

NASTF SDRM Registry
Subordinate Enrollment Procedures
(Performed by the LSID Business Owner or Primary LSID Account Holder)

A Primary LSID account holder may request to enroll additional "Subordinate" employees in "the Registry" by performing background checks on subordinate candidates; ensuring that these individuals are covered by applicable bonds, insurance policies and licenses; and submitting a Subordinate Account Registry Application.

It is a requirement that the Primary LSID account holder must perform a background check on subordinate account holder candidates. Background checks shall meet all Registry standards (noted below) and must be completed prior to submitting an application to add an employee subordinate LSID account. This requirement is the responsibility of the Primary LSID Account Holder.

The employee background check shall include all items required of the Registry Administrator as follows:

- 1) The following information will be used to conduct a basic internet background check:
 - a) First and last name, and middle initial (if applicable)
 - b) Address including City, State and County
 - c) Date of Birth
 - d) Social Security Number
- 2) The internet background check requires:
 - a) Social security number trace
 - i. The social security number is instantly validated.
 - ii. If invalid, the applicant will be called to confirm information.
 - iii. If applicant is unable to provide a valid social security number the Adverse Action Process will be initiated.
 - b) Two level background check based on the social security number search as follows:
 - i. Minimal Due Diligence
 - ii. Searches the county records of the address provided.
 - iii. Lists all addresses associated to the social security number from 5 to 7 years old.
 - iv. Lists all "AKA's" associated to the social security number from 5 to 7 years old.
 - c) Maximum due Diligence
 - i. Searches every county listed on the social security trace.
 - ii. Searches all "AKA's" listed on the social security trace.
 - iii. Criminal County Court search
 - iv. search of all counties listed in social security trace
 - v. the most current criminal activity posted in the county records

Background Acceptance criteria for subordinate LSID account holders is at the discretion of the business owner / Primary LSID account holder.

As a minimum standard however, no individual shall be added as a subordinate LSID account holder if there is a record of any of the following:

- a. Felony convictions and/or criminal convictions relating to any types of theft, larceny or auto theft
- b. Criminal convictions relating to fraud

The business owner shall follow the same (or similar) process; require the same application and supporting documentation as is required for a Primary LSID Account holder by the Registry.

- a. It is acceptable for the subordinate LSID account holder to be covered by the Primary LSID account holder's (and/or business ID owner) liability insurance and fidelity bond
- b. The Primary LSID account holder is required to maintain application and background check records for as long as an employee remains in the Registry.
- c. The Primary LSID account holder shall run background checks on subordinate employees every two years.
- d. The Primary LSID account holder must provide copies of the state trade licenses for the subordinate account holder candidates as a pre-condition to registration.

The Primary LSID account holder attests to following these prescribed procedures every time the Registry is used by automatically executing an electronic signature upon logging onto the Registry website.

Failure to abide by this policy will result in termination of the Primary and all subordinate accounts.