

PHARMACY

Centralized Criminal Background Check Service



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American Association of Colleges of Pharmacy

Why a Centralized Service?

- National healthcare organizations, institutions, and state legislatures require student pharmacists to complete a CBC at least once during their educational career
- Commonly required for hospital staff, individuals who work or volunteer with children or other vulnerable populations, which include student pharmacists
- Introductory Pharmacy Practice Experiences (IPPEs)
- Lower cost for students
- Ease of implementation for member institutions

Pre-implementation

- Adhoc Criminal Background Check Advisory Panel convened in May 2006
- Panel Recommends:
 - CBC initiated at the time of first acceptance by a pharmacy school
 - CBC not be a component of the application, interview, or selection processes for pharmacy school
 - CBC a mandatory component of the pre-matriculation process for each accepted applicant
 - Notify & obtain permissions from student in application process
 - Each school follow state laws in regard to CBC
 - Institutional policies should back up enrollment decisions made based on CBC information

Pre-implementation

- Panel Recommendations cont.
 - CBC should as data are accessible and to the extent permitted by law:
 - search by Social Security number
 - determination of areas of prior residence
 - search, based on areas of prior residence, at the local (county) level, as well as searches at the state, national, and federal levels
 - sex offender search
 - search for dishonorable discharge from the Armed Forces

Pre-implementation

- Panel Recommendations cont.
 - CBC should as data are accessible and to the extent permitted by law:
 - search of the U.S. Department of Health and Human Services Office of Inspector General List of Excluded Individuals/Entities (LEIE), a database which provides information to the public, health care providers, patients, and others relating to parties excluded from participation in the Medicare, Medicaid, and all Federal health care programs
 - conviction information for all criminal offenses (felonies, misdemeanors) committed as an adult
 - all types of adjudications
 - all legal processes not yet resolved (e.g., an arrest record for an offense pending court disposition, an unresolved bench warrant, a failure to appear in court)

Implementation

- RFP Process/Vendor Selection
- Board Approval
 - Who bears the cost?
 - AACCP Member Benefit
 - Ease of implementation
- Promotion of Pilot Program – schools selected
- Educational Programming for all AACCP member schools

Implementation

- 12 schools participating in Pilot Program
 - Drake University
 - Midwestern University – Glendale
 - Northeastern Ohio Universities Colleges of Medicine and Pharmacy (NEOUCOP)
 - Nova Southeastern University
 - University of California, San Diego
 - University of California, San Francisco
 - University of Louisiana at Monroe
 - University of Maryland
 - University of Michigan
 - Samford University
 - Touro College of Pharmacy - NY
 - West Virginia University

AACP CBC Process

- Cost included in PharmCAS application fee – increase of \$10 per applicant for pilot
 - based on estimates of acceptance offers (history of school + 25% over-offer)
- Applicant notified in PharmCAS application multiple times
- Pre-order available for all applicants at pilot schools
- First acceptance offer for an applicant is trigger for Liaison to send relevant applicant data to Certiphi (CBC Vendor)



CERTIPHI.
SCREENING INCORPORATED

Criminal Background Checks in Pharmacy Education

Tony D'Orazio, CEO
Certiphi Screening, Inc.

Suzi Arant, Business Developer
Certiphi Screening, Inc.



Part I:
The Components of the CBC



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



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



Applicant Data and SSN Verification

Subject Data

Clear

Name: Richard A. Adwell**Date of Birth:** 01/01/1977**Social Security #:** 961-48-0000

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

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

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

Comments: None

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)



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

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: GC00008240-00
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

Federal Criminal Records Searches

| Federal Criminal | See Below |
|-------------------------------|--|
| Source Searched: | US District Court - Central District of CA, Los Angeles (Western Division) |
| Records Covered: | Felony & Misdemeanor |
| Date of Search: | 03/13/2007 |
| Subject Covered: | Richard A. Adwell |
| Search Results: | Records found |
| Comments: | See details below |
| Case Number: | CR-2000-000017-00 |
| Offense / Filing Date: | 12/25/2002 |
| Charge: | Count 1: Medicaid Fraud |
| Charge Type: | Felony |
| Disposition Date: | 12/25/2003 |
| Disposition Type: | Guilty |
| Disposition Details: | Pled guilty |
| Sentence: | Fine/costs \$100,000.00 - paid; 3 years jail; Credit for time served |
| Comments: | Please note this case was verified by Name and Date of Birth. |

Statewide Criminal Records Searches

| | |
|--------------------|-----------|
| Statewide Criminal | See Below |
|--------------------|-----------|

| | |
|-------------------------------|---|
| Source Searched: | California Department of Law Enforcement |
| 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: | SC00008240-00 |
| Offense / Filing Date: | 08/15/2000 |
| Charge: | Count 1: Public Drunkenness |
| Charge Type: | Misdemeanor |
| Disposition Date: | 09/11/2000 |
| Disposition Type: | Guilty |
| Disposition Details: | Pled guilty |
| Sentence: | Fine/costs \$125.00 – paid |
| Comments: | Please note this case was verified by Name and Date of Birth. |

National Criminal Database Searches

| National Criminal Database | | See Below |
|--------------------------------|---|-----------|
| Source Searched: | National Criminal Database | |
| Date of Search: | 03/12/2007 | |
| Subject Covered: | Richard A. Adwell | |
| Search Results: | Records found | |
| Comments: | See details below | |
| Jurisdiction | VA Circuit Courts | |
| Full Name: | ADWELL, RICHARD A | |
| Date of Birth: | 01/01/1977 | |
| Case Number: | CR90001904 | |
| Sentence: | 10 Months Suspended Sentence; 24 Months Probation; Costs \$291.00 | |
| Offense Description: | Possess Cocaine | |
| County or Jurisdiction: | Roanoke, VA | |
| Disposition: | Guilty | |
| Disposition Date: | 02/21/1997 | |
| Offense Date: | 10/30/1996 | |
| Offense Severity: | Felony | |
| Comments: | Please Note That On 03/25/1998 Defendant Was Found In Violation Of Probation And Was Sentenced To 18 Months Jail. | |

Part II: The Components of the CBC

Sex Offender Registration Search

- State 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



Sex Offender Registration Search

| Sex Offenders History | See Below |
|-------------------------|---|
| Source Searched: | National Sex Offender Database |
| Date of Search: | 03/12/2007 |
| Subject Covered: | Richard A. Adwell |
| Date of Birth: | 01/01/1977 |
| Search Results: | Records Found |
| Notes: | Please note that according to the California Sex Offender Registry, the subject is registered as a Sex Offender in California under section 288, crimes against children. Please see attached copies for further details. |

Part II: The Components of the CBC

Certiphi's SanctionsBase

- Proprietary database of sanctions and disciplinary actions taken by various state and federal authorities / boards against individuals and organizations
 - Sanctions and Disciplinary Actions
 - Coverage: State and federal authorities and boards
 - Source: SanctionsBase[®] database
 - Research Process: Real-time integrated database with verification of results

HHS – OIG Exclusion Search

CertiphiSM SanctionsBase[®]

[See Below](#)

| | |
|---------------------------|---|
| Source Searched: | Certiphi SM 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[®].

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

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 |

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



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

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

Part II:
Distributing the Results



Part III: Delivery of Results to Student

[HELP](#)

Welcome to the Application Station - Student Edition!

Please use the steps below to complete the Background Investigation Process.

Please Note: The Background Investigation Report will be automatically released on 07/21/2007 unless disputed.

1 Step 1 - View Background Investigation Report

The status of your investigation is below.

Permissions & Disclosure Completed: 07/09/2007

Background Investigation Start Date: 07/09/2007

Background Investigation Completion Date: 07/11/2007

Automatic Release Date: 07/21/2007

VIEW REPORT

To view the printable copy of your background investigation report, please click the "View Report" button below.

[VIEW REPORT](#)

VIEW DISCLOSURE

To view the printable copy of your Permissions & Disclosure forms, please click the "View Disclosure" button below.

[VIEW DISCLOSURE](#)

2 Step 2 - Release or Dispute Report

After you review your Background Investigation Report in Step 1 above, please select one of the two options below:

Current Release Status: Not Released (Automatic Release 07/21/2007)

Current Dispute Status: No Disputes

RELEASE

If you have no disputes with the Background Investigation Report and wish to release the report now, click the "Release Report" button below.

[RELEASE REPORT](#)

DISPUTE

If you wish to dispute one or more sections of the Background Investigation Report, click the "Dispute Report" button below.

[DISPUTE REPORT](#)

■ Distribute Your Report


(Use the options below to send your report to a third party)

Click below to Open the Report Delivery Manager:

[OPEN REPORT DELIVERY MANAGER](#)

CERTIPHI.

Part III: Delivery of Results to School

**myCERTIPHI**
SCREENING INCORPORATED

Average Turnaround Time
1.14 Days


[personalize](#) [myContent](#) [myLayout](#) [myColor](#) [myAccount](#) [myHelp](#)

Welcome, P.T. School

[myReports+](#) [myTools](#) [Log Out](#)

Multifaceted management of & access to your screening reports.

myApplicants [edit](#) [-](#) [x](#) [?](#)

 **myApplicants**

[ARCHIVE](#) [ARCHIVE ALL](#) Application Year(s) Displayed: 2008 [REFRESH](#)

| <u>Id</u> | <u>Subject</u> | <u>SSN</u> | <u>PTCAS ID#</u> | <u>Application Year</u> | <u>Investigation Status</u> | <u>Investigation Complete Date</u> | <u>Results</u> | <u>Archive</u> | <u>Viewed</u> | <u>Application Status</u> |
|-----------|-------------------------------------|-------------|------------------|-------------------------|-----------------------------|------------------------------------|----------------|--------------------------|---------------|---------------------------|
| 1. | Adwell, Richard | xxx-xx-7641 | 10000001 | 2008 | Complete - Released | 03/28/2007 | Review | <input type="checkbox"/> | | Accepted |
| 2. | Baden, Forrest Alan | xxx-xx-0000 | 10000002 | 2008 | Complete - Not Released | 03/28/2007 | --- | | | Accepted |
| 3. | Barnack, Ellen S. | xxx-xx-1548 | 10000003 | 2008 | Complete - Not Released | 03/18/2007 | --- | | | Accepted |
| 4. | Barnes, Ellen A. | xxx-xx-2156 | 10000004 | 2008 | In Process | --- | --- | | | Wait-Listed |
| 5. | Baugh, Arthur E. | xxx-xx-0000 | 10000005 | 2008 | In Process | -- | --- | | | Accepted |

[\[back\]](#) [\[more\]](#) 5 Reports ready.

Part III: Delivery of Results to Experiential Sites, Clinics, etc.


[HELP](#)

Welcome to the Report Delivery Manager

The Report Delivery Manager allows you to deliver your Background Report to parties of your choice. Click the [HELP](#) button for more details about how the Report Delivery Manager works.

■ Your Current Report Deliveries - All Deliveries

Please see below for a list of your current CBC report delivery statuses.

| Recipient | Status | Created | Accessed | Expiration | Emailed? | Details | Actions |
|------------------------------|----------|--------------------|--------------------|--------------------|------------------|-------------------------|------------------------|
| Mark Smith Chai Clinic | Active | 01/10/2009 01:00PM | Not Accessed | 01/13/2009 01:00PM | jdoe@hotmail.com | Details | Revoke |
| Gayle Wilson Alpha Clinic | Accessed | 01/06/2009 01:00PM | 01/07/2009 04:32PM | 01/09/2009 01:00PM | None Sent | Details | Renew |
| James Markson Beta Clinic | Expired | 01/04/2009 03:00PM | Not Accessed | 01/07/2009 03:00PM | None Sent | Details | Renew |

■ Create a New Delivery

To send a copy of your report to a third party, click the "create a New Delivery" Button below:

[CREATE A NEW DELIVERY](#)

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



Part III: 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.



Part IV: 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



Part IV: 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

Part IV: 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)

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

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

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

Part IV: Using the CBC – Best Practices

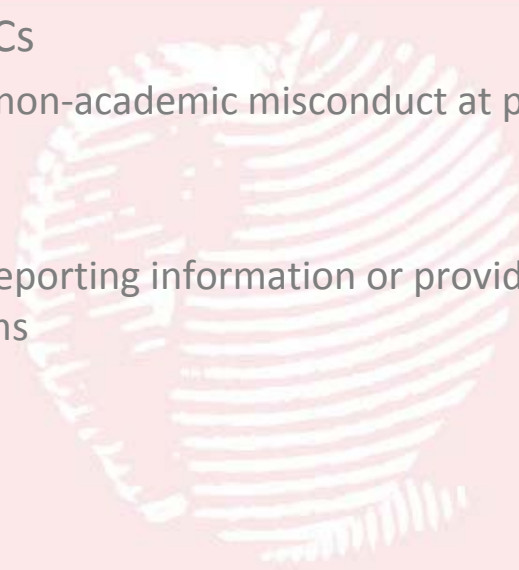
Reviewing Criminal Background Information

- 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

Part IV: Using the CBC – Best Practices

Reviewing Criminal Background Information

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



Part IV:
The Centralized CBC Process

Jennifer L. Athay, Pharm.D
Director of Student Affairs
AACP



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

1. APPLICANT ACCEPTANCE

School Accepts/Alternate Lists Applicant

PharmCAS

School performs an admissions action:

- Offer Made
- Declined offer
- Rescinded
- Withdrew

Applicant data securely sent to Certiphi®



ApplicationStation checks for Permissions and Disclosure

If Permissions are NOT on file an e-mail is sent to the applicant requesting the Permissions and Disclosure

2. PERMISSION RECEIVED

Permissions and Disclosure Obtained



Applicant creates an account and logs into ApplicationStation to complete the CBC Permissions and Disclosure forms

Applicant uses this account to track the status of the CBC



The Certiphi receives Permissions and Disclosure forms

CBC process begins

3. CBC IS PROCESSED

The CBC Report is Completed



CBC PROCESS

- Conduct CBC
- Utilize any existing CBC research on the applicant where appropriate
- Re-verify previously reported information if necessary
- Filter report results based on FCRA and state regulations
- Post completed report on applicant for review on ApplicationStation:Student Edition
- Applicant receives e-mail that CBC is ready for review

Part IV: The Centralized CBC Process - Steps 4-6

4. APPLICANT REVIEW

Applicant Review CBC



APPLICANT REVIEW

Applicant has a 10 calendar day review period BEFORE the report is made available to the school

Applicant logs into ApplicationStation to:

- View CBC results
- Release the CBC results to school (before the 10-day review period)
- Dispute the CBC results; CBC is not released to the school until dispute has been resolved

5. CBC RELEASED

Applicant Review CBC



After 10 calendar day review period or upon release by the applicant, the CBC is prepared for the school and sent to the myCertiphi Web site



- School's CBC filters are applied to the report
- Filtered CBC is posted on myCertiphi site where school can access the results
- E-mail notification of CBC release is sent to designated school representatives

6. PROGRAM OVERVIEW

myCertiphi.com® provides AACCP with a Full Program Overview



PROGRAM OVERVIEW

- Program Summary Reports
- CBC Hit Ratios
- CBC Turnaround Reports
- CBC Dispute Statistics
- Permissions Turnaround
- Invoicing/Billing Statistics

Part IV: 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

