



USF Health - Morsani College of Medicine  
GME POLICY & PROCEDURE

<b>Title: Background Check Policy</b>	GME-199-A
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**Scope:** Applies to all University of South Florida Morsani College of Medicine (“USF MCOM”) residents and fellows (“Residents”) in Accreditation Council for Graduate Medical Education (“ACGME”) accredited and non-accredited/non-standard programs as appointed through the House Office Contract issued from the USF MCOM Graduate Medical Education Office (“GME Office”).

**Background:** The University of South Florida (“USF”) System Policy 0-615 (Criminal History Background Checks) requires that a criminal history background check be conducted on prospective employees as a condition of employment. The USF MCOM GME Office is committed to creating a professional and safe working environment, which includes a responsibility to the health, welfare, and safety of patients and others at the facilities where Residents train.

**Policy:** The GME Office has established policies and procedures to assist in evaluating whether potential and current Residents are eligible to participate in training programs. To this end, Residents will be required to complete a Level 1 background check and National Practitioner Data Bank (NPDB) search in addition to review of education and work history as a condition of employment. Additionally, a criminal background check may be authorized if: (1) there is a reasonable belief that the Resident has been convicted of a crime without reporting it to the GME Office or (2) required as a condition of participation in programs run by educational affiliates.

Residents must give a truthful and comprehensive self-disclosure of any conviction or plea of guilty, nolo contendere, or no contest to, a misdemeanor or felony in any jurisdiction. All misdemeanors and felonies must be disclosed, even if adjudication was withheld. Refusal to undergo any part of the background check process will render a Resident ineligible for appointment or be grounds for disciplinary action, up to and including termination.

As a condition of appointment as a Resident with GME, all incoming Residents and those Residents transitioning into a new program must undergo:

- A Level 1 background check – includes a nationwide criminal history background check through validated national database sources, and a check of the National Sex Offender Public Website. It may also include a local criminal record check through local law enforcement agencies.

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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
- National Practitioner Data Bank (NPDB) – includes a report on any adverse licensure, certification and clinical privileges, a report on medical malpractice claims, and health care related civil judgments or criminal convictions taken in federal or state court.

Criminal history background checks and NPDB queries will be used only to evaluate individuals for employment or specified volunteer positions and will not be used to discriminate on the basis of race, color, marital status, sex, religion, national origin, disability, age, genetic information, sexual orientation, gender identity or expression, or veteran status.

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

**Procedures:** Resident will provide all requested demographic information required by the background screening vendors to perform a Level 1 Background check and NPDB query. Demographic information will be entered through each vendor’s website.

The GME Office: manages the background check and process through third-party vendors; runs NPDB query and; sends Residents instructions via the onboarding checklist about placing an order for the screening through each vendor’s website.

Level 1 Background Check and NPDB Query

If a criminal history background checks reveals any felony or misdemeanor convictions, or the NPDB reveals any reports, the findings will be referred to an Advisory Committee for review. The Advisory Committee shall consist of the GME HR administrator, Director of GME, and an attorney representative of the USF Office of General Counsel. The results will be reviewed on a case by case basis. Information that will be taken into account includes, but is not limited to:

- the nature and gravity of the finding(s) and the circumstances surrounding the finding(s);
- the time that has passed since the finding and/or completion of the sentence; and
- the rehabilitation record, actions, and activities of the individual since the finding(s), including subsequent work history.

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The existence of a conviction or report does not automatically disqualify an individual from employment. Adverse information triggers a process not a result. Each case will be judged on its own merit with respect to the above factors; however, it is expected that the individual must have made good-faith, truthful and comprehensive disclosures. The Program Director in the program to which the Resident is to be appointed will also be informed of the confirmed convictions or reports. This Advisory Committee will review the results of the Level 1 background check and NPDB query any corroborating evidence from the Board of Medicine application, and, as needed, is able to solicit additional information from the Self-Insurance Program (SIP), and the applicable Program Director and/or Chairman to determine whether the Resident should be appointed. The Advisory Committee will make a recommendation to the DIO, who will then make a final determination. The decision of the DIO will then be communicated to the Resident and Program Director in writing.

Results will be received and maintained in each vendor's website. The Resident and USF GME HR administrator will have access to the results.

Outside the U.S.

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

Results Disclosure

Results of the Level 1 background checks and NPDB query will be available only to USF administrative officials and affiliated educational sites for on-boarding and credentialing purposes.

APPROVED:



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Senior Associate Dean, Graduate Medical Education/DIO

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