



**Department of
Early Education and Care**
THE COMMONWEALTH OF MASSACHUSETTS

EEC Background Record Check Unit

POLICY STATEMENT: Interns and Volunteers for all Program Types

DATE: September 10, 2019

EEC BRC UNIT POLICY NUMBER: 19-008

Interns and Volunteers

Many Programs utilize the services of interns and volunteers to provide care to children attending licensed, approved, and funded Early Education and Care (EEC) programs. EEC's Background Record Check (BRC) requirements apply to interns and volunteers under certain conditions. EEC regulations define the categories of candidates as follows:

Interns

In EEC's BRC regulations, an intern is defined in EEC's BRC regulations as, "Any person who provides their services to an EEC licensed, approved 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." *See* 606 CMR 14.04.

An intern is someone who is working for purposes of gaining work experience and knowledge in a field and for a limited period. Candidates who are direct interns within Programs 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).

Volunteers

Volunteers are individuals who are assisting the program and are always unpaid. EEC regulations define volunteer as, "Any person who assists in an unpaid and unsupervised capacity for an EEC licensed, approved or CCDF-funded Program." *See* 606 CMR 14.04. EEC requires that Volunteers complete an EEC BRC only if they are assisting a Program in an **unsupervised** capacity.

While all employees and interns of EEC licensed, approved, 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 to an EEC licensed, approved, or funded Program.

Examples of volunteers in Group and School Aged Child Care Programs include:

- Jumpstart Volunteers

*Volunteers who are used in the ratio for Group and School Age programs must have a BRC run.

Volunteers in Family Child Care Programs: It is presumed that volunteers in family child care programs may be unsupervised due to the nature of the program and are therefore required to complete EEC's BRC process. *See* 606 CMR 14.05(2)(b). Volunteers in Family Child Care Programs are to have their EEC BRC entered as the role of Persons Regularly on Premises.

If a group, school aged, funded, or residential program or placement agency is considers using a volunteer with no unsupervised access to children, then an EEC BRC is not needed.