

**INSTRUCTIONS ON USE OF THE INVESTIGATIVE CONSUMER REPORT (ICR)**  
**SUPPLEMENTAL DISCLOSURE**

Each consumer shall receive the Consumer Report Disclosure (Disclosure Regarding Background Information).

In addition to the Consumer Report Disclosure, the consumer shall also receive the Supplemental ICR Disclosure if:

1. Personal Interviews

If the background check includes information from personal interviews, then provide the Supplemental ICR Disclosure. The most common form are personal interviews with (1) former employers, and (2) personal or professional references.

Notes:

- Asking only to confirm information is not an ICR.
- An education verification is not an ICR.
- A reference check (personal or professional) is an ICR.
- An employment verification that only confirms information and does not ask about performance, “eligibility for rehire,” etc. is not an ICR. However, given the close line between an employment verification that is an ICR and one that is not, it is our policy and protocol to provide the Supplemental ICR Disclosure in all cases of employment verifications.

2. California

In CA, an ICR includes background reports with or without information obtained from a personal interview. So, if the consumer lives or is applying for a position in CA, provide the Supplemental ICR Disclosure.