

ISSUE DATE October 25, 2021	EFFECTIVE DATE Immediately	NUMBER 3490-21-04
SUBJECT Changes to the Child Protective Services Law, 23 Pa.C.S. § 6344, as it Pertains to Clearances		BY  Jonathan Rubin, Deputy Secretary Office of Children, Youth & Families

SCOPE

County Children and Youth Social Service Agencies
 Private Children and Youth Social Service Agencies
 Juvenile Court Judges' Commission
 Administrative Office of Pennsylvania Courts
 Juvenile Law Center
 Orphans' Court Judges
 Statewide Adoption and Permanency Network
 Guardians Ad Litem
 County Children and Youth Solicitors
 Child Welfare Resource Center
 Pennsylvania State Resource Family Association
 State Youth Development Centers/Youth Forestry Camps
 Adoption Agencies
 Child Residential and Day Treatment Facilities
 Foster Care Agencies
 Pennsylvania Commission on Crime and Delinquency

PURPOSE

The purpose of this bulletin is to announce significant changes made to the Child Protective Services Law (CPSL) (23 Pa.C.S., Chapter 63) as it pertains to clearance and verification requirements.

Section 6344 (relating to employees having contact with children; adoptive and foster parents) of the CPSL requires employees, volunteers, foster/resource parents, prospective adoptive parents, school employees (those governed and not governed by the Public School Code of 1949) and any other individual who is responsible for or who has direct contact with children to submit clearances. In

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addition to providing information related to clearance and verification requirements, this bulletin highlights the following updates:

- The definition of “resident of Pennsylvania (PA)”;
- Act 54 of 2018 as it pertains to employees that supervise a child during an internship, externship, co-operative, or similar program are now considered as volunteers;
- Portability of fingerprint-based Federal Bureau of Investigations (FBI) criminal history clearances;
- The “grounds for denying employment or volunteer participation in a program, activity or service”;
- Act 47 of 2019 regarding hiring on a provisional basis; and
- The appropriate use of the Commonwealth Law Enforcement Assistance Network (CLEAN).

This bulletin contains the most current information regarding clearances and replaces previously issued guidance. This bulletin should be used in conjunction with the CPSL.

BACKGROUND

Federal Law

The federal Child Abuse Prevention and Treatment Act (CAPTA), the United States’ foremost legislation addressing child abuse and neglect, was originally enacted on January 31, 1974 (Public Law (P.L.) 93–247). CAPTA has been amended several times, mostly recently by the Victims of Child Abuse Act Reauthorization Act of 2018 (P.L. 115-424), which provides immunity from civil and criminal liability for people who make good-faith child abuse or neglect reports or who provide information or assistance, including medical evaluations or consultations, in connection with a report, investigation, or legal intervention. CAPTA provides federal funding to states in support of prevention, assessment, investigation, prosecution, and treatment activities. CAPTA provides grants to public agencies and non-profit agencies for demonstration programs and projects as a means of promoting innovation and disseminating best practices.

Additionally, CAPTA identifies the federal role in supporting research, evaluation, technical assistance, and data collection activities; establishes the Office on Child Abuse and Neglect; and mandates the National Clearinghouse on Child Abuse and Neglect Information. It also sets forth a minimum definition of child abuse and neglect. CAPTA plays a major role in shaping the nationwide system of governmental child protective services in place today.

A key component of CAPTA is the requirement of clearances in § 106(b)(2)(B)(xxii) which asserts that states shall have “provisions and procedures for requiring criminal background record checks (referred to as clearances in this bulletin) that meet the requirements of § 471(a)(20) of the Social Security Act (42 U.S.C. 671(a)(20)) for prospective foster and adoptive parents and other relatives and non-relatives residing in the household”. Additionally, a prospective foster or adoptive parent and any adult living in their household, must also obtain a child abuse and neglect registry check from any other State in which they have resided in the last five years.

Section 471 of the Social Security Act enhanced the list of individuals required to obtain clearances by adding any relative guardian and adults living in the home of the relative guardian related to the approval of a resource parent; and any child-care institution, including a group home, residential treatment center, shelter, or other congregate care setting for adults working in these settings. As per the Social Security Act, states are required to:

- (1) Check any child abuse and neglect registry maintained by the State to include any State in which the applicant has resided within the past five years; and
- (2) Conduct criminal records checks, including fingerprint-based checks of national crime information databases.

State Law

Guided by CAPTA, PA enacted the CPSL in 1975 with the passing of Act 124 and later amended the CPSL by enacting Act 136 in 1982. This law established the Statewide Child Abuse Hotline and the Central Registry. The explicit purpose of the law was to encourage more complete reporting of suspected child abuse and to establish in each county a child protective service capable of investigating such reports swiftly and competently. The law was intended to protect children from abuse and to provide rehabilitative services for children and parents to ensure the child's well-being and to preserve and stabilize family life wherever appropriate.

In 2014, Act 153 updated the CPSL by providing a list of individuals required to obtain clearances, mandating that the required clearances are obtained and maintained by the employer, administrator, supervisor or other person responsible for employment decisions, requiring foster parents to report suspected child abuse, and requiring foster parents to contact their foster care agency within 72 hours of an arrest or conviction of an offense that would constitute grounds for denial or is named as a perpetrator in a founded or indicated report. Act 153 also added timeframes for employees, volunteers, and foster or prospective adoptive parents to obtain new clearances and included exceptions to the clearance requirements for volunteers.

Act 15 of 2015 clarified and made more explicit, the statutory provisions which require employees and adult volunteers who work with children to obtain criminal history and child abuse history clearances.

Act 54 of 2018 updated the CPSL at §§ 6344(b), 6344(b.1) and 6344.2 to establish that a paid individual, who supervises or is responsible for a child during an internship, externship, co-operative, or similar program, is now able to obtain volunteer clearances for this purpose only and at no cost. With this statutory change, individuals who supervise or are responsible for children in an internship, externship, co-operative, or similar program are also required to submit the FBI Criminal History Clearance if they have not been a resident of PA for the entirety of the previous 10-year period.

Most recently, Act 47 of 2019 amended the CPSL to require that employers, administrators, supervisors or other persons responsible for employment decisions may not employ applicants on a provisional basis. Act 47 took effect on December 31, 2019. The CPSL formerly allowed a 90-day provisional hire period for individuals who applied for but were still waiting on their clearance results. As of January 1, 2020, all employees having direct contact with children are required to obtain the three mandatory clearances prior to beginning employment. This ensures that those who have direct contact with children meet state and federal requirements, enhancing the safety of the environments where children are served.

Child Care Centers, Group Child Care Homes, and Family Child Care Homes Certified through the Office of Child Development and Early Learning (OCDEL) Only

Under Act 47, the Department of Human Services (Department) is authorized to grant a waiver regarding hiring employees on a provisional basis but only for child care centers, group child care homes, and family child care homes for a single period not to exceed 45 days. New employees are

not permitted to work alone with children and must be in the immediate vicinity of a permanent employee until all required clearance results are received and submitted to the employer or designee.

Act 47 also requires child care centers, group child care homes, and family child care homes to do the following:

- Have employees, prospective employees and volunteers obtain a National Crime Information Center National Sex Offender Registry (NSOR) Verification;
- In addition to the PA Child Abuse Clearance, the Pennsylvania State Police (PSP) Criminal History Clearance, and the FBI Criminal History Clearance, have employees, prospective employees, and volunteers obtain and submit out-of-state child abuse clearances, criminal history clearances, and sex offender registry checks, or their equivalent, for each state that the individual has resided, in the past five years;
- In no case, hire or approve an employee, prospective employee, or volunteer if their name appears on the Statewide database or its equivalent as a perpetrator of child abuse;
- In no case, hire or approve an employee, prospective employee, or volunteer if their name appears on the National Crime Information Center NSOR or on a state's sex offender registry;
- In no case, hire or approve an employee, prospective employee, or volunteer if they have been convicted of one or more of the following offenses under Title 18 (in addition to those listed under § 6344 (c)) or an equivalent crime under federal law or the law of another state:
 - A felony offense under § 2718 (relating to strangulation);
 - A felony offense under § 3301 (relating to arson and related offenses); or
 - An offense under 18 U.S.C. § 2261 (relating to interstate domestic violence) or § 2262 (relating to interstate violation of protection order).

For further information relating specifically to child care centers, group care homes, and family child care homes, please refer to the OCDEL [Regional Offices](#).

DEFINITIONS

Adult: An individual 18 years of age or older.

Adult family member: A person 18 years of age or older who has the responsibility to provide care or services to an individual with an intellectual disability or chronic psychiatric disability.

Child: An individual under 18 years of age.

Child-care services: Includes any of the following:

- (1) Child care centers;
- (2) Group care homes;
- (3) Family child care homes;
- (4) Foster homes;
- (5) Adoptive parents;
- (6) Boarding homes for children;
- (7) Juvenile detention center services or programs for delinquent or dependent children;
- (8) Mental health services for children;
- (9) Services for children with intellectual disabilities;

- (10) Early intervention services for children;
- (11) Drug and alcohol services for children;
- (12) Daycare services or programs that are offered by a school; or
- (13) Other child-care services that are provided by or subject to approval, licensure, registration or certification by the Department or a county social services agency or that are provided pursuant to a contract with the Department or a county social services agency. The term does not apply to services provided by administrative or other support personnel unless the administrative or other support personnel have direct contact with children.

Commonwealth Law Enforcement Assistance Network (CLEAN): Used by the Commonwealth's criminal justice agencies to access driver's license and motor vehicle information, state criminal history record information maintained in the Pennsylvania State Police Central Repository, the Commonwealth's central registry for Protection from Abuse orders, "hot" (stolen and wanted) files, law enforcement messaging capabilities, and a host of other services.

County agency: The county children and youth social service agency established pursuant to § 405 of the act of June 24, 1937 (P.L.2017, No.396), known as the County Institution District Law or its successor, and supervised by the Department under Article IX of the act of June 13, 1967 (P.L., No.21), known as the Public Welfare Code (now the Human Services Code).

Direct contact with children: The care, supervision, guidance or control of children or routine interaction with children.

Direct volunteer contact with children: The care, supervision, guidance or control of children and routine interaction with children.

Family child-care home: A residence where child day-care is provided at any time to no less than four children and no more than six children who are not relatives of the caregiver.

Family members: Spouses, parents and children or other persons related by consanguinity and affinity.

Founded report: A child abuse report involving a perpetrator that is made pursuant to the CPSL, if any of the following applies:

- (1) There has been a judicial adjudication based on a finding that a child who is a subject of the report has been abused and the adjudication involves the same factual circumstances involved in the allegation of child abuse. The judicial adjudication may include any of the following:
 - (i) The entry of a plea of guilty or nolo contendere.
 - (ii) finding of guilt to a criminal charge.
 - (iii) A finding of dependency under 42 Pa.C.S. § 6341 (relating to adjudication) if the court has entered a finding that a child who is the subject of the report has been abused.
 - (iv) A finding of delinquency under 42 Pa.C.S. § 6341 if the court has entered a finding that the child who is the subject of the report has been abused by the child who was found to be delinquent.
- (2) There has been an acceptance into an accelerated rehabilitative disposition program and the reason for the acceptance involves the same factual circumstances involved in the allegation of child abuse.
- (3) There has been a consent decree entered in a juvenile proceeding under 42 Pa.C.S. Ch. 63 (relating to juvenile matters), the decree involves the same factual circumstances

involved in the allegation of child abuse and the terms and conditions of the consent decree include an acknowledgment, admission or finding that a child who is the subject of the report has been abused by the child who is alleged to be delinquent.

- (4) A final protection from abuse order has been granted under § 6108 (relating to relief), when the child who is a subject of the report is one of the individuals protected under the protection from abuse order and:
- (i) only one individual is charged with the abuse in the protection from abuse action;
 - (ii) only that individual defends against the charge;
 - (iii) the adjudication involves the same factual circumstances involved in the allegation of child abuse; and
 - (iv) the protection from abuse adjudication finds that the child abuse occurred.

Indicated report:

- (1) A report of child abuse made pursuant to the CPSL if an investigation by the Department or county agency determines that substantial evidence of the alleged abuse by a perpetrator exists based on any of the following:
 - (i) Available medical evidence.
 - (ii) The child protective service investigation.
 - (iii) An admission of the acts of abuse by the perpetrator.
- (2) A report may be indicated based on available medical evidence or the child protective service investigation for any child who is the victim of child abuse, regardless of the number of alleged perpetrators.
- (3) A report may be indicated based on available medical evidence or the child protective service investigation listing the perpetrator as "unknown" if substantial evidence of abuse by a perpetrator exists, but the Department or county agency is unable to identify the specific perpetrator.

Parent: A biological parent, adoptive parent or legal guardian.

Perpetrator: A person who has committed child abuse as defined by the CPSL. The following shall apply:

- (1) The term includes only the following:
 - (i) A parent of the child.
 - (ii) spouse or former spouse of the child's parent.
 - (iii) A paramour or former paramour of the child's parent.
 - (iv) A person 14 years of age or older and responsible for the child's welfare or having direct contact with children as an employee of child-care services, a school or through a program, activity or service.
 - (v) An individual 14 years of age or older who resides in the same home as the child.
 - (vi) An individual 18 years of age or older who does not reside in the same home as the child but is related within the third degree of consanguinity or affinity by birth or adoption to the child.
 - (vii) individual 18 years of age or older who engages a child in severe forms of trafficking in persons or sex trafficking, as those terms are defined under § 103 of the Trafficking Victims Protection Act of 2000 (114 Stat. 1466, 22 U.S.C. § 7102).
- (2) Only the following may be considered a perpetrator for failing to act:
 - (i) A parent of the child.
 - (ii) spouse or former spouse of the child's parent.
 - (iii) A paramour or former paramour of the child's parent.

- (iv) A person 18 years of age or older and responsible for the child's welfare.
- (v) A person 18 years of age or older who resides in the same home as the child.

Person responsible for a child's welfare: A person who provides permanent or temporary care, supervision, mental health diagnosis or treatment, training or control of a child in lieu of parental care, supervision and control.

Program, activity, or service: Any of the following in which children participate and which is sponsored by a school or a public or private organization:

- (1) A youth camp or program;
- (2) A recreational camp or program;
- (3) A sports or athletic program;
- (4) A community or social outreach program;
- (5) An enrichment or educational program;
- (6) A troop, club or similar organization.

Resident of PA (as it pertains to § 6344.2(b.1)(1)(ii) of the CPSL): A person's physical presence within the Commonwealth rather than technical maintenance of a residence in the Commonwealth.

Resource Family: A family which provides temporary foster or kinship care for children who need out-of-home placement and may eventually provide permanency for those children, including an adoptive family.

Routine Interaction: Regular and repeated contact that is integral to a person's employment or volunteer responsibilities.

School: A facility providing elementary, secondary or postsecondary educational services. The term includes the following:

- (1) Any school of a school district.
- (2) An area vocational-technical school.
- (3) A joint school.
- (4) An intermediate unit.
- (5) A charter school or regional charter school.
- (6) A cyber charter school.
- (7) A private school licensed under the act of January 28, 1988 (P.L.24, No.11), known as the Private Academic Schools Act.
- (8) A private school accredited by an accrediting association approved by the State Board of Education.
- (9) A nonpublic school.
- (10) An institution of higher education.
- (11) A private school licensed under the act of December 15, 1986 (P.L.1585, No.174), known as the Private Licensed Schools Act.
- (12) The Hiram G. Andrews Center.
- (13) A private residential rehabilitative institution as defined in § 914.1-A(c) of the Public School Code of 1949.

School employee: An individual who is employed by a school or who provides a program, activity or service sponsored by a school. The term does not apply to administrative or other support personnel unless the administrative or other support personnel have direct contact with children.

Volunteer: An adult applying for or holding an unpaid position as a volunteer with a child-care service, a school or a program, activity or service, as a person responsible for a child's welfare or having direct volunteer contact with children.

DISCUSSION

The following sections will discuss the differences in clearance requirements as it pertains specifically to adult employees, employees who are minors, exchange visitors who possess a J-1 Visa, school employees, volunteers, and prospective foster or adoptive parents. There are also several clearance requirements that overlap, so this duplicate information will have a separate section within this bulletin titled *Clearance Requirements that Impact Employees, Volunteers, Foster Parents and Adoptive Parents the Same*.

The following individuals are required to obtain clearances as per the CPSL:

- (1) An employee of child-care services.
- (2) A foster parent.
- (3) A prospective adoptive parent.
- (4) A self-employed provider of child-care services in a family child-care home.
- (5) (i) Except as provided under subparagraph (ii), an individual 14 years of age or older who is applying for or holding a paid position as an employee with a program, activity or service, as a person responsible for the child's welfare or having direct contact with children.
 - (ii) If the program, activity or service is an internship, externship, work study, co-op or similar program, an adult applying for or holding a paid position with an employer that participates in the internship, externship, work study, co-op or similar program with a school and whom the employer and the school identify as the child's supervisor and the person responsible for the child's welfare while the child participates in the program with the employer. The adult identified under this subparagraph as the person responsible for the child's welfare is required to be in the immediate vicinity at regular intervals with the child during the program.
- (6) Any individual seeking to provide child-care services under contract with a child-care facility or program.
- (7) An individual 18 years of age or older who resides in the home of a foster parent for at least 30 days in a calendar year or who resides in the home of a prospective adoptive parent for at least 30 days in a calendar year.
- (8) An individual 18 years of age or older who resides for at least 30 days in a calendar year in the following homes which are subject to supervision or licensure by the department under Articles IX and X of the act of June 13, 1967 (P.L.31, No.21), known as the Human Services Code:
 - (i) A family living home.
 - (ii) community home for individuals with an intellectual disability.
 - (iii) A host home for children.

This paragraph does not include an individual with an intellectual disability or chronic psychiatric disability receiving services in a home.

(9) School employees governed and not governed by the provisions of the Public School Code of 1949 (per Act 153 of 2014). The requirement to obtain clearances does not apply to an employee of an institution of higher education whose direct contact with children, during employment, is limited to either:

- (i) Prospective students visiting a campus operated by the institution of higher education; or
- (ii) Matriculated students who are enrolled with the institution.

- (10) Volunteers having contact with children.
- (11) Exchange visitors (see exceptions below in the “Clearance Requirements for Exchange Visitors” Section)

The required clearances include:

1. A PSP Criminal History Clearance from the State Police for the purpose of verifying the identity of the applicant and obtaining a current record of any criminal arrests and convictions.
2. A PA Child Abuse History Clearance as to whether the applicant is named in the Statewide database as the alleged perpetrator in a pending child abuse investigation or as the perpetrator of a founded or indicated report.
3. A fingerprint-based FBI Criminal History Clearance for the purpose of verifying the identity of the applicant and obtaining a current record of any criminal arrests and convictions.

Any exceptions to these three required clearances will be covered in the respective section of this bulletin.

The following three questions can be used to determine if employees of an agency or organization will need clearances within a program, activity, or service setting:

1. *Is the employee responsible for the welfare of a child?* If the employee is acting in lieu of or on behalf of a parent, they will need clearances.
2. *Does the employee have direct contact with children?* Consider if the employee provides care, supervision, guidance, or control of children. As the terms above are not defined in statute, it is suggested that the common meaning of these terms be used, with child safety serving as the paramount consideration. If it is determined that the employee provides care, supervision, guidance, or control of children, they will need clearances.
3. *Does the employee have routine interaction with children?* Consideration should be given to the employee’s role within the agency or organization. Does the employee have regular and repeated contact with children that is integral to their employment responsibilities? If yes, they will need clearances.

Employers, administrators, supervisors or other persons responsible for employment decisions or involved in the selection of volunteers (from this point of the document will be called “employer or designee”) should consult with legal counsel when making the determination if an employee is required to obtain clearances. Employers and designees are also encouraged to inquire with their insurer regarding possible insurance coverage implications if an employee does or does not obtain clearances.

Absence of Social Security Numbers

If an applicant does not have a social security number, they may still obtain the PSP Criminal History Clearance, the PA Child Abuse History Clearance, and the FBI Criminal History Clearance. Social security numbers may be requested but are not required for these clearances.

Provisional Hiring

As per § 6344(m)(relating to provisional employees for limited periods) of the CPSL, employers or designees may not employ applicants on a provisional basis. All required clearance results must be

obtained by the individual and provided to the employer or designee, prior to employment. Copies of the required clearances must be maintained by the employer or designee.

This change in provisional hiring, resulting from the passage of Act 47 of 2019, took effect December 31, 2019. The only exception to provisional hiring, pursuant to Act 47, was previously discussed in the *Child Care Centers, Group Child Care Homes, and Family Child Care Homes Certified through the OCDEL* section of this document. As stated previously, under Act 47, the Department of Human Services (Department) is authorized to grant a waiver regarding hiring employees on a provisional basis but only for child care centers, group child care homes, and family child care homes for a single period not to exceed 45 days.

Clearance Requirements for Prospective Adoptive Parents, Foster Parents and Individuals Residing in the Applicants Home

In addition to being required to obtain the PSP Criminal History Clearance, the PA Child Abuse Clearance and the FBI Criminal History Clearance, prospective adoptive parents, foster parents and household members must comply with additional requirements outlined in the CPSL.

When approving a prospective foster parent, a foster family care agency shall require prospective foster parents and any individual over the age of 18 years residing in the home to submit the PSP Criminal History Clearance, the PA Child Abuse Clearance and the FBI Criminal History Clearance for review by the foster family care agency (includes a county children and youth agency (CCYA) or private social service agency). If a prospective foster parent, or any individual over 18 years of age residing in the home, has resided outside this Commonwealth at any time within the previous five-year period, the foster family care agency shall require that person to submit a clearance obtained within the previous one-year period from the Statewide central registry, or its equivalent in each state in which the person has resided within the previous five-year period, as to whether the person is named as a perpetrator of child abuse. If the clearance indicates that the person is named as a perpetrator of child abuse within the previous five-year period, the foster family care agency shall forward the clearance to the Department for review. After review, it is strongly recommended that discussions be held between the Department, county agency, and/or foster family care agency to determine if the individual is a threat to the safety of children and able to be a foster parent.

The foster family care agency shall not approve the prospective foster parent if the Department determines that the person is named as the equivalent of a perpetrator of a founded report of child abuse within the previous five-year period.

Prospective adoptive parents and any individual over 18 years of age residing in the home shall submit the PSP Criminal History Clearance, the PA Child Abuse Clearance and the FBI Criminal History Clearance for review. If a prospective adoptive parent, or any individual over 18 years of age residing in the home, has resided outside this Commonwealth at any time within the previous five-year period, the agency or person designated by the court shall require that person to submit a clearance obtained within the previous one-year period from the Statewide central registry, or its equivalent in each state in which the person has resided within the previous five-year period, as to whether the person is named as a perpetrator of child abuse. If the clearance shows that the prospective adoptive parent is named as a perpetrator of child abuse within the previous five-year period, the agency or person designated by the court shall forward the clearance to the Department for review. The updated clearances may be required prior to the child being placed in a home by the adoption agency or intermediary for clearances over one year old. The agency or person designated by the court shall not approve the prospective adoptive parent if the Department determines that the

person is named as the equivalent of a perpetrator of a founded report of child abuse within the previous five-year period. If the adoptive parents are not planning to adopt in the future, they are not required to renew clearances every 60 months.

If a foster parent, prospective adoptive parent or an individual over 18 years of age residing in the home is arrested for or convicted of an offense that would constitute grounds for denying approval under the CPSL or is named as a perpetrator in a founded or indicated report, the foster parent or prospective adoptive parent shall provide the agency with written notice no later than 72 hours after the arrest, conviction or notification that the individual was named as a perpetrator in the Statewide database.

Foster parents and prospective adoptive parents are required to report any changes in the family household composition, to include individuals over the age of 18 residing in the home, within 30 days of the change for review by the agency. All household members must comply with the clearance requirements outlined in the CPSL.

In no case may the prospective adoptive or foster parent be approved if the prospective adoptive or foster parent or an individual 18 years of age or older who resides for at least 30 days in a calendar year with the prospective adoptive or foster parent:

- I. Is named in the Statewide database as the perpetrator of a founded report committed within the five-year period immediately preceding verification; or
- II. Has criminal history record information indicating the applicant has been convicted of one or more of the offenses as outlined in the "Grounds for Denying Employment or Volunteer Services" section or under § 6344(c) of the CPSL.

Clearance Requirements for Employees, Ages 14 through 17

Unless applying for or holding a position in a child care center, group child care home or family child care home, an individual between 14 and 17 years of age who applies for or holds a paid position as an employee and who is a person responsible for the child's welfare or a person with direct contact with children through a program, activity or service prior to the commencement or recertification of employment is required to submit the three required clearances. The CPSL provides for one exception related to the submission of the FBI Criminal History Clearance, allowing the individual to only submit the PA Child Abuse History Clearance and the PSP Criminal History Clearance but not the FBI Criminal History Clearance if all of the following apply:

1. The minor has been a resident of this Commonwealth during the entirety of the previous 10-year period or, if not a resident of this Commonwealth during the entirety of the previous 10-year period, has received an FBI Criminal History Clearance at any time since establishing residency in this Commonwealth. The minor may provide a valid copy of the FBI Criminal History Clearance to the employer or designee; and
2. The individual and the individual's parent or legal guardian swear or affirm in writing, via the designated form created by the Department, that the individual is not disqualified from service pursuant to § 6344(c), or has not been convicted of an offense similar in nature to those crimes listed in § 6344(c) under the laws or former laws of the United States or one of its territories or possessions, another state, the District of Columbia, the Commonwealth of Puerto Rico or a foreign nation, or under a former law of this Commonwealth.

Clearance Requirements for Volunteers

Section 6344.2 (relating to volunteers having contact with children) provides that adults applying for or holding an unpaid position as a volunteer with a child-care service, a school or a program, activity or service, as a person responsible for the child's welfare or having direct volunteer contact with children must obtain clearances. Clearances are not required for volunteers under 18 years of age. Examples of unpaid positions as a volunteer responsible for the welfare of a child or having direct contact with children can include but are not limited to:

- Parent/Guardian chaperones for schools
- Girl Scouts/Boy Scouts
- Agency volunteers that help with transportation or other services
- Big Brothers/Big Sisters
- Literacy programs
- Little League coaches
- Church Sunday school teachers, child event coordinators
- Hospital volunteers working with children

If an employer or designee is still not clear whether clearances, as it relates to volunteers, are required, consideration should be given to the following questions:

1. Is the volunteer an adult?
2. Is the volunteer responsible for the welfare of a child? When determining whether a volunteer is responsible for the welfare of a child consider whether the volunteer is acting in lieu of or on behalf of a parent. If the volunteer is acting in lieu of or on behalf of a parent, this individual will need clearances. If a determination is made that the volunteer is not responsible for the welfare of a child, proceed to question 3.
3. Does the volunteer have direct volunteer contact with children (refer to the *Definitions* section for "direct volunteer contact with children")? In other words, does the volunteer provide care, supervision, guidance or control of children? As the terms care, supervision, guidance or control are not defined, the common meaning of these terms shall be used, with child safety serving as the paramount consideration.
4. Does the volunteer have routine interaction with children? Consideration should be given to the volunteer's role within the agency. If regular, ongoing contact with children is integral to their volunteer responsibilities, then the answer to this question is yes.

If the volunteer requires clearances, the employer or designee making decisions regarding volunteers must require the volunteer to submit a PSP Criminal History Clearance, PA Child Abuse History Clearance, and an FBI Criminal History Clearance, with one possible exception.

The submission of the FBI Criminal History Clearance does not need to be completed and submitted if all of the following apply:

1. The position the prospective volunteer is applying for is unpaid.
2. The prospective volunteer has been a resident of this Commonwealth during the entirety of the previous 10-year period or, if not a resident of this Commonwealth during the entirety of the previous 10-year period, has received an FBI Criminal History Clearance at any time since establishing residency in this Commonwealth and provides a valid copy of the previously obtained FBI Criminal History Clearance to the employer or designee responsible for the selection of volunteers.
3. The prospective volunteer swears or affirms in writing, via the designated form created by the Department, that the volunteer is not disqualified from service pursuant to § 6344(c) or has not been convicted of an offense similar in nature to those crimes listed in § 6344(c) under the

laws or former laws of the United States or one of its territories or possessions, another state, the District of Columbia, the Commonwealth of Puerto Rico or a foreign nation, or under a former law of this Commonwealth.

Volunteers in a child care center, group child care home or family child care home must have all three clearances and the NSOR verification as there is no exception to obtaining the FBI Criminal History Clearance for these settings.

The employer or designee responsible for the selection of volunteers commits a misdemeanor of the third degree if that employer or designee intentionally fails to require a prospective volunteer applicant to obtain and submit the required clearance results before approving the volunteer. If the information obtained reveals that the prospective volunteer applicant is disqualified from service, the volunteer applicant shall not be approved for service.

Instances When Clearances Are Not Required for Volunteers: Volunteers are not required to obtain clearances if all of the following apply:

1. The individual is currently enrolled in a school.
2. The individual is not a person responsible for the child's welfare.
3. The individual is volunteering for an event that occurs on school grounds.
4. The event is sponsored by the school in which the individual is enrolled as a student.
5. The event is not for children who are in the care of a child-care service.

Nonresident Volunteer Clearances: Employers or designees responsible for volunteers may allow a volunteer applicant, who resides in another state or country, to serve on a provisional basis not to exceed a total of 30 days in a calendar year if the volunteer is in compliance with the clearance standards under the law of the jurisdiction where the volunteer resides. The nonresident volunteer must provide the employer or designee with documentation of clearances from the jurisdiction of the volunteer's residence.

Waiver of Fees for Certain Clearances: The fees for the PSP Criminal History and PA Child Abuse History Clearances for a volunteer are waived (free of charge), under the following conditions:

1. The clearances are required to comply with the CPSL.
2. The clearances may not be used and shall not be valid to satisfy the requirements for employment under § 6344(b) or any other law for which a similar clearance may be required.
3. Clearances shall only be provided free of charge to a volunteer once every 57 months.
4. The volunteer swears or affirms, in writing, the following:
 - a. The clearances are necessary to comply with the requirements under the CPSL.
 - b. The volunteer has not received clearances free of charge within the previous 57 months.
 - c. The volunteer understands that the clearances shall not be valid or used for any other purpose.

Presumption of Good faith: For the purposes of criminal liability under § 6344.2, an employer or designee are presumed to have acted in good faith when identifying individuals required to submit clearances and maintain records as required by the CPSL.

Clearance Requirements for Family Living Homes, Community Homes for Individuals with an Intellectual Disability and Host Homes

The following applies to an individual over 18 years of age residing in a family living home, a community home for individuals with an intellectual disability or a host home for children, which are subject to supervision or licensure by the Department:

- If an individual is arrested for or convicted of an offense that would constitute grounds for denying approval under the CPSL or is named as a perpetrator in a founded or indicated report, the individual must provide the agency with written notice no later than 72 hours after the arrest, conviction or notification that the individual was named as a perpetrator in the Statewide database.
- The adult family member who is providing services to a child in the home shall be required to report any other change in the household composition within 30 days of the change for review by the agency. If any individual over 18 years of age, who has resided outside this Commonwealth at any time within the previous five-year period, begins residing in the home, that individual shall, within 30 days of beginning residence, submit to the agency a clearance obtained from the Statewide database, or its equivalent in each state in which the individual has resided within the previous five-year period, as to whether the person is named as a perpetrator. If the clearance shows that the person is named as a perpetrator within the previous five-year period, the agency shall forward the clearance results to the Department for review.

Exception: *This does not apply to an adult with an intellectual disability or chronic psychiatric disability receiving services in a home.*

Clearance Requirements for Exchange Visitors

Unless applying for or holding a position in a child day-care center, group day-care home or family child-care home, an individual in possession of a nonimmigrant visa issued pursuant to 8 U.S.C. § 1101(a)(15)(j)(relating to definitions) to an exchange visitor, commonly referred to as a "J-1" Visa, shall not be required to submit a PSP Criminal History Clearance, PA Child Abuse History Clearance, or an FBI Criminal History Clearance if all of the following apply:

1. The individual is applying for or holds a paid position with a program, activity or service for a period not to exceed a total of 90 days in a calendar year;
2. The individual has not been employed previously in this Commonwealth or another state, the District of Columbia or the Commonwealth of Puerto Rico; and
3. The individual swears or affirms in writing, via the designated form created by the Department, that the individual is not disqualified from service pursuant to § 6344(c) or has not been convicted of an offense similar in nature to the crimes listed in § 6344(c) under the laws or former laws of the United States or one of its territories or possessions, another state, the District of Columbia, the Commonwealth of Puerto Rico or a foreign nation, or under a former law of this Commonwealth.

Clearance Requirements that Impact Employees, Volunteers, Foster Parents and Adoptive Parents the Same

The employer or designee responsible for employment decisions or involved in the selection of volunteers, foster parents or adoptive parents must:

1. Require the applicant to submit the clearance results prior to employment or service;
2. Maintain a copy of the required clearances results.

An employer or designee commits a misdemeanor of the third degree if he/she intentionally fails to require employees, volunteers, or prospective foster or adoptive parents to provide copies of clearances prior to employment or service.

Renewal of Clearances

Individuals required by the CPSL to obtain clearances must renew their clearances every 60 months. The date of the oldest clearance must be the date used when calculating the renewal date for clearances. Clearances may be required more frequently based on licensure or employer requirements.

Portability of the FBI Criminal History Clearance between the Department and the Pennsylvania Department of Education (PDE)

A recent audit by the federal Criminal Justice Information Services (CJIS) determined that it is no longer acceptable for the Department to accept an FBI Criminal History Clearance obtained through PDE or vice versa. Differences exist in the process of obtaining clearance information between the two departments making it against federal regulation for the FBI Criminal History Clearance to be portable. Individuals who work for both the Department and PDE must obtain two separate FBI Criminal History Clearances. Realizing the additional time and costs associated with obtaining two separate sets of the FBI Criminal History Clearance, the Department continues collaborative discussions with PDE and CJIS in efforts to identify changes necessary to allow portability of clearances between the two departments.

Grounds for Denying Employment or Service

1. In no case shall an employer or designee responsible for employment decisions or involved in the selection of volunteers, foster parents or adoptive parents, hire or approve an applicant where the Department has verified that the applicant is named in the Statewide database as the perpetrator of a founded report committed within the five-year period immediately preceding verification.
 - i. In the case of prospective foster or adoptive parent, they will not be approved if the prospective foster or adoptive parent or an individual 18 years of age or older who resides for at least 30 days in a calendar year with the prospective foster or adoptive parent is named in the Statewide database as the perpetrator of a founded report committed within the five-year period immediately preceding verification.
2. In no case shall an employer or designee responsible for employment decisions or involved in the selection of volunteers, foster parents or adoptive parents, hire or approve an applicant if the applicant's criminal history record information indicates the applicant has been convicted of a felony offense under The Controlled Substance, Drug, Device and Cosmetic Act (P.L. 233, No. 64), committed within the five-year period immediately preceding verification under this section.
3. In no case shall an employer or designee responsible for employment decisions or involved in the selection of volunteers, foster parents or adoptive parents, hire or approve an applicant if the applicant's criminal history record information indicates the applicant has been convicted of

one or more of the following offenses under Title 18 (relating to crimes and offenses) or an equivalent crime under Federal law or the law of another state:

1. Chapter 25 (relating to criminal homicide).
2. Section 2702 (relating to aggravated assault).
3. Section 2709.1 (relating to stalking).
4. Section 2901 (relating to kidnapping).
5. Section 2902 (relating to unlawful restraint).
6. Section 3121 (relating to rape).
7. Section 3122.1 (relating to statutory sexual assault).
8. Section 3123 (relating to involuntary deviate sexual intercourse).
9. Section 3124.1 (relating to sexual assault).
10. Section 3125 (relating to aggravated indecent assault).
11. Section 3126 (relating to indecent assault).
12. Section 3127 (relating to indecent exposure).
13. Section 4302 (relating to incest).
14. Section 4303 (relating to concealing death of child).
15. Section 4304 (relating to endangering welfare of children).
16. Section 4305 (relating to dealing in infant children).
17. A felony offense under section 5902(b) (relating to prostitution and related offenses).
18. Section 5903(c) or (d) (relating to obscene and other sexual materials and performances).
19. Section 6301 (relating to corruption of minors).
20. Section 6312 (relating to sexual abuse of children).

The attempt, solicitation or conspiracy to commit any of the offenses set forth above.

Written Notice of New Arrest, Conviction or Substantiated Child Abuse for Employees and Volunteers

1. If an employee or volunteer is arrested for or convicted of an offense that would constitute grounds for denying employment or participation in a program, activity or service under the CPSL, or is named as a perpetrator in a founded or indicated report, the employee or volunteer shall provide the employer or designee with written notice not later than 72 hours after the arrest, conviction or notification that the person has been listed as a perpetrator in the Statewide database.
2. If the employer or designee has a reasonable belief that an employee or volunteer was arrested or convicted for an offense that would constitute grounds for denying employment or participation in a program, activity or service under the CPSL, or was named as a perpetrator in a founded or indicated report, or the employee or volunteer, has provided notice as required under the CPSL, the employer or designee shall immediately require the employee or volunteer to submit clearances as required under § 6344(b) and cover the cost for the employee or volunteer to obtain the updated clearances.

Noninterference with Decisions

Nothing in the CPSL shall be construed to otherwise interfere with the ability of an employer or designee to make employment, discipline or termination decisions or from establishing additional standards as part of the hiring or selection process for employees or volunteers.

Confidentiality of Clearances and Information

Under § 6344(n)(relating to confidentiality), information provided and compiled shall be confidential and shall not be subject to the Right-to-Know Law (P.L.6, No.3). This information shall not be released except as permitted by the Department through regulation.

How to Obtain Clearances

The PSP Criminal History clearance can be obtained online at [“Pennsylvania Access To Criminal History” \(PATCH\)](#).

The PA Child Abuse History Clearance can be submitted and paid for online through the [Child Welfare Information Solution \(CWIS\) self-service portal](#).

The FBI Criminal History Clearance is now done through IDEMIA (also referred to as IdentoGo or MorphoTrust). It is a multi-step process. More information can be found at <http://www.keepkidssafe.pa.gov/resources/clearances/index.htm>

The Department must comply with clearance requests no later than 14 days from the receipt of the request.

How to Obtain Out-of-State Clearances (For Prospective Foster and Adoptive Parents Only)

To obtain a clearance from another state, the following steps must be completed:

1. Go to KeepKidsSafe.pa.gov;
2. Click on the “Clearance” tab;
3. Scroll down to “Clearance from other states” and click on the “out-of-state clearances” link. There are directions for out-of-state criminal history clearances, as well as child abuse history clearances.
4. Find the state in which you are requesting the clearance and complete the application as instructed;
5. Once the application is completed, verify whether that state has a fee for the clearance. If a fee is required, the fee must be included with the completed application;
6. If the state accepts clearance requests from applicants, then the application can be mailed by the applicant. Skip to step 9. If the state requires the application come from Pennsylvania, then the application and any fee, must be sent to ChildLine (continue to step 7). Please note that requests are completed on a first come, first serve basis;

ChildLine
ATTN: Out-of-State
P.O. Box 8053170
Harrisburg, PA 17105

7. If there are any errors on the submitted application, ChildLine will reject the application and return it to the applicant or sending agency;
8. Applications will be sent to the respective state no later than 14 days after ChildLine receives the request, unless the application is incomplete and rejected;
9. All out-of-state clearance results must be returned to ChildLine (address listed under step 6)

10. ChildLine will review the clearance results and distribute an outcome notification to the applicant or sending agency;
11. If the applicant or sending agency has any questions throughout the processing of the out-of-state clearance, please call 1-877-371-5422.

Commonwealth Law Enforcement Assistance Network (CLEAN)

Under the Adam Walsh Child Protection and Safety Act, Section 151, the Department was able to apply for a full access originating agency identifier (ORI) which would allow users to query the Interstate Identification Index (III) via the CLEAN. When the Department received the full access ORI it was only authorized to be used for investigating and responding to reports of child abuse, neglect, or exploitation and no other purposes.

During an audit in 2017, the FBI Criminal Justice Information Services (CJIS) Division, found that CCYAs were conducting name based III queries via CLEAN, either directly or via the Pennsylvania Justice Network (JNET), for inappropriate purposes and therefore were in direct violation of the Adam Walsh Child Protection and Safety Act, Section 151.

III queries through CLEAN are not permitted for the purposes of: screening foster/adoptive parent applications and household members 18 years of age or older; emergency/non-emergency child custody/placement caregivers; contracted staff or volunteers working with or around children; city/county employment vetting; agency employment; review of individuals appealing a report of substantiated child abuse (not currently under investigation for allegations of child abuse); or for the purposes of providing civil court briefs.

In instances where CCYAs are required to obtain criminal history information, such as the emergency placement of a child, the information is to be obtained through CLEAN and the International Public Safety and Justice Network (Nlets) for in and out of state criminal history checks. Any agency obtaining criminal history information from CLEAN or Nlets needs to follow the Pennsylvania Criminal History Record Information Act (CHRIA), CJIS policies and the CLEAN Administrative Regulations. The information obtained through this process is criminal history information and must be treated in accordance with the above policies.

Note: This guidance does not pertain to the background checks and trainings that are required for a user to access CLEAN (i.e. CLEAN Direct User's, Unescorted Access, IT personnel).

Nlets is the premiere interstate justice and public safety network in the nation for the exchange of law enforcement, criminal justice, and public safety-related information. To accomplish this, the Nlets system provides reliability based on a network built to endure threats without impacting performance. Through the Nlets network, law enforcement and criminal justice agencies can access a wide range of information, from standard driver license and vehicle queries to criminal history and Interpol information consisting of transnational crime, terrorism, cybercrime, or organized crime. Nlets provides a way to query each state's Criminal History Repository separately and each state may respond according to their own laws. It is important to note that not all states have automated systems, and some states will only respond to certain inquiries, therefore responses may not be received from some states. This specific information can be found on the AM – Help File Request screen in Nlets as described in Attachment A.

For more detailed information and images of Nlets transactions, please refer to Attachment A.

Attachment A

How To Do A Criminal History Search Using Nlets

All county children and youth agencies (CCYAs) must have access to the Commonwealth Law Enforcement Assistance Network (CLEAN). This can be accomplished with a direct CLEAN terminal, via JNET (PA Justice Network) or your local 911 Center.

- If the CCYA would like to inquire about direct access, they should contact:

CLEAN Bureau of Communications and Information Services
 8001 Bretz Drive
 Harrisburg, PA 17112
ra-clean@pa.gov

Once the CCYA has access to CLEAN via the direct connect or JNET, use the steps below to complete a Nlets transaction. If the CCYA only has access via the 911 Center they would need to reach out to 911 to have them run the below transactions for them.

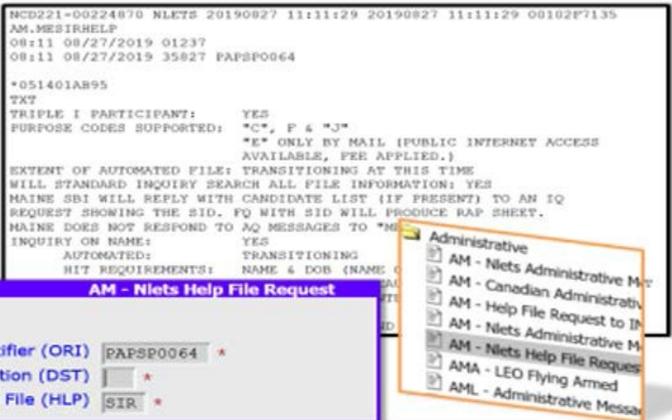
- A. To access the AM – Help File Request:



Criminal History Searches Using Nlets

AM – Help File Request

With the State Abbreviation in the DST Field and "SIR" in the HLP field, the state will respond with information about how they respond to IQ and FQ transactions. This also will explain why no response is received from that state.



```

NCD221-00224870 NLETS 20190827 11:11:29 20190827 11:11:29 09102P7135
AM.MESIRHELP
08:11 08/27/2019 01237
08:11 08/27/2019 35827 PAFSP0064
*051401AR95
TX?
TRIPLE I PARTICIPANT: YES
PURPOSE CODES SUPPORTED: *C*, P & *J*
                          *E* ONLY BY MAIL (PUBLIC INTERNET ACCESS
                          AVAILABLE, FEE APPLIED.)
EXTENT OF AUTOMATED FILE: TRANSITIONING AT THIS TIME
WILL STANDARD INQUIRY SEARCH ALL FILE INFORMATION: YES
MAINE SBI WILL REPLY WITH CANDIDATE LIST (IF PRESENT) TO AN IQ
REQUEST SHOWING THE SID. FQ WITH SID WILL PRODUCE RAP SHEET.
MAINE DOES NOT RESPOND TO AQ MESSAGES TO *M
INQUIRY ON NAME: YES
AUTOMATED: TRANSITIONING
HIT REQUIREMENTS: NAME & DOB (NAME O
                    
```

AM - Nlets Help File Request

Originating Agency Identifier (ORI) *

Destination (DST) *

Help File (HLP) *

Administrative

- AM - Nlets Administrative M...
- AM - Canadian Administrativ...
- AM - Help File Request to IP...
- AM - Nlets Administrative M...
- AM - Nlets Help File Request...
- AMA - LEO Flying Armed
- AML - Administrative Messa...

COMMONWEALTH LAW ENFORCEMENT ASSISTANCE NETWORK

B. Steps to a Nlets transaction:

1)



“NL” Destination

This can be used for the IQ – Criminal History Identity Query only

Nlets will take this query and send it to ALL states that support the IQ message

No-hit responses are filtered out, leaving only relevant responses.

IQ - Nlets Query Identity Information

Originating Agency Identifier (ORI) PAPS0064

Optional Control Field (OCF)

Destination State (DST) NL

Purpose Code (PUR)

Attention (ATN)

Name (NAM)

Enter one of the following combinations:

- Date of Birth and Sex with Optional Race.
- Date of Birth and Sex with Optional Race and either Social Security or Miscellaneous Number.
- Social Security Number only. - Miscellaneous Number only

Date of Birth (DOB)

Sex (SEX) Race (RAC)

Social Security Number (SOC)

Miscellaneous Number (MNU)

Submit Delete

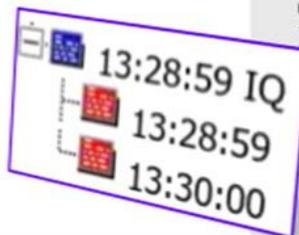


2)



“NL” Destination

The ACK message comes back right away. It takes about a full minute for the responses from all the states to come back.



IQ - Nlets Query Identity Information

Originating Agency Identifier (ORI) PAPS0064

Optional Control Field (OCF)

Destination State (DST) NL

Purpose Code (PUR)

Attention (ATN)

Name (NAM)

Enter one of the following combinations:

- Date of Birth and Sex with Optional Race.
- Date of Birth and Sex with Optional Race and either Social Security or Miscellaneous Number.
- Social Security Number only. - Miscellaneous Number only

Date of Birth (DOB)

Sex (SEX) Race (RAC)

Social Security Number (SOC)

Miscellaneous Number (MNU)

Submit Delete



3)



“NL” Destination

It will advise where the query was sent, who responded, who do not have records, and all responding state information.

It is very important to review the whole message.

Some “no response” states can sneak through as a state that replied.

Sometimes a “no reply” state can come through as a completely separate message.

Some states will supply a list of aliases (AKA) or a list of names that sound similar.

```
NCD221-00224891 NLETS 20190827 13:22:50 20190827 13:22:50 051401AB9C
IR.NL0000000
10:22 08/27/2019 04255
10:22 08/27/2019 46723 PAPSP0064
*051401AB9C
TXT
```

Inquiries were sent to the following states:

AK, AL, AR, AZ, CA, CO, CT, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NB, NC, ND, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY

The following states responded indicating record(s) on file:

AR, CA, CT, FL, HI, KS, LA, MA, MD, MI, NH, NY, OK, OR, PA, RI, VT, WY

The following states responded indicating no record on file:

AK, AL, AZ, CO, DE, GA, IA, ID, IL, IN, KY, ME, MN, MO, MS, MT, NB, NC, ND, NJ, NM, NV, OH, SC, SD, TN, TX, UT, VA, WA, WV

No response received from the following states: WI

Identity Criminal History response from AR060015Y:

```
Identity Criminal History response from CASIR0000:
PUR/C.ATN/WILKINSON
NAM/TEST, JOSEPH.SEX/M.DOB/19521005
CA DOJ SACRAMENTO, DATE: 20190827 TIME: 10:21:55
```



4)



Positive Responses

A positive response from an IQ query will provide the information that the person was booked with including a SID number.

To obtain the Criminal History for this particular record, note the SID number and the state that provided the information. The state abbreviation is always found in beginning of their ORI.

An FQ transaction is now needed.

```
Identity Criminal History response from MASIR0000
PUR/C.ATN/WILKINSON.NAM/TEST, JOSEPH.DOB/1952-10-05.SEX/M
```

RESULT: 1 of 10

```
NAME:
TEST, TESTER T
TESTY, TESTER
```

DOB	SSN	RACE	SEX	MISCELLANEOUS NUMBER	SID
19520508	027363434	U	N		MA10148291



5)



Positive Responses

FQ – Nlets Query Full Criminal History

The Destination (DST) is the state abbreviation code that you took note of in the IQ response as well as the State Identification Number (SID).

The Attention (ATN) field will always be “Your Last Name/Reason you are requesting the information”.

Some states require the white fields completed. That too is found in their help file. (Slide 3)

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6)



FQ – Nlets Query Full Criminal History

Automated records will come back in the format that the state uses. They not all look alike and the information that is supplied can differ from state to state.

REMEMBER: Not all state participate in supplying Criminal History information in this fashion or may be restricted to what kind of agency may receive this information. Therefore you may receive rejection notices from time to time.

```

MCD221-00224898 NLETS 20190827 14:26:45 20190827 14:26:45 051401AB9F
FR.MASIR0000
11:26 08/27/2019 06681
11:26 08/27/2019 51484 PAPSP0064
*051401AB9F
TXT
ATN/WILKINSON/TRAINING
***** CRIMINAL HISTORY RECORD *****
Data As Of 2019-08-27
***** Introduction *****
This rap sheet was produced in response to the following request:
State Id Number MA10148291 ()
Purpose Code D
Attention WILKINSON/TRAINING
The information in this rap sheet is subject to the following caveats:
***** IDENTIFICATION *****
Subject Name(s)
TEST, TESTER T
TEST, TESTER T (AKA)
TESTY, TESTER (AKA)
    
```

COMMONWEALTH LAW ENFORCEMENT ASSISTANCE NETWORK



ANY QUESTIONS/ISSUES?

877-777-3375

PUBLIC SAFETY SERVICE DESK

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