

No./Title: EM102 – CRIMINAL BACKGROUND CHECKS FOR MATRICULATING STUDENTS	Resp. Office: ADMISSIONS Approval Body: CASA	Effective Date: 09/15/2005
Category: Students	Last Review: 09/07/2021	Next Review: 09/07/2024
Contact: Director of Admissions	☎ 901.448.5560	✉ uthscadmit@uthsc.edu

POLICY

In order to assure that admitted students can successfully pursue careers as health care professionals and to conform to new requirements at clinical training sites, UTHSC programs must assure that all entering students undergo a criminal background check (CBC) prior to matriculation. In addition, clinical training sites may require updated criminal background checks before students begin training in their facilities. Once accepted for admission or as required for clinical training, students must complete the procedure described below. Adverse findings on a criminal background check may lead to a withdrawal of the offer of admission or denial of access to a clinical training site.

All applicants and students have a continuing duty to notify their program director and/or dean (academics / student affairs) of any arrest, indictment, conviction of a felony or misdemeanor, or disciplinary action by a state healthcare professions licensing board after the time of application and as long as they are affiliated with UTHSC. This notification shall be made within 48 hours.

CRIMINAL BACKGROUND CHECK PROCESS OVERVIEW

UTHSC requires that admitted students undergo a criminal background check (CBC) prior to matriculation using a process that has been established by Verified Credentials for student background checks. This is an electronic service which can be found online at <https://scholar.verifiedcredentials.com/uthsc> a link to the site is included in each UTHSC NetID letter. Students are responsible for initiating the procedures to obtain the background check and will assume the cost of the assessment. The CBC search may include the following:

1. County Criminal Record Search - uses student address information from the prior 7 years to provide a comprehensive report on criminal records from county courthouses.
2. A review of fraudulent activity (ID Search Plus) is obtained by matching the student's name, address and/or social security number against a credit-reporting database.
3. A Level 3 FACIS report (Fraud and Abuse Control Information System) obtains information on a wide range of disciplinary actions affecting health care providers, ranging from exclusion and debarments to letters of reprimand and probation. A Level 3 search accesses over 800 databases in 50 states.

4. Sex Offender Database - A database search for individuals registered as sex offenders in the selected state or jurisdiction. Information and offender level retrieved varies by location. Tennessee Abuse Registry - This registry, maintained by the Tennessee Department of Health, contains a list of persons who have abused, neglected, or misappropriated personal property of a vulnerable person who is under eighteen (18) years of age, or who, by reason of advanced age or other physical or mental condition is vulnerable to abuse, neglect or misappropriation of property and who was, at the time of such determination, in the care of:
 - a. A state agency;
 - b. An entity which is licensed or regulated by a state agency; or
 - c. An entity under the provisions of a contract between that entity and a state agency.

Allegations of abuse, neglect or misappropriation of personal property against individuals are investigated thoroughly. Due process is afforded to all accused persons. License verification

5. Employment histories.

A student whose CBC shows findings other than **GREEN** (no findings), including the following, may be excluded by the healthcare facility from a clinical placement program:

1. History of any felony conviction within the last seven years
2. History of class "A" misdemeanor conviction within the last seven years
3. History of class "B" misdemeanor conviction within the last seven years
4. Listing on the registry maintained by the Department of Health pursuant to T.C.A. Section 68-11-1004
5. Listing on any of the following registries: HHS/OIG list of excluded individuals, GSA list of Parties Excluded from Federal Programs, U.S. Treasury, Office of Foreign Assets Control (OFAC), List of Specialty Designated Nationals (SDN),
6. An encumbered license (current or prior) in a health-related field if applicable.

Verified Credentials will provide a report of the above eligibility screens to the designated UTHSC official(s) for each student.

PROCEDURE

1. All UTHSC programs open and close active session codes for their incoming classes within the Verified Credentials website.
2. Students will be referred to Scholar by Verified Credentials website (<https://scholar.verifiedcredentials.com/uthsc>) and follow the instructions to set up their First Time User account.

3. The students will complete the online process for initiating the background screening which includes:
 - a. Posting his/her biographical information for the past seven years;
 - b. Electronically signing the “Disclosure & Authority to release Information” Form and ,
 - c. Submit payment.
4. Verified Credential will process the order.
5. Verified Credentials will:
 - a. Request county criminal searches based on the past seven years of residency and ID Plus search results, OIG, Tennessee Abuse Registry, and verification of licensure (if applicable), certification or designation, employment verification;
 - b. Complete the background check;
 - c. Compare and note any discrepant information; and,
 - d. Finalize and deliver via email, all findings.
6. A summary report will be sent to UTHSC program contact displaying only the following limited information:
 - a. The student's demographic information,
 - b. The type of verification ordered,
 - c. Color-coded: **GREEN** = No discrepancies, **YELLOW** = Pending or undetermined records, and **RED** = Convictions on criminal searches or disqualifying results on all other verifications.
7. When the summary report is coded **GREEN**, UTHSC will add that information to the student's file and notify the student's healthcare site that the student has received a clear (**GREEN**) rating from the private company. If the health care site requires additional information or investigations, either UTHSC or the healthcare site will notify the student.
8. When a summary report is coded either **RED** or **YELLOW**, the Dean or Dean’s designee of the respective UTHSC college, will determine what action is needed. For students with reports coded **RED**, Dean or Dean’s designee will notify the student by telephone and in writing that the student must schedule an appointment to review the results of his/her background check for findings other than employment verifications. It will be necessary for the student to bring the complete, detailed copy of the report and all correspondence from the private company that conducted the CBC to the appointment. The student and the Dean or the Dean’s designee will meet to solicit additional information or appropriate explanation of the code.
9. Additional background checks may be required by clinical affiliates prior to student entry into their sites. Students may bear the cost of these additional background checks.

CONTINUING DUTY TO UPDATE

Students have a duty to update their program director and/or dean (academic or student affairs) of any arrest, indictment, or conviction of a felony or misdemeanor crime (except for minor traffic violations), as well as any disciplinary action by a state healthcare professions licensing board within 48 hours of the incident. Such notification is a professional responsibility and failure to report may result in academic action up to and including dismissal. Program directors and/or deans will refer all reports of arrest, indictment, or convictions to the Office of Student Conduct and Community Standards.

CHALLENGED RESULTS

1. Students who question the accuracy of the report should immediately send a brief written statement as to the area they believe to be incorrect to the private company that performed the CBC;
2. Re-verification will be made if the company determines that reasonable grounds exist and that the request is not frivolous or irrelevant;
3. If parts of the report are deleted or changed because of re-verification, UTHSC and the student will receive a corrected report; and,
4. If the student does not challenge the **RED** or **YELLOW** results and the student does not meet the UTHSC CBC requirement, UTHSC enrollment and/or participation in all clinical rotations may be denied.

Adverse findings from a criminal background check are reviewed by the college/academic program and may lead to withdrawal of an offer of admission. If a prospective student is denied admission to a program or if a current student is denied participation in clinical rotations due to CBC findings, the student will be notified by certified letter from the appropriate Dean or the Dean's designee of the respective college explaining why the student cannot matriculate or continue in the program. A copy of the withdrawal letter must be delivered to the Office of Admissions, Director of Admissions Operations for processing within Banner.

All disputes pertaining to the Criminal Background Check findings must be communicated in writing directly to Verified Credentials at 952.985.7202 or 800.938.6090.

APPROVAL HISTORY

Effective: August 7, 2018

Effective: September 15, 2005

Revision: February 19, 2013, Committee on Academic and Student Affairs (CASA)

Revision: April 21, 2015, CASA

Reviewed: May 15, 2018, CASA

Revised: August 7, 2018, CASA

Approved: August 8, 2018, Chancellor
Reviewed: September 7, 2021, CASA
Approved: October 11, Chief Academic Officer