

Student Background Check Policy

I. Applicability

This policy applies to applicants who have received an offer of admission to or students enrolled in an educational program that includes, or may include at a future date, assignment to a clinical health care facility. Visiting students who enroll in courses with such an assignment are also subject to the policy.

II. Policy

Applicants who have received an offer of admission must submit to and satisfactorily complete a background check review as a condition to matriculation to the [School of Medicine](#). An offer of admission will not be final until the completion of the background check(s) with results deemed as satisfactory. Admission may be denied or rescinded based on a review of the background check.

Additionally, students who are currently enrolled and who do not have a valid background check must submit to, and satisfactorily complete, a background check review as a condition to enrolling or participating in education experiences at affiliated sites as required.

Students who refuse to submit to a background check or do not pass the background check review may be dismissed from the program.

Applicants who have received an offer of admission or students who are dismissed may seek admission into another educational program that does not have a clinical component requirement in its curriculum.

III. Rationale

- A. Health care providers are entrusted with the health, safety and welfare of patients, have access to controlled substances and confidential information, and operate in settings that require the exercise of good judgment and ethical behavior. Thus, an assessment of a student or applicant's suitability to function in such a setting is imperative to promote the highest level of integrity in health care services.
- B. Clinical facilities are increasingly required by accreditation agencies, such as [Joint Commission of Healthcare Organization \(JCAHO\)](#), to conduct background checks for security purposes on individuals who provide services within the facility and especially those who supervise care and render treatment. To

facilitate this requirement, educational institutions have agreed to conduct these background checks for students and faculty.

- C. Clinical rotations are an essential element in medical school curriculum. Students who cannot participate in clinical rotations due to criminal or other adverse activities that are revealed in a background check are unable to fulfill the requirements of medical school. Additionally, many health-care licensing agencies require individuals to pass a criminal background check as a condition of licensure or employment. Therefore, it is in everyone's interest to resolve these issues prior to a commitment of resources by the School of Medicine, the student, or applicant.
- D. The School of Medicine is obligated to meet the contractual requirements contained in affiliation agreements between the university and the various health-care facilities.

IV. Background Check Report

- A. **Obtaining a Background Check Report** The School of Medicine will designate approved company (ies) to conduct the background checks and issue reports directly to the [School of Medicine](#). Results from a company other than those designated will not be accepted. Students and applicants who have received an offer of admission must contact a designated company and comply with its instructions in authorizing and obtaining a background check. Students and applicants who have received an offer of admission are responsible for payment of any fees charged by a designated company to provide the background check service.
- B. **Scope** Background checks include the following and cover at least the past seven years:
 - Criminal history search, including convictions, deferred adjudications or judgments, and pending criminal charges involving felonies, Class A, Class B, and Class C violations
 - [Social Security Number](#) verification
 - [Violent Sexual Offender and Predator Registry](#) search
 - [Office of the Inspector General \(OIG\)](#) List of Excluded Individuals/Entities
 - [General Services Administration \(GSA\)](#) List of Parties Excluded from Federal Programs
 - [U.S. Treasury Office of Foreign Assets Control \(OFAC\)](#), List of [Specially Designated Nationals \(SDN\)](#)
 - Applicable State Exclusion List

Rights

Students and applicants who have received an offer of admission have the right to review the information reported by the designated company for accuracy and completeness and to request that the designated company verify that the background information provided is correct. Prior to making a final determination that will adversely affect the applicant or student, the [School of Medicine](#) will provide applicants or students a copy of or access to the background check report issued by the designated company, and inform them of their rights, how to contact the designated company to challenge the accuracy of the report, and that the designated company was not involved in any decisions made by the School of Medicine.

Procedure

A. Applicants

1. Applicants must complete the required background check screening following the offer of admission but prior to matriculation.
2. The background check report will be submitted to the Background Check Review Committee for its review. If the report contains negative findings, the committee may request that the applicant submit additional information relating to the negative finding, such as a written explanation, court documents, and/or police reports. The committee will review all information available to it and determine appropriate action.
3. Admissions decisions are final and may not be appealed.

B. Current Students

1. For students who did not have a background check review at the time of their admission into the educational program, students must complete the background check review prior to commencement of an assignment at a health care facility as required.
2. Background check reports will be submitted to the Background Check Review Committee for its review. If the report does not contain any negative findings as determined by the committee, the student will be allowed to participate in clinical rotations. If the report contains negative findings, the Background Check Review Committee may request that the student submit additional information relating to the negative finding, such as a written explanation, court documents and police reports. The Background Check Review Committee will review all information available to it and determine whether the student should be permitted to participate in clinical rotations or be dismissed from the program.

3. If the Background Check Review Committee determines that dismissal from the program is warranted, a student may appeal that decision in accordance with the university's grievance procedure for academic matters found in this Catalog.

C. Committee Review Standards

1. In reviewing the background check reports and any information submitted, the Background Check Review Committee may consider the following factors in making its determinations: the nature and seriousness of the offense or event, the circumstances surrounding the offense or event, the relationship between the duties to be performed as part of the educational program and the offense committed, the age of the person when the offense or event occurred, whether the offense or event was an isolated or repeated incident, the length of time that has passed since the offense or event, past employment and history of academic or disciplinary misconduct, evidence of successful rehabilitation, and the accuracy of the information provided by the applicant who has received an offer of admission or student in the application materials, disclosure forms, or other materials. The committee should bear in mind both the safety interests of the patient and the workplace, as well as the educational interest of the student. In reviewing background checks and supplementary information, advice may be obtained from university counsel, university police, or other appropriate advisors.

VI. Confidentiality and Record Keeping

- A. Background check reports and other submitted information are confidential and may only be reviewed by university officials and affiliated clinical facilities in accordance with the [Family Educational Records and Privacy Act \(FERPA\)](#).
- B. Students: Background check reports and other submitted information of students will be maintained in the Office of Student Affairs in accordance with the university's record retention policy for student records.
- C. Applicants Denied Matriculation: Background check reports and other submitted information of applicants denied matriculation into the program will be maintained in accordance with the university's record retention policy.

VII. Other Provisions

- A. The [School of Medicine](#) shall inform students who have negative findings in their background check report and are nonetheless permitted to enroll that the School of Medicine's decision is not a guarantee that every clinical facility will permit the student to participate in the educational program at its facility, or that any state will accept the individual as a candidate for registration, permit, or licensure.

- B. A background check will be honored for the duration of enrollment if the student is continuously enrolled. An assigned clinical health care facility may require a repeat background check. A student who has a break in enrollment is required to complete a new background check. A break in enrollment is defined as non-enrollment of at least one semester in the approved curriculum of the certificate or degree program. However, a student whose attendance has been suspended due to a licensing agency's eligibility certification process will not be considered as having a break in enrollment. An officially approved leave of absence is not considered a break in enrollment.
- C. Falsification of information, including omission of relevant information, may result in denial of admission or dismissal from the educational program.
- D. Criminal activity that occurs while a student is in attendance at the university may result in disciplinary action, including dismissal, and will be addressed through the university's academic or disciplinary policies.