



201 East Washington Avenue, Room E200
P.O. Box 8916
Madison, WI 53708-8916
Telephone: 608-421-7550
Fax: 608-422-7156
WRS: 711

Governor Scott Walker
Secretary Eloise Anderson

Division of Early Care and Education
Bureau of Early Care Regulation

December 14, 2018

BECR Memo 2018-24

To: **Higher Education Entities**

From: Mark E. Andrews, Director
Bureau of Early Care Regulation

A handwritten signature in blue ink, appearing to read "Mark E. Andrews".

RE: Background Check Update

FEDERAL REQUIREMENTS HAVE CHANGED

In 2014, with the reauthorization of the Child Care and Development Block Grant (CCDBG), the Department of Children and Families (DCF) began planning for changes related to background checks required for regulated child care centers. These changes require the DCF to perform fingerprint-based background checks on all individuals working and residing in regulated child care programs, including caregivers and noncaregiver employees. This impacts institutes of higher learning, because student teachers placed at a child care center as part of a practicum are considered caregivers under these guidelines.

As of October 1, 2018, DCF has begun to perform the federally mandated fingerprint-based background checks on all **NEW** child care licensees, applicants, household members, caregivers (including student teachers), and noncaregiver employees. It is important to note that even if a student in your program has had a background check, they will need to undergo one through the new process.

Note: Student teachers **CANNOT** be placed in a program prior to receiving an eligibility notice from a DCF fingerprint-based background check.

BACKGROUND CHECKS FOR NEW STUDENT TEACHERS IN CHILD CARE CENTERS

As of October 1, 2018, all new student teachers are required to undergo a fingerprint-based background check, performed by the DCF, to establish eligibility to work in a child care center. Background checks can now be requested through the Child Care Provider Portal (CCPP). A link to information about the CCPP is located in the resources section below.

BACKGROUND CHECKS FOR CURRENT STUDENT TEACHERS BEGINNING JANUARY 1, 2019

Starting on January 1, 2019, DCF will begin conducting fingerprint-based background checks on all existing student teachers whose employment begin date is before October 1, 2018. To ensure timely processing of the large number of anticipated background checks, DCF will be conducting them in small batches. Higher education institutes will receive a 60 day notice, and a 30 day notice, prior to receiving the fingerprint instruction letter outlining steps their caregivers (student teachers) must follow to undergo the required background checks.

SCHOOLS WITH PROGRAMS WHO HAVE ACCESS TO THE CCPP

If your institution currently has a child care center attached with access to the CCPP, you will need to request a new location under the existing provider number. Then you can request another CCPP account for the new location by following the instructions below. This process ensures the separation of the care facility and practicum student program when monitoring student eligibility and background check history.

GAINING ACCESS TO THE CCPP

The CCPP is the easiest way to manage background checks for student teachers and practicum students. Schools can obtain CCPP access by following these steps:

1. Submit a request for a provider number if you do not have one, or request a new location under an existing provider number by completing a Provider Number Request at <https://dcf.wisconsin.gov/childcare/provider-number-request>.
2. Obtain a DWD login at <https://www.dwd.state.wi.us/AccountManagement/accountcreation.aspx>.
3. Use the provider, location number and DWD login to complete a CCPP request at <https://dcf.wisconsin.gov/childcare/provider-portal/ccpp-access>.

FBI FEE INCREASES EFFECTIVE JANUARY 1, 2019

Due to the staffing and labor costs of performing background checks, the FBI has increased their fee by \$1.25. This will result in an increase of the total cost collected by Fieldprint when an individual schedules their fingerprint appointment. The cost will continue to be \$37.75 until January 1, 2019, at which point it will increase to \$39.00.

CONCERNS AND QUESTIONS

DCF has received multiple requests from providers to answer a few specific questions, the questions and answers are listed below:

The new process includes multiple new letters and communications. Which letter allows a student teacher to begin working at a program?

Individuals who have received their *Preliminary Background Check - Eligibility* notice may begin residing or working at a program as long as they are under periodic direct observation by someone who has had a DCF-approved background check. It is important to note the preliminary eligibility letter is different than the Fingerprint Instruction Letter. Preliminary Eligibility will not be received until after an individual's fingerprints are submitted and DCF

has reviewed their criminal record for barred offenses. A *Final Background Check – Eligibility* notice will be provided after the complete background check has been conducted.

Who is responsible for the students’ background checks?

Providers are responsible for ensuring all of their caregivers and noncaregiver employees and contractors have undergone the new background check process. However, DCF is encouraging higher education programs to be proactive. This will allow their students to be placed at centers more quickly. Students may not be placed at a program until they have received a preliminary eligibility determination from DCF.

Who is responsible for paying the background check fees?

The new law does not specify who is responsible for the fees. Providers are free to adjust their policy to address who will be responsible for paying for the fees. It is important to note, that no matter who is responsible for payment, an appointment cannot be scheduled without paying the fee on the Fieldprint site.

HELPFUL LINKS AND RESOURCES

The Child Care Provider Portal is a vital tool for completing the new background check process. Information on the portal can be found here:

<https://dcf.wisconsin.gov/childcare/provider-portal/info>

DCF has developed a web page that contains information on the new background checks process. We encourage higher education entities to visit the web page frequently to learn more about the coming changes. The web page can be found here:

<https://dcf.wisconsin.gov/cclicensing/cbc-updates>

Checklists with step-by-step instructions for performing background checks can be downloaded from the “Background Check Checklists” tab located here:

<https://dcf.wisconsin.gov/cclicensing/cbc-updates>

An interactive web tool for assistance in deciding who needs a background check can be found here:

<https://dcf.wisconsin.gov/ccregulation/background-check>

More information will be coming as we continue to perform background checks. If you have not yet signed up to receive DCF emails you can subscribe here:

<https://dcf.wisconsin.gov/childcare/email-signup>