

 	Howard University College of Nursing and Allied Health Sciences Department of Physician Assistant	Policy Number	PHAS - 017
	Background Check and Drug/Alcohol Screening Policy	Effective Date	04/01/2023
		Last Reviewed	05/13/2025
	Approved by: Felecia M. Banks, PhD, M.Ed, OTR/L, FAOTA Interim Dean, College of Nursing and Allied Health Sciences	Revision Date	02/09/2026
		Next Review	05/13/2027

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I. **PURPOSE**

To provide prospective and matriculating physician assistant students the program policy on criminal background and drug screening and the university policy in drug and substance abuse.

II. **POLICY**

It is the practice and procedure of the Howard University Physician Assistant (PA) Department to obtain a criminal background check and drug screening on matriculating physician assistant students. This practice meets compliance as hospitals and clinical partners require students assigned for supervised clinical practices experiences (SCPE) to have documentation of these requirements.

Howard University, in continuance of a safe and drug-free living, learning, and working environment for students, faculty and staff, the University (inclusive of all departments and programs) complies with all applicable federal, state, and local regulations.

Safe and competent delivery of patient care requires all providers to be free of impairment from drugs and alcohol. Howard University, inclusive of the PA program reserves the right to advise individuals who exhibit behaviors indicative of the problematic use of alcohol or other drugs to seek professional assistance. It may include a referral to the University Counseling Center, the Student Health Center for counseling, advisement, and treatment, as appropriate.

Students are subject to and will be required to pass a criminal background check and drug screen 90 (ninety) days prior to the start of matriculation and 30 (thirty) days prior to the start of the clinical phase of the program. **Criminal background checks and drug screenings will be the financial responsibility of the student.**

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III. **DEFINITIONS**

Viewpoint – The vendor retained to perform the student criminal background checks, exclusively serves the healthcare industry and is affiliated with the American Hospital Association (AHA) and the American Society for Healthcare Human Resources Association (ASHHRA).

IV. **PROCEDURES**

1. Students who are extended and have accepted conditional admission into the Howard University Physician Assistant Program will be required to initiate, complete and pass a criminal background check and drug screening through Viewpoint within 90 (ninety) days* prior to the start of matriculation and 30 (thirty) days* prior to the start of the clinical phase of the program.

a. The process will include the following searches:

i. **Criminal Background Check**

1. Social Security Number Validation/Verification
2. Criminal Record Searches (county, state, national, federal)
3. Sex Offender Registry Search
4. OIG/SAM Excluded Parties Search
5. myRecord Tracker

ii. Drug Screening

*Students who do not meet this requirement will forfeit their seat in the program and/or be dismissed prior to the clinical phase.

2. Viewpoint will obtain your release and consent electronically. The criminal background checks should be completed within 10 days of Viewpoint's receipt of the release form. There may be a few isolated exceptions to this timeframe.

3. Results of the criminal background check will be made available to the program. Upon request, results will be provided to hospitals and clinical partners as students are assigned to each facility for clinical training. Each health care facility will have access to the report results and will make the final determination if a student is eligible to rotate with them.

4. Results of the urine drug screen will be made available to the program. A negative drug screen is required for matriculation and entry to the clinical year.

a. A result of "negative- dilute" or any variation will require repeat testing.

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- i. The student will be permitted 3 (three) attempts for a negative result.
 - ii. A negative drug screen is required for matriculation and entry to the clinical year.
 - iii. If a student is unable to achieve a negative result after 3 attempts, the student will be subject to disciplinary action, including program dismissal.
 - b. A positive result will be subject to disciplinary action, including program dismissal.
 - i. Students, faculty, and staff who violate the University's alcohol and drug policies will be subject to disciplinary action, up to and including dismissal from the program and/or possibility of expulsion from the University (for students), termination of employment (for faculty and staff), and termination of contract (for contractors and affiliates). The University may also refer a matter to the appropriate police or other governmental authorities for prosecution.
 - c. Although medical marijuana and recreational marijuana are legal for use in the District of Columbia, Howard University and the Physician Assistant Department prohibit the use of marijuana by students. In the event a student holds a valid prescription for medical marijuana, uses cannabidiol (CBD) oil (which is also prohibited) and has a positive drug screen, the students will not be allowed to participate in clinical rotations and will be subject to disciplinary action, including dismissal from the program.
5. The types of sanctions that may be imposed by the University for students also may include, but are not limited to:
- a. Participation in special workshops, classes, or seminars.
 - b. Warning or reprimand.
 - c. Requirement to seek counseling and/or repeat testing.
 - d. Suspension or probation.
 - e. Dismissal from the PA program.
 - f. Expulsion from Howard University.
 - g. Immediately vacate on-campus housing and lose housing privileges.