

# Security Guidelines for the Electricity Sector: Employment Background Screening

<b>NERC</b>	<b>Guideline</b>
<b>Guideline Title: Employment Background Screening</b>	<b>Version: 1.0</b>
Revision Date:	Effective Date: June 14, 2002

## **Purpose:**

Pre-employment background investigations mitigate the “insider” threat by assuring only trustworthy and reliable personnel have unescorted access to critical facilities. Effective pre-employment screening may prevent or deter negligent hiring, theft, and drug use at critical job locations.

Each company must assess the need for employment background screening within the context of its operating environment and subject to its own evaluation of its vulnerability and risk to its perceived spectrum of threats.

## **Applicability:**

This guideline applies to facilities and functions that are considered critical to the support of the electricity infrastructure and the overall operation of the individual company.

Each company is free to define and identify those facilities and functions it believes to be critical, keeping in mind that the ability to mitigate the loss of a facility through redundancies may make that facility less critical than others.

A critical facility may be defined as any facility or combination of facilities, if severely damaged or destroyed, would have a significant impact on the ability to serve large quantities of customers for an extended period of time, would have a detrimental impact to the reliability or operability of the energy grid, or would cause significant risk to public health and safety.

## **Guideline Statement:**

This guideline recommends “best practices” for the electricity sector in the area of “Employment Background Screening” for facilities or functions identified as critical.

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## Guideline Detail:

Depending on job classification or expected duties of the prospective employee, the background screening investigation process may consist of all or some of the following elements:

1. Verification of social security number;
2. Local-level criminal history check,
3. Residence/employment checks
4. Motor vehicle check or drivers license history;
5. Drug screening, and,
6. Verification of highest level of education or professional certifications, i.e., CPA, PE, etc.

It is the company's discretion as to the extent and breadth of the screening process; e.g. number of criminal checks, the historical periods covered, the number of former employers contacted, the number of personal references verified, etc. Consider developing several levels of background checks based on different time periods and amount of information to be verified.

Background screening programs typically fall into the following classifications:

- Full Employment Backgrounds – May consist of a comprehensive investigation including most of the aforementioned elements. This type of background screening should be considered for full time personnel working at or in direct support of critical facilities.
- Limited Employment Backgrounds – A less extensive investigation than a Full Employment Background, this type of screening includes elements such as criminal history and social security check. Limited background checks may be appropriate for summer and intern students, co-op employees, and independent contractors who work at or in direct support of identified critical facilities on a brief or intermittent basis.
- Leased / Contract Employment Backgrounds – Depending on specific duties, this type of screening may be less extensive than the Limited Employment Background. Lease / Contract backgrounds, however, may be required contractually with the vendor company.

## **Security Guidelines for the Electricity Sector: Employment Background Screening**

For applicants who are non-citizens or who have lived outside the country within the last five to seven years, full or limited background investigations may require international inquiries including education, criminal, and previous employer checks.

When conducting background investigations, all applicable federal and state laws such as the Fair Credit Reporting Act should be reviewed, understood, and complied with. Consideration should be given to conducting pre-employment screening for contractors and vendors who either work at or work in direct support of critical facilities. Alternatively, the company may require that employment agencies conduct background investigations for contract personnel using the same criteria the company uses for prospective employees. An audit of the employment agency screening processes may be included as part of the company's normal contract compliance program.

A key component of a good background investigation is a comprehensive employment application form. Willful omission, misrepresentation, or falsification of information on the employment application may be considered appropriate grounds for denying employment (or denying access to company facilities to contractors).

Each company should publish specific "disqualification criteria." Job applicants should be fully knowledgeable of the criteria that will be used to deny employment.

The questions on the application form as well as the disqualification criteria should be reviewed and approved by the Human Resources and Legal departments to assure that state and federal laws are properly complied with. (Consideration should be given to developing an audit process as a means of documenting compliance.)

Each company should designate the department or function responsible for pre-employment screening. Activities are typically conducted by or coordinated with the company's Security Department.

Background checks usually are not repeated once personnel are hired. Effective supervisor training, however, may be useful in detecting behavioral changes that may trigger a company to update an individual's background check. In addition further credible information could be received that might trigger an additional background investigation. Organizations may consider on-going programs to evaluate and ensure the trustworthiness and reliability of personnel.

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## Certified Products/Tools:

## Related Documents:

- Fair Credit Reporting Act as amended September 30, 1997.
- Security Guidelines for the Electricity Sector: Guideline Overview
- Security Guidelines for the Electricity Sector:
  - Vulnerability and Threat Assessment
  - Threat Response
  - Emergency Plans
  - Continuity of Business Processes
  - Communications
  - Physical Security
  - Cyber Security
  - Protecting Potentially Sensitive Information
- *An Approach to Action for the Electricity Sector, Version 1*, NERC, June 2001, <http://www.nerc.com>
- *Threat Alert Levels and Physical Response Guidelines*, NERC, November 2001, <http://www.nerc.com>
- *Threat Alert Levels and Cyber Response Guidelines*, NERC, March 2002, <http://www.nerc.com>

## Revision History:

Date	Version Number	Reason/Comments

Version 1.0  
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