

# Rescreening Checklist:

## What Every Employer Needs to Know

Use this checklist to evaluate and strengthen your post-hire screening strategy.

### 1. POLICY & COMPLIANCE

- ☒ Do you have a formal, documented screening and rescreening policy? Are employees made aware in your employee handbook that you screen and rescreen?
- ☒ Are you aware of industry-specific regulations that require periodic background checks (e.g., healthcare, education, financial services, gaming, transportation)?
- ☒ Are you staying compliant with Fair Credit Reporting Act (FCRA) requirements when conducting rescreens?
- ☒ If you are subject to industry-specific, state and/or federal level regulatory screening requirements, are they incorporated in your policies and procedures?
- ☒ Much like your screening program, does your rescreen program outline how you treat results?
- ☒ Does your policy require employees to disclose post-hire arrests or convictions? Is such a policy appropriate for your organization or required by regulation?
- ☒ Have you consulted legal counsel to ensure your rescreening policy is fair, consistent, and non-discriminatory?

### 2. RESCREENING FREQUENCY

- ☒ Are you conducting rescreens at regular intervals (e.g., annually, biennially)?
- ☒ Have you defined frequency based on role risk (e.g., finance, childcare, access to sensitive data)?
- ☒ Do you have a system to trigger rescreens at key milestones (e.g., promotions, new responsibilities)?
- ☒ Are you using continuous monitoring tools for high-risk or regulated positions?



### 3. WHAT TO INCLUDE IN A RESCREEN

Every rescreen program is different, and depending on your organization's risk mitigation strategy, your rescreening package may include fewer or more than what's listed below. The following are background checks that are typically included in a rescreening package.

- ☒ Criminal history searches (combinations of county, statewide, national, and or federal)
- ☒ Motor vehicle records (for driving roles)
- ☒ License or certification verification
- ☒ Drug screening (if applicable to your policy)
- ☒ Sex offender registry check (especially in youth- or elder-facing roles)
- ☒ Sanctions/Exclusion list checks (e.g., OIG, SAM databases for healthcare or government contractors)

### 4. COMMUNICATION & CONSENT

- ☒ Do you obtain employee consent prior to rescreening, as required by the FCRA and other applicable state laws? This is typically combined with consent for initial screening.
- ☒ Is your communication transparent and aligned with your employee policies?
- ☒ Do you explain to new hires during onboarding and via your employee handbook that rescreening is part of ongoing employment?
- ☒ Do you provide clear dispute instructions process if negative information is flagged in the background report?
- ☒ Do you follow the multi-step adverse action process outlined under the FCRA and applicable state laws if using negative results to make adverse decisions against employees? The FCRA applies not only to applicants but also to existing employees.

### 5. SYSTEMS & AUTOMATION

- ☒ Do you partner with a background screening provider who offers automated rescreening or monitoring?
- ☒ Are you notified when licenses expire or when compliance violations occur?
- ☒ Is your screening program integrated with your HRIS or ATS for ease of tracking?
- ☒ Are you using centralized dashboards or reporting to monitor completion rates and flags?

### BONUS: STRATEGIC QUESTIONS TO ASK

- ☒ Are there positions in your organization that require a more frequent review?
- ☒ Could continuous monitoring be an effective tool to supplement in-between regular rescreens?
- ☒ How do you document your screening decisions to support audits or investigations?
- ☒ Have you benchmarked your program against industry leaders?