Policy

Calhoun Community College (CCC) is contractually obligated to comply with requirements set forth by agencies used for on-site clinical education. Therefore, all Health Science students at CCC are required to undergo background checks to meet these requirements. This prerequisite is noted in the college catalog.

Background checks will be conducted by a designated private vendor approved by the Health Sciences Division. A background check from another vendor or agency will not be accepted. Background checks must be completed by the deadlines set by the Health Science Division. An initial background check shall be in effect for one year, and an update will be required annually for each ensuing academic year. A student who has been out of a Health Science program sequence for one semester or more must, at his/her expense, update their background check.

Each student shall contract directly with the approved vendor for his/her background check, and results are confidential. The clinical agency that receives the results of the background check will make the decision to approve or deny a student for clinical privileges. The Dean of Health Sciences, Program Director, and/or level liaison will have access to an approved/denied list, but not to specific results of the background check. Some clinical settings may continue to require a separate background check, including fingerprints. The student is responsible for payment of the background check.

Investigations for Background Check

The background check may include, but is not limited to, searches, histories, and verifications as indicated below:

- **Positive Identification Maiden/AKA Name Search**
- **Social Security Number Trace** which is a verification that the number provided by the individual was issued by the Social Security Administration and is not listed in the files of the deceased. The SSN trace is also used to locate additional names and addresses.
- **Residency History / Employment Verification**
  - Employment Verification which may include the reason for separation and eligibility for reemployment for each employer. The last seven years may be searched if the student is 21 years of age or older.
  - Healthcare Employment Verification Network Search
- **Professional License/Certification Verification/Personal References/Interviews**
  - Criminal Search reveals felony and misdemeanor convictions, and pending criminal cases usually including the date, nature of the offense, sentencing date, disposition, and current status. The criminal background check may occur in current and previous counties of residence and employment through a search of court records. City, state, and/or federal records may also be searched. Federal criminal cases may reveal tax evasion, fraud, drug offenses, and other offenses.
- **Most Wanted List**
  - National Criminal Database Searches, which includes a compilation of historical data, collected from multiple sources in multiple states by background check companies.
  - Adult and Child Abuse/Neglect Registries
- **National Sex Offender/Predator Registry Search**, which includes a search of the state or county repository for known sexual offenders.
- **Misconduct Registry Search**
- **Office of the Inspector General (OIG) List of Excluded Individuals/Entities** which identifies those individuals who have committed offenses deeming them ineligible to care for patients receiving Medicare, Medicaid and other Federal health care benefits.
General Services Administration (GSA) Excluded Parties List Service identifies the List of Parties Excluded (EPLS) which identifies those excluded throughout the US Government from receiving Federal contracts and certain types of Federal financial/non-financial assistance/benefits.

- Executive Order 13224 Terrorism Sanctions Regulations
- Government Suspect/Watch List
- Office of Foreign Assets Control (OFAC) list of Specially Designated Nationals (SDN) which includes individuals associated with terrorism and Narcotics Trafficking.

- FACIS Database Searches includes OIG, GSA, OFAC and other sources.
- National Healthcare Data Bank Search and Sanction Report may include Medicare/Medicaid Sanction Search, OIG, GSA, and FDA Debarment Check.
- Fingerprinting and the National Criminal Information Center which may reveal National Wants and Warrants information
- National Criminal Applicable State Exclusion List
- Any Other Public Records

**Consent**

Students are provided the background check policy at the time of enrollment in a Health Science program and sign an acknowledgement. The student will provide consent(s) to the college-designated vendor conducting the background check. If the student is under eighteen (18) years of age, the student’s parent or guardian must sign the consent form in addition to the student. This consent will provide permission for:

1. the vendor to perform required background checks,
2. the vendor to provide results to Calhoun Community College Division of Health Sciences, and
3. the vendor to provide results to any contracted clinical affiliate to determine eligibility for clinical rotation.

**1. Background Check Procedure**

The background checks will be conducted by a college-designated vendor according to program specific deadlines. Background checks performed by any other vendor or agency will not be accepted. Students reinstated to a program after an absence from program coursework of one semester or more, are required to repeat background check procedure.

The student will be responsible for the cost of the background check. Any student failing to pay the fee in effect at the time of the background check by the published deadline and/or refusing to sign the consent form(s) will not undergo a background check and will be prohibited from attending clinical learning experiences. The student in this situation will be dismissed from the program. A grade of "F" will be recorded for the course(s) if the student does not officially withdraw.

If a student is experiencing extenuating circumstances that prohibit completion of the background check by the deadline, they should contact the Health Sciences program director who will determine if the student will be allowed to proceed with the background check. No student will be allowed to attend a clinical experience until the full background check process is completed.

**2. Results**

Background checks must be accomplished prior to assignment of any student for a clinical rotation and annually thereafter for subsequent clinical rotations. Results of the background check will be sent to the Health Sciences program director. A secure, electronic copy of all results will be maintained by the vendor.

Health Science program directors/designee have access to the secure database at all times. Designees at the clinical affiliate will be provided with a copy of negative results for students assigned to that agency, as requested.

Students with a background check that renders them ineligible for a clinical rotation will be informed of the results by the Health Sciences program designee and/or background check vendor. Students with a background check that indicates ineligibility will be denied assignment to a clinical facility. Students are advised to contact the background check vendor to dispute any information reported and to clear any findings of the background check.
Background checks that could render a student ineligible to obtain clinical learning experiences include, but are not limited to, certain convictions or criminal charges which could jeopardize the health and safety of patients, sanctions, or loss or revocation of professional licensure. Felony or repeated misdemeanor activity within the past seven (7) years and Office of the Inspector General violations will normally prohibit the obtainment of clinical learning experiences with clinical affiliate(s). Findings on background checks can have licensure implications upon graduation from a health program. Each clinical facility must, and will, have the discretion and authority to make the final decision regarding the eligibility of any student to attend their facility for a clinical experience.

**Background Check - General Guidelines (subject to change)**

CCC Health Science students will be accepted to participate in a clinical rotation if their background check reveals:

- No history of criminal offenses
- Misdemeanors for expired or failure to obtain a hunting or fishing license
- Misdemeanors for traffic or moving violations (excluding DUI)
- Any single misdemeanor over 2 years old

Students will not be allowed to attend clinical rotations if their background check reveals:

- Any misdemeanor less than 2 years old that is related to crimes against the person (such as assault and battery), crimes based on dishonesty or untruthfulness (such as theft or embezzlement), or drug and other substance abuse related crimes.
- A felony conviction less than 5 years old.
- A felony conviction that is a crime against a person such as battery or assault.

A student will be considered for clinical rotations on a case-by-case basis if their background check reveals:

- Any felony crime based on dishonesty or untruthfulness (such as theft or embezzlement) or drug and other substance abuse related crimes AND more than 5 years old (all decisions made by the review committee are final and may not be appealed.)
- Multiple misdemeanors regardless of length of time since offense (all decisions made by the review committee are final and may not be appealed).

Students who are unable to resolve a background check resulting in ineligibility will be dismissed from the Health Sciences program due to the inability to complete required clinical rotations. A grade of "F" will be recorded for the course(s) if the student does not officially withdraw. **The student will be advised by a program director as to their eligibility for program re-entry and the mechanisms for reapplication to the program.**

The Health Sciences program designee will have access to the results of the background check. Designees at the assigned clinical affiliates will be provided results on students only upon specific request and only to determine student eligibility at their facility.

Results of any student's background screen will be shared only on a need to know basis with the exception of legal, disciplinary or appeal actions, which require access to the results.

Date of Policy Adoption: January 18, 2008
Revised: March, 2017