

## **Colorado State University OT Criminal Background Check, Drug Test, HIPAA, OSHA Policy and Procedures**

All CSU OT students will complete a minimum of one criminal background check per year, scheduled for summer or early fall with the CSU vendor CastleBranch. Students may need to do additional background checks if required by a confirmed fieldwork site. Students are responsible for initiating the background check by going to the CastleBranch web site to register, pay and authorize release to the CSU OT Department. The criminal background check is required, if the student does not complete the check or it is delayed, fieldwork will be postponed, cancelled or rescheduled until the check is completed.

It is the student's responsibility to forward the results from the background check to the student's confirmed fieldwork placement if required by the site (for a list of site prerequisites-please refer to E\*Value). Student criminal background check results and drug test are education records as defined in the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99), and are reviewed only by personnel with a legitimate educational interest, such as the academic fieldwork coordinator and the program assistant within CSU. Results are also released to personnel at the fieldwork site. The student background check results and drug test will be stored in the secured databank with the vendor and retrieved only when needed to meet requirements for a placement.

The term "criminal background check" refers to a formal review of official state, local, and/or federal law enforcement records. Requirements to conduct student criminal background checks can arise from state law, agreements with fieldwork sites and potentially from the rules of external agencies (Joint Commission on Accreditation of Healthcare Organizations-JCAHO). Background checks are performed annually because the information is accurate on the day the check is performed and becomes potentially outdated over time.

If a student's background check indicates a criminal conviction or if the drug test is positive, the student will be notified and provided an opportunity to address the concerns and dispute any information contained. This process could affect timing for beginning the fieldwork placement, or may prevent a student from receiving a fieldwork placement. Every effort will be made to work with the student to ensure accuracy and prompt review of any discrepancies.

The student is expected to complete the initial background check included in **CastleBranch Package OK30 - Background Check + Drug Test + HIPAA & OSHA eLearning package** upon admission into the OT program. This package also includes a mandatory 10 panel drug test, HIPAA eLearning Course and OSHA eLearning Course. Subsequent background checks **CastleBranch Package OK30re-Annual Recheck Package**, checks at least annually while in the OT academic program will review the time frame since the initial background check without repeating the full 7 year history. Some fieldwork sites conduct their own required student background check, which occurs in addition to the CSU OT background checks.

1. **CastleBranch Package OK30 - Background Check + Drug Test + HIPAA & OSHA eLearning package \$93.00:**

- 7-Year County Criminal Search (include Maiden/Alias Names)
- Nationwide Record Indicator with Sex Offender Index (NRI w/ SOI) (include Maiden/Alias Names)
- Nationwide Healthcare Fraud & Abuse
- Nationwide Federal Crime Search
- Social Security Verification
- Residential History
- 10-Panel Drug Test
- HIPAA eLearning Course
- OSHA eLearning Course

2. **CastleBranch Package OK30re - Annual Recheck Package \$18.80:**

- Current County Criminal Search
- NRI w/ SOI
- Nationwide Healthcare Fraud & Abuse Search
- Residential History

**Note:** This check is intended to review a student's background record during second year of program since the initial check, expanding upon the comprehensive 7 year history to update it without repeating the time frame prior to the initial check.