BACKGROUND CHECKS

Policy and Procedures on Criminal Background Checks (CBC) for Health Professions Programs in the Quinnipiac University School of Health Sciences (SHS), School of Medicine (SOM) and School of Nursing (SON) Revised 7/20/18, Revised 4/30/2019, Revised 5/28/2020, Revised 5/3/2021, Revised 5/10/2022.

Purpose
Healthcare providers are entrusted with the health, safety and welfare of patients. They have access to controlled substances and confidential information and operate in settings that require they exercise good judgment and ethical behavior. Therefore, an assessment of a student’s suitability to function in such a setting is imperative to promote safety and the highest level of integrity in the delivery of health care. Clinical facilities are required by accreditation agencies, such as The Joint Commission, to conduct criminal background checks for security purposes on individuals who provide services within the facility and especially those who supervise care and render treatment. The Joint Commission indicates that students must have a criminal background check if mandated by state law for healthcare providers, or by the clinical facility’s policy. To meet these requirements and to comply with the requirements stipulated in contracts between clinical agencies and the Schools of Medicine (SOM), Nursing (SON), and Health Sciences (SHS), all schools require criminal background checks of all students.

For all items in this document the primary dean’s representative is as follows (but alternative designees may be named, as appropriate):

- The appropriate dean’s representative for SON is the Assistant Dean for Student Services.
- The appropriate dean’s representative in the SOM is the Associate Dean for Student Affairs.
- The appropriate dean’s representative for SHS is the Assistant Dean for Career Development.

Policy Statement
This policy applies to all students prior to enrollment, at additional points in their curricula as specified in their program manuals and summarized in the Timing of Background Checks (p. 1), and/or prior to beginning clinical rotations or fieldwork placements as required by their assigned sites. Additionally, all students who have had a break in their enrollment (e.g., academic or other leave of absence, suspension, etc.) must have a background check prior to returning to their program. Students must comply with all applicable state and federal regulations as required by the State of Connecticut, the state in which they reside, and the state in which clinical or fieldwork placements are located. Coursework cannot begin until a cleared background check is on record in their school.

Timing of Criminal Background Checks
Completed criminal background check due dates are specific to each program within the SOM, SON and SHS, and are outlined below:

<table>
<thead>
<tr>
<th>School of Nursing</th>
<th>Full-time Undergraduate</th>
<th>Prior to junior year and as required by the clinical site</th>
</tr>
</thead>
<tbody>
<tr>
<td>School of Nursing</td>
<td>Accelerated</td>
<td>Prior to program orientation and as required by the clinical site</td>
</tr>
<tr>
<td>School of Nursing</td>
<td>Graduate Program (MSN Nurse Practitioner)</td>
<td>Prior to program orientation and as required by the clinical site</td>
</tr>
<tr>
<td>School of Nursing</td>
<td>Online Nursing Programs</td>
<td>August 24 prior to beginning fall semester and as required by the clinical site</td>
</tr>
<tr>
<td>School of Nursing</td>
<td>Students matriculating in Spring/Summer</td>
<td>Prior to the start of classes that semester and as required by the clinical site</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Athletic Training/Sports Medicine</td>
<td>Prior to program orientation</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Cardiovascular Perfusion</td>
<td>Prior to program orientation</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Diagnostic Medical Sonography</td>
<td>Prior to start of clinical component</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Advanced Medical Imaging and Leadership</td>
<td>Prior to program start</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Occupational Therapy</td>
<td>Prior to junior year, prior to spring semester of graduate year, and as required by the clinical site</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Pathologists’ Assistant</td>
<td>Prior to program orientation and prior to start of clinical phase of the program</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Physician Assistant</td>
<td>Prior to program start date and again between May 13-31 prior to the start of clinical rotations</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Physical Therapy</td>
<td>Prior to program orientation</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Radiologist Assistant</td>
<td>Prior to program orientation</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Radiological Sciences</td>
<td>Prior to start of professional component</td>
</tr>
<tr>
<td>School of Health Sciences</td>
<td>Social Work</td>
<td>Prior to program orientation</td>
</tr>
</tbody>
</table>

Background Check Procedure
The university will designate an approved vendor(s) to conduct criminal background checks. All issues will be reported from the vendor(s) directly to the appropriate designee within each school’s dean’s office. Results from vendors other than those designated by the university to conduct criminal background checks will not be accepted. If a clinical site requires
Background Checks

A criminal background check will be honored for the duration of termination of enrollment for the student. Falsification or omission occurs post-admission, such discovery will be included in the background check. The designated vendor(s) will advise students of their rights and assist in verifying the accuracy of the report from the designated vendor(s). Students must comply with the vendor's method for completing the criminal background check. Incoming and current students are required to review the appended information from the designated vendor(s).

Criminal activity that occurs while a student attends the university must be reported by the student to the dean within five business days of its occurrence and could result in disciplinary action, including dismissal. Failure to report criminal activity or breach of university policy will be addressed through the university's academic integrity or student conduct disciplinary policies as determined by the dean's office and the Background Check Review Committee process outlined in this document.

A student with a positive criminal background check does not comply with clinical affiliation contractual agreements and, therefore, the student's program will likely be unable to secure the clinical or fieldwork placements necessary to complete requirements for graduation. In addition, a student with a positive criminal background check may not comply with state board standards to test for licensure.

Incoming and current students will be advised that final program acceptance is dependent upon a successful background investigation. Incoming and current students are required to review the appended information from the designated vendor(s).

The criminal background check will be conducted utilizing the following measures (see Appendix 5 (p. 5)):

1. The background check must be completed by the approved vendor(s).
   a. If a clinical site requires a fingerprint background check, students may obtain a fingerprint check as outlined in Appendix 6 (p. 6).
2. The student must comply with the vendor's method for completing background checks.
3. The standard criminal background check for Quinnipiac University includes:
   a. Social Security Number Validation/Verification
   b. Criminal Record Searches (Statewide, County & Federal Searches)
   c. National Criminal Database Search
   d. Sex Offender Registry Search
   e. OIG/GSA Search (Office of Inspector General/General Services Administration) Sanctions-Based Search
   f. Additional options are available if needed:
      i. International Criminal Record Check
      ii. Education Verification
      iii. Professional Licensing Verification
      iv. Employment History Verification
      v. Other as determined by vendor
4. All states in which the student has resided must be included in the report.
5. If the accuracy of the background check is disputed by the student, it is the responsibility of the student to ensure that any misinformation in the initial criminal background check report is corrected with the vendor.
Criminal Background Check Report Scoring
The university will maintain a current contract with the outside vendor(s) and will provide the vendor(s) with Quinnipiac scoring criteria.

Report Results
Negative Criminal Background Checks
No further action by the student or school is required if the results of the student's background check are negative.

Positive Criminal Background Checks
Any student whose report indicates a positive result in their criminal background check will receive notification by email from the dean's office within five business days. Students are required within five business days of the emailed notification to schedule a time to discuss the findings with the appropriate dean/designee. Following that meeting, the student will be notified of the dean's decision within five business days regarding whether the student may begin or continue their program or be dismissed from the program in which he/she is enrolled.

Appeals Process
Any student who receives a letter of dismissal for a positive criminal background check may elect to proceed to the appeals process. Relevant considerations in the appeal may include: the date, nature, and number of convictions; the relationship the conviction bears to the duties and responsibilities of the position; and successful efforts toward rehabilitation.

The appeal must be made by the student in writing within five business days of the emailed notification of dismissal by the dean's office. It is the student's responsibility to initiate the appeal process by emailing a written appeal to the dean. The dean's office will schedule a meeting of the Background Check Review Committee within 14 business days of receipt of the appeal request and will notify the student of the meeting date. Students currently enrolled and attending classes will be permitted to attend classes but will not be permitted to begin or continue clinical or fieldwork experiences until the Background Check Review Committee has made a final decision.

Once a final decision is made regarding the student's appeal, the Background Check Review Committee will notify the student by email. The dean's office will copy all related correspondence to the appropriate chair and/or program director.

The decision of the Background Check Review Committee regarding the student's responsibility to initiate the appeal process by emailing a written appeal to the dean. The dean's office will schedule a meeting of the Background Check Review Committee within 14 business days of receipt of the appeal request and will notify the student of the meeting date. Students currently enrolled and attending classes will be permitted to attend classes but will not be permitted to begin or continue clinical or fieldwork experiences until the Background Check Review Committee has made a final decision.

Background Check Review Committee
A Background Check Review Committee will be convened with the assistance of a representative of the dean's office. Members of the Background Check Review Committee will include representation from, but not limited to, the following offices:
- Dean of the school in which the student is enrolled
- Admissions
- Student Affairs

- Academic Affairs
- Finance (if applicable)

A careful review of the self-reported information in the applicant/current student's file will occur. This review will include:
- criminal convictions
- pending adjudications
- information in the criminal background check report
- relevant supplementary materials obtained from the applicant/current student and from other sources including court documents
- institutional policies and procedures

Factors considered in reviewing an individual case may include, but are not limited to:
- the nature, circumstances, and frequency of any reported offense(s)
- the length of time since the offense(s)
- available information that addresses efforts at rehabilitation
- the accuracy of the information provided by the student in their application materials
- the relationship between the duties to be performed as part of the educational program and the offense committed

Any incoming or current student who is referred to the Background Check Review Committee has the right to appear before that committee to contest or explain the findings from the criminal background check.

A student appearing before the Background Check Review Committee will not be permitted to have legal representation, parents, family members, or students or faculty from the Quinnipiac University School of Law at the appeal hearing. A student may request, in writing, to have an adviser assigned by the dean. If a student requests an assigned adviser and then refuses this adviser, no further advisers will be assigned. An adviser may assist the student in preparing for the appeal but may not attend the appeal.

Students receiving a positive report who are not dismissed and who elect to continue the program do so at their own risk (see Appendix 4: Quinnipiac University Disqualifying Crimes for SON Students (p. 5)). Because state licensure requirements are subject to change without notice, Quinnipiac University and the SON/SOM/SHS cannot guarantee that any student will be eligible to sit for any state examination, should there be any findings in their background check report. Students with a positive result who receive permission from the dean's office or the Background Check Review Committee to proceed in their program and who decide to continue in their program must sign a Student Waiver Regarding Background Check Results (see Appendix 3 (p. 4)).

Maintenance of Records and Confidentiality
Information obtained for the purpose of and during the criminal background check will be retained by the dean's office separate from other student educational and academic records. Confidentiality will be maintained consistent with FERPA guidelines. The program chair, program director and clinical coordinator will be provided with the student's name and the date the report was cleared or failed to clear. If a clinical or fieldwork site requires a copy of any report, the student must either email a copy of their report directly to the facility or sign a release
form for the vendor(s) who will submit the report to the email address of the person authorized to receive it.

This document will be kept on file throughout the above student's duration of enrollment and for a period of 7 years thereafter.

Appendix 1: A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA.

For more information, including information about additional rights, visit Federal Trade Commission Consumer Rights Credit and Loans (http://www.ftc.gov/credit/) or write to:

Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580
1-877-FTC-HELP (382-4357)

You must be told if information in your file has been used against you. Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance or employment — or to take another adverse action against you — must tell you, and must give you the name, address and phone number of the agency that provided the information.

You have the right to know what is in your file. You may request and obtain all the information about you in the files of a consumer reporting agency (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:

- a person has taken adverse action against you because of information in your credit report.
- you are a victim of identity theft and place a fraud alert in your file.
- your file contains inaccurate information as a result of fraud.
- you are on public assistance.
- you are unemployed but expect to apply for employment within 60 days.

In addition, by September 2005 all consumers will be entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. Visit Federal Trade Commission Consumer Rights Credit and Loans (http://www.ftc.gov/credit/) for additional information.

You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate, and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. Visit Federal Trade Commission Consumer Rights Credit and Loans (http://www.ftc.gov/credit/) for an explanation of dispute procedures.

Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.

Consumer reporting agencies may not report outdated negative information. In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.

Access to your file is limited. A consumer reporting agency may provide information about you only to people with a valid need — usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.

You must give your consent for reports to be provided to employers. A consumer reporting agency may not give out information about you to your employer, or a potential employer, academic institution or affiliated educational sites without your written consent. For more information, visit Federal Trade Commission Consumer Rights Credit and Loans (http://www.ftc.gov/credit/).

You may seek damages from violators. If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.

Identity theft victims and active duty military personnel have additional rights. For more information, visit Federal Trade Commission Consumer Rights Credit and Loans (http://www.ftc.gov/credit/).

Appendix 2: Fair Credit Reporting Act Disclosure and Authorization Form for Criminal Background Checks

I understand that, as a condition of admission to Quinnipiac University (QU)’s Schools of Medicine, Nursing and Health Sciences program, I will be required to obtain a criminal background check(s) through QU’s nationwide application service. Accordingly, I hereby authorize QU or its agent(s) to conduct a criminal background check(s). I understand that this authorization shall be valid for subsequent criminal background check(s) during my participation in the School of Medicine, Nursing or Health Sciences program. Further, I also authorize clinical training facilities to conduct criminal background check(s), and the reporting agency to provide the results to QU and/or clinical or field work facilities. In all cases, all expenses associated with the criminal background check(s) are my responsibility, as applicable per my program.

If I am offered conditional admission, the offer will not be considered final, and I will not be permitted to enroll until completion of my criminal background check(s), with results deemed acceptable by QU. If the results of the criminal background check(s) are not deemed acceptable by QU, or if information received indicates that I have provided false or misleading statements, have omitted required information, or in any way I am unable to meet the requirements for completion of the program, the conditional admission will be denied or rescinded, and/or I will be disciplined or dismissed.

Appendix 3: Student Waiver Regarding Background Check Results

In the event of positive findings on the criminal background check, the student is required to acknowledge that the results of the criminal background check for the SOM, SON, and SHS at Quinnipiac University (the "results") were received. The student will be required to sign a
Document acknowledging that, to the best of the student's knowledge, the results are accurate, and will also acknowledge that the university has advised that because of these results the student may not be eligible for participation in clinical affiliations and may not be eligible to sit for the certification examination and/or individual state licensure in the student's desired profession.

Student must, after careful consideration, voluntarily elect to continue with as much of the curriculum for which they are cleared to participate regardless of the results. Student must be aware that they do so at their own risk, and agree that Quinnipiac University will not be liable in any way if they are unable to participate in clinical affiliations, sit for any certification examination and/or individual state licensure examination or receive any benefit for which the student would otherwise be eligible but for the results.

Appendix 4: Quinnipiac University Disqualifying Crimes for SON Students

Criminal Background Check Reporting Criteria

Some criminal offenses preclude students from participating in patient care (i.e., red flags). In addition, some professional licensure boards include specific offenses which constitute those crimes for which licensure are prohibited. Several issues arising from the background check involve what constitutes a failing report and to what extent clinical sites would refuse a student based on the failed status. All felony cases listed below will be posted as a "FAIL." In addition, each clinical facility may require stringent criteria for placement.

Major Offenses

Red flags are those that indicate clear potential threat or harm to the community. These constitute an automatic failure of the criminal background check and dismissal from the program. Examples include but are not limited to:

- Abduction
- Arson (first through third degree); attempted arson
- Assault (first through fourth degree) including domestic assault (spousal abuse); assault by a caregiver against a vulnerable adult and related offenses when resulting in a felony
- Battery and related offenses when resulting in a felony
- Burglary; breaking and entering resulting in a felony
- Child abuse, neglect of a child, endangering the welfare of a child; malicious punishment of a child
  - Contributing to the delinquency or dependency of a child
  - Exploitation of a child; solicitation of children to engage in sexual conduct
  - Termination of parental rights resulting in a felony
- Coercion or attempt to coerce
- Controlled substances and illicit drugs-sale, distribution (including great bodily harm caused by distribution of drugs), delivery or possession of controlled substances and/or illicit drugs and related offenses when resulting in a felony
- Credit card crimes; credit card fraud, credit card theft, illegal use of a credit card
- Criminal abuse; neglect; financial exploitation of a vulnerable adult
- Embezzlement
- Forgery including check forgery and related offenses
- Fraud
- Harassment; stalking
- Hate crimes and related offenses
- Incest
- Kidnapping, false imprisonment
- Killing, murder, manslaughter; injury, death, assault of an unborn child by injury to the mother
- Lewd and lascivious behavior; indecent exposure when resulting in a felony
- Mistreatment of confined persons or residents or patients
- Murder, maiming, manslaughter, attempted murder, attempted maiming, attempted manslaughter
- Distribution of or possession of obscene literature and materials in any form, including pornography when resulting in a felony
- Obtaining signature by false pretense
- Prohibited acts of persons in familial or custodial authority
- Prostitution, sexual solicitation and related offenses
- Robbery and related offenses resulting in a felony
- Sexual abuse, sexual assault, sexual battery, rape, incest and other sexual offenses
- Sexual misconduct; criminal sexual conduct (first through fourth degree); indecent exposure; use of minors in sexual performance; possession of pictorial representations of minors resulting in felony convictions
- Shooting at or in a public transit vehicle or facility; drive-by shootings
- Tampering with a witness resulting in a felony
- Terrorist threats or actions
- Theft and related offenses resulting in a felony
- Vehicular homicide, vehicular assault, hit and run
- Weapon crimes (i.e., dangerous weapons, machine guns, short-barreled shotguns etc.) and related offenses
- Wounding — malicious wounding, unlawful wounding

Minor Offenses

Minor offenses will still appear as red but may not constitute an automatic failure of criminal background check. These will be reviewed independently by representatives from the dean's office and the program and a decision will be made on the nature of the crime and the nature of the position. If this review results in failure of the criminal background check and dismissal from the program, the student may appeal this result to the Background Check Review Committee.

Examples include but are not limited to:

- 10-year-old charge of possession of marijuana
- Driving Under the Influence
- Positive drug screen
- Riot resulting in a misdemeanor
- Shoplifting
- Disorderly conduct
- Failure to report maltreatment of a vulnerable adult

Appendix 5: Sample Criminal Background Check Contents

Analyzed Social Security Number Search — credit bureau data analyzed/or names, SSNs & addresses
CT Statewide Criminal Records Repository — for CT residents only

County Criminal Records Search — searches conducted in all counties of residence outside of CT

National Criminal File Search — national database search covering more than 810 million criminal, sex offender and violation records, includes verification of hits

National Sexual Offender Database Search — database search covering sex offender records collected nationwide

OIG / GSA EPLS Search — search covers the federally mandated Health and Human Services Office of Inspector General’s (OIG) List of Excluded Individuals/Entities (LEIE), and the General Service Administration (GSA)-Excluded Parties List (EPLS)

SanctionsBase® — proprietary search covering sanctions, disciplinary and administrative actions taken by hundreds of federal and state healthcare regulatory authorities, including Food and Drug Administration, National Institutes of Health, GSA, Office of Foreign Asset Control, terrorist watch lists and more

Criminal Background Check, Recheck

Primary name and address only.

OIG & GSA Excluded Parties Search

SanctionsBase® search

Analyzed Social Security Number Search — credit bureau data analyzed for names, SSNs & addresses

County Criminal Records Search — current county only, searches conducted on current county of residence

National Criminal File Search — national database search covering more than 810 million criminal, sex offender and violation records, includes verification of hits

Appendix 6: Fingerprint Background Check Procedure

There are occasions when a clinical site may require a student to obtain a fingerprint background check. In these instances, the student must consult with their clinical coordinator, who will notify the university’s Department of Public Safety that a fingerprint background check is to be obtained.

Criminal History Searched by Fingerprint through Connecticut State Police


1. Fingerprinting is available by appointment only.
   a. Make an appointment at State Police Headquarters:
      https://outlook.office365.com/owa/calendar/
      DepartmentOfEmergencyServicesandPublicProtectionCopy@ct.gov/
      bookings (https://outlook.office365.com/owa/calendar/
      DepartmentOfEmergencyServicesandPublicProtectionCopy@ct.gov/
      bookings/)
   b. State Police Headquarters, 1111 Country Club Road, Middletown, CT 06457

2. You will be required to bring the following:
   a. Appointment confirmation page from the fingerprint appointment booking as well as the pre-enrollment confirmation page with tracking number and barcode.
   b. Valid government-issued photo ID. (Driver’s License, Connecticut ID Card or Passport)
   c. Appropriate fees

3. Fees (all are required, including both state and federal criminal history check)
   a. $15 Fingerprinting Fee
   b. $75 for a State Criminal History Check
   c. $13.25 for a Federal Criminal History Check. NOTE: Not all fees are required for all services requested. Federal Criminal History Check is only available in accordance with applicable State Statute or Federal Act.
   d. All fees must be paid separately in check, money order or cash (if paying in cash, all fees are to be exact change only. No change will be made at the window). If you are unsure of the amount of your fees, please contact SPBI at 860-685-8480

4. Have results sent to the email (FingerPrints@qu.edu) address FingerPrints@qu.edu

5. Email (public.safety@qu.edu) Quinnipiac University Public Safety at public.safety@qu.edu and alert them to expect an email with the results of your fingerprint background check. Include your name and the program in which you are enrolled. Please copy the email to the clinical education coordinator, fieldwork coordinator, or director of clinical education for your program.

For All In-State and Out-Of-State Completed Results

The chief of public safety and/or their designee will be responsible for monitoring, receiving and storing all fingerprint results received via email (FingerPrints@qu.edu) or through the mail from the State of CT.

As soon as results have been received by the Department of Public Safety the chief and/or their designee will contact via email the clinical coordinator with the results of each individual students’ fingerprints. Only a pass or fail result will be provided to the individual coordinator.

Any student who fails the Criminal History Record will follow the procedures outlined in this document. If the student would like to obtain more information regarding the result, they will be required to set up an appointment with the chief of public safety.

All students are required to confirm with their clinical facilities whether an updated background check or other information is required and complete these requirements prior to starting the rotation. Failure to successfully pass any of the clinical facility’s requirements will preclude the student from participating in clinical or field work.