



Policy Advisory

Policy Title: BRC Requirements for the Roles of Intern, Volunteer, and Affiliated Person for All Program Types

Policy Number: BRC-26-01

Release Date: March 4, 2026

Effective Date: April 1, 2026

Policy Link: [Link to full policy document](#)

OVERVIEW

The Massachusetts Department of Early Education and Care (EEC) is expanding the set of roles used to classify candidates submitted for a background record check (BRC) in family child care (FCC) programs. FCC educators will now be able to classify BRC candidates as interns, volunteers, or affiliated persons when submitting their BRC. These three roles already existed for BRC candidates in group and school age (GSA) and residential and placement (R&P) programs, but for FCC programs, candidates in these roles were previously classified under the broader category of individuals “regularly on the premises” (ROP). The addition of these 3 new roles for FCC allows for more specificity during the BRC process with BRC requirements more precisely reflecting an individual’s role in the program.

This policy replaces a previous policy outlining the BRC requirements for interns, volunteers, and affiliated persons in all program types. The update reflects the specific BRC requirements for these three roles in FCC programs; the BRC requirements for these roles in GSA and R&P programs remain unchanged.

APPLICABILITY

This policy applies to intern, volunteer, and affiliated person BRC candidates in all licensed and funded EEC programs.

KEY UPDATES

- FCC educators will need to select the appropriate new role when submitting a BRC in LEAD for an intern, volunteer, or affiliated person rather than submitting these candidates using the ROP role as they did previously.
- FCC (and GSA) candidates with a role of intern, volunteer, or affiliated person are subject to Mandatory Disqualification if their BRC contains offenses listed in EEC's Table of Disqualifying Offenses – Mandatory Disqualifications. The Mandatory Disqualification policy has not changed, but because ROPs are not subject to Mandatory Disqualifications, this policy will now be applied to FCC interns, volunteers, and affiliated persons who were previously run as ROPs.
- Candidates who are found Not Suitable due to a Mandatory Disqualification are not eligible for the same role in the same program type as long as the disqualifying charge appears on their BRC and do not qualify for an appeal of this determination. Previously, these BRCs were submitted as ROPs and, because ROPs are not subject to Mandatory Disqualifications, candidates with Mandatory Disqualifications on their BRC would undergo a review rather than being found automatically ineligible.

RESOURCES

- [Frequently Asked Questions \(FAQ\)](#)

OBSOLETE

This policy replaces the EEC policy “Interns and Volunteers for all Program Types” that was released on September 10, 2019.