

UNIVERSITY OF FLORIDA COLLEGE OF MEDICINE JACKSONVILLE

Office of Graduate Medical Education

POLICY: Trainee Background and Drug Screens	
Approved by: GMEC	Page(s): 1 of 3
Approval date: 11/5/2024	Reviewed date: 6/1/15; 2/25/19
Effective date: 3/1/2006	Revised date: 08/10/09; 8/2/15; 5/20/19; 10/6/21; 10/20/22; 9/20/24

Purpose:

Many hospitals and other clinical facilities to which residents rotate require criminal background screen and/or drug screen of all individuals working, training, or volunteering in their institutions. These include several of the University of Florida College of Medicine - Jacksonville's educational partners. In addition, application for either an allopathic or osteopathic unrestricted or training license in Florida requires a level II FBI fingerprint background screen, self-disclosure of criminal convictions and of prior substance abuse and/or treatment for any individual seeking licensure in the state. The eligibility requirements for a health care practitioner are defined in Florida Statute chapter 456 and the applicable statutory practice acts.

The University of Florida College of Medicine - Jacksonville (UFCOM-J) has established the following policies and procedures to evaluate whether residents are eligible to participate in its educational programs. Individuals with a record of criminal activity unsuitable for patient contact, who are not eligible to participate in Medicare, Medicaid, Tricare, or other Federal health care programs, or who are impaired due to substance abuse, are not eligible for appointment as a trainee.

Note: for purposes of this policy, resident refers to both residents, fellows, and post-doctoral associates.

Policy:

As a condition of appointment into a residency or fellowship program at the UFCOM-J, all trainees must undergo screening to include:

- An FBI level II criminal background check, including fingerprint screening through ACHA and cleared by the Department of Health Background Screening Unit
- A check of the US Department of Health and Human Services Office of Inspector General (OIG) list of excluded individuals and US System for Awards Management (SAM) excluded parties list
- A 12-panel urine drug screen

Procedures:

Criminal background checks

MD/DO Physicians:

Incoming housestaff (on- or off-cycle) will receive instructions to schedule a fingerprint background screen appointment with the preferred provider. The screening should be completed within two weeks of receipt of the appointment packet materials. Incoming residents entering the United States for the first time who do not have a social security number will have a background check completed by the Department of Homeland Security as part of the visa processing procedure (which includes biometric screening to check each individual against criminal and terrorist databases). Visa holders will still be required to complete the fingerprint screening process for Florida Department of Health licensure upon entry into the US. Results of the fingerprint background screening are not available to the University.

DDS/DMD Dentists:

Trainees in the Oral and Maxillofacial Surgery department programs will receive instructions to provide an authorization for a State and Federal criminal background check to be performed by SecurTest with screen results going to the Associate Dean for Student Affairs (ADSA) and his designee. Individuals whose background yields a positive result will receive a SecurTest verification form, rights form, and copy of the criminal history report via Federal Express, with instructions for completion should they believe that the background check report is erroneous. SecurTest must receive the verification form within five (5) working days of receipt of the form by the

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incoming resident, and in that case, SecurTest will utilize that additional data to clarify, correct, and/or validate their information¹.

Podiatric Residents:

Trainees in the Podiatry program will receive instructions to provide an authorization for a State and Federal criminal background check to be performed by SecurTest with screen results going to the Associate Dean for Student Affairs (ADSA) and his designee. Individuals whose background yields a positive result will receive a SecurTest verification form, rights form, and copy of the criminal history report via Federal Express, with instructions for completion should they believe that the background check report is erroneous. SecurTest must receive the verification form within five (5) working days of receipt of the form by the incoming resident, and in that case, SecurTest will utilize that additional data to clarify, correct, and/or validate their information².

Confirmed positive results will be referred to a committee consisting of the Senior Associate Dean for Graduate Medical Education and Associate Deans for Graduate Medical Education, with the UFCOM-J Associate General Counsel acting in an advisory capacity. This committee will review the results of the check, as well as any corroborating evidence from the FL Department of Health, to determine whether the incoming resident meets appointment eligibility. Should the committee decide not to appoint, the decision will be communicated to the incoming resident and program director in writing by the Senior Associate Dean for Graduate Medical Education.

OIG/SAM sanctions verification

Trainees are required to complete the verification search using the OIG and SAM websites as part of their appointment packet. Any incoming resident who has been excluded from participation in Medicare, Medicaid, Tricare or other Federal health care programs will be ineligible for employment and may not be appointed. Should that occur, the Senior Associate Dean for Graduate Medical Education will communicate that information to the incoming resident and program director in writing. The National Residency Matching Program (NRMP) will also be informed that the matched applicant is ineligible to participate in graduate medical education training.

Drug Screens

Incoming housestaff will receive instructions in their appointment packet that a 12-drug Medical Professional Panel urine drug screen is required as part of their appointment process. Program Administrators enroll each trainee online and an electronic authorization chain of custody form is e-mailed to the housestaff. Results of the urine drug screen are released to the UFCOM-J Associate Dean of Student Affairs (ADSA) for clearance. This should be completed no later than June 1st. Incoming residents who will be entering the United States on a visa must have this screen done as soon as possible after arrival. Off-cycle residents should have this screen done as soon as possible after they have received the appointment packet.

¹ SecurHomeland is an instant search against over 300 million criminal records covering all 50 states. Instantly reports results from multiple criminal record sources, including department of corrections prison, parole and release files, administrative office of courts records, state and county criminal records, proprietary record information and Sexual/Violent offender registries. New criminal record data is added regularly with proprietary data added daily. SecurHomeland is FCRA-compliant database.

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Positive results will be compared with medication information provided on the incoming resident's HAMS form (ADA law prohibits LabCorp from requesting this information as part of the screening process). Any questions regarding positive tests will be reviewed by the ADSA with LabCorp's Ph.D. toxicology consultants, if needed.

Should an incoming resident test positive for an illegal or non-prescribed controlled substance, the of the drug screen sample will be sent to another lab (Quest Diagnostics) for re-test (positive samples are retained by LabCorp for one year). The results of that re-test will be considered final. The decision to appoint the trainee will be at the sole discretion of the ADSA and the SADEA.

Attestations

All residents who have been cleared for all requirements will have an attestation form created (merge document auto filled with name and program). Once signed by the ADSA, the form will be available for inclusion in the appointment packets for Mayo Clinic Hospital, Baptist Medical Center and Wolfson Children's Hospital, Duval County Health Centers, and Nemours Children's Clinic, if applicable.

Access/Disclosure

Results of background checks, OIG/SAM sanctions check, and drug screens will be available only to UF administrative officials as indicated above for legitimate security purposes. Datasets containing OIG/SAM screening information will be saved to a confidential personnel folder.