STANDARD OPERATING PROCEDURES

<b>Background Chec</b>	k and Drug Screening	SOP #: SA.021.04
Effective Date	06.25.2019	
Last Revision/Review	05.09.2023	

# 1. Purpose

To outline and define the processes by which students complete a Criminal Background Check and 10-Panel Drug Screening, and the maintenance of student reports by the Office of Student Affairs.

# 2. Related Policy/Authority

College Catalog

## 3. Faculty/Staff Responsibilities

Office of Student Affairs

Registrar

#### 4. Definitions/Abbreviations

Student Report – Digital copy of the Background Check and 10-Panel Drug Screening report generated by Castlebranch

## 5. Procedural Steps

1.1 All students are required to complete a Criminal Background Check and 10-panel Drug Screen and the results are a condition of enrollment. BCOM utilizes Castlebranch, as an external vendor to process all Criminal Background Checks and Drug Screens.

#### 2.1 Schedule

- a. Students are required to order and complete a Criminal Background Check and 10-Panel Drug Screening at the following times during their enrollment:
  - i. OMS-I: completion of both the background check and drug is required prior to matriculation on the first day of Orientation Week. These items are required to be ordered no earlier than 60 days prior to matriculation.
  - ii. OMS-II: completion of updated Background Check and Drug Screen is required prior to May during OMS-II, as a part of onboarding requirements for OMS-III clinical rotations.
  - iii. OMS-III & OMS-IV: Students are required to maintain a non-flagged student report within the previous 12 months at all times.
  - iv. Returning: Any student returning to Burrell to begin a new academic year after suspension or LOA, will need to have a background check and drug screening completed, regardless of OMS year.
- 3.1 The Office of Student Affairs maintains a record of student reports utilizing two formats:
  - a. <u>Student Information Database</u>: Microsoft Access file titled "BCOM Student Affairs." The database is located on the Student Affairs Shared Drive (I:), under Student Affairs in the "Confidential Files" folder. The correct file has an icon without a lock. This database to

#### STANDARD OPERATING PROCEDURES

- house relevant data and student information as it pertains to student matriculation and ongoing policy compliance.
- b. <u>PDF Files</u>: Student reports are saved as PDF files in the Student Affairs Shared Drive (I:) under "Student Affairs>Confidential Files>Background Check-Drug Screen" in a folder designated for that student's graduation year ("DO 2022"). All filenames are the "Last Name First Name" format. If a student has only completed one of the two requirements, a two-letter suffix is added to the end of the filename, demarking which report is included (i.e., BG for Criminal Background Check, DS for 10-panel Drug Screening).

#### 4.1 Report Notification

- a. Student Affairs can verify that a student has either ordered or has completed their requirement in the following ways:
  - i. Website: Administrative users can log into Castlebranch and filter orders by those that are marked as "Complete" or "In Progress."

#### 5.1 Record Maintenance

- a. Access Database
  - i. Once proof of compliance is submitted to Student Affairs by Complio, data will be recorded in the following manner for both Background Checks and Drug Screens in the Access Database:
    - 1. Status:
      - a. Nothing: Student has not yet ordered the required screening
      - b. <u>In Progress</u>: Student has ordered, but the requirement is not yet completed.
      - c. <u>Complete</u>: Requirement has been completed, and no flags were found.
      - d. <u>Fail</u>: Requirement has been completed, and at least one flag is found.
    - 2. Date: the date when the requirement's status is reported by Complio as "Complete".
    - 3. Expiration Date: the date when the requirement will no longer be in compliance, 12 months from the "Date"

#### b. New Innovations

- i. For OMS-II students who are currently completing on-boarding requirements for clinical rotations, or for any current OMS-III or OMS-IV students, a record of their report is also located in an online database, New Innovations. Background Check and Drug Screen information is located under Personnel Record→ Demographics→Certifications. Student Affairs is responsible for updating the information for each student.
- ii. Data entered into New Innovations, is the same data entered into the Access Database.
- iii. In addition to updating the data, Student Affairs will upload the digital record of most recently complete student report.

#### 6.1 Flagged Result

a. A flagged result can occur in three situations. The response by BCOM depends on the reason for the flagged result:

#### STANDARD OPERATING PROCEDURES

- i. Criminal Background Check is flagged
  - 1. In this case, the situation is referred to Enrollment Management. The Registrar will confirm whether the situation was reported
    - For all incoming students, confirm with Admissions Office whether the flagged item was reported by the student on application.
    - b. For all continuing students, confirm with Student Affairs as to whether the flagged item was reported to the institution.
      - i. If the flagged item was not reported to the College within 2 business days of the initial incident, the Office of Student Affairs will collect a statement from the student and determine if the flagged result constitutes a potential violation of the College's Code of Professional Conduct.
        - If a current student is participating in clinical rotations, the Office of Student Affairs may report the flagged results to the Office of Clinical Education.
- ii. 10-Panel Drug Screen comes back with a flagged result
  - 1. Positive result
    - a. The student will be given the opportunity to complete a new drug screen and 24 hours to do so. Student will be required to submit proof of sample collection to the Office of Student Affairs.
      - If the follow-up drug screening is negative, then no additional action is needed and the student is considered in compliance.
      - ii. If the follow-up drug screening is positive:
        - 1. Incoming Student: Applicant's Offer is rescinded
        - Continuing Student: Student would be immediately suspended from the Osteopathic Medical Program
  - 2. Dilute Negative result
    - a. The student will be given the opportunity to complete a new drug screen and 24 hours to do so. Student will be required to submit proof of sample collection to the Office of Student Affairs.
      - If the follow-up drug screening is negative, then no additional action is needed and the student is considered in compliance.
      - ii. If the follow-up drug screening is positive, process listed above for positive result will be followed.

#### STANDARD OPERATING PROCEDURES

iii. If the follow-up drug screening is dilute negative, student will repeat the process

- iii. Order for 10-Panel Drug Screen is cancelled by the student.
  - 1. Student Affairs will reach out to the student to determine the reason behind the cancelled order. If needed, the student will be given a deadline to order and complete a new drug screening.

# 6. Reports/Charts/Forms/Attachments/Cross References

## 7. Maintenance

Designed and implemented by Executive Director of Student Affairs, Associate Director of Student Affairs.

# 8. Signature

Approved by	05.09.2023
Department Head of Student Affairs	Date

## 9. Distribution List

Internal/External

# **10.** Revision History

Revision Date	Subsection #	Summary of Changes	New/Cancellation/ Replacement Procedure? (if	Approval Date
			applicable)	
01.22.2021	4,5 [1.1,4.1]	Revision to reflect the change to using Castlebranch		01.22.2021
04.22.2021	5	Added information about a flagged background check and notification process.		04.22.2021
08.08.2022	6	Adjusted flagged background check report timeframe		08.08.2022
05.09.2023	6	Added process for Dilute Negative result		05/.19.2023

STANDARD OPERATING PROCEDURES