Background Check Policy for Positions Involving Direct Patient, Clinical Research Subject and Clinical Educational Program Participant Contact

Subject: Background Check Policy for Positions Involving Direct Patient, Clinical Research Subject and Clinical Educational Program Participant Contact

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Authorized by: Sara Saathoff, Associate Dean and Executive Director
Biological Sciences Division Human Resources

Purpose:

The Biological Sciences Division (BSD) is committed to ensuring that the academic, clinical and research missions are supported by qualified employees and that its community is safe. The BSD is also committed to taking meaningful actions to protect its finances, property, and other assets.

Among our most valuable assets are our patients, clinical research subjects and clinical educational program participants. Because positions involving direct patient, clinical research subject and clinical educational program participant contact are unique to the BSD, they are often not covered in University of Chicago Human Resources policy.

The purpose of this policy is to specifically define the background check requirements for prospective employees, excluding faculty and other academic appointees, for roles involving patient, clinical research subject or clinical educational program participant contact, as outlined by The Joint Commission (formerly known as JCAHO).

Policy:

The BSD requires that prospective employees performing functions involving direct patient, clinical research subject or clinical educational program participant contact complete and clear The Joint Commission background check, in addition to the background check requirements listed under the University's U204 Reference and Background Checks prior to beginning work. This includes current University employees that are undergoing a job change that now involves direct patient, research subject, or program participant contact.

Note: The above policy supplements responsibilities set forth in other University policies including, but not limited to, the University’s personnel, financial and administrative policies, the Employee Handbook, the Student Manual, and any other departmental handbook, manual, policy, or procedure.

Definitions:

Clinical Education Program Participants: Individuals who participate in clinical education programs offered by University of Chicago Medicine.

Clinical Research Subjects: Individuals who participate in clinical research protocols at
Direct Patient, Clinical Research Subject, and/or Clinical Education Program Participant Contact: The provision of services that require direct interaction between the employee and patient, research subject, and/or clinical education program participant. Examples include assessment, performing procedures, teaching, and implementation of a care plan. Positions include, but are not limited to the following: nurses, medical assistants, therapists, social workers, physician assistants, genetic counselors and mental health workers.

Employees: Staff, temporary workers, agency workers, contractors, consultants, students or independent contractors (does not apply to faculty, other academic appointees or postdoctoral scholars).

Joint Commission Background Check Clearance: Meeting the requirements set forth in this policy.

Patients: University of Chicago Medicine registered patients (inpatient/outpatient).

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BSD Guiding Principles regarding Background Checks

A. Initializing the Background Check

Each Human Resource Professional (HRP) in the BSD is responsible for determining whether the position requires the Joint Commission (JCAHO) background check. After an offer has been extended for a position that involves direct patient, clinical research subject or program participant contact, the HRP must initiate the background check process. The HRP must select the Joint Commission (JCAHO) background check option as outlined in Addendum 1.1, in addition to any other background check requirements that may be outlined in the University’s U204 Reference and Background Checks policy.

B. Prospective Employee Submits Background Check Information

If the HRP initialized the background check with an e-link through our current background check vendor, the prospective employee will receive an email from our background check vendor to submit their background check information online.

Prospective employees that do not successfully complete the background check process will not be permitted to work.

C. Background Check Clearance

When the background check clears, the HRP will receive an email confirmation from University of Chicago Human Resources.

Results of the required background check will be kept strictly confidential.

D. Exception
In extenuating circumstances, HRPs may find a need to request that an employee with direct patient/clinical research subject contact begin employment prior to receiving background check clearance from University Human Resources. All requests for exceptions must be submitted directly to BSD Human Resources for consideration.

**Related Policies and Links**

[U204 Reference and Background Checks](#)
Addendum 1.1

The Joint Commission (JCAHO) Background Check Packages

When recruiting for a position that involves direct patient, clinical research subject or clinical education program participant contact, the HRP must choose from one of the following background check options:

The Joint Commission (JCAHO) Package, which includes:
- Statewide Criminal – current state only
- Federal Search - all names, all address 7 years
- County Search – all names, all address 7 years
- SSN Trace
- Kwikscreen –National Criminal Database (includes SOR)
- Education – verify highest degree earned
- Employment – last 3 employers but not beyond 7 years

The Joint Commission (JCAHO) + MVR (If job will require driving a vehicle), which includes:
- Statewide Criminal – current state only
- Federal Search - all names, all address 7 years
- County Search – all names, all address 7 years
- SSN Trace
- Kwikscreen –National Criminal Database (includes SOR)
- Education – verify highest degree earned
- Employment – last 3 employers but not beyond 7 years
- MVR (Driving History)
### Determining Appropriate Background Check Package

#### New Hires

<table>
<thead>
<tr>
<th>Position Type</th>
<th>Type of Background Check Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Patient, Clinical Research Subject and/or Clinical Education Program Participant Contact</td>
<td>Joint Commission</td>
</tr>
<tr>
<td>Direct Patient, Clinical Research Subject and/or Clinical Education Program Participant Contact + Driving</td>
<td>Joint Commission + MVR</td>
</tr>
</tbody>
</table>

#### Transfers

<table>
<thead>
<tr>
<th>Position Type</th>
<th>Type of Background Check Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moving From Non-Direct Patient, Clinical Research Subject or Clinical Education Program Participation Contact Role to Direct Patient, Clinical Research Subject and Clinical Education Program Participation Contact Role</td>
<td>Joint Commission</td>
</tr>
<tr>
<td>Moving From Non-Direct Patient, Clinical Research Subject or Clinical Education Program Participation Contact Role to Direct Patient, Clinical Research Subject, and Clinical Education Program Participation Contact Role AND Moving from Non-Driving Role to Driving Role</td>
<td>Joint Commission + MVR</td>
</tr>
</tbody>
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