

Introduction

Good afternoon. My name is Erica Crystal and I am the Secretariat Labor Relations Director/Deputy General Counsel (Labor) at the Executive Office of Health and Human Services (EOHHS). I am here to present staff testimony on proposed amendments to regulation 101 CMR 15.00. These amendments were proposed on December 19, 2025.

Background

The purpose of 101 CMR 15.00 is to establish a core standardized policy and procedure for the Executive Office of Health and Human Services (EOHHS), its agencies, and vendor programs regarding the review of criminal records of candidates for employment. It is the policy of EOHHS that an individual's Criminal Offender Record Information (CORI) be carefully considered so that the vulnerable populations served by EOHHS and its agencies are protected. It is also the policy of EOHHS that qualified rehabilitated offenders are given a fair opportunity to be employed and reintegrate successfully into the workforce. The current version of this regulation is dated 2017.

Proposed Amendments

The proposed amendments to this regulation are intended to strengthen, clarify, and centralize the criminal background check process for applicants and employees throughout the EOHHS Secretariat, while balancing the need to protect EOHHS' vulnerable clients with providing fair chances of employment for qualified rehabilitated offenders. To this end, the proposed regulation adds a schedule of Mandatory Exclusions, which consists of convictions for the most serious felony offenses, such as: murder, crimes against children and sexual assaults. Additionally, the existing schedule of convictions, which was last revised in 2017, has been updated to reflect the current state of the law and terminology. Lastly, the amended regulation also centralizes the CORI hiring decisions at the Secretariat level, instead of the agency level, to provide greater consistency across the Secretariat.

This concludes my testimony. Thank you.