

## 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 matriculation, 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. Applicants 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 programs whose program of study requires them to complete a clinical rotation.

### *Prospective Students:*

Prospective students seeking admission to the HSP will be informed of this policy and its requirements will be posted on the admissions website. 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 at the time of acceptance. 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. The CBC and DS are conditions of acceptance..

### *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/or DS in a timely manner may result in academic holds preventing registration until the requirements are complete.

Failure of either the CBC or DS may preclude participation in any further clinical rotations. As a result, the student may not be able to complete the requirements of the education program, may not be eligible for federal or state credentialing required for practice, and may be dismissed from the Program.

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; or (4) with the written consent of the student. *CBC*: Enrolled 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. Any disruption in enrollment may require the student to undergo an additional criminal background check. In addition, students may be required to undergo additional CBCs during their matriculation as a Health Sciences student, as deemed necessary by the academic and/or clinical facility.

*DS*: Students may be required to complete a DS during their matriculation as a student in the HSP, as deemed necessary by the academic and/or clinical facility. Any disruption in enrollment may also require the student to undergo a DS as determined by the academic and/or clinical faculty.

### ***Procedures For Criminal Background Check***

1. Prospective students for any of the Health Sciences programs requiring clinical practica will be notified through the admissions web page that admission is contingent upon the successful completion of a CBC and authorization of the release of the CBC results to appropriate academic and/or clinical personnel after admission.
2. Once admitted, students will be notified by e-mail of the deadline for completion of the CBC. The School will provide students with the name(s) of 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 whether the CBC has been completed. 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 recommendation to the Dean of SMHS for further disposition. The Dean of SMHS will make the final decision regarding the action to be taken regarding the status of the student.
4. 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.
5. Students are responsible to provide all requested information and documentation to clinical sites providing practica experience. The HSP may not be able to find alternative sites for students ineligible to attend clinical rotations at specified sites based on the results of the CBC. If a student is unable to be placed in a clinical facility, s/he will be unable to complete his/her educational requirements and will be dismissed from the program pending the outcome of an appeal, should such right be invoked.

### ***Procedures For Drug Screen***

1. Prospective students for any of the HSP that require clinical practica will be notified through the admissions web page that, if accepted, they will be required to complete a drug screen and authorize release of the results to appropriate academic and/or clinical personnel.

Students accepted for admission will be notified that matriculation is contingent upon the evaluation and acceptable outcome of all required drug screens

2. Upon completion of the screening the vendor will send an email notifying the student that the drug screening report is complete. 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. The results are only accessible to a designee of the Senior Associate Dean of Health Sciences via the secure database where the vendor has posted the results of the DS. If a positive drug screen is received, the Senior Associate Dean of Health Sciences will review and investigate the results and make a recommendation to the Dean of the SMHS for further disposition. The Dean of SMHS will make the final decision regarding the action to be taken regarding the status of the student.
3. Students are responsible to provide all requested information and documentation to clinical sites providing practica experience. HSP may not be able to find alternative sites for students ineligible to attend clinical rotations at specified sites based on a positive DS. If a student is unable to be placed in a clinical facility, s/he will be unable to complete his/her educational requirements and will be dismissed from the program pending the outcome of an appeal, should such right be invoked.

Last updated March 2016