




<b>Title:</b> Background Check Policy	
<b>Written by:</b> Dean of Enrollment Management	
<b>Date Initiated:</b> 4/2007	<b>Date Revised:</b> 4/2010; 4/2014; 4/2017
<b>Approved by:</b>  <hr/> Chancellor	<b>Governing Board Approval:</b> <hr/> Date
<hr/> 1/12/2016 Date	<hr/> 1/12/2016 Date

**PURPOSE**

The Joint Commission on the Accreditation of Healthcare Organizations (JCAHO) requires background checks for health science and nursing students working in hospitals. Trinity College employs a third party service to conduct the required criminal background checks on all accepted students. Accepted students are required to complete the background check online process as defined in their Welcome Packet. Students will receive a copy of their criminal background information from this service. All costs associated with this service are the responsibility of the student. Trinity College will accept previous background checks from other authorized agencies that are within 6 months of the start of the academic program. No student will be permitted in a clinical area without verification of a background check. A criminal background check revealing a conviction for certain crimes could result in a ban from participation in clinical rotations and progression in a student’s program. Students may dispute the accuracy and completeness of the information in the background report with the third party, in writing, within 14 days of receipt or the report, by email at [clientservices@verifiedcredentials.com](mailto:clientservices@verifiedcredentials.com) or call 800-938.609

**POLICY AND PROCEDURE**

The Dean of Enrollment Management will review background checks that reveal a discrepancy against the Illinois Department of Public Health’s Health Care Worker Registry of Disqualifying Convictions at <http://www.idph.state.il.us/nar/disconvictions.htm>. In accordance with the Health Care Worker Background Check Act [225 ILCS 46] and 77 ILL Adm. Code 955 Section {955.160}, returned student background checks will be compared to: 1) those disqualifying offenses that may be considered for a waiver by the submission of a waiver application; 2) offenses that may be considered for a rehabilitation waiver; and 3) offenses that are always disqualifying except through the appeal process.

Additionally, students participating in clinical experiences at UnityPoint Health will undergo Illinois and Iowa criminal background checks – this is further defined by both states. Iowa is to

be run through the Iowa state police. For students pursuing non-licensed programs in Illinois, an Illinois fingerprint is required. For students in licensed programs in Illinois, (such as RN, Rad Tech) a name based search through the Illinois state police is required. In Illinois and Iowa child and dependent adult abuse registry checks, Federal Health Care Program Exclusion Screening; HHS/OIG, and General Services Administration (“GSA”) excluded parties’ lists are checked to verify that students are not listed on the excluded parties lists before clinical placement and every 90 days or as required by law. The results of the UnityPoint Health Trinity background checks are only valid within 30 days of the student’s start date in the clinical facility.

Trinity College will keep information contained in the report confidential when obtaining, retaining, using and destroying the report. The College will use the Criminal Background Report only for purpose as authorized and defined by JACHO. Students will be notified in writing by the Director of Student Services & External Relations of the decision to deny admission based on a disqualifying offense. Written notification also includes contact information for the third party conducting the check and a statement that the third party did not make the decision to take the adverse action and is unable to provide the student the specific reasons why the adverse action was taken. The student has the right to obtain a free copy of the report from the third party if, within 60 days after receipt of written notification; he or she requests an additional copy. It’s the student’s right under the Federal Consumer Reporting Agency [FCRA] to dispute with the third party the accuracy or completeness of any information in the report. Denial of placement in the clinical setting is ultimately a decision that is made by the clinical agency and not the College.

**NOTE:** If a student is required to drop his/her program of study due to the results of this background check, all tuition and fee charges owed will be assessed as appropriate based on College policy. It is the student’s responsibility to inform the Dean of Enrollment Management and/or their Program Chair/Director of any offense that may occur after admission to the program.

If a student’s enrollment is interrupted by a student initiated withdrawal or an administrative withdrawal, a new background check must be completed prior to a student’s return to the clinical setting. Students on approved leave of absence are exempt from submitting a new background check.