


CERTIPHI.
SCREENING INCORPORATED


Criminal Background Checks
in Pharmacy Education
Suzi Arant, Senior Business Developer



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Part I:
The Centralized CBC Process



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Part I: The Centralized CBC Process - Steps 1-3

<p>1. APPLICANT ACCEPTANCE School Accepts/Rejects Late Applicant</p> <p>PharmCAS</p> <p>School performs an admissions action:</p> <ul style="list-style-type: none"> • Offer Made • Declined offer • Rescinded • Withdrawn <p>Applicant data securely sent to Certiphier®</p> <p>APPLICATION STATION</p> <p>Application Station checks for Permissions and Disclosure</p> <p>If Permissions are NOT on file an e-mail is sent to the applicant regarding the Withdrawal and Disclosure</p>	<p>2. PERMISSION RECEIVED Permissions and Disclosure Obtained</p> <p>LEGAL MENTIONS OF LAW CENTER Application Station receives email from Legal Mentions of Law Center for complete the CBC Permissions and Disclosure Form</p> <p>Applicant completes form and sends to Student Services of the CBC</p> <p>CERTIPHIER</p> <p>The Certiphier receives Permissions and Disclosure Form</p> <p>CBC process begins</p>	<p>3. CBC IS PROCESSED The CBC Report is Completed</p> <p>CERTIPHIER</p> <p>CBC PROCESS</p> <ul style="list-style-type: none"> • Conduct FIC • Utilize any existing CBC records on the applicant where appropriate • Re-verify previously reported information if necessary • Filter report results based on FOIA and state regulations • Send completed report on applicant for review on Application Station Student i items • Applicant receives e-mail that CBC is ready for review
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Part I: The Centralized CBC Process - Steps 4-6

<p>4. APPLICANT REVIEW Applicant Review CBC</p> <p>APPLICATION STATION APPLICANT REVIEW Applicant has a 10 calendar day review period. UI URL, the report is made available to the school.</p> <p>Applicant logs into Applicant Station to:</p> <ul style="list-style-type: none"> View CBC results Release the CBC results to school Dispute the CBC results. CBC is not released to the school until dispute has been received. 	<p>5. CBC RELEASED Applicant Review CBC</p> <p>CERTIPHI offer 30 calendar day review period or more options by the applicant. The CBC is prepared for the school and sent to the applicant. The school.</p> <p>myCERTIPHI Schools CBCs that are applied for this review.</p> <ul style="list-style-type: none"> Released CBC to applicant on myCERTIPHI site where school can access the results. 30-day notification of CBC release to applicant where school representative. 	<p>6. PROGRAM OVERVIEW myCERTIPHI enables AACP with a Full Program Overview</p> <p>myCERTIPHI PROGRAM OVERVIEW</p> <ul style="list-style-type: none"> Program Summary Reports CUL Hit Rates CBC Non-renewal Reports CBC Dispute Statistics Personnel, Financials Invoicing/Billing Statistics
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Part I: The Centralized CBC Process

The Benefits of a Centralized CBC System

- CBC standardization across all Pharmacy schools
- Reduced cost due to reuse of data
- Greater efficiency for the schools
- Less wear-and-tear on students and more convenient process
- Community level analytics and statistics

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Part II:
The Components of the CBC



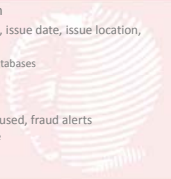
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Part II: The Components of the CBC

Applicant Data and SSN Verification

- Social Security Number (SSN) Validation
 - SSN Structure – Valid number structure, issue date, issue location, death index
 - Source: Social Security Administration databases
- SSN Verification
 - SSN match with name, additional SSNs used, fraud alerts
 - Source: Credit report "header" database




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Part II: The Components of the CBC

Applicant Data and SSN Verification (continued)

- AKA Name Search
 - Names associated with SSN
 - Source: Credit report "header" database
- Residence Address Search
 - Addresses associated with SSN
 - Source: Credit report "header" database
 - Research process: Real-time integrated databases



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Applicant Data and SSN Verification

Subject Data Clear

Name: Richard A. Adwell

Date of Birth: 01/01/1977

Social Security #: 961-48-0000

State Issued: California	SSN Validator
Date Issued: 1977 - 1980	California
DOB Scan: Clear	1977 - 1980
Death Index: Clear	Clear
Valid SSN: Yes	Clear

Current Address: 1234 Main Street
Sunnyville, CA 12345
Los Angeles County
United States

Other Addresses: 321 Central Avenue
Raidenville, CA 34567
Santa Maria County
United States

Comments: None

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Part II: The Components of the CBC

Criminal Records Searches

- County Criminal Records Searches
 - County/state level criminal records
 - Coverage: Individual county jurisdiction
 - Source: Courthouse databases and in-person searches
- Statewide Criminal Records Repository Search
 - County/state level criminal records
 - Coverage: Statewide
 - Source: State repositories (not all states available)



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Part II: The Components of the CBC

Criminal Records Searches (continued)

- Federal Criminal Records Search
 - Federal-level criminal records
 - Coverage: Federal district court
 - Source: Courthouse databases and in-person searches
- "National" Criminal Database
 - Miscellaneous levels of state/county criminal records
 - Miscellaneous criminal records throughout the country (not comprehensive)
 - Source: Third-party databases



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County Criminal Records Searches

County Criminal See Below

Source Searched: Los Angeles County Superior Court
 Records Covered: Felony & Misdemeanor
 Date of Search: 03/12/2007
 Subject Covered: Richard A. Adwell
 Search Results: Records found
 Comments: See details below

Case Number: GC0000240-00
 Offense / Filing Date: 08/15/2000
 Charge: Count 1. Disorderly Conduct - Public Drunkenness
 Charge Type: Misdemeanor
 Disposition Date: 09/11/2000
 Disposition Type: Guilty
 Disposition Details: Pled guilty
 Sentence: Fine/costs \$110.00 - paid
 Comments: Please note this case was verified by Name, Date of Birth, and SSN.

County Criminal Clear

Source Searched: Santa Maria County Superior Court
 Records Covered: Felony & Misdemeanor
 Date of Search: 03/12/2007
 Subject Covered: Richard A. Adwell
 Search Results: No records found
 Comments: None

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Part II: The Components of the CBC

Sex Offender Registration Search

- National Sex Offender Registration Databases
 - State sex offender registries
 - Coverage: National (with some exceptions)
 - Source: Third-party databases
 - Research Process: Real-time integrated database with verification of results



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Sex Offender Registration Search

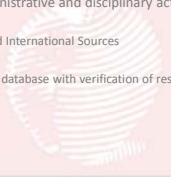
Sex Offenders History	See Below
<p>Source Searched: National Sex Offender Database</p> <p>Date of Search: 03/12/2007</p> <p>Subject Covered: Richard A. Adwell</p> <p>Date of Birth: 01/01/1977</p> <p>Search Results: Records Found</p> <p>Notes: Please note that according to the California Sex Offender Registry, the subject is registered as a Sex Offender in California under section 268, crimes against children. Please see attached copies for further details.</p>	

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Part II: The Components of the CBC

Certiphi's SanctionsBase

- Certiphi's proprietary database of administrative and disciplinary actions in the healthcare field
 - Coverage: over 1,000 Federal, State and International Sources
 - Source: SanctionsBase® database
 - Research Process: Real-time integrated database with verification of results



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SanctionsBase®

Certiphi® SanctionsBase® See Below

Source Searched:	Certiphi® SanctionsBase®
Date of Search:	03/11/2007
Subject Covered:	Richard A. Adwell
Search Results:	Records found
Comments:	See details below

Source of Action:	California Board of Pharmacy
Date of Action:	04/02/2003
Alleged Violation:	Criminal conviction
Action Taken:	License Revoked
Case / Docket #:	P402
Notes:	None


Note: Certiphi Screening's SanctionsBase® is a proprietary database of sanctions and disciplinary actions taken by various state and federal authorities against individuals and organizations. These include individuals that have been fined or censured by regulators in healthcare, financial services, and other regulated professions. The database also contains the names of known and wanted terrorists and drug traffickers. Please advise if you would like more detailed information on the exact contents of Certiphi Screening's SanctionsBase®.

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Part II: The Components of the CBC

HHS – OIG Exclusion Search

- Department of Health and Human Services (HHS) Office of the Inspector General (OIG) Medicare/Medicaid Sanctions/Fraud Database
 - Medicare/Medicaid program violations
 - Coverage: Medicare/Medicaid programs
 - Source: SanctionsBase® database
 - Research Process: Real-time integrated database with verification of results



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HHS – OIG Exclusion Search

Certiphi® SanctionsBase® See Below

Source Searched:	Certiphi® SanctionsBase®
Date of Search:	03/11/2007
Subject Covered:	Richard A. Adwell
Search Results:	Records found
Comments:	See details below

Source of Action:	HHS - OIG
Date of Action:	04/02/2003
Alleged Violation:	Criminal conviction
Action Taken:	Subject was excluded indefinitely
Case / Docket #:	N01-01
Notes:	None

Note: Certiphi Screening's SanctionsBase® is a proprietary database of sanctions and disciplinary actions taken by various state and federal authorities against individuals and organizations. These include individuals that have been fined or censured by regulators in healthcare, financial services, and other regulated professions. The database also contains the names of known and wanted terrorists and drug traffickers. Please advise if you would like more detailed information on the exact contents of Certiphi Screening's SanctionsBase®.

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Part II: The Components of the CBC

Military Service Discharge Search

- Search for Type of U.S. Military Service Discharge
 - Honorable, general, OTH, bad conduct, dishonorable
 - Form DD-214 – Report of separation
 - Source 1: Military Records Center – Can take a long time to obtain records
 - Source 2: Commanding Officer – Preferred method (if possible)
 - Source 3: Student – Should have a copy of DD-214
 - Research Process: Written correspondence, telephone, e-mail
 - Coverage: U.S. military service



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Military History Discharge Search

Military Discharge History Clear


Branch of Service:	U.S. Army
Location:	Harker Heights, TX
Rank:	Staff Sergeant
Rank Reported by Subject:	Staff Sergeant
Service Dates:	11/23/1984 to 05/01/2005
Service Dates Reported by Subject:	11/23/1984 to 05/01/2005
Discharge Type:	Honorable relief from active duty
Source:	Myra Williams, Personnel
Date of Search:	05/21/2007
Comments:	None

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Part II: The Components of the CBC

International Searches

- Criminal Record Searches
 - Availability and access varies greatly by country
 - in-person searches vs. police clearances
 - Results can take a long time to obtain
 - Research Process: Written correspondence, e-mail, in-person



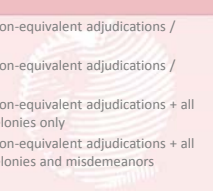
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Part II: The Components of the CBC

Report Filtering Options

- Option 1: All convictions and conviction-equivalent adjudications / felonies only
- Option 2: All convictions and conviction-equivalent adjudications / felonies and misdemeanors
- Option 3: All convictions and conviction-equivalent adjudications + all arrests without final adjudication / felonies only
- Option 4: All convictions and conviction-equivalent adjudications + all arrests without final adjudication / felonies and misdemeanors



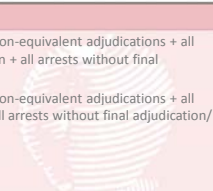
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Part II: Components of the CBC

Report Filtering Options (continued)

- Option 5: All convictions and conviction-equivalent adjudications + all arrests regardless of final adjudication + all arrests without final adjudication / felonies only
- Option 6: All convictions and conviction-equivalent adjudications + all arrests regardless of adjudication + all arrests without final adjudication/ felonies and misdemeanors



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Part III:
Website Demonstration



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Part IV:
Screening Program Setup




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Part IV: Screening Program Set-Up

Service Implementation

- End-User Agreement
 - FCRA provisions
 - General business terms
 - Report filtering preferences
- Site Visit – Compliance
- Service Implementation
 - Training of end-users
 - Provisioning of end-users in system



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Part IV: Screening Program Set-Up

Contact Information

- Jen Athay, PharmD - AACP
 - Phone 703-739-2330, ext 1024
 - Email jathay@aacp.org
- Suzi Arant, Certiphi Screening
 - Phone 888-260-1370, ext 2012
 - Email sarant@certiphi.com



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Part V:
Using the CBC – Best Practices

Note: Many of the slides in this section come from a presentation by Steven T. Case, Ph.D., of the University of Mississippi School of Medicine and contain information from the AAMC's GSA-COA Information Guide to Effective Practice for CBCs.



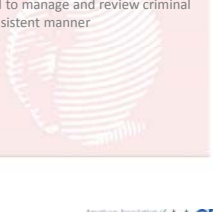
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Part V: Using the CBC – Best Practices

What Schools Can Expect

- Number of students whose CBCs need attention may be small
- However, it is important to be prepared to manage and review criminal history information in a systematic, consistent manner




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Part V: Using the CBC – Best Practices

Set-Up and Infrastructure - Best Practices

- Devise administrative infrastructure for management of CBC and criminal history information
 - Who will review the information?
 - Where will it be stored and for how long?
 - Will records of the review be retained?
- Appoint faculty committee with legal support to write institutional policies



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Part V: Using the CBC – Best Practices

Set-Up and Infrastructure - Best Practices

- Policies and procedures should be developed at each school for collection, storage and management of criminal history data
- All schools should inform applicants and enrolled students about the above policies and procedures
- Applicants and students should be advised that criminal history information derived from CBC may be compared to statements on PharmCAS and elsewhere
- It may be appropriate to allow certain individuals to matriculate/remain enrolled with conditions (rehabilitation or monitoring programs)

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Part IV: Using the CBC – Best Practices

Reviewing Criminal Background Information

- Issues to consider - Schools must codify factors for assessing the seriousness of criminal history information
 - **Potential threat to patients** - Abuse of at-risk populations, homicide, child pornography-related offenses, sexual assault, rape
 - **Potential threat to school or community at large** - Repeated "disturbing the peace" violations, aggravated assault, domestic violence, some drug charges, sexual harassment, repeated alcohol-related offenses, homicide, rape

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Part IV: Using the CBC – Best Practices

Reviewing Criminal Background Information

- Issues to consider - Schools must codify factors for assessing the seriousness of criminal history information
 - **Ability to complete clinical rotations** - Depends on specific criteria established by affiliated clinical institutions
 - **Eligibility for licensure** - Depends on state-specific licensure requirements and may change over time

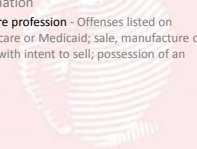
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Part IV: Using the CBC – Best Practices

Reviewing Criminal Background Information

- Issues to consider - Schools must codify factors for assessing the seriousness of criminal history information
 - **Appropriate for member of healthcare profession** - Offenses listed on previous slides; fraud involving Medicare or Medicaid; sale, manufacture or possession of controlled substances with intent to sell; possession of an unlicensed deadly weapon



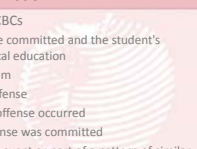
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Part V: Using the CBC – Best Practices

Reviewing Criminal Background Information

- Factors to consider when reviewing CBCs
 - The relationship between the offense committed and the student's participation in basic science or clinical education
 - Components of the education program
 - The nature and seriousness of the offense
 - The circumstances under which the offense occurred
 - The person's age at the time the offense was committed
 - Whether the offense was an isolated event or part of a pattern of similar offenses
 - The length of time since the offense was committed



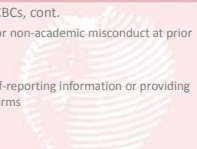
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Part V: Using the CBC – Best Practices

Reviewing Criminal Background Information

- Factors to consider when reviewing CBCs, cont.
 - Past employment history, academic or non-academic misconduct at prior institutions
 - Evidence of successful rehabilitation
 - Fortrightness of the applicant in self-reporting information or providing information on application-related forms



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