

**Alternate Staff Screening Policy**

(applicable to EHS/HS staff not eligible to complete a fingerprint background check)

**Policy: To ensure the safety and well-being of all families, NMCAA will screen all potential education staff following the Head Start Program Performance Standards.**

**Due to state and federal FBI fingerprint check restrictions, only those staff working in a licensed childcare setting are able to fully comply with the above Performance Standard 1302.9(b). The following policy and procedure were initially set in accordance with DHHS Docket Number HHS-ACF-2019-0006 which stated, "The date for programs to comply with background checks procedures as described in 45 CFR 1302.90(b) is further delayed until September 20, 2021." All staff denied access to FBI fingerprint checks, under the current state system, will continue to follow this process.**

**Procedures: Prior to employment with NMCAA, all potential staff will undergo and complete the following screening procedures: Professional and personal reference checks, DHHS, ICHAT/SORS clearance and obtain a medical and tuberculosis (TB) clearance. DHHS and ICHAT/SORS will be completed at hire and every three years after hire. Human Resources will send notice to staff that have expired DHHS and ICHAT/SORS.**

**Applicant Screening Process:**

* Review ***Alternate Hiring Staff Procedures*** for detailed information regarding the hiring and screening process.
* Supervisors shall conduct interviews and complete reference checks on all potential staff. Applicants shall provide two work references and one personal reference on the agency application.
* Applicants may be offered employment contingent upon the successful completion of a comprehensive background check, including the following:
	+ Michigan Internet Criminal History Access Tool (ICHAT)
	+ Michigan Child Abuse and Neglect Registry (DHHS Clearance)
	+ National Sex Offender Registry
	+ Criminal history registry and child abuse/neglect registry for any states of residence in the past 5 years
	+ If the applicant lived out of the country in the past five years, equivalent checks must be provided, if available. If they cannot be provided, the person must sign a self-certifying statement that he/she is “eligible” to be the licensee or work in the child care center.
* The supervisor must **NOT** make an offer of employment if either of the following conditions are met:
* An applicant is not of responsible character and suitable to meet the needs of children;
* Through the comprehensive background check process, the applicant has been determined to be ineligible to work in a child care center with children.

**Additional Screening Processes:**

* After an offer of employment, but prior to the first day of hire, all applicants will submit the following:
	+ Documentation that the individual is free from communicable tuberculosis (TB); negative results must be verified within one year prior to employment.
	+ A medical clearance from a health care provider.

**Post-Employment Screening Processes:**

* All staff shall complete DHHS and ICHAT/SORS clearance every three years; employment decisions shall be made based on the DHHS and ICHAT/SORS results.
* All staff shall obtain a new medical clearance and provide documentation of a negative TB screen every five years moving forward.

**Distribution:** Original - To be posted in a place visible and accessible to staff and parents.

**Reference**: HSPPS 1302.90 (b)(i) (3)(4)(5), HSPPS 1302.93 (a); Licensing R 400.8107 (1)(a), R 400.8110 (1)(b), (3)(c), R 400.8112, R 400.8125 (4), R 400.8128

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