Policy and Procedures Concerning Criminal Background Checks and Drug Screening – Health Sciences Students

Some criminal offenses preclude students from participating in patient care. In addition, some professional licensure boards prohibit licensure for those convicted of specific offenses. Thus, students from professional programs are subject to the statutory and/or regulatory requirements independently imposed by law, or as required by affiliating entities. Students must meet any and all requirements of the clinical facility, which may be more extensive than referenced herein. Inability to participate in patient care or being subject to any other exclusion prescribed by law will preclude successful completion of the requisite curriculum. As such, affected students may not be eligible for admission, continuation in the program, or graduation, if applicable.

This policy is designed to provide a safe environment for patients, visitors, faculty, employees and students at The George Washington University School of Medicine and Health Sciences (SMHS), specifically the Health Sciences Programs (“HSP”) and its affiliated institutions. Criminal background checks (CBC) and Drug Screens (DS) allow the HSP to evaluate whether students possess the character and fitness to participate in clinical education activities.

The HSP do not guarantee that state licensure boards will ultimately issue a license to an individual with or without a criminal record. Prospective students with any record of a criminal offense are strongly encouraged to contact the licensing board of the profession within the state in which they would like to practice in the future to determine whether or not their record could preclude them from obtaining a license.

This policy applies to all students enrolled in Health Sciences courses and/or admitted to programs that require a clinical rotation.

Prospective Students:
Prospective students seeking admission to the HSP will be informed of this policy and its requirements through the policy posted on the admission website, and imbedded within the application. Prospective students are required to disclose misdemeanor or felony convictions at the time of application for admission.

New Students:
Students admitted to any HSP that require clinical practica will be informed of this policy and its requirements during the admission process. Once admitted, students will be required to complete a CBC and DS, and to authorize release of the results to appropriate academic and/or clinical personnel.

Enrolled Students:
The cost of all CBCs and DSs shall be the responsibility of the student, unless the clinical facility agrees to assume the cost. Further, the student shall be deemed responsible for completing all CBCs and DSs in a timely manner. Failure to complete the CBC and DS in a timely manner may result in academic holds preventing registration until the requirements are complete.

The results of the CBC or DS may preclude participation in any clinical rotations. HSP may not be able to find alternative sites for a student ineligible to attend clinical rotations at specified sites based on the results of the CBC and/or DS. As a result, the student may not be able to complete degree requirements, may not be eligible for federal or state credentialing required for practice, and
may be dismissed from the program. Any disruption in enrollment may require the student to undergo an additional CBC or DS.

Results of all CBCs and DSs shall be privileged and confidential, are maintained in a secure place, and shall not be released or otherwise disclosed to any person or agency, other than the (1) Senior Associate Dean of Health Sciences or his/her designee; (2) persons who have a legitimate need to know, as determined by the Senior Associate Dean of Health Sciences; (3) upon direction of a court order; (4) any affiliated entity providing clinical training; or, (5) with the written consent of the student.

Students are required to disclose misdemeanor or felony convictions, other than minor traffic violations, to the Office of the Senior Associate Dean of Health Sciences within five (5) business days of occurrence. Non-disclosure or falsification may be grounds for dismissal or degree revocation.

**Procedures For Criminal Background Check**

1. Prospective students for any of the HSP requiring clinical practica are notified through the admissions webpage of the CBC policy.

2. Students will be notified by e-mail of the deadline for completing the CBC. HSP will provide students the approved vendor(s) to conduct CBCs. Students will be given instructions on obtaining and reporting the results of their CBC. Students will be responsible for all costs associated with completion of a criminal background check.

3. The program director or designee can access a secure database to determine if the CBC is complete or not complete, but cannot view the results.

4. The results of the CBC will be only accessible to the Senior Associate Dean of Health Sciences (or his/her designee) through a secure database hosted by the vendor. If a CBC report reveals a significant event (i.e. report with anything other than a minor misdemeanor), the Senior Associate Dean of Health Sciences will review and investigate the results, and make a decision on the action to be taken regarding the status of the student. If the CBC results preclude a student from being placed in a clinical facility, s/he may be dismissed from the program, pending the outcome of an appeal, should such right be invoked.

5. Students claiming inaccuracies in their CBC will be referred to the entity completing the initial CBC for procedures as required by the Fair Credit Reporting Act.

6. Students are responsible to provide all requested information and documentation to clinical sites providing practica experience. Students may be required to undergo additional CBCs, as deemed necessary by the academic and/or clinical facility.

**Procedures For Drug Screen**

1. Prospective students for any of the HSP that require clinical practica are notified through the admissions webpage of the DS policy.

2. Students will be notified by e-mail of the deadline for completing the DS. HSP will provide students the approved vendor(s) to conduct DSs. Students will be given instructions on obtaining and reporting the results of their DS. Students will be responsible for all costs associated with completion of a criminal background check.

3. The program director or designee can access a secure database to determine if the DS is complete or not complete, but cannot view the results.

4. The results of the DS will be only accessible to the Senior Associate Dean of Health Sciences (or his/her designee) through a secure database hosted by the vendor. If a positive DS is received, the Senior Associate Dean of Health Sciences will review and investigate the results, and make a decision on the action to be taken regarding the status of the student. If
the DS results preclude a student from being placed in a clinical facility, s/he may be dismissed from the program, pending the outcome of an appeal, should such right be invoked.

5. Students are responsible to provide all requested information and documentation to clinical sites providing practica experience. Students may be required to undergo additional DSs, as deemed necessary by the academic and/or clinical facility.