



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

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Applicability: All Licensed and Funded Programs

BACKGROUND

Many programs utilize the services of interns, volunteers, and affiliated persons to provide care and/or services to children attending programs licensed and funded by the Department of Early Education and Care (EEC). EEC's background record check (BRC) requirements apply to interns, volunteers, and affiliated persons, although the specific BRC requirements can vary based on an individual's role, responsibilities, and the type of program in which they provide services.

This policy outlines the BRC requirements for interns, volunteers, and affiliated persons operating in programs licensed or funded by EEC.

AUTHORITY

- 606 CMR 14.04: Definitions
- 606 CMR 14.05: Candidate Categories and Applicable Background Record Checks
- 606 CMR 14.10: Disqualifications

DEFINITIONS

For the purposes of this policy, the following definitions are used:

- **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.
- **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.

POLICY STATEMENT

All interns and affiliated persons providing services in EEC licensed or funded programs, regardless of their potential for unsupervised access to children, must undergo an EEC BRC. Different criteria are used for determining whether a volunteer must have an EEC BRC in order to provide services in an EEC licensed or funded program.

Interns and Affiliated Persons

Interns and affiliated persons must complete a full BRC through the program, regardless of whether such individuals work in a supervised or unsupervised capacity. [See 606 CMR 14.05(3)(b) and 14.05(4)(b)].

Interns and affiliated persons who complete the EEC BRC process in any program type except for residential and placement programs are subject to mandatory disqualifications if their BRC contains any of the offenses in EEC’s Table of Disqualifying Offenses – Mandatory Disqualifications [See 606 CMR 14.10(1)].

Volunteers

In family child care programs, all volunteers are required to complete EEC’s BRC process [See 606 CMR 14.05(2)(b)].

In all other program types, EEC requires that volunteers complete an EEC BRC if they are assisting a program in an unsupervised capacity [See 606 CMR 14.04] and/or if they are

included in a group and school age program's staff:child ratio calculation [See 606 CMR 7.10(3)(b)].

Volunteers who complete the EEC BRC process in any program type except for residential and placement programs are subject to mandatory disqualifications if their BRC contains any of the offenses in EEC's Table of Disqualifying Offenses – Mandatory Disqualifications [See 606 CMR 14.10(1)].

OBSOLETE

This policy replaces EEC's previous Interns and Volunteers for all Program Types policy that was released on September 10, 2019.