USF Health – Morsani College of Medicine
GRADUATE MEDICAL EDUCATION POLICY & PROCEDURE

<table>
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<th>Title: Background Check and Drug Screening Policy</th>
<th>No.: GME-199</th>
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<td>Effective Date: 12/9/15</td>
<td>Approval Date: 4/2019</td>
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Scope:

This Policy applies to all residents and fellows (hereinafter “Resident”) participating in accredited post-graduate medical training programs (i.e., residency or fellowship) and non-accredited clinical fellowship programs at the University of South Florida Morsani College of Medicine.

Background:

The University of South Florida Morsani College of Medicine Graduate Medical Education (the “GME Office”) is committed to hiring the most capable Residents to achieve our strategic mission and goals. Part of this commitment is to create 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. To better achieve this commitment, the GME Office requires that every Resident complete a background check and drug screening as a condition of appointment.

Policy:

The GME Office has established the following 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 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 Residents. Residents 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 Resident with GME, all new Residents and those Residents entering a new program must undergo a background check and drug screen including:

- Level 1 background check
- A 10-Panel urine drug screen

This process must be completed and results verified prior to the training start date. Failure to receive results prior to the training start date will result in a delayed start, including a delayed payroll start date.
**General Procedures**
The GME Office manages the background check and drug screen process through a third-party vendor. The GME Office sends Residents instructions about placing an order for the two screenings through the vendor’s website.

**LEVEL 1 BACKGROUND CHECK**
All appointments are contingent upon satisfactory results of a 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 offenses will be referred to an advisory committee consisting 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 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 Resident is to be appointed will also be informed of the confirmed offenses. 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 Resident should be appointed. Should the committee decide not to appoint, that decision will be communicated to the Resident and program director in writing by the Director of GME. Any decision to reject or accept a Resident is solely at the discretion of the Director of GME.

**Procedures**
Resident will provide all requested demographic information required by the background screening vendor 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 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. For Residents who reside in other countries prior to the start of training, a Level 1 background check 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 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. 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.
10 PANEL URINE DRUG SCREEN
Any confirmed positive result for an illegal or non-prescribed substance will render the Resident ineligible for appointment, and that information will be communicated in writing to the Resident 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
Residents 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 Resident about prescription medications s/he may be taking. All final determinations will be made by drug screen vendor’s medical review officer. Should Resident 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 Resident whose urine drug screen result was Dilute Negative.

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

Outside the U.S.
Residents 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.

RESULTS DISCLOSURE
Results of the Level 1 background checks and drug screens will be available only to USF administrative officials for legitimate security purposes. Requests for Level 1 background check and drug screen results will require that Resident complete and sign a release form prior to disclosure. Requestors will be provided a verification letter documenting the types of screenings the Resident completed and screening dates.

APPROVED:

[Signature]
Senior Associate Dean, Graduate Medical Education

c:p&p\background check

Effective: 12/2015
REVIEWED and APPROVED at GMEC 12-9-2016
REVIEWED and APPROVED at GMEC 4-10-2019