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August 9, 2011

Equal Employment Opportunity Commission  
131 M St., NE  
Washington, DC 20507

Via email: [Commissionmeetingcomments@eoc.gov](mailto:Commissionmeetingcomments@eoc.gov)

Re: Arrest and Conviction Records as a Barrier to Employment

To the Equal Employment Opportunity Commission:

On July 22, the Consumer Data Industry Association ("CDIA") filed a comment in connection with the July 26 EEOC meeting ("meeting") on the above captioned matter ("CDIA I"). To supplement information from the meeting, CDIA provides some additional points to consider in this second comment ("CDIA II").

CDIA was founded in 1906 and is the international trade association that represents approximately 200 consumer data companies. CDIA members represent the nation's leading institutions in credit reporting, mortgage reporting, check verification, fraud prevention, risk management, employment reporting, tenant screening and collection services.

This comment addresses several points: (1) Federal laws are in place today to require maximum possible accuracy of criminal history information and to protect job applicants; (2) The democratization of information makes third party criminal history searches even more important; (3) Criminal history searches conducted by the private sector offer better risk-management than information taken from limited government databases; and (4) The social science work cited by the American Bar Association and the U.S. Department of Justice is preliminary, has several key limitations, and should not serve as a basis for making any public policy decisions.

**1. Federal laws are in place today to require maximum possible accuracy of criminal history information and to protect job applicants.**

Several times during the July 26 meeting, comments were made that discounted the public safety needs of criminal history checks and overemphasized the detriment criminal

history checks have on ex-offenders. Such opinions often suffer from a critical defect: they are couched in the assumption that the federal Fair Credit Reporting Act (“FCRA”)<sup>1</sup> does not exist. However, since 1971 the FCRA has served as a touchstone for consumers, employers, law enforcement, and regulators concerning the use of criminal history information.

### ***A. General protections***

The FCRA governs consumer reports, regulates consumer reporting agencies, and protects consumers. *Consumer reporting agencies are required to maintain reasonable procedures to assure maximum possible accuracy.*<sup>2</sup> There are many other consumer protections as well. For example:

- Those that furnish data to consumer reporting agencies cannot furnish data that they know or have reasonable cause to believe is inaccurate, and they have a duty to correct and update information.<sup>3</sup>
- Consumers have a right to dispute information on their consumer reports with consumer reporting agencies or lenders and the law requires dispute resolution within 30 days (45 days in certain circumstances). If disputed information cannot be verified, the information subject to the dispute must be removed.<sup>4</sup>
- A consumer reporting agency that violates federal law is subject to private rights of action, enforcement by the Federal Trade Commission (“FTC”), and state attorneys general.<sup>5</sup>

### ***B. Protections specific to employment screening***

In addition to the general protections above, there are protections specific to the use of consumer reports for employment purposes. The FCRA allows employers to review the criminal histories of prospective and existing employees.<sup>6</sup> However, this legal privilege comes with certain obligations. In short, under § 1681b(b) of the FCRA:

- An employer must certify to the consumer reporting agency that the employer has and will comply with the employment screening provisions of the FCRA, and that the information from the consumer report will not be used in violation of any applicable federal or state EEO laws or regulations.
- Prior to requesting a consumer report, an employer must provide to the prospective employee a written disclosure that a consumer report may be obtained for employment purposes and the consumer must authorize the employer’s use of a consumer report. The disclosure document provided to the consumer must contain only the disclosure.

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<sup>1</sup> 15 U.S.C. §1681 *et seq.*

<sup>2</sup> *Id.*, § 1681e(b).

<sup>3</sup> *Id.*, § 1681s-2(a)(1)-(2).

<sup>4</sup> *Id.*, § 1681i(a)(1), (5).

<sup>5</sup> *Id.*, § 1681n, 1681o, 1681s.

<sup>6</sup> *Id.*, § 1681b(a)(3)(B).

- Prior to taking an adverse action, the employer must provide to the consumer a copy of the consumer report and the summary of rights mandated by the FTC. The employer must provide a second adverse action notice if an adverse action is actually taken.

## **2. The democratization of information makes third party criminal history searches even more important.**

In written and oral testimony before and at the meeting, Adam Klein expressed concern that employers were using the Internet to conduct their own searches on prospective or existing employees. Recent survey data makes clear that employers are increasingly using social media to make their hiring decisions.<sup>7</sup> The reliability of search engines and social media as the sole basis for employment decisions cannot be covered in this comment; however, the use by employers of these sources of information in conducting background searches underscores one of the key differences between searches conducted by consumer reporting agencies and those performed by employers. Criminal history searches by consumer reporting agencies are regulated by the FCRA and searches by employers are not.

Moreover, information gathered by consumer reporting agencies serves a number of important purposes. One illustration of the value of consumer reporting agency searches comes from the General Accountability Office (“GAO”). In March 2004, the GAO issued a report regarding child support enforcement and collections. The report noted that in 2002, \$657 million in child support obligations were collected but were either not distributed or delayed in part because of “unreliable” data and a lack of accountability for accurate data.<sup>8</sup> However, a number of “state agencies took steps to address missing information and improve payment processes.” To improve child support distributions,

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<sup>7</sup> Jenna Wortham, *More Employers Use Social Networks to Check Out Applicants*, New York Times Business, Innovation, Technology, and Society (BITS) Blog, <http://bits.blogs.nytimes.com/2009/08/20/more-employers-use-social-networks-to-check-out-applicants/> (last visited July 28, 2011). This story summarized a poll of 2,667 managers and human resource workers that

found that 35 percent of employers decided not to offer a job to a candidate based on the content uncovered on a social networking site.

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More than half of the employers who participated in the survey said that provocative photos were the biggest factor contributing to a decision not to hire a potential employee, while 44 percent of employers pinpointed references to drinking and drug use as red flags.

Other warning signs included bad-mouthing of previous employers and colleagues and poor online communication skills..

<sup>8</sup> *General Accounting Office, Child Support Enforcement; Better Data and More information on Undistributed Collections are Needed*, GAO-04-377 (March 2004), 1, 8, 13.

[s]tate officials cited the importance of allowing staff to access federal, state, and private databases to locate custodial parents. Officials in 1 state said they had a contact with a private vendor because they found this information to be most useful. Virginia's system automatically searched databases to match cases that needed information. Such databases included...credit bureaus [also known as consumer reporting agencies].<sup>9</sup>

Further evidence of the value of information from consumer reporting agencies comes from the Association for Children for Enforcement of Support ("ACES"). ACES reports that public record information provided through commercial vendors helped locate over 75 percent of the "deadbeat parents" they sought.<sup>10</sup>

### **3. Criminal history searches conducted by the private sector offer better risk-management than limited information from government databases.**

There was discussion at the July 26 meeting about the benefits of employer access to the FBI criminal history database over information from the private sector. Several points serve to dispel the bias in favor of limiting searches to the FBI database. While the FBI database is a single source based on arrest records from law enforcement, consumer reporting agencies often provide more comprehensive and more complete information. Data supplied to the FBI comes primarily from law enforcement and is provided on a voluntary basis; not all law enforcement agencies report to the FBI. Contrast that with information from consumer reporting agencies that comes from court filings. The use of court information allows consumer reporting agencies to follow the information beyond the arrest, through a trial, and towards ultimate conclusion.

The value of using consumer reporting agencies is best proved by the FBI itself which uses the services of commercial vendors. Then-FBI Director Louis Freeh testified before Congress in 1999 and noted that in 1998, his agency made more than 53,000 inquiries to commercial on-line databases "to obtain public source information regarding individuals, businesses, and organizations that are subjects of investigations." This information, according to Director Freeh, "assisted in the arrests of 393 fugitives, the identification of more than \$37 million in seizable assets, the locating of 1,966 individuals wanted by law enforcement, and the locating of 3,209 witnesses wanted for questioning."<sup>11</sup>

Other law enforcement agencies also make use of information provided by consumer reporting agencies. The "[Texas] Attorney General's Office routinely uses national databases provided by private resellers to track down individuals who are delinquent in their child-support payments, as well as to help locate suspects in the course of conducting consumer

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<sup>9</sup> *Id.*, 24.

<sup>10</sup> *Information Privacy Act, Hearings before the Comm. on Banking and Financial Services, House of Representatives, 105<sup>th</sup> Cong., 2<sup>nd</sup> Sess. (July, 28, 1998)* (statement of Robert Glass).

<sup>11</sup> *Hearing before the Senate Comm. on Appropriations Subcomm. for the Departments of Commerce, Justice, and State, and the Judiciary and Related Agencies, March 24, 1999* (Statement of Louis J. Freeh, Director of the Federal Bureau of Investigation).

protection and criminal investigations.”<sup>12</sup> As stated by the Department of Homeland Security: “[W]e often get more accurate data from the commercial sector. In addition, the processes by which government agencies manage data often makes it difficult to acquire and needs [a] great deal of labor intensity into making it usable and accessible to other entities.”<sup>13</sup>

**4. The social science work cited by the American Bar Association and the U.S. Department of Justice is preliminary, has several key limitations, and should not serve as a basis for making any public policy decisions.**

CDIA presented to the Commission in the CDIA I comment, two papers by Dr. Jeffrey L. Sedgwick.<sup>14</sup> Attached as an appendix to this comment is a third paper from Dr. Sedgwick that directly addresses testimony raised at the July 26 meeting and the EEOC’s meeting on Nov. 20, 2008. In the latest paper,<sup>15</sup> Dr. Sedgwick (a) points out the witnesses’ over-reliance on employment as the remedy to recidivism and key to enhanced public safety; (b) highlights the validity and reliability of the contemporary social science research most frequently cited to support various recommendations; and (c) concludes with some suggestions for action by the EEOC most likely to enhance employment prospects for those with criminal records, especially members of protected classes such as young African-American males.

## **Conclusion**

CDIA again thanks the Commission for allowing us an opportunity to comment on the need for employers to protect themselves, their other employees, and their customers through the use of appropriate and factual criminal history information. We hope the Commission keeps in mind several points: (1) Federal laws are in place today to require maximum possible accuracy of criminal history information and to protect job applicants; (2) The democratization of information makes third party criminal history searches even more important; (3) Criminal history searches conducted by the private sector offer better risk-management than information

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<sup>12</sup> *Amicus Argument of James Ho for State of Texas, Taylor v. Acxiom Corp.*, U.S. Court of Appeals (5<sup>th</sup> Cir.) Case Nos. 08-41083, 41180, 41232, (Nov. 4, 2009).

<sup>13</sup> The Privacy Office, Department of Homeland Security, Privacy and Technology Workshop, Official Transcript at 6 (Sept. 8-9, 2005) (comments of Grace Mastalli Principal Deputy Director for the Information Sharing and Collaboration Program at DHS), [http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_wkshop\\_09-2005\\_transcript\\_panel1.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_wkshop_09-2005_transcript_panel1.pdf), (last visited Apr. 6, 2010).

<sup>14</sup> Dr. Jeffrey L. Sedgwick served as Assistant Attorney General for the Office of Justice Programs from Oct. 2008 to Jan. 2009. Prior to that appointment, Dr. Sedgwick served from Jan. 2006 to Oct. 2008 as director of the Bureau of Justice Statistics. Prior to his appointments, Dr. Sedgwick taught for 30 years at the University of Massachusetts-Amherst. He is currently Professor Emeritus of Political Science at the university.

<sup>15</sup> Overview of EEOC Meeting Testimony on *Employment Discrimination Faced by Individuals with Arrest and Conviction Records* (20 November 2008) and on *Arrest and Conviction Records as a Barrier to Employment* (26 July 2011).

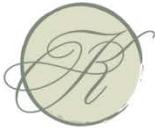
taken from limited government databases; and (4) The social science work cited by the American Bar Association and the U.S. Department of Justice is preliminary, has several key limitations, and should not serve as a basis for making any public policy decisions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'E. J. Ellman', with a long horizontal flourish extending to the right.

Eric J. Ellman  
Vice President, Public Policy and Legal Affairs

## Appendix I



# KESWICK ADVISORS

Overview of EEOC Meeting Testimony on *Employment Discrimination Faced by Individuals with Arrest and Conviction Records* (20 November 2008) and on *Arrest and Conviction Records as a Barrier to Employment* (26 July 2011).

Prepared for the Consumer Data Industry Association (CDIA)

By

Jeffrey Leigh Sedgwick, Ph.D.

During its two most recent meetings (20 November 2008 and 26 July 2011), the Equal Employment Opportunity Commission (EEOC) has visited the topic of the impact of criminal history background checks on the employment prospects of African-Americans, a protected class under Title VII of the Civil Rights Act of 1964. At each of these meetings, individuals representing the research, legal and advocacy communities offered statements concerning the potential impact of criminal histories on the employment prospects of job applicants.

In the brief executive summary that follows, I will: (a) point out the witnesses' over-reliance on employment as the remedy to recidivism and key to enhanced public safety; (b) highlight the validity and reliability of the contemporary social science research most frequently cited to support various recommendations; and (c) conclude with some suggestions for action by the EEOC most likely to enhance employment prospects for those with criminal records, especially members of protected classes such as young African-American males.

First, much of the testimony offered to the Commission in its two hearings asserted, strongly suggested or implied that the current level of unemployment in the Black community constitutes a threat to public safety. The unspoken assumption is that the lack of legitimate earning opportunities leads to higher crime rates. But the relationship between unemployment and criminal conduct is not one of simple cause and effect. This is demonstrated by several facts commonly known in the social science community, such as:

- *Two-thirds of inmates in State prisons were employed during the month before they were arrested for their current offense; over half were employed full time.*<sup>1</sup>
- *From 1979 to 1997, the property and violent crime rates (adjusted for changes in demographic characteristics) increased by 21% and 35%, respectively, in the United States despite no change in the long term unemployment rate.*<sup>2</sup> and
- *Decreasing wage trends for low skill workers account for over 50% of the increase in both the property and violent crime indices during the same period. A sustained long-term decrease in crime rates thus depends on whether the wages of less skilled men improve.*<sup>3</sup>

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<sup>1</sup> Department of Justice, *Survey of State Prison Inmates, 1991*. (Washington, DC: Bureau of Justice Statistics, 1993) 3. See also, Department of Justice, *Mental Health and Treatment of Inmates and Probationers*. (Washington, DC: Bureau of Justice Statistics, 1991)

<sup>2</sup> Eric D. Gould et al, "Crime Rates and Local Labor Market Opportunities in the United States: 1979-1997," *The Review of Economics and Statistics* 84, no. 1 (2002): 57-8. In this context, it is interesting to note that according to the FBI's Preliminary Annual Uniform Crime Report on 2010, property and violent crime rates in the United States have fallen each year since 2006, despite rising unemployment and the large number of inmates released back into the community annually during that same period.

Successful reentry to legitimate society is shaped as much or more by factors that have nothing to do with employment.<sup>4</sup> These factors include not only the individual's characteristics, but also offending and substance abuse histories, family relationships, community contexts, and State policies offering supportive re-entry services. Discouraging the use of background checks will not by itself enhance re-integration into society. It will certainly, however, expose employers and the public to the harm of re-offense due to factors that have nothing to do with the regular presence of a paycheck. The following characteristics of state inmates make clear that their problems upon re-entry extend far beyond issues related to background checks. Consider the following facts<sup>5</sup>:

- *Over 60% of inmates had been incarcerated in the past.* A Department of Justice study of 272,111 inmates released from prison in 1994 found that they had accumulated 4.1 million arrest charges before their most recent imprisonment and another 744,000 charges within 3 years of release.<sup>6</sup> *This is an average of 17.9 charges each.* The number of times a prisoner has been arrested in the past is a good predictor of whether that prisoner will continue to commit crimes after being released.<sup>7</sup>
- *Substance abuse is a significant contributing factor to the likelihood of incarceration.* Thirty-one percent of inmates committed their offense under the influence of drugs, and 17% committed their offense to get money for drugs. Thirty-two percent of inmates committed their offense under the influence of alcohol having consumed on average the equivalent of three six-packs of beer or two quarts of wine. Half of these had been drinking for six hours or more before their offense. Studies of released prisoners report that their success or failure to confront their substance abuse problem often emerges as a *primary factor* in their post-prison adjustment.<sup>8</sup>
- *The presence of stable marital and family relationships greatly reduces the likelihood that an offender will re-offend.* Fifty-five percent of inmates had never married, while 27% were widowed, divorced or separated; yet 43% of female inmates and 32% of male inmates had 2 or more children under age 18. Although the day-to-day role of husband or parent and reintegration into a family are not social roles that ex-offenders (particularly men) necessarily adopt immediately upon release, acceptance of that role is highly significant in the transformation toward law-abiding citizen after release. Indeed, interpersonal conflict with heterosexual partners is mentioned by recidivists as a common problem leading to failure *second only to problems involving substance abuse.* In an inmate's early life, it is well-known that the absence of such stable relationships can serve as a harbinger of trouble to come.<sup>9</sup> Most inmates did not live with both parents while growing up; over 25% had parents who abused drugs or alcohol; and 37% had an immediate family member with a jail or prison record.
- *Lack of educational advancement leads to enhanced risks of incarceration.* Thirty-four percent of inmates had completed high school while another quarter had gotten a general equivalency degree (GED). Limited education often translates into poor job skills, creating diminished prospects for stable employment and decent wages upon release.

Second, the most recent two meetings of the EEOC have been marked by numerous references to recent social science research on "redemption" or the point in time during which a released offender has avoided further contact with the criminal justice system that renders his or her criminal record essentially useless in predicting the risk of reoffending. The most widely cited articles of this research are Megan C. Kurlychek, Robert Brame and Shawn D. Bushway, "Scarlet Letters and Recidivism: Does an Old Criminal Record Predict Future Offending?" *Criminology & Public Policy* 5: 483-504 and Alfred Blumstein and Kiminori Nakamura, "Redemption in the Presence of Widespread Criminal Background Checks,"

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<sup>3</sup> Ibid., 58.

<sup>4</sup> Christy A. Visher and Jeremy Travis, "Transitions from Prison to Community: Understanding Individual Pathways," *Annual Review of Sociology* 29 (2003): 91.

<sup>5</sup> *Survey of State Prison Inmates, 1991.*

<sup>6</sup> Department of Justice, *Recidivism of Prisoners Released in 1994.* (Washington, DC: Bureau of Justice Statistics, 2002) 1.

<sup>7</sup> Visher and Travis, p. 95.

<sup>8</sup> Ibid.

<sup>9</sup> Visher and Travis, p. 99.

*Criminology* 47: 327-359. Both are widely cited in the debate on access to and dissemination of criminal history information to employers, landlords, issuers of occupational licenses et cetera.

The main points that I would make about these two studies are as follows:

- *Individuals with a prior arrest or juvenile contact with police always pose a risk of arrest that is statistically significantly higher than those without prior police contact or arrest.* Bushway et al estimates that an individual with a prior arrest at age 18 and no offenses for the following seven years is *twice* as likely to be arrested within the next four months as an individual with no prior arrests. If we estimate the risk of rearrest over the next two years (ages 25 and 26), then the ex-offender is *five and one-half times* as likely to be arrested.
- The risk of recidivism varies by age and crime at the time of first arrest; it also varies by the birth year of the offender (due to variations in crime rates over time). Consequently, *there is no single estimate of time “clean” or “straight” that applies to all ex-offenders specifying when their risk of re-offending is no greater than the general population.*
- Both research articles note that the determination of time “clean” or “straight” that renders an ex-offender employable *depends on specific attributes of the employer or job.* And neither article offers any helpful insight on these attributes.

It is most unfortunate that, despite the above, these two articles have been misinterpreted and used to claim, quite prematurely, that criminal records become “stale” and useless as guides to risk assessment after a very short time – as little as three to seven years. Blumstein and Nakamura conclude their article with a list of issues still to be addressed, underlining the preliminary and incomplete character of their current findings. While their article demonstrates that in theory one could define the time “clean” or “straight” at which an ex-offender faces an equal risk (or “sufficiently close”) of arrest as the general population of the same age (or non-offenders of the same age) given sufficient information on birth year, age at first offense, and first arrest offense replicated for more jurisdictions, more offense types and more birth years, the gap between theory and practice still yawns before us. In addition to the still incomplete research agenda mentioned by Blumstein et al., one would also want to correct for the problem of out-of-jurisdiction arrests and for time incarcerated/incapacitated. As well, when determining when comparative risks are “sufficiently close,” one would need information on the distribution and variation in risk preference among employers and the characteristics of jobs especially suited for re-entering offenders. In short, there is much more research to be done on these questions.

*But it is important to note that even when this more extensive research agenda is completed, the result will not be a single estimate of the time since last contact with the criminal justice system at which a criminal record becomes “stale” and unpredictable, but rather a very large number of such estimates, each tailored to the unique circumstances of particular offenders including their age at first offense, nature of most recent offense, current age, and year of birth (to mention just of few). What we won’t get is a single estimate on which a regulatory standard or administrative “bright line” sealing past criminal records can be anchored.* The fruits of this particular line of research are more relevant to the employers’ assessment of the comparative risk of individual job applicants than to the articulation of administrative or regulatory guidances or rules uniformly applied.

While witnesses have over interpreted the preliminary literature on redemption, it is quite striking that they have been reticent to engage a similarly preliminary body of research demonstrating that criminal history background checks *reduce* employment discrimination against Blacks. This is, of course, the literature on statistical discrimination by scholars such as Harry J. Holzer<sup>10</sup> and Lior Jacob Strahilevitz.<sup>11</sup> Holzer et al found that employers who conducted criminal background checks on applicants were more than 50% more likely to hire African Americans than employers who did not (24% versus 14.8%, respectively).<sup>12</sup> Interestingly, Shawn Bushway has found that African Americans have *higher* wages in those states that have automated access to criminal history records to the greatest degree, and he attributes this finding to statistical

<sup>10</sup> Harry J. Holzer, Steven Raphael and Michael A. Stoll, “Perceived Criminality, Criminal Background Checks, and the Racial Hiring Practices of Employers,” *Journal of Law & Economics* 49 (2006): 451-80.

<sup>11</sup> Lior Jacob Strahilevitz, “Privacy Versus AntiDiscrimination,” John M. Olin Law & Economics Working Paper No. 349, The University of Chicago, July 2007.

<sup>12</sup> Holzer et al. at 464.

discrimination in those states that have not automated access.<sup>13</sup> Bushway also found that access to criminal history records reduced the differential between whites' wages and blacks' wages and the differential between whites and black employment levels (but the results were not statistically significant). At this early stage of the research on statistical discrimination, the policy conclusion reached by Strahilevitz is quite striking: we should "provide decision makers with something that approximates complete information about each applicant, so that readily discernable facts like race or gender will not be overemphasized and more obscure but relevant facts, like past job performance and social capital, will loom larger."<sup>14</sup> This recommendation points in exactly the opposite direction as those recommending curtailing access to criminal histories through background checks; indeed, it suggests that such limits on access to information will make racial discrimination worse.

Third and finally, given two (preliminary) bodies of research that point to diametrically opposing policy recommendations concerning access to criminal history records, the Commission may well wonder if there is any constructive path forward to address the immediate re-entry needs of Black ex-offenders. It seems to me that there quite clearly is such a way forward that has been touched upon by a number of witnesses.

First, ex-offenders can be better counseled as to what types of employers and what types of employment opportunities are most open to hiring ex-offenders. It makes little sense in a slack job market to waste time applying for jobs or to employers who are effectively closed by federal, state and local statutes barring employment of ex-offenders. Emphasis should be placed on information steering ex-offenders toward employers with a demonstrated willingness to hire ex-offenders and to support services that can assist them in dealing with the non-employment challenges they face immediately post-release. A number of witnesses have observed that such intermediary support agencies can effectively increase the changes of employment by pre-screening applicants for employers as well as building their job skills and providing positive work recommendations.

At the same time, employers can be better educated on the actual risks of hiring ex-offenders as well as the availability of resources such as bonding programs or tax credits that mitigate risk of employing ex-offenders. Informing employers of evidence-based elements of risk will reduce reliance on statistical discrimination or racial stereotypes.

*Jeffrey L. Sedgwick was appointed on January 2008 by President George W. Bush to serve as Assistant Attorney General for the Office of Justice Programs; he was confirmed by the Senate of the United States in October 2008 and served until January 2009. Mr. Sedgwick also served until October 2008 as director of the Bureau of Justice Statistics, the statistical agency of the Department of Justice, a position to which he was appointed by President George W. Bush in January 2006. Prior to his appointments, Dr. Sedgwick taught for 30 years at the University of Massachusetts - Amherst. He is currently Professor Emeritus of Political Science at the University.*

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<sup>13</sup> Shawn D. Bushway, "Labor Market Effects of Permitting Employer Access to Criminal History Records," *Journal of Contemporary Criminal Justice* 20 (2004): 282.

<sup>14</sup> Strahilevitz at 10.