

**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 child care setting are able to fully comply with the above Performance Standard 1302.9(b). The following policy and procedure is in accordance with** **DHHS Docket Number HHS-ACF-2019-0006: 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.**

**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.**

**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

5/2021 P:\Head Start Files\ADMIN\Procedures Manual\Postings\Alternate Staff Screening Policy