

Background Check Procedures

Revised March, 2016

Controlled Substance Access Background Check Forms

[Danforth Campus \(PDF\)](#)

[School of Medicine \(PDF\)](#)

United States Drug Enforcement Administration Requirement

“The registrant shall not employ, as an agent or employee who has access to controlled substances, any person who has been convicted of a felony offense relating to controlled substances or who, at any time, had an application for registration with the DEA denied, had a DEA registration revoked or has surrendered a DEA registration for cause. For purposes of this subsection, the term “for cause” means surrender in lieu of, or as a consequence of, any federal or state administrative, civil or criminal action resulting from an investigation of the individual’s handling of controlled substances.”

Missouri Bureau of Narcotics and Dangerous Drugs Requirement

“The applicant must answer yes or no to whether the applicant, or any officer of a corporate applicant or individual employed by any applicant having access to controlled substances, has ever entered a plea of guilty, no contest, nolo contendere, or otherwise been convicted of any violation of any state or federal law related to the possession, manufacture, distribution, dispensing or prescribing of controlled substances. If the applicant currently holds or has previously held a state or federal controlled substance registration or state professional license or registration, the applicant must answer yes or no to whether their license, registration or application or renewal thereof has ever been surrendered, revoked, suspended, denied, restricted or placed on probation and if any such action is pending.”

Human Resources Objectives

Develop a process to ensure the following objectives are met and maintained:

1. Prevent unauthorized access to any employee who has a federal or state conviction related to controlled substance.
2. Ensure all required license(s) and registration(s) are tracked as appropriate.
 - BNDD Registration— WUSM Registration # ;
 - Danforth Registration # DEA Registration— WUSM Registration # ;
 - Danforth Registration # Ensure required institutional license and registration data are tracked in DEA SharePoint site.

Washington University Controlled Substance Access Acknowledgement Form

Completion of the form, and the appropriate approvals, are required to gain access to controlled substances. Access should be restricted to the PI and his/her employees who need clearance to perform specific job functions within the assigned lab. The PI will determine the members of his/her lab that will need access.

Employees should not access controlled substances until they have received approval via Human Resources and have received training regarding safety and security from the PI (or designee) or Environmental, Health and Safety office, as appropriate. The form contains specific questions (noted below) that must be answered before the process can move forward.

- *Have you ever entered a plea of guilty, no contest, nolo contendere, or otherwise been convicted of any violation of any state or federal law relating to a controlled substances?*
- *Have you ever had a federal or state controlled substance registration denied, restricted, revoked or surrendered for cause or otherwise placed on probation?*

Completed forms must be returned to the Human Resources Office. Incomplete or illegible forms may cause delay in approval process.

Process for Existing PI and Staff

1. HR receives the completed Controlled Substance Access Request form PI noting individual staff members that will require access.
2. HR conducts Federal and State criminal background check and processes results as appropriate.
 - Federal and State criminal background check parameters include the employee's current home address. Generally, this information is accessed through the Federal District Court Records (PACER) system and Missouri State Highway Patrol Central Criminal Repository (Illinois State Highway Patrol as appropriate). The current cost to complete the background check is approximately \$20.00, subject to additional processing fees as issued by the state or agency.
3. HR will confirm the disposition of the check and archive the results upon conclusion. HR will notify the PI and department Executive Director/Business Manager of any potential issues.

New Protocols/Amendments

1. PI notifies Institutional Animal Care and Use Committee (IACUC) of the need to use controlled substances via protocol/amendment.
2. IACUC notifies Human Resources.
3. Process steps are the same as noted above.

Staffing changes (New = new hires, transfers, promotions, duty changes)

- PI must notify Human Resources immediately to complete the background check prior to allowing employee access to controlled substances.
- Human Resources must audit the active list of approved employees on an annual basis. Employees who no longer need access to controlled substances due to changes in job duties or position should be denied access at the local level.

PI Responsibilities

- Ensure lab personnel are properly training regarding the safe usage and secure storage of controlled substances within the lab.
- Restrict access to controlled substances by unauthorized individuals.
- Maintain an accurate list of approved controlled substances users.
- Notify Human Resources of staffing changes as appropriate.

Employee Responsibilities

- An employee must notify Human Resources immediately if (1) he/she is convicted of any drug-related offense, and (2) his/her state or federal controlled substances registration or state professional license or registration, or application for or renewal of such registration or license, is surrendered, revoked, suspended, denied, restricted, or placed on probation, or if any such action is pending.