



**THE GEORGE  
WASHINGTON  
UNIVERSITY**  
WASHINGTON, DC

**Responsible University Official:** Senior Associate Dean for Health Sciences

**Responsible Office:** Health Sciences Dean’s Office

**Last Revised Date:** March 7, 2018

## **Background Check and Drug Screening**

### **Policy Statement**

It is the policy of Health Sciences Programs at the George Washington University (GW Health Sciences) that all students enrolled in Health Sciences (HS) courses or programs which require them to complete a clinical rotation complete a criminal background check (CBC) and drug screening (DS).

### **Reason for Policy**

This policy is designed to provide a safe environment for patients, visitors, faculty, employees and students in GW Health Sciences and its affiliated institutions. Criminal background checks (CBC) and Drug Screens (DS) allow GW Health Sciences to evaluate whether students possess the character and fitness to participate in clinical education activities.

### **Who is Governed by this Policy**

This policy applies to students enrolled in any GW Health Sciences course or program which requires completion of a clinical rotation or supervised clinical experience.

### **Table of Contents**

<b>Policy Statement</b>	1
<b>Reason for Policy</b>	1
<b>Who is Governed by this Policy</b>	1
<b>Table of Contents</b>	1
<b>Policy</b>	2

<b>Definitions</b>	3
<b>Procedures</b>	3
<b>Forms</b>	<b>Error! Bookmark not defined.</b>
<b>Related Information</b>	<b>Error! Bookmark not defined.</b>
<b>Contacts</b>	5
<b>Document History</b>	5
<b>Who Approved This Policy</b>	5

## **Policy**

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 may 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.

GW Health Sciences does 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.

Prospective students seeking admission to GW Health Sciences are informed of this policy and its requirements through posted information on the admissions website. Prospective students are required to disclose misdemeanor or felony convictions at the time of application for admission. 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 for programs which require a clinical rotation and a requirement for participating in any course involving a supervised clinical experience.

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. Academic holds

may be applied to students who fail to complete the CBC and/or DS in a timely manner, thus preventing registration until the requirements are complete.

A program of study may require subsequent CDC or DS to meet clinical facility requirements prior to placement of a student in a clinical rotation. If a student has an unsatisfactory result on either a CBC or DS during the matriculation period, it 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.

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## Definitions

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**CBC:** Criminal Background Check. 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 for ongoing monitoring during their matriculation as a GW Health Sciences student.

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

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## Procedures

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### Procedures for Criminal Background Check:

1. Prospective students for any program requiring clinical rotations or course requiring a supervised clinical experience 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 the appropriate academic and/or clinical facility personnel.

2. Once admitted, students will be notified by e-mail of the deadline for completion of the CBC as well as 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 the CBC.
3. The respective GW Health Sciences 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 determine a disposition.
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 the rotation experience. GW Health Sciences may be unable to secure alternative sites for students ineligible to attend clinical rotations at specified sites based on the results of the CBC. If a student is ineligible for placement in a clinical rotation, s/he may be unable to complete his/her educational requirements and may be dismissed from the program pending the outcome of an appeal, should such right be invoked.

#### Procedures for Drug Screening:

1. Prospective students for any program requiring clinical rotations or course requiring a supervised clinical experience 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 the appropriate official within their program of study and affiliating entities providing the clinical rotation experience.
2. Students accepted for admission into programs requiring completion of clinical rotations will be notified that matriculation is contingent upon the evaluation and acceptable outcome of all required drug screens.
3. Upon completion of the screening, the vendor will send an email notifying the student that the drug screening report is complete. The Senior Associate Dean for Health Sciences (or his/her designee) will access a secure database to determine if the DS is complete and all results are satisfactory. If an unsatisfactory drug screen is received, the Senior Associate Dean of Health Sciences will review and make a disposition regarding the status of the student.

4. Students are responsible to provide all requested information and documentation to clinical sites providing rotation experiences. GW Health Sciences may be unable to secure alternative sites for students ineligible to attend clinical rotations at specified sites based on an unsatisfactory DS. If a student is unable to be placed in a clinical facility, s/he may be unable to complete his/her educational requirements and may be dismissed from the program pending the outcome of an appeal, should such right be invoked.

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## Contacts

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Contact	Telephone	Email
Health Sciences Dean's Office	202-994-0384	hsp@gwu.edu

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## Document History

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- **Last Reviewed Date:** March 7, 2018
- **Last Revised Date:** March 7, 2018
- **Policy Origination Date:** November 2018

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## Who Approved This Policy

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Reamer Bushardt, Senior Associate Dean for Health Sciences  
Mary Lynn Reed, Senior Counsel, Medical Center

*This policy, as well as all [university policies](#), are located on the [Office of Compliance and Privacy's](#) home page.*