

UConn

Administrative Policy

2001-03 Background and Sanctions Check

Title	Background and Sanctions Check
Policy Owner and Contact Information	Office of Healthcare Compliance https://health.uconn.edu/healthcare-compliance/
Campus Applicability	UConn Health Campus
Applies to	UConn Health employees, students, resident physicians, contractors and other agents of UConn Health.
Effective Date	8/3/2020

PURPOSE:

As mandated by federal and state laws UConn Health will conduct all required exclusion screenings on employees, students, contractors and other agents of UConn Health. UConn Health will also perform background checks on all employees, students, residents, contractors and other agents of UConn Health.

POLICY STATEMENT:

UConn Health does not knowingly intend to employ, place, engage or retain persons in positions of trust who have demonstrated a propensity to engage in illegal activities. If a person has been excluded from participation in a federally funded or state funded healthcare program or has been convicted and in certain cases arrested for a criminal offense, the nature of the situation, and the responsibility of the person will be considered in determining whether to move ahead with the employment, placement or engagement or to terminate the individual. For individuals of the Medical Staff holding a medical staff appointment, such termination shall be in compliance with the Medical Staff Bylaws.

- Applicants unwilling to submit to a background check or sanctions check are not considered for employment, placement or engagement.
- All individuals about whom information is discovered through the background and sanctions checks process shall have the right to review and defend any and all information obtained in the process.
- All staff and volunteers of UConn Health are obligated to notify their supervisor or Human Resources within five business days if they have been convicted and in certain cases arrested for a criminal offense, or if they have been excluded/debarred from a federally-funded healthcare program or the State of Connecticut while in the employ of UConn Health. Contractors are also required to report exclusions/debarments to UConn Health.
- All staff covered by the Medical Staff Bylaws have an obligation to notify the Medical Staff Office within five business days if they are convicted and in certain cases arrested of a criminal offense or have been excluded/debarred from a federally funded healthcare program or the State of Connecticut.

- The inquiries into the background of all persons associated with UConn Health are intended to comply with federal and state law and are required as per the organization’s Corporate Compliance Plan.

PROCEDURES/FORMS:

[Background Check and Exclusions Check Procedures](#)

REFERENCES:

- CT General Statutes Sec. 46a-79 and 46a-80
- Sections 1128, 1128A and 1156 of the Social Security Act
- Department of Health And Human Services Office of Inspector General Publication of the OIG Compliance Program Guidance for Hospitals, February 23, 1998
 - Supplemental Compliance Program Guidance for Hospitals, January 31, 2005
- Section 306(a) and (b) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C §335(a) and (b))

RELATED POLICIES:

[Medical Staff Bylaws](#)

ENFORCEMENT:

Violations of this policy or associated procedures may result in appropriate disciplinary measures in accordance with University By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, the University of Connecticut Student Code, other applicable University Policies, or as outlined in any procedures document related to this policy.

APPROVAL:

<u>Andrew Agwunobi (Signed)</u>	<u>8/13/20</u>
UConn Health Chief Executive Officer	Date

<u>Kiki Nissen (Signed)</u>	<u>8/6/20</u>
Administrative Policy Committee Co-Chair	Date

<u>Janel Simpson (Signed)</u>	<u>8/12/20</u>
Administrative Policy Committee Co-Chair	

POLICY HISTORY:

New Policy Approved: 10/18/01
Revisions: 9/13/02, 9/24/09, 8/3/20