



## **STUDENT BACKGROUND CHECK REQUIREMENT**

Dear Applicant,

I would like to congratulate you on your acceptance to National University of Natural Medicine (NUNM). NUNM's mission is "To educate and train physicians and practitioners in the art and science of natural medicine." It is NUNM's responsibility to ensure the highest level of integrity and safety to our patients, students and community. Therefore, as of fall 2009, all admitted applicants to NUNM are required to submit a criminal background screening prior to matriculation. A background screening is a review of any past activities that might signify a potential risk for patients or others, including criminal behavior, that otherwise would exclude a graduate from eligibility for Oregon State licensure at the conclusion of their academic career.

NUNM has contracted with a third party company to conduct student background screenings. With this letter, you will find the NUNM Release of Information form, the Request and Information Sharing of Student Background Check Information Policy, NUNM Background Check Policy, and online background screening instructions. The Release of Information form allows NUNM to review your history for any criminal misdemeanors, felonies, and/or presence on an abuse registry for children, dependent adult or sex abuse. All information gathered by the screening is covered by the Family Educational Right and Privacy Act (FERPA) and is used only to determine admission and matriculation.

Failure to return the consent form or complete the background check will constitute a withdrawal of admission to NUNM and application fees will not be returned. All background screenings will not occur until you have been accepted to NUNM and have returned the Release of Information form. Also included in this letter is a copy of the Fair Credit Reporting Act Disclosure. Please note, that your background screening does NOT include a credit check, but the copy of the Fair Credit Reporting Act

Disclosure is required to be provided by law. This and the other policy information are for your review and do not need to be returned.

Please sign the release of information form and return it to the NUNM Office of Admissions in enough time to allow sufficient time for review. If you have any questions, please do not hesitate to contact me at [rallen@nunm.edu](mailto:rallen@nunm.edu); or Elizabeth Hayward, Director of Admissions and Recruitment, at [ehayward@nunm.edu](mailto:ehayward@nunm.edu).

Sincerely yours,

Rachael Allen  
Dean of Students



## **REQUEST & INFORMATION SHARING OF STUDENT BACKGROUND CHECK INFORMATION POLICY**

### **1. Authorization to share information**

Background check and supplied information falls under the Family Educational Right to Privacy Act (FERPA) guidelines and can only be reviewed by University officials, affiliated clinical facilities and the student. FERPA prohibits the release of student information without the written consent of the student unless there is a specific FERPA exception.

- a. NUNM will inform students via the student handbook and university catalog that affiliated healthcare and clinical facilities that a student attends during their course of study may be provided a copy of background check information upon request. Such request for information must include rationale for information needed.
- b. Affiliated clinical and healthcare facilities that offer educational services are considered educational institutions. Therefore, it is reasonable for such institutions to request the release of information without the student's authorization.
- c. Background check and supplied information will be maintained in the office of the Dean of Students in accordance to university record retention policy for student records.

### **2. Request for Information**

Request for background information must be submitted in writing to the Dean of Students and must include rationale of request.

### **3. Transmission of Information**

Educational records will be sent third parties in a confidential manner. Confidential manner is defined as sent either in a secured, marked "confidential" envelope with a request for confirmation of receipt. Transmission should not occur via fax due to the probability that the machine could be located in a public area.

### **4. Confidentially of Information.**

A release of confidential information that is subject to FERPA requires third party confidentiality of the educational records while in their possession. NUNM will inform the affiliated facility of the following in writing:

- a. The records are confidential and subject to FERPA
- b. The information is to be viewed only by those individuals who have legitimate reason to review the information to verify or audit the qualifications of the student to participate in the educational process at the facility.
- c. The information may not be disclosed to other entities without the written authorization of the student.
- d. The information must be destroyed when it is no longer needed for the purpose for which it was provided.
- e. Improper disclosure of personally identifiable information within the report may result in a prohibition of access to information for at least five years.



## FAIR CREDIT REPORTING ACT: NOTICE TO STUDENTS AND PROSPECTIVE STUDENTS

By law, NUNM is required to provide you with this information as a part of our background check procedures, regardless that the background check is for criminal not financial information.

The federal Fair Credit Reporting Act (FCRA) is designed to promote accuracy, fairness, and privacy of information in the files of every "consumer reporting agency" (CRA). Most CRAs are credit bureaus that gather and sell information about you -- such as if you pay your bills on time or have filed bankruptcy -- to creditors, employers, landlords, and other businesses. You can find the complete text of the FCRA, 15 U.S.C. §§1681-1681u, at the [FTC's web site](#). The FCRA gives you specific rights, as outlined below. You may have additional rights under state law. You may contact a state or local consumer protection agency or a state attorney general to learn those rights. Click to view our [frequently asked questions and answers about the FCRA](#).

- **You must be told if information in your file has been used against you.** Anyone who uses information from a CRA to take action against you -- such as denying an application for credit, insurance, or employment -- must tell you, and give you the name, address, and phone number of the CRA that provided the consumer report.
- **You can find out what is in your file.** At your request, a CRA must give you the information in your file, and a list of everyone who has requested it recently. There is no charge for the report if a person has taken action against you because of information supplied by the CRA, if you request the report within 60 days of receiving notice of the action. You also are entitled to one free report every twelve months upon request if you certify that (1) you are unemployed and plan to seek employment within 60 days, (2) you are on welfare, or (3) your report is inaccurate due to fraud. Otherwise, a CRA may charge you up to eight dollars.
- **You can dispute inaccurate information with the CRA.** If you tell a CRA that your file contains inaccurate information, the CRA must investigate the items (usually within 30 days) by presenting to its information source all relevant evidence you submit, unless your dispute is frivolous. The source must review your evidence and report its findings to the CRA. (The source also must advise national CRAs -- to which it has provided the data -- of any error.) The CRA must give you a written report of the investigation, and a copy of your report if the investigation results in any change. If the CRA's investigation does not resolve the dispute, you may add a brief statement to your file. The CRA must normally include a summary of your statement in future reports. If an item is deleted or a dispute statement is filed, you may ask that anyone who has recently received your report be notified of the change.
- **Inaccurate information must be corrected or deleted.** A CRA must remove or correct inaccurate or unverified information from its files, usually within 30 days after you dispute it. **However, the CRA is not required to remove accurate data from your file unless it is outdated (as described below) or cannot be verified.** If your dispute results in any change to your report, the CRA cannot reinsert into your file a disputed item unless the information source verifies its accuracy and completeness. In addition, the CRA must give you a written notice telling you it has reinserted the item. The notice must include the name, address and phone number of the information source.
- **You can dispute inaccurate items with the source of the information.** If you tell anyone -- such as a creditor who reports to a CRA -- that you dispute an item, they may not then report the information to a CRA without including a notice of your dispute. In addition, once you've notified the source of the error in writing, it may not continue to report the information if it is, in fact, an error.
- **Outdated information may not be reported.** In most cases, a CRA may not report derogatory information that is more than seven years old; ten years for bankruptcies.
- **Access to your file is limited.** A CRA may provide information about you only to people with a need recognized by the FCRA -- usually to consider an application with a creditor, insurer, employer, landlord, or other business.

- **Your consent is required for reports that are provided to employers, or reports that contain medical information.** A CRA may not give out information about you to your employer, or prospective employer, without your written consent. A CRA may not report medical information about you to creditors, insurers, or employers without your permission.
- **You may choose to exclude your name from CRA lists for unsolicited credit and insurance offers.** Creditors and insurers may use file information as the basis for sending you unsolicited offers of credit or insurance. Such offers must include a toll-free phone number for you to call if you want your name and address removed from future lists. If you call, you must be kept off the lists for two years. If you request, complete, and return the CRA form provided for this purpose, you must be taken off the lists indefinitely. Click [here](#) to learn more about removing yourself from credit bureaus lists.
- **You may seek damages from violators.** If a CRA, a user or (in some cases) a provider of CRA data, violates the FCRA, you may sue them in state or federal court.

The FCRA gives several different federal agencies authority to enforce the FCRA:

For questions or concerns regarding	Please contact
CRAs, creditors and others not listed below	Federal Trade Commission Consumer Response Center-FCRA Washington, DC 20580 202-326-3761
National banks, federal branches/agencies of foreign banks (word "National" or initials "N.A." appear in or after bank's name)	Office of the Comptroller of the Currency Compliance Management Mail Stop 6-6 Washington, DC 20219 800-613-6743
Federal Reserve System member banks (except national banks, and federal branches/agencies of foreign banks)	Federal Reserve Board Division of Consumer & Community Affairs Washington, DC 20551 202-452-3693
Savings associations and federally chartered savings banks (word "Federal" or initials "F.S.B." appear in federal institution's name)	Office of Thrift Supervision Consumer Programs Washington D.C. 20552 800- 842-6929
Federal credit unions (words "Federal Credit Union" appear in institution's name)	National Credit Union Administration 1775 Duke Street Alexandria, VA 22314 703-518-6360
State-chartered banks that are not members of the Federal Reserve System	Federal Deposit Insurance Corporation Division of Compliance & Consumer Affairs Washington, DC 20429 800-934-FDIC

<http://www.creditreporting.com/fair-credit-reporting-act-law.html>