

Undergraduate Medical Education (UME) Policy

Title: Background Check Policy			
<i>Origination Date:</i> 10/06/2010	<i>Revision History:</i> 06/17/2019; 06/12/2025	<i>Last revised/affirmed:</i> 06/12/2025	<i>Review frequency:</i> 4 years
Purpose:	Health care providers are entrusted with the health, safety and welfare of patients, have access to controlled substances and confidential information, and operate in settings that require the exercise of good judgment and ethical behavior. Thus, an assessment of an applicant or student's suitability to function in such a setting is imperative to promote the highest level of integrity in health care services. Additionally, findings in a criminal background check report may prevent a student from participating in educational activities at clinical affiliates, and/or impact their ability to obtain state registration, permit, or licensure. This policy specifies the criminal background check requirement of all Long School of Medicine (LSOM) applicants and students.		
Definitions:	<p>Accepted applicant – an individual who has applied and received an offer of admission to the Long School of Medicine, hereafter referred to as applicant in this policy.</p> <p>Student – an individual currently enrolled at the Long School of Medicine, whether in a degree program or as a visiting student.</p> <p>Family Educational Rights and Privacy Act (FERPA) - a federal law that protects privacy interests of parents and students in their educational records. FERPA defines student as any individual who is or has been in attendance at an educational agency or institution and regarding whom the agency or institution maintains education records.</p>		
Policy:	<p>This policy applies to applicants and students.</p> <p>All applicants and students are required to submit a background check report in order to matriculate to the LSOM. Admission to and/or continued participation in the medical education program may be denied based on a review of a background check. Anyone who refuses to comply with a background check, falsifies information (including omission of relevant information), or does not pass the background check review may be denied admission or dismissed from the medical education program. All expenses related to the background check are the applicant or student's responsibility.</p> <p>A student may be asked at any time to complete a repeat background check. Examples of when a repeat background check may be requested include, but are not limited to:</p> <ul style="list-style-type: none"> • an affiliated clinical health care facility requires a background check as a condition of participating in educational experiences, • a return from a leave of absence, • criminal activity identified at any point, • a break in enrollment, or • there is sufficient information to suspect misconduct. <p>Criminal activity that occurs while a student is enrolled may result in disciplinary action, including dismissal, and will be addressed through relevant academic and disciplinary policies.</p>		
Process:	<p>Obtaining a Background Check Report</p> <ol style="list-style-type: none"> 1. All applicants must complete a criminal background check following an offer of admission and prior to matriculation in accordance with UTHSCSA HOP 4.4.1. 2. Applicants and students must contact a designated company and comply with its instructions in authorizing and obtaining a criminal background check and are responsible for payment of any associated fees. 		

Undergraduate Medical Education (UME) Policy

3. Criminal background checks must include the following and cover at least the past seven years:
- Criminal history search, including convictions, deferred adjudications or judgments, and pending criminal charges involving felonies, Class A, Class B, and Class C violations
 - Social Security Number verification
 - Violent Sexual Offender and Predator Registry search
 - Office of the Inspector General (OIG) List of Excluded Individuals/Entities
 - General Services Administration (GSA) List of Parties Excluded from Federal Programs
 - U.S. Treasury Office of Foreign Assets Control (OFAC), List of Specially Designated Nationals (SDN)
 - Applicable State Exclusion List

Review of Background Check Report Results

Applicants/Students have the right to review the information reported by the designated company for accuracy and completeness and to request that the designated company verify the background information provided is correct.

Prior to making a final determination that may adversely affect an applicant or student; the LSOM will provide the individual a copy of or access to the background check report issued by the designated company. The individual may challenge the accuracy of the report under the rights afforded by the background check company agreement.

The Admissions Committee, or a subset thereof, will review an applicant's initial criminal background check report submitted at the time of admission to the LSOM. If the report contains findings, the committee may request that the applicant submit additional information relating to the finding, such as a written explanation, court documents, and/or police reports. Based on this review, the committee will determine appropriate action which may include rescinding the offer of admission. The findings and resultant actions will be shared with the LSOM Office of Student Affairs. These decisions cannot be appealed.

If a student is asked to complete a background check, a student affairs dean will review the results. If the report contains findings, the findings will be presented to the Student Progression and Promotion Committee (SPPC), which may request that the student submit additional information relating to the finding, such as a written explanation, court documents, or police reports. Based on this review the SPPC will determine appropriate action. The SPPC has the authority to remove the student from the medical education program during the adjudication of findings. If the SPPC determines that dismissal from the program is warranted, a student may appeal that decision in accordance with LSOM's *Adverse Action* policy.

In reviewing background check reports and any additional information submitted, a committee may consider the following factors in making its determinations:

- the nature and seriousness of the offense or event,
- the circumstances surrounding the offense or event,
- the relationship between the duties to be performed as part of the educational program and the offense committed,
- the age of the person when the offense or event occurred,
- whether the offense or event was an isolated or repeated incident,
- the length of time that has passed since the offense or event,
- past employment and history of academic or disciplinary misconduct,
- evidence of successful rehabilitation,

Undergraduate Medical Education (UME) Policy

	<ul style="list-style-type: none"> accuracy of the information provided by the applicant or student in the application materials, disclosure forms, or other materials, and whether the finding will prevent licensure as a physician. <p>Confidentiality and Record Keeping</p> <ol style="list-style-type: none"> 1. Background check reports and related documentation are handled with respect and confidentiality. These records are securely maintained by the Office for Undergraduate Medical Education in accordance with the university's record retention policy. 2. All background check reports and related documentation are confidential and may only be reviewed by university officials and affiliated clinical facilities in accordance with the Family Educational Records and Privacy Act (FERPA).
--	---

Approval Body: Long School of Medicine Office for Undergraduate Medical Education, Executive Leadership

CERTIFIED BY:

Policy Custodian (s)

Name: *Judianne Kellaway, MD*
 Title: *Associate Dean for Admissions & Outreach*

Date

Name: *Joshua Hanson, MD*
 Title: *Associate Dean for Student Affairs*

Date

ACCEPTED AND AGREED TO:

Responsible Officer

Name: *Deborah Conway, MD*
 Title: *Vice Dean for Undergraduate Medical Education*

Date

Responsible Executive

Name: *Robert Hromas, MD, FACP*
 Title: *Dean, Long School of Medicine*

Date

Related regulations, policies, and accreditation standards:

- UT Health San Antonio Handbook of Operating Procedures, [Policy 4.4.1 Criminal Background Checks](#)
- UT Health San Antonio Handbook of Operating Procedures, [Policy 2.2.3 Family Educational Rights and Privacy](#)
- UT Health San Antonio Catalog, [Family Educational Rights and Privacy Acts \(FERPA\) Policy, Pertinent Information](#)
- LSOM Academic Grievance Policy
- LCME Element 10.3 Policies Regarding Student Selection/Progress and Their Dissemination