



Policy FAQ

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

For Family Child Care (FCC) educators, EEC is adding 3 new role types to the background record check (BRC) process: intern, volunteer, and affiliated person. Previously, all three of these roles were grouped under the category of individuals “regularly on the premises” (ROP). The addition of these 3 new roles for FCC will provide more specificity during the BRC process, more accurately reflecting an individual’s role in the program.

For group and school age (GSA) and residential and placement (R&P) programs, this policy does not make any changes to the existing BRC policies. The roles of intern, volunteer, and affiliated person previously existed for these program types and the BRC requirements for these roles remain unchanged.

FAQ

Q. How should FCC educators use the 3 new roles in the BRC process?

A. FCC educators should select the appropriate role when submitting a candidate’s BRC. Interns and volunteers, who have historically been submitted as ROPs, should now be run under their specific role if they match the definitions below. Similarly, affiliated persons, including roles like transportation drivers, therapists, and specialty teachers like music or yoga teachers who visit multiple programs, should now be submitted in LEAD using the new affiliated person role instead of ROP. The ROP role is still available for individuals who are present at an FCC home on a recurring basis but do not reside at the home, are not employed by the program, and do not meet the definitions of intern, volunteer, or affiliated person.

Q. What are the definitions for each role?

A. Intern: Any person who provides their services to an EEC licensed or funded program in order to gain work experience in and knowledge of a field. Internships may be paid or unpaid, part of a formal educational program or informally designed. Internships are usually for limited periods of time.

Volunteer: Any person who assists in an unpaid and unsupervised capacity for an EEC licensed or funded program. It is presumed that volunteers in FCC programs could potentially have unsupervised contact with children.

Affiliated Person: A person who has regular association with an EEC licensed or funded program through employment, contract, or an informal agreement with the program or parents for the purpose of providing services on behalf of the program or a child in attendance. Sometimes referred to as a “third-party” person. Examples of affiliated persons include transportation providers, temporary workers, specialty service providers, and clinicians, therapists, and home visitors for family child care systems.

Q. Will interns, volunteers, and affiliated persons go through a full background record check?

A. Yes. When an individual’s BRC is run under these roles, they will have a complete background record check, including fingerprints. If a candidate has previously completed an EEC BRC at another program, they may qualify for a suitability transfer if they meet the eligibility criteria detailed in EEC’s [Suitability Transfer of Background Record Checks policy](#).

Q. Are there any differences in how the BRCs of candidates in these new roles are evaluated?

A. Unlike FCC candidates in the ROP role, federal law requires that FCC and GSA candidates with a role of intern, volunteer, or affiliated person are subject to certain mandatory disqualifications. Interns, volunteers, and affiliated persons with “mandatory disqualification” offenses in their BRC are automatically ineligible for approval in FCC and GSA programs. These offenses are listed in the Table of Disqualifying Offenses – Mandatory Disqualifications, available on [EEC’s website](#). If a child care intern, volunteer, or affiliated person has an offense in their BRC that is on EEC’s table of mandatory disqualifications, their BRC application will be found “Not Suitable” due to a mandatory disqualification.

Mandatory disqualification does not apply to candidates for residential and placement programs.

- Q. What does it mean if a candidate is found Not Suitable due to a mandatory disqualification?**
- A. 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. Additionally, candidates found Not Suitable due to a mandatory disqualification do not qualify for an appeal of this determination.
- Q. If an intern, volunteer, or affiliated person has already been found suitable as an ROP, do they need a new BRC using one of the new roles?**
- A. Interns, volunteers, and affiliated persons who have been found suitable as an ROP within the last 3 years do not need to have their BRC run again to reflect these new roles until they reach their 3-year renewal period. At that time, their BRC should be renewed using the new role that accurately reflects their role in the program.
- Q. Can someone be an intern, volunteer, or affiliated person with multiple programs?**
- A. Yes. An individual can be an intern, volunteer, or affiliated person with as many programs as they'd like. Candidates associating with multiple programs will submit a consent form for each program. Candidates may qualify for a suitability transfer when having their BRC run for multiple programs if they meet the eligibility criteria detailed in EEC's [Suitability Transfer of Background Record Checks policy](#).
- Q. If someone provides services to multiple FCC programs, will each program need to enter that candidate in LEAD?**
- A. Yes. Each program who receives services from an intern, volunteer, or affiliated person should enter them in LEAD. This will generate a BRC consent form for the candidate for each program and role for which they are submitted. Candidates may qualify for a suitability transfer when having their BRC run for multiple programs if they meet the eligibility criteria detailed in EEC's [Suitability Transfer of Background Record Checks policy](#).
- Q. Are Early Intervention staff required to undergo an EEC BRC as affiliated persons?**
- A. No, Early Intervention (EI) is overseen by the Department of Public Health (DPH) and it is the joint policy of DPH and EEC that EI staff are not required to undergo an EEC BRC because they do not have the potential for unsupervised contact with children. Instead, EI staff must undergo background record checks as specified in the Early Intervention Operational Standards and as contractually required. For more information, see EEC's [Background Record Checks of Early Intervention Employees and Specialty Service Providers in Early Education and Care Settings policy](#). As a reminder, EEC licensed, and funded programs are prohibited from leaving EI staff alone with children because such individuals have not received a BRC through EEC.