

Student - Policy on Criminal Background Check and Drug Screening

Policy Number: 100.1136.104 Policy Revision Date: May 10, 2022

Policy Category: General Administrative Policy Owner:

Vice Dean Policy

Audience: Students

1. Definitions:

2. Medical Curriculum Committee Review: Medical Curriculum Committee: May 10, 2022

3. Introduction / Purpose: All applicants accepted to Geisinger Commonwealth School of Medicine's MD program must consent to, submit, and satisfactorily complete a criminal background check conducted by a vendor selected by the Association of American Medical Colleges (AAMC) and three additional background checks. Furthermore, accepted MD students must submit and satisfactorily complete a drug screening prior to matriculation and within the timeframe designated by the Office of Admissions. The Urine Drug Screen is consistent with the Geisinger Health System screen and includes nicotine as the health system is a tobacco-free environment. Should a student's urine drug screen return positive for nicotine, the student will be referred to Student Health Services for tobacco cessation counseling. Continuing MD students are required to consent to, submit and satisfactorily complete updates to the criminal background checks and urine drug screen as conducted by a vendor selected by the institution at designated interval(s) within the curriculum.

4. Governance and Enforcement: Associate Dean of Admissions, Enrollment Management and Financial Aid and Associate Dean of Student Affairs

5. Policy: Criminal Background Check Policy Applicable to the MD Program: All applicants accepted by Geisinger Commonwealth School of Medicine to the MD program must consent to, submit, and satisfactorily complete a criminal background check ("CBC") conducted by a vendor selected by the AAMC. In addition, all accepted applicants must consent to, submit, and after a student receives an offer of admission, the process will proceed with AAMC's recommended vendor and instructions from the Office of Admissions indicating the necessary steps to complete the additional background checks. In addition, such a student is required to advise the Office of Admissions of any arrest for a violation of a crime within 48 hours of the arrest. Matriculation to Geisinger Commonwealth School of Medicine's MD program is contingent upon receipt of a satisfactory report for all background checks and drug screenings. Failure to satisfactorily complete the background checks and drug screenings by the deadline dates prescribed may result in disciplinary actions up to and including the retraction of the acceptance offer. A positive result for nicotine as part of the drug screen, will not, by itself, prompt a retraction of the acceptance offer, but the student will be referred for mandatory smoking cessation counseling at the time of matriculation. Geisinger Commonwealth School of Medicine will follow the AAMC guidelines and procedures on Criminal Background Checks for students as detailed on the AMCAS website: https://www.aamc.org/students/applying/amcas/how_to_apply/134176/background_check_details.html

In addition: 1. The applicant will not be assessed an additional fee for the CBC.

2. Geisinger Commonwealth School of Medicine's final decision about the applicant's matriculation to the School will be made only after a review of CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, FBI Fingerprinting, drug screening results and, where applicable, the applicant's response.

3. The CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, FBI Fingerprinting, and drug screening results will not be used for any purpose other than the School's decision regarding an accepted applicant's matriculation to the School.

4. The CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, FBI Fingerprinting, and drug screening results will be confidential, maintained by the Admissions Office in accordance with applicable laws, and will not become part of the student's academic record.

5. The CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, FBI Fingerprinting, and drug screening results will not be used to unlawfully discriminate in admissions, matriculation or other decisions. The Associate Dean of Admissions, Enrollment Management and Financial Aid or designee reviews the results of the CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, FBI Fingerprinting, and drug screening. In cases where the results of the background checks and/or drug screenings are satisfactory, the accepted student's admissions record will reflect that the investigation was completed and satisfactory. In cases where the results of the background checks and/or drug screening reveal information of concern, the Associate Director of Admissions, Financial Aid, and Enrollment Services or designee will contact the accepted applicant, specify the issue or issues of concern, and ask the applicant to provide a written response addressing the issue(s). The applicant must respond to the request within 10 days. The Pre-Matriculation Credentialing Committee (PMCC), appointed by the Vice Dean and separate from the Admissions Committee, will be responsible for reviewing relevant information regarding applicants whose background checks and/or drug screenings, after consideration of the applicant's response, continue to reflect information of concern. The Associate Dean of Admissions, Enrollment Management, and Financial Aid will chair the PMCC. Additional members may include representatives from academic affairs, diversity affairs, legal counsel, student affairs, hospital administrators and physicians. The PMCC will carefully consider the results of the CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, FBI Fingerprinting, drug screening, self-reported information in the applicant's AMCAS file and the applicant's written response to the issue(s) of concern. After such consideration, the PMCC shall make a recommendation to the Vice-Dean with respect to how the issue(s) should be resolved. Factors considered in developing its recommendation may include, but not be limited to: 1. The nature, circumstances, and frequency of any reported offense(s); 2. The length of time since the offense(s) occurred; 3. Available information that addresses efforts at rehabilitation; 4. The accuracy of the information provided by the applicant in their medical school application materials; and, 5. The applicant's response, and any other information self-reported in the applicant's application file. The PMCC will not consider: 1. Records of arrest for which there was no felony or serious misdemeanor conviction or other outcome of significant concern including but not limited to deferred prosecution or adjudication agreements, regardless of how defined by state law (collectively "outcome of significant concern"). Arrest records for which charges are still pending will be considered by the PMCC; 2. Conviction of a crime that has been annulled or expunged; 3. Conviction of a crime for which the individual has been pardoned; 4. Information concerning juveniles, except for offenses for which the juvenile was tried as an adult. The final decision regarding the matriculation of an accepted applicant is made by the Vice Dean after consideration of the PMCC

recommendation. The decision of the Vice Dean is final. Geisinger Commonwealth School of Medicine will inform the student of its final decision in writing. *For applicants who are accepted into the MD program from the waitlist in a timeframe that prevents them from completing all required background checks and/or drug screenings in accordance with generally applicable deadlines, Geisinger Commonwealth School of Medicine will allow the student to begin classes subject to satisfactory completion of all background checks and drug screenings in accordance with deadlines specifically prescribed by the School for that applicant. Once results are received, the background checks and drug screenings will be verified based on the above-mentioned protocol. All policies and procedures referenced above remain in effect.

Student Criminal Background Check Policy for Continuing Enrollment in the MD Program.

Geisinger Commonwealth School of Medicine requires already enrolled students to report to the Associate Dean of Students any arrest for a violation of a crime within two business days. All continuing MD students must also consent to, submit, and satisfactorily complete updates to their original criminal background checks and drug screening conducted by vendors selected by the School at the college prescribed deadlines. Furthermore, all continuing students must consent to, submit, and satisfactorily complete additional background checks (the CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, drug screening and FBI Fingerprinting) as required by Geisinger Commonwealth by the deadline(s) prescribed by the School. The CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, drug screening and FBI Fingerprinting results will not be a component of the student's academic record. Continued enrollment in Geisinger Commonwealth School of Medicine's MD program is contingent upon receipt of a satisfactory report for all background checks and drug screenings. Failure to satisfactorily complete all background checks and drug screenings may result in disciplinary actions up to and including dismissal. In addition:

1. Geisinger Commonwealth School of Medicine's final decision about the student's continued enrollment in the MD Program will be made only after review of all checks and screenings as applied by the policies governing the Academic and Professional Standards for the MD Program.
2. The CBC, Pennsylvania Criminal Background Check, Child Abuse Clearance, FBI Fingerprinting, and drug screening results for enrolled students may be used in connection with disciplinary matters brought before the Associate Dean of Students Affairs and/or the CAPS Committee (please refer to the Policy on Academic and Professional Standards for the MD Program).
3. Students interested in completing extramural rotations will be required to research requirements, complete and follow all credentialing requirements of the extramural site at their own expense.

6. Key Stakeholders: Students