



Adverse Action Procedures

If you decide to not hire an applicant, based in whole or in part on a consumer report provided by Castle Branch Inc., you will need to adhere to the following FCRA regulations.

STEP 1: PROVIDE YOUR APPLICANT WITH A COPY OF A PRE-ADVERSE ACTION DISCLOSURE.

If you decide not to hire someone based on the information provided in the consumer report, then you must first supply the applicant with a pre-adverse action disclosure (Form A). This disclosure must include a copy of the report and a copy of "A Summary of Your Rights under the FCRA" (604.b.3.A), before you take the adverse action.

If the applicant applies by mail, phone or electronically, within three (3) days of taking the adverse action, you must provide either in writing, orally or electronically that:

- I. A decision to not hire the applicant was based in whole or in part on a consumer report received from Castle Branch Inc.
- II. Provide Castle Branch contact information
- III. Explain that Castle Branch does not make hiring decisions and will be unable to provide specific reasons as to why the applicant was not hired
- IV. Lastly, the applicant may request a free copy of the report and may dispute with Castle Branch the accuracy or completeness of any information in the report (604.b.3.B). (see Form B)

STEP 2: PROVIDE YOUR APPLICANT WITH A NOTICE OF ADVERSE ACTION.

If you have decided not to hire someone who has applied in person based on the information provided in the consumer report and you have sent the pre-adverse action letter (Form A), then you must send an adverse action notification. The adverse action notification (Form B) must include the following information:

- I. A decision to not hire the applicant was based in whole or in part on a consumer report received from Castle Branch Inc.
- II. Provide Castle Branch contact information
- III. Explain that Castle Branch does not make hiring decisions and will be unable to provide specific reasons as to why the applicant was not hired
- IV. Lastly, the applicant may request a free copy of the report and may dispute with Castle Branch the accuracy or completeness of any information in the report (604.b.3).

FORM A
EXAMPLE OF PRE-ADVERSE ACTION LETTER

Date

Applicant Name
Applicant Address
City, State Zip

Dear Applicant,

Your application for employment with Company Name is currently being reviewed for disqualifying attributes. This process was initiated, in whole or in part, based on information provided by:

Castle Branch Inc.
P.O. Box 1699
Wilmington, NC 28402
(888) 723-4263

This letter is sent to you in compliance with the Fair Credit Reporting Act.

Please be advised that Castle Branch Inc. did not make the decision to take the adverse action and is therefore unable to provide you with specific reasons as to why the adverse action was taken.

FORM B
EXAMPLE OF ADVERSE ACTION NOTIFICATION

Date

Applicant Name
Applicant Address
City, State Zip

Dear Applicant,

(your company name) regrets to inform you that we have found it necessary to reject your application for employment.

This action may have been influenced by information contained in a consumer report made, at our request, by:

Castle Branch Employment Screening
PO Box 1699
Wilmington, NC 28402
(888) 723-4263

This letter is sent to you in compliance with the Fair Credit Reporting Act. Castle Branch Inc. did not make the adverse decision and therefore cannot provide the reason for the decision.

You may obtain a free copy of the report within (60) days and you have the right to dispute the accuracy of the information with Castle Branch Inc.