



Updated Employee/Volunteer Background Clearance Requirement

Overview: The Department of Human Services (DHS) has updated its Suitability Screening Policy for Service Provider Employees and Volunteers serving clients of the DC Department of Human Services. The policy will affect programs funded through TCP's Management and Sole Source grants. TCP has also implemented this policy for TCP programs funded through HUD. The following document breaks down the updated policy applicable to TCP funded programs and provides examples of the types of positions relative to category (Safety Sensitive, Protection Sensitive, and Security Sensitive) that will be required to undergo the noted clearances. Notwithstanding, each provider must make an independent assessment of each position to determine whether a clearance is required and if so, in advance of hiring, the provider must determine which clearance is required.

All employees, no matter the position, are required to undergo a General Suitability Screening that verifies the following:

- a. Past employment, including dates and titles held
- b. Educational background, including all relevant diplomas, degrees and relevant certifications
- c. Licenses, certifications, and training, required for the position
- d. At least three (3) reference checks to ascertain character, reputation, relevant traits, and other relevant qualities, and whether the individual providing the reference would recommend the applicant for the position for which he or she is being considered. The reference checks shall be made with the individual's former employer except that personal references may be utilized instead of, or in addition to, checks with former employers, as deemed necessary by the personnel authority.

***All Service Providers must maintain records of the General Suitability Screening in each employee's file that can be shared with TCP upon request. This information will also be reviewed during your program's annual audit.**

Per the updated policy, positions within the below categories require the noted background clearances **every 2 years:**

- Safety Sensitive
- Protection Sensitive
- Security Sensitive

Safety Sensitive

Positions in which it is reasonably foreseeable that, if the employee performs the position's routine duties while under the influence of drugs or alcohol, the employee could suffer a lapse of attention or other temporary deficit that would likely cause actual, immediate and serious bodily injury or loss of life to self or others.

Required Clearances:

- a. Background Checks (MPD and FBI)
- b. CFSA Clearances (for programs serving youth only)
- c. National Sex Offender Registry
- d. Traffic Record Check (if the employee drives as part of their routine duties)
- e. Pre-employment drug and alcohol test, reasonable suspicion drug and alcohol test, post-accident or incident drug or alcohol test, random drug test, return to duty or follow up drug and alcohol test

The policy provides the below examples of safety sensitive duties:

- a. Operating large trucks, heavy or power machinery, or mass transit vehicles, tools, or equipment.
- b. Handling hazardous quantities of chemical, biological or nuclear materials.
- c. Maintaining the safety of patrons in and around a pool or aquatic area.
- d. Engaging in duties directly related to the public safety, including, but not limited to, responding or coordinating responses to emergency events.
- e. Carrying a firearm
- f. Direct care and custody of children, youth, or other vulnerable persons, which may affect their health, welfare, or safety.

Potential Roles that may fall into this category include but are not limited to:

- a. Meal Vendor Staff (cooks, drivers)
- b. All Janitorial Staff
- c. Security Personnel
- d. Program Managers/Supervisors
- e. Licensed Social Workers/Clinical Staff (counselors, therapists..etc)
- f. All staff that interact directly with youth (youth and family programs) to include case managers, residential assistants/monitors..etc
- g. Staff that work directly with clients in medical/respite programs

Protection Sensitive

Positions that are not safety sensitive positions, but that include duties or responsibilities that involve caring for children or vulnerable Adults.

Required Clearances:

- a. Background Checks (MPD and FBI)
- b. Traffic Record Check (if the employee drives as part of their routine duties)

- c. Pre-employment drug and alcohol test, reasonable suspicion drug and alcohol test, post-accident or incident drug or alcohol test, random drug test, return to duty or follow up drug and alcohol test.
- d. Medical Screening (Physical) and TB screening

The policy provides the below examples of protection sensitive duties:

- a. Coordinating, developing, or supporting recreational activities.
- b. Managing, planning, directing, or coordinating educational activities; and
- c. Performing tasks involving individual or group counseling.

Potential Roles that may fall into this category include but are not limited to:

- a. Residential aids/monitors
- b. Direct support staff

Security Sensitive

Positions of special trust that may reasonably be expected to affect the access to or control of activities, systems, or resources that are subject to misappropriation, malicious mischief, damage, or loss or impairment of communications or control

Required Clearances:

- a. Background Checks (MPD and FBI)
- b. Traffic Record Check (if the employee drives as part of their routine duties)
- c. Reasonable suspicion drug and alcohol test, post-accident or incident drug or alcohol test

The policy provides the below examples of security sensitive duties:

- a. Handle currency.
- b. Have the ability to create, delete, or alter the financial, personnel, payroll, or related transactions of another person.
- c. Have routine access to the personal identifying information of others.
- d. Have routine access to master building keys or controls.
- e. Have the ability to create, delete, or alter any form of credentials, including, but not limited to, computer network credentials and any form of government identification.
- f. Have involvement in or access to homeland security and emergency management plans, after action reports, analytical products, hazard analyses, and/or risk assessments that relate to preparedness, response, mitigation, protection of critical infrastructure and key assets, or the protection of data related to persons and/or property before, during, and after an act of terrorism, manmade or natural disaster, or emergency event.
- g. Have access to networks, files, or drives that include classified, law enforcement sensitive, or for official use only information related to federal or District government terrorism investigations or other man-made disasters in either electronic or hard copy.

Potential Roles that may fall into this category include but are not limited to:

- a. All Finance Staff
- b. Staff that manages contract information/deliverables
- c. Executive Directors/leadership
- d. Any staff that has access to HMIS or any other client databases such as CATCH, HTH/OCTO, Osnum
- e. HR staff

All clearances must be submitted to TCP with your contract's Tier One Deliverables Package at the beginning of each contract period and should also be provided to TCP upon request.