utilizing inquiries like Origin, Cursory Indicator New York, County Criminal, Statewide Criminal, and Federal Criminal inquiries. Furthermore, CI would have underlined the importance of the Federal Criminal inquiry. An important inquiry containing federal offenses that are not found through State and County record searches. The Wind Beneath My Wings Academy would have discovered that Due Diligence was under the supervision of the US Marshall for 24 Months for the Possession of Narcotics. Regrettably, The Wind Beneath My Wings Academy For Excellence was not using CI and appointed Due for a Board of Directors position he was not qualified to hold.

What will Due do now that he's found employment? Check in with us in our next edition for more on Due Diligence and his deceitful ways.

Also, check in with Due at [www.commercialinvestigationllc.com/duespage.html](http://www.commercialinvestigationllc.com/duespage.html) to see if he's finally able to evade Commercial Investigations LLC!

For more information on our Full Due Diligence report, please contact CI at 800-284-0906 or [info@commercialinvestigationllc.com](mailto:info@commercialinvestigationllc.com).

*To Be Continued . . .*



### MEET DUE DILIGENCE

#### Last "Scene" from Due

In Due's last appearance, we learned that Due turned his attention to the elite employment website The Shoots & Ladders; an site catering to \$100K jobs. Because of Due's finesse and personality, he was able to get his resume forwarded to Tech Valley Medical Center for the CFO position.

The Board of Directors at Tech Valley Medical Center was able to gain valuable insight pertaining to Due through CI's Full Due Diligence Background Investigation report which clearly shed light on the fact that Due could not handle the responsibilities that were necessary for the position.

In the current edition, we meet up with Due as he obtains employment thanks to a background check by Bargain Basement Backgrounds Incorporated. This data broker background check company only conducted a national criminal search. Had CI been used instead Due would still be unemployed.

To see Due's past reports, view his page online at: [www.commercialinvestigationllc.com/duespage](http://www.commercialinvestigationllc.com/duespage)

Read previous issues of CI Times to see the full details of Due's life at: [www.commercialinvestigationllc.com/Newsletter](http://www.commercialinvestigationllc.com/Newsletter).

## CAPITAL EAP PARTNERSHIP

Commercial Investigations LLC is pleased to announce its partnership with Capital EAP.

Since 1978 Capital EAP (a non-profit Employee Assistance Program) has been an important part of the business community, throughout the Capital Region, New York State, and throughout the country. Capital EAP offers businesses the opportunity to enhance the wellbeing of their employees and their families, thus increasing productivity and reducing healthcare costs. The US Department of Labor estimates that for every dollar a company invests in an EAP, the return on investment is \$6 - \$15. Capital EAP currently serves nearly 100 businesses and covers over 40,000 employees and their families.



programs to managers and employers. Among these are: formal supervisory referrals, traumatic incident management, trainings on Reasonable Suspicion, Department of Transportation compliance assistance, world-class compliance trainings, and work-skill enhancement workshops.

For the benefit of both employer and employee, Capital EAP has partnered with regional businesses to provide a variety of services at discounted rates, including: Commercial Investigations, Adirondack Health & Wellness, Excelsior College, Best Fitness, and e-Cornell.

There are four office locations in Albany, Schenectady, Clifton Park, and Saratoga Springs. Telephonic and web-based sessions are also available. For more information, contact Kathy Van Aken at 518-465-3813, ext. 109, or [kvanaken@capitaleap.org](mailto:kvanaken@capitaleap.org).

CI assists employers, volunteer organizations and others with protecting their clients, employees, and overall businesses through CI's Background Investigations. For more information visit our website at [www.commercialinvestigationsllc.com](http://www.commercialinvestigationsllc.com) or call us at 800-284-0906.

Capital EAP offers employees and their dependent family members professional counseling sessions that focus on issues that interfere with their productivity such as, relationship concerns, childcare, eldercare, legal issues, or financial issues to name a few. Professional development workshops are also included as well as an online resource library and monthly newsletters.

In addition to supportive counseling services, Capital EAP offers a variety of consulta-

## ∞ INQUIRY SPOTLIGHT ∞

### FEDERAL CRIMINAL

CI's FEDERAL CRIMINAL inquiry is a powerful search, generated for each name and address attributed to the subject based on our SSN & Address Information inquiry. Due to compliance standards, federal criminal searches are typically run for the past 7-10 years at the client's discretion. CI's FEDERAL CRIMINAL search is unique in that it employs additional verification elements via the subject's date of birth and social security number to eliminate false hits. False hits frequently occur when a subject has a common name.

A FEDERAL CRIMINAL inquiry is an important step for eliminating an employer's liability for negligent hiring. Federal criminal searches often reveal serious violations of federal law that state or county searches do not encompass. Examples of federal crimes include drug trafficking, embezzlement, carjacking, kidnapping and many crimes committed across state lines.

Please contact CI at 800-284-0906 or [info@commercialinvestigationsllc.com](mailto:info@commercialinvestigationsllc.com) for more information on CI's FEDERAL CRIMINAL inquiry, or to add this inquiry to your current requests.

## COMMERCIAL INVESTIGATIONS LLC

A LICENSED PRIVATE INVESTIGATIVE AGENCY

Providing the "Proactive Truth" in high quality Background Investigations through "Human Intervention with an Investigative Approach".

### BACKGROUND INVESTIGATIONS

CI provides accurate, timely, cost-effective and fully compliant reports delivered with exceptional client service.

New York State  
Department of Economic Development  
Certified  
Woman Owned Business Enterprise  
**(Certification # 49494)**

[www.commercialinvestigationsllc.com](http://www.commercialinvestigationsllc.com)

[info@commercialinvestigationsllc.com](mailto:info@commercialinvestigationsllc.com)

Cohoes NY & Harmony FL

Phone: 800-284-0906

Fax: 212-937-3858

This publication is designed to provide accurate and authoritative information with respect to the subject matters covered. It is distributed with the understanding that CI is not engaged in rendering accounting or legal services.