

Temple University College of Public Health and School of Social Work

Policy Number: 03

Effective Date: 11/20/2023

Last Review: 11/20/2023

Issuing Authority: Office of the Dean

Title: Background Check Requirements for Practicum Experiences

1. **Scope of Policy:** The purpose of this policy is to define Temple University College of Public Health's policy for background checks for programs which require a practicum placement with an affiliate site. For a variety of reasons students enrolled in programs which have a clinical practicum placement with an affiliate are required to undergo background checks and child abuse clearances as a condition of placement with the affiliate site. In addition, some affiliates also require urine drug screenings. Background checks are good for five years in the state of Pennsylvania, unless otherwise noted in an affiliation agreement.
2. **Reason for Policy:** To ensure that students complete the appropriate background clearances prior to beginning a practicum experience at an affiliate site.
3. **Who Should Read this Policy:** All students who will be participating in any practicum course work with an affiliate agency regardless of if on site with an affiliate or remote.
4. **Resources:**
 - a. Temple University Policy: **Safety of Minors Policy # 04.61.12**
 - b. Pennsylvania Department of Human Services:
<https://www.dhs.pa.gov/KeepKidsSafe/Clearances/Pages/PA-Child-Abuse-History-Clearance.aspx>
 - c. Pennsylvania State Police: <https://www.psp.pa.gov/Pages/Criminal-History-Background-Check.aspx>
 - d. Pennsylvania Department of Education:
<https://www.education.pa.gov/Educators/Clearances/CHRI/Pages/Applicant-Procedures.aspx>
 - e. Pennsylvania Department of Human Services:
<https://www.dhs.pa.gov/KeepKidsSafe/Clearances/Pages/FBI-Fingerprinting.aspx>
5. **Definitions: Types of background clearances:**
 - a. **General background:** includes the following:
 - i. Residency History
 - ii. County Criminal Searches (previous 7 years) outside of PA
 - iii. National Record Indicator w/ Sex Offender Index
 - iv. Nationwide Healthcare Fraud and Abuse Search (OFAC, OIG, GSA)
 - b. **Pennsylvania statewide police request for criminal records (PACH) Act 34**
 - c. **Child Abuse History Clearance ACT 151**
 - i. Pennsylvania Department of Human Services (DHS) Child Abuse History Clearance ACT 151
 - ii. Fingerprint for PA Dept of Education – Federal Criminal History Record (CHRI) ACT 141 for the appropriate setting: health care or public school
 1. FBI fingerprints for DHS clearance (practicum in health care settings)
 2. FBI fingerprints for Department of Education (practicum in public schools)
6. **Procedure:**
 - a. Students in practicum experiences will be required to purchase a membership for the APPROVE compliance monitoring module in EXXAT-the college's clinical practice management system, which is HIPAA and FERPA compliant.
 - b. Students will sign a waiver noting understanding of the need for background clearances and how these clearances can be used (Appendix A)

- c. Students will purchase all the required background screenings, **except FBI Fingerprints** directly through Universal Background Screening Inc. through a link embedded in Approve.
 - i. Universal background is a secure HIPAA/FERPA electronic environment.
 - d. Upon purchase students will sign an FTC waiver noting understanding of the background checks and how the information will be used.
 - e. Students will complete requested documents and submit screenings.
 - f. Background check results will be directly uploaded to the student's account in APPROVE when completed.
 - g. FBI fingerprints are purchased by the student directly through Identogo website: <https://www.identogo.com> using the appropriate service code noted below. Program faculty will inform student of which service code should be used. In the event that a student is in both a health care and school district setting they will need to obtain 2 sets of fingerprints one for DHS and one for Department of Education.
 - i. FBI fingerprints for DHS clearance will use **Service Code 1KG756 (service code Employee >= to 14 yrs contact with children).**
 - ii. FBI fingerprints for Dept of Education will use **Service Code 1KG6XN (for school districts).**
7. **Record keeping:** Background clearance documents will be stored in EXXAT / APPROVE clinical practice management system.