Think Of Us
Don't Let Fingerprinting Stop Your Work

The Play: Use a myriad of creative approaches like community partnerships and mobile fingerprinting units to ensure prospective foster parents, particularly kinship placements, can still be licensed in a timely manner even amidst stay-at-home orders. In extreme circumstances, new federal guidance allows you to temporarily delay fingerprinting as long as you conduct all available name-based checks.

Difficulty:

- Low if relaxing fingerprinting requirements for the period of the pandemic.
- Medium if establishing a partnership with community vendors like UPS Stores.
- Difficult if procuring and launching the use of mobile fingerprinting machines.

The Problem It Solves

Fingerprinting is required for IV-E eligibility, but given the current restrictions due to COVID-19, it can be harder to get all applicants to agree to leave their home and to find an open fingerprinting location. This can leave children in group homes or juvenile detention while awaiting fingerprint clearance, or create unnecessary temporary placements.

How To Do This

- Follow emergency placement background check minimums. Emergency placements typically don't require fingerprinting immediately; instead, a name-based state and local background check conducted by phone or by a local law enforcement officer, plus a state abuse/neglect registry check, is sufficient.

- Use mobile fingerprinting machines. If you have existing LiveScan mobile fingerprinting machines, essential workers with appropriate PPE can conduct fingerprinting at individual homes when absolutely necessary. After isolation ends, these machines can still be a source of greater efficiency, as trained workers can collect fingerprints during routine home study visits without requiring family members to make separate trips. Your Attorney General's office may have information about mobile unit availability and procurement options.
• **Partner with vendors that conduct fingerprinting in community-based locations like UPS Stores and Staples.** UPS is considered an essential business, and locations across the country are open during this time. This will also be a good partnership to have following the period of the pandemic, as these public locations tend to be both easier to access and less stressful than police stations.

• **Make a proactive plan with each applicant.** Applicants may have a harder time getting fingerprinted on their own right now. Review the locations and hours of available fingerprinting stations - vendors have updated hours on their website and/or sent to your background check unit via a daily email. Make a plan for each applicant to select a location they feel comfortable visiting and a transportation method they feel comfortable using. For example, they may feel more comfortable at a UPS store than at a police station, even if the police station is closer.

• **Leverage Title IV-E guidance to extend the deadline for fingerprinting in cases where absolutely necessary to place a child.** Most states report that they are still able to complete fingerprints within the timeframe required by their normal emergency placement rules (2-10 days). However, if an applicant is homebound or in a remote area, and placement is in the best interest of the child, you may still be eligible for IV-E even if fingerprints have to be delayed. Maintain a list of these exceptions and follow-up with families as your area modifies stay-at-home orders.

**Who's Doing This?**

California and Rhode Island use LiveScan mobile fingerprinting machines.

Ohio leverages home fingerprinting cards.

Michigan, Indiana (IdentoGO), Ohio, and New Mexico (Gemalto) already have contracts in place with vendors that support community-based fingerprinting in places like UPS Stores to conduct fingerprinting for child welfare needs. Because many citizens feel more comfortable going to a UPS store than a police station, this partnership with UPS has increased the efficiency and speed of child welfare services in these states, and is now considered a best practice.

**Relevant Resources:**
The Children’s Bureau is allowing Title IV-IE agencies to potentially delay fingerprinting requirements and to resume fingerprinting after this crisis. We do not encourage this, as the risk is high. Applicants can and do pass initial local/state name-based background checks but turn out to have a disqualifying crime on their federal background check. Instead, we encourage states and agencies to take advantage of the options above.

- On April 15, 2020, the U.S. Children’s Bureau issued guidance allowing for flexibility on Fingerprint-Based Criminal Records Checks for Title IV-E agencies, provided that the agencies:
  - Conduct all available name-based criminal background checks for prospective foster parents, adoptive parents, legal guardians, and adults working in child care institutions, and
  - Complete the fingerprint-based checks of NCID pursuant to §471(a)(20)(A), (C), and (D) of the Act as soon as it can safely do so, in situations where only name-based checks were completed.