



Elson S. Floyd College of Medicine

WASHINGTON STATE UNIVERSITY

Graduate Medical Education Policy

GME TRAINEE APPOINTMENT POLICY

Scope: Applies to Washington State University Elson S. Floyd College of Medicine Graduate Medical Education (GME) Trainees at accredited and non- accredited graduate medical education training programs (i.e. residency or fellowship) sponsored by the College of Medicine.

GMEC Approval: March 16, 2021

1.0 Policy Statement:

It is the Elson S. Floyd College of Medicine (ESFCOM) policy that all Trainees are consistently appointed and reappointed to their respective programs per the elements and procedures of this policy.

2.0 Definitions

Accreditation Council for Graduate Medical Education (ACGME): accredits Sponsoring Institutions, residency, and fellowship programs, confers recognition on additional program formats or components, and dedicates resources to initiatives addressing areas of importance in graduate medical education.

Designated Institutional Official (DIO): The individual in a Sponsoring Institution who has the authority and responsibility for all of that institution's ACGME-accredited
Program Director (PD): The individual designated with authority and accountability for the operation of a residency/fellowship program.

Trainee: a physician in training at an ACGME accredited graduate medical education program, the term includes Interns, Residents, and Fellows or other trainee enrolled in an educational program whose education falls under the purview of the ESFCOM Office of Graduate Medical Education.

3.0 Responsibilities

GMEC and DIO

4.0 Procedures

4.1 Trainee Application Process

Washington State University participates in the National Resident Matching Program (NRMP) and utilizes the application process within ERAS. Within the application, applicants are asked:

- Have you ever been convicted of a misdemeanor in the United States? (yes or no)
 - If yes, please explain:

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- Have you ever been convicted of a felony in the United States? (yes or no)
 - If yes, please explain:
- Is there anything in your past history that would limit your ability to be licensed or would limit your ability to receive hospital privileges? (Note: This section is not intended to solicit information about health, disability, or family status)

Responses to these questions are not visible to GME or Program staff during the process of considering the applicant for interview or ranking and are referenced during the background check process.

If a resident is considered for appointment outside of the NRMP matching process, a similar application and disclosure process is utilized.

4.2 Trainee Appointment Process

All residents and fellows must meet all requirements for initial appointment and reappointment. These required items, as well as successful background check and drug screen include:

- Applicants must provide:
 - Copy of Medical school diploma
 - Copy of ECFMG Certificate (if applicable)
 - Copy of USMLE/COMLEX Step 1, Step 2 CK score report or transcript
 - Copy of USMLE/COMLEX Step 3 documentation, if PGY-3 or higher
 - Physician In Training Agreement (PITA) - signed electronically via MedHub
 - National Provider Identifier (NPI) Number
 - Washington State provider license
 - DEA registration
 - Department of Health (DOH) Opioid Training Certificate of Completion (for Residents prescribing long-acting opioids)
 - Immunization documentation
 - Summative Evaluation from previous program (if applicable)

4.3 Trainee Background Check

Following the residency or fellowship match and as part of the onboarding process, pre-employment screenings and criminal background checks will be completed. Trainees must consent to a background check through a national background check screening service provider and several federal regulatory checks as part of onboarding.

A formal background investigation will be conducted by an Investigation Vendor and includes:

- Social Security Number Validation and Search
- County Criminal Records Search
- Statewide Criminal Records Repository
- Washington State Patrol (WATCH)
- Federal Criminal Records Search
- National Criminal Database

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- National Sexual Offender Database Search
- National Practitioner Data Bank
- OIG / SAM (Formerly GSA) EPLS Search - search covers the federally-mandated HHS Office of Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE), and the System for Awards Management (SAM) - Excluded Parties List (EPLS)
- Search covering sanctions, disciplinary and administrative actions taken federal and state healthcare regulatory authorities, including FDA, NIH, OFAC, terrorist watch lists and more

The Investigation Vendor will provide the GME Institutional Office with a written copy of the Background Investigation report for each trainee and will include information on all prior criminal convictions and sexual offender registry status. Prior arrests or detention orders that did not result in criminal convictions or pleas or were expunged, or sealed convictions, shall not be considered.

Upon receipt of a Background Investigation report with no adverse record, trainee onboarding will be processed by GME.

Should an adverse record be received as a result of information obtained from the Background Investigation, the information will be reviewed by a review committee consisting of the DIO, Program Director, and HRS representative. The results will be reviewed on a case by case basis. This committee will make a recommendation and it is the responsibility of the DIO to make the final decision. Information that will be taken into account includes, but is not limited to:

- the nature and gravity of the finding(s) and the circumstances surrounding the finding(s)
- the time that has passed since the finding and/or completion of the sentence
- the rehabilitation record, actions, and activities of the individual since the finding(s), including subsequent work history.

The trainee applicant may be requested to provide additional information or explanation. The existence of a conviction or report does not automatically disqualify an individual from employment as adverse information triggers a process not a result. Each case will be judged on its own merit with respect to the above factors; however, it is expected that the individual must have made good-faith, truthful and comprehensive disclosures.

If the decision is made to rescind the offer to the trainee to join the program, the decision must be communicated to the trainee and Program Director in writing. If the trainee is joining the program through the NRMP, Match Waiver must be requested.

A copy of the background investigation report will be maintained confidentially in accordance with the law and WSU policy. This record may be provided to others as the need arises such as regulatory audit, ACGME accreditation review, and legal proceedings.

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4.4 Trainee Drug Screen

In accordance with the residency or fellowship match standards, Master Affiliation Agreement terms and conditions with established residency training sites, and as part of the onboarding process, pre-employment screenings that include a drug screen is required. All incoming trainees are subject to a drug test provided by an approved and contracted investigation vendor.

Confidential results of the drug screen are provided to the GME office. Upon receipt of a drug screen report with no adverse items, trainee onboarding will be processed by GME.

Should a drug screen report with adverse results, the report will be reviewed by the DIO. If warranted, the report will be reviewed by a review committee consisting of the DIO, Program Director, and HRS representative. The results will be reviewed on a case by case basis. This committee will make a recommendation and it is the responsibility of the DIO to make the final decision.

If the decision is made to rescind the offer to the trainee to join the program, the decision must be communicated to the trainee and Program Director in writing. If the trainee is joining the program through the NRMP, Match Waiver must be requested.

A copy of the drug screen report will be maintained confidentially in accordance with the law and WSU policy. This record may be provided to others as the need arises such as regulatory audit, ACGME accreditation review, and legal proceedings.

4.5 Trainee Re-Appointment

Upon eligibility of trainee for reappointment and/or promotion to the next level of training, it is the trainee's responsibility to maintain and update the documentation required and provided at time of appointment. Trainees may be subject to a criminal background check and drug screen prior to reappointment.

5.0 Related Policies

GME Qualifications, Eligibility, and Selection of Residents Policy, GME Renewal and Promotion Policy; GME Compensation Policy; GME Grievance and Due Process Policy

6.0 Key Search Words

Appointment, background check

7.0 Revision History

GMEC Approval: Revision/Review Date(s)

Responsible Office: ESFCOM GME Office

Policy Contact: Designated Institutional Official

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Supersedes: N/A