

Cover Your Backside with the New FCRA Background Check Disclosure

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In the employment world, the only constant, is change. We constantly navigate a minefield of updated regulations, new state and federal guidance, and bombshell court opinions that impact our day-to-day work. And while a wave of ban the box legislation has impacted *when* or *if* we may request an applicant's criminal background records, our notice obligations under the Fair Credit Reporting Act ("FCRA") for a third-party criminal background check have remained largely unchanged. Until last week.

That's because the Consumer Financial Protection Bureau issued a new model ["A Summary of Your Rights Under the Fair Credit Reporting Act"](#) disclosure form document. The new form must be used by employers and background check companies starting September 21. Take time while implementing this new form to ensure your procedures comply with the FCRA and applicable state and federal laws affecting background checks.