

# BACKGROUND CHECK POLICY FOR APPLICANTS AND STUDENTS

## Background Check Policy for Applicants and Students

### Policy Scope

This policy is intended for all University of Nebraska Medical Center (UNMC), College of Allied Health Professions (CAHP) applicants and students. A national Student Background Check ("SBC") is required of each student prior to matriculation into their program of study. Students will be provided with instructions from the CAHP regarding the requirements, procedure, and timeline for completing the SBC.

The University reserves the right to rescind an offer of admission or progression or to place monitoring requirements on any individual whose background investigation reveals a history of conduct that:

- is reasonably determines increases the risk of harm to patients or individuals; or
- was not accurately disclosed in response to a direct question regarding criminal history on any application for admission in connection with the program; or
- is inconsistent with the high standard of ethical conduct required of all members of the academic community, is otherwise unbecoming a member of the academic community, or would preclude completion of required educational activities; or
- will impede the student's ability to become licensed or certified in their profession.

Required Background Check Searches include but are not limited to the following:

- Social Security Number Verification
- Maiden and AKA Name Search
- Positive Identification National Locator with previous address
- Criminal History Investigation
- National Wants & Warrants Submission
- National Sex Offender Registry
- Sexual Offender Registry/Predator Registry
- Adult and Child Abuse Registry
- Sanction Check- National Healthcare Data Bank (NHDB)
- Officer of Inspector General Sanctions
- Excluded Parties Listing System

The SBC for students who are licensed or certified health professionals may include the above and may also include the following:

- Education Verification (highest level)
- Professional License Verification
- Certifications & Designations Check
- Professional Disciplinary Action Search

### Policy Definitions

*Adverse Finding* – A term describing a Student Background Check ("SBC") report of anything other than "clear" or "no findings" or other similar language used by the approved vendor that issued the SBC report.

*Applicant* – A term describing a prospective student who has submitted an application for admission to a health profession education program for whom an admissions decision has not yet been made.

*Break in Enrollment* – A term describing non-attendance of at least two consecutive semesters (Fall, Spring, Summer) or more.

*Matriculation* – A term describing the process of initial student enrollment in a health profession education program.

*Student* – A term describing an applicant who received an offer of acceptance or an individual who is currently enrolled in a health profession education program.

### Policy Statement

The CAHP is committed to accepting and educating students who meet established standards for professionalism, are of high moral character, and are suitable candidates for professional certification or licensure. The purposes of conducting a Student Background Check ("SBC") are multiple:

- Health care providers are entrusted with the health, safety, and welfare of patients, research participants, and health services and scientific resources; have access to confidential and sensitive information; and operate in settings that require the exercise of good judgment and ethical behavior. Thus, an assessment of a student's or applicant's suitability to function in clinical settings is imperative to ensure the highest level of integrity in students in the college/ program.
- Clinical facilities are required by their accreditation agencies to obtain a SBC for security purposes on individuals who supervise care, render treatment, and provide services within the facility.
- Clinical rotations are an essential element in health profession program curricula. Students who cannot participate in clinical rotations because of adverse activities reported in SBCs may not be able to fulfill the requirements of a health profession education program. Therefore, these issues must be resolved prior to a commitment of resources by the CAHP, student, or applicant.
- Health professionals are increasingly invited to engage in interprofessional work through team science projects. Thus, it is imperative to promote and underscore a shared expectation for demonstration of the highest level of integrity, good judgment, and ethical behavior.

### Procedures – General

#### Failure to Submit a Background Check

Applicants or students who refuse to submit to a background check will not be admitted or progress.

### Identification of Vendors

UNMC will designate the approved vendors to perform the Student Background Checks and will recognize SBCs from vendors that are approved by the centralized application services with which it participates. Results from any entity other than those designated by UNMC or a participating centralized application service *will not be accepted*. The list of approved vendors will be maintained by the CAHP Office of Enrollment Management & Student Affairs.

### Allocation of Cost

Accepted applicants and enrolled students must pay the costs associated with procuring a background check.

### Falsification of Information

Falsification of information, including omission of relevant information, may result in denial of admission or dismissal from the student's program and may be addressed through the university's academic or disciplinary policies.

### Period of Validity

Unless otherwise noted, the CAHP will honor student background checks conducted as part of the matriculation process into their program of study, however a SBC may be necessary more frequently, depending on class, rotation, or practicum site requirements or following a break in enrollment.

### Report of Findings and Access to Student Background Check ("SBC")

Students may request a copy of the SBC results from the vendor. The vendor will also provide the CAHP with the SBC results for students.

### Background Check Record Maintenance

Background check reports and other submitted information are confidential and may only be reviewed by University of Nebraska Medical Center officials and affiliated clinical facilities in accordance with the Family Educational Records and Privacy Act (FERPA). Student background check reports and other submitted student information will be maintained in the office of the college or maintained electronically. Records will be maintained according to state statute requirements.

## Procedures – Reviewing Background Checks

### Applicants

The CAHP Deans for Academic Affairs and Student Affairs will review self-reported adverse findings disclosed on the application when the program indicates that the applicant may be offered acceptance to the program. The CAHP Deans will review each self-reported adverse finding to determine the potential impact that any adverse findings might have on the applicant's ability to matriculate into the college/program or to complete the program. The CAHP Deans may consult members of the program for information pertaining to the impact of adverse findings on licensure or certification or the availability of clinical placements. No applicant identifying factors will be disclosed.

If the CAHP Deans determine a self-reported adverse finding on an application:

- is more egregious than was disclosed, or
- may preclude the acceptance or participation in educational, practicum or rotation activities,

then the CAHP Deans may recommend to the applicant that they immediately submit a formal SBC at a cost to the applicant. The CAHP Deans will consult with the applicant regarding the implications of the self-reported finding for admission to the program, clinical placement, and licensure and/or certification eligibility. The CAHP Deans will review the evidence and make a final decision. The final decision by the CAHP Deans will be made in writing to the applicant within ten (10) business days or within ten (10) business days following receipt of the requested SBC.

If the decision is to remove the application from the admissions pool, the written notice must include the reason for removal of the application and inform the individual that they have five (5) business days to submit a written response to the CAHP Deans or designee describing any mitigating factors they would like to be considered. The CAHP Deans or designee will then notify the applicant in writing whether the decision to remove the application stands or is reversed within five (5) business days. If the removal of the application stands, that decision is not appealable. If the removal of the application is reversed, the CAHP Deans or designee must inform the applicant in writing of their current admission status within five (5) business days.

### Students

The CAHP Deans for Academic Affairs and Student Affairs will review those SBC reports that identify an adverse finding. The CAHP Deans will review each referred SBC to determine the potential impact that any adverse findings might have on the student's ability to continue or to complete the program. The CAHP Deans may consult members of the program for information pertaining to the impact of adverse findings on licensure or certification or the availability of clinical placements.

If the CAHP Deans determine that a SBC includes an adverse finding that:

- was previously undisclosed,
- is more egregious than was disclosed,
- may preclude the acceptance or participation in educational, practicum or rotation activities,
- will impede the student's ability to become licensed or certified in their profession, or
- conflicts with what was reported by the applicant on application materials,

then the CAHP Deans may rescind the offer for admission for an incoming student. Such a determination must be communicated in writing to the program director or designee and the incoming student within ten (10) business days.

Involvement in criminal activity that occurs or is discovered while an individual is a student at the University of Nebraska Medical Center may result in disciplinary action, including dismissal, and will be addressed through the university's academic or disciplinary policies.

Students have an ongoing responsibility, during their enrollment, to make CAHP leadership aware of any criminal charges. Criminal charges should be reported to the CAHP Deans for Academic Affairs and Student Affairs within ten (10) days of the criminal charge.

## **Procedures – Attesting to a Background Check**

The following procedure may apply to programs with affiliation agreements requiring program attestation of student background checks.

Within ten (10) days of being notified of an adverse finding on a student background check, the CAHP Deans for Academic Affairs and Student Affairs will consult with the Program Director and/or designee to determine if a student has met or will meet the standards for academic progression and/or clinical education placement. The Program Director and/or designee is responsible for completing and submitting background check attestation forms in accordance with the affiliation agreement.

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## **References**

**UNMC Background Check Policy**

**UNMC FERPA Policy**