Title: Background Check and Drug Screening Policy

Effective Date: 12/9/15  
Revision Date: 12/16  
Approval Date: 12/9/15  
No.: GME-199

Policy Statement

The University of South Florida (“University”) Morsani College of Medicine Graduate Medical Education (“GME”) has established the following policies and procedures to assist in evaluating whether potential and current residents and fellows (hereinafter “Trainee”) are eligible to participate in training programs. To this end, Trainees will be required to complete a background check and drug screening. Individuals with a record of activity unsuitable for patient contact, who are not eligible to participate in Medicare, Medicaid, Tricare, or other Federal health care programs, or who may be impaired due to substance abuse, are not eligible for appointment or reappointment as Trainees. Trainees must give a truthful and comprehensive self-disclosure of any conviction or prior substance abuse and /or treatment as is required for unrestricted licensure by the Florida Board of Medicine as part of this or any employment application, licensing, credentialing, privileging or other training related process, including application to the Florida Board of Medicine. Guilty verdicts, guilty pleas, and pleas of nolo contendere (no contest) must be included in any disclosure.

As a condition of appointment as a Trainee with GME, all new Trainees and those Trainees entering a new program must undergo a background check and drug screen including:

- Level 1 background check
- A 10-Panel urine drug screen
- Florida Department of Law Enforcement (FDLE) background check

This process must be completed and results verified prior to the employment and training start date. Failure to receive results prior to the training start date will result in a delayed start, including delayed payroll start date.

General Procedures
The GME office manages the background check and drug screen process and utilizes the University’s approved third-party online vendors to assist in the process. The GME office sends Trainees instructions about placing an order for the three screenings through the vendor’s website.

LEVEL 1 BACKGROUND CHECK
The Level 1 background check consists of:

- 7-year unlimited U.S. county criminal search (current, maiden, and alias names)
- Nationwide healthcare fraud and abuse scan
- Nationwide record indicator with sex offender index
- Social security alert
- Residency history
Any confirmed positive results will be referred to an advisory committee consisting of the GME HR administrator, Director of GME, and USF General Counsel. The results will be reviewed on a case by case basis. Information that will be taken into account are:

- the nature of the offense(s);
- the time that has passed since the offense had occurred; and
- the rehabilitation record, actions, and activities of the individual since the conviction.

The Program Director in the program to which the Trainee is to be appointed will also be informed of the positive result. This committee will review the results of the check, as well as any corroborating evidence from the Board of Medicine application, to determine whether the Trainee should be appointed. Should the committee decide not to appoint, that decision will be communicated to the Trainee and program director in writing by the Director of GME.

**Procedures**

Trainee will provide demographic information – legal name, social security number, date of birth, residing county – to perform a Level 1 Background check. Demographic information will be entered through the background screening vendor’s website.

Results will be received and maintained in the background screening vendor’s website. The Trainee and USF GME HR administrator will have access to the results.

**Outside the U.S.**

Trainees who reside in Puerto Rico and Canada prior to the start of training at USF will complete a Level 1 background check. For Trainees who reside in other countries prior to the start of training at USF, a Level 1 background check will be conducted on a case by case basis prior to arrival in the United States. If Trainees residing in other countries do not complete a background check prior to arrival in the United States, the Level 1 background check should be completed as soon as possible after their arrival. The USF HR Administrator will notify the background screening vendor when a Level 1 background check needs to be ordered in another country or territory. Trainees entering the United States on a visa without a social security number will have background checks completed by the Department of Homeland Security as part of the visa processing procedure.

**10 PANEL URINE DRUG SCREEN**

Any confirmed positive result for an illegal or non-prescribed substance will render the Trainee ineligible for appointment, and that information will be communicated in writing to the Trainee and program director by the Director of GME. Positive results for prescribed medications may lead to a PRN referral as part of the medical screening process.

**Procedures**

Trainees will receive information about the urine drug screen procedures through the background screening vendor’s website.
When a positive result is received, the drug screen vendor’s chief medical officer will contact Trainee about prescription medications s/he may be taking. All final determinations will be made by drug screen vendor’s medical review officer. Should Trainee challenge the results of the drug screen, this information will be forwarded to drug screen vendor, which will send the sample to another lab for re-testing (positive samples are retained by drug screen vendor for one year). The results of that re-test will be considered final.

**Dilute Negative Results**
If a Dilute Negative result is received, it will be treated as a negative result. GME reserves the right to retest, in the future and without advance notice, any Trainee whose urine drug screen result was Dilute Negative.

Results will be received and maintained in the background screening vendor’s website. The Trainee and USF GME HR administrator will have access to the results.

**Outside the U.S.**
Trainees who reside outside of the United States (excluding Puerto Rico) prior the start of training at USF must complete the urine drug screen as soon as possible after arriving in the U.S.

**FLORIDA DEPARTMENT OF LAW ENFORCEMENT (FDLE) BACKGROUND CHECK**
Any confirmed positive results will be referred to an advisory committee consisting of the GME HR administrator, Director of GME, and USF General Counsel. The results will be reviewed on a case by case basis. Information that will be taken into account is:
- the nature of the offense(s);
- the time that has passed since the offense had occurred; and
- the rehabilitation record, actions, and activities of the individual since the conviction.

The Program Director in the program to which the Trainee is to be appointed will also be informed of the positive result. This committee will review the results of the check, as well as any corroborating evidence from the Board of Medicine application, to determine whether the Trainee should be appointed. Should the committee decide not to appoint, that decision will be communicated to the Trainee and program director in writing by the Director of GME.

**Procedures**
Trainees will receive information about the background check procedures through the background screening vendor’s website. Procedures will vary depending on whether the Trainee resides in or out of the state of Florida at the time of registration.
Results will be received and maintained at the Florida Department of Law Enforcement (FDLE) and are accessed by the USF GME HR administrator through their secure web portal.
Outside the U.S.
Trainees who reside outside of the United States (including Puerto Rico) prior to the start of training at USF must complete the FDLE background check process as soon as possible after arriving in the U.S.

RESULTS DISCLOSURE
Results of the Level 1 background checks, drug screens, and FDLE background checks will be available only to USF administrative officials for legitimate security purposes. Requests for Level 1 background check, drug screen, and/or criminal background check results will require that Trainee complete and sign a release form prior to disclosure.

APPROVED:

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REVIEWED and APPROVED at GMEC 12-9-2015