

BACKGROUND INVESTIGATION POLICY AND PROCEDURES

PURPOSE: To assure the safety and well-being of patients, students, faculty and staff in the clinical and academic environments and to attest to clinical agencies the students' eligibility to participate in clinical activities.

SCOPE: This policy applies to all students in the School of Dentistry.

POLICY: Background investigations will be conducted, via a contractual arrangement with an outside vendor, as a condition of enrollment to the School of Dentistry. These checks will be conducted following conditional acceptance and prior to matriculation. Once a student matriculates within the School of Dentistry, the student is responsible for notifying the Background Evaluation Committee, through the Assistant / Associate Dean for Admissions and Student Affairs, of any misdemeanor or felony arrests / indictments. Failure to do so will result in action by the Background Evaluation Committee. The Assistant / Associate Dean for Admissions and Student Affairs may request a background check on any student at any time based on reasonable suspicion.

Confidentiality: The handling of all records and subject information will be strictly confidential and revealed only to those required to have access. Any breach of confidentiality will be considered serious and appropriate disciplinary action will be taken. Background investigation records will be stored for three (3) years after the student leaves Creighton University and will then be shredded.

The investigation will include but may not be limited to, a combination of the following screenings for every state and county of residence:

- Social Security Number Search (name/address search)
- County Criminal Record Search
- Nebraska Child Abuse/Neglect Central Register
- Nebraska Adult Protective Services Central Registry
- FACIS® Level 1 includes, but not limited to:
 - (OIG) Office of Inspector General List of Excluded Individuals
 - (GSA) General Services Administration Excluded Parties Listing
- Sex Offender Registry

PROCEDURES: Permission to conduct this required background investigation will be obtained following conditional acceptance to the School of Dentistry. The investigation MUST be completed prior to initial course enrollment from individuals admitted to the School of Dentistry. A copy of "Your Rights under the Fair Credit Reporting Act" will be given to each person with the appropriate permission or assent form from the outside vendor.

Outcome of the Background Investigation (Note: The outside vendor conducting the background investigation is not responsible for eligibility decisions)

If the background investigation results indicate adverse information:

1. The Assistant /Associate Dean for Admissions and Student Affairs (or representative) will notify the admitted student within seven (7) business days via an "Adverse Letter of Notification".
2. Within seven (7) days of the date of this written notice:

- a. The student may contact the Assistant /Associate Dean for Admissions and Student Affairs to discuss the adverse information
 - b. The student will provide a written explanation of the adverse information for the Background Evaluation Committee.
 - c. The student may contest the results of the investigation. The student must directly notify the vendor to contest the results of the adverse information. Detailed contact information will be provided in the "Adverse Letter of Notification".
 - d. *Failure to complete any part of this process in the described time frame may result in termination of acceptance to the School of Dentistry.*
3. If the student contests the results of the investigation, the vendor is required to re-investigate the disputed information within ten (10) business days from the date of the student's dispute of the report. The re-investigation report will be sent to the Assistant / Associate Dean for Admissions and Student Affairs.
 4. A determination will be made regarding the student's eligibility for clinical course participation by the School of Dentistry's Background Evaluation Committee at the next regularly scheduled meeting or within thirty (30) days from the receipt of the student's written explanation of the investigation and the results of the re-investigation report if the student contests the results.
 - a. The Assistant / Associate Dean for Admissions and Student Affairs, in preparation for the Background Evaluation Committee meeting, will consult with designated individuals who have expertise in their respective areas to review the adverse results. The panel of consultants will consist of, but not be limited to, the following individuals:
 - i. Representative of the General Counsel's Office
 - ii. Representative of the Human Resources Department
 - iii. University Privacy Officer
 - iv. Faculty Member Appointed to the Nebraska Board of Dental Examiners
 - b. Consideration will be given to
 - i. Number of convictions;
 - ii. Nature, seriousness and date(s) of occurrence of the violation(s);
 - iii. Rehabilitation;
 - iv. Relevance of the crime committed to dental profession standards;
 - v. State or federal requirements relative to the dental profession;
 - vi. All known information regarding the student, including the written explanation;
 - vii. Any other evidence demonstrating an ability to perform clinical and academic expectations competently and free from posing a threat to the health and safety of others.
 - c. The Background Evaluation Committee will review the written explanation of the adverse information and advice of the consultants. The student will not be allowed to be present at the proceedings.

5. Following deliberation of the Background Evaluation Committee, the Assistant / Associate Dean for Admissions and Student Affairs will notify the student of the outcome in writing within three (3) business days.

NOTE: Any identified misrepresentation, falsification, or material omission of information from the application discovered during the acceptance

process and deliberation of clinical course eligibility may result in termination of acceptance to the School of Dentistry.

ADMINISTRATION AND INTERPRETATIONS: Questions about this policy and procedure may be directed to the Assistant / Associate Dean for Admissions and Student Affairs. In addition, the General Counsel's Office or Compliance Officer for the Health Sciences may be consulted.

AMENDMENTS OR TERMINATION OF THIS POLICY: Creighton University School of Dentistry reserves the right to modify, amend, or terminate this policy at any time.

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