

SAN MATEO COUNTY  
BEHAVIORAL HEALTH AND RECOVERY SERVICES

DATE: April 21, 1998

BEHAVIORAL HEALTH POLICY NO.: 98-14

SUBJECT: Fingerprinting of Interns, Trainees, Community Workers and Volunteers;  
Fingerprinting Requirements for Professional Licensure

AUTHORITY: County Regulation; National Child Protection Act of 1993 as amended to include People with Disabilities and the Elderly (1994); BHRS Policy 03-20, Organized Health Care Arrangement (OHCA)

AMENDED: December 16, 1998; December 15, 2003; February 10, 2010, December 14, 2011

#### BACKGROUND

- A. County of San Mateo personnel policies require pre-employment fingerprinting and background checks on all prospective employees, whether filling ordinance or extra-help positions, whose work requires a face-to-face relationship for the care and/or security of consumers and/or families, or who have access to County funds. Other members of the workforce, including but not limited to interns, trainees, mental health counselors, community workers and volunteers working for Behavioral Health and Recovery Services (BHRS), may have the same relationships and responsibilities, but have previously been exempt from this regulation.

A purpose of this policy is to extend, for BHRS, the conditions of County Resolution No. 55186 to include all other individuals (as described above) who work at County-owned or operated sites or who otherwise serve clients as part of the BHRS workforce.

- B. New fingerprinting requirements have been adopted by the various licensing boards. Those covered by the Board of Behavioral Sciences (BBS), which includes MFT's and LCSW's, and all nurses who are licensed by the Board of Registered Nursing are among those who have additional requirements. While the responsibility to obtain fingerprints as indicated lies with the individual professional practitioner, a purpose of this policy is to confirm those expectations herein.

#### POLICY

- A. All interns, trainees, mental health counselors, community workers, peer counselors, family partners and volunteers whose work requires a face-to-face relationship for the care and/or security of consumers and/or families, or who have access to County funds, must agree to fingerprinting. BHRS must receive the fingerprinting information prior to these individuals' first day of work.

BHRS POLICY 98-14

Fingerprinting of Interns, Trainees, Community Workers, and Volunteers Amended 2/10

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- Interns and Trainees

For the purposes of this policy, intern/trainee means an individual in a supervised clinical placement prior to obtaining a Masters or Doctoral degree in a behavioral field of study. Most interns/trainees will qualify for an extra-help position within BHRS and, therefore, are included in County Resolution 55186, and will be fingerprinted as a condition of applying for employment. The intern/trainee coordinator is responsible to assure that these staff are appropriately identified and hired in sufficient time for fingerprinting to clear prior to work with clients.

RN classifications – All RN students/interns require fingerprinting, which will occur in the following manner:

- RN practicum students (pre-Bachelor's degree) may, upon consultation with the Deputy Director of Adult Services, be allowed to have fingerprinting assured by the placing college or university with whom BHRS has a current MOU.
- All other nursing students/trainees, including but not limited to licensed RN's pursuing higher degrees and/or Nurse Practitioner Certifications (from institutions of higher learning with whom BHRS has an MOU) also are required to be fingerprinted as a condition of placement with BHRS. Fingerprinting shall be done using the same procedures as for County staff. BHRS will assume the costs of this process.

- Community Workers

Supervisors of these staff members shall assure that the fingerprinting procedure has been followed. Community Workers applying for positions within BHRS are included in County Resolution 55186 and will be fingerprinted as a condition of applying for employment. Paid Vocational Rehabilitation Services trainee personnel shall have the fingerprinting process arranged and paid for through that service.

- Volunteers

For the purposes of this policy, volunteers include, but are not limited to, peer counselors, community workers, family partners, licensed, waived or registered clinicians, and administrative staff. Volunteers may not begin work in an affected position until fingerprints have cleared.

Volunteers whose placement involves a face-to-face relationship with clients or access to County funds shall have fingerprinting done using the same procedures as for County staff. Volunteers will be expected to complete an application form similar to that required for employment to facilitate BHRS assuming the costs of this process.

Supervisors shall explain the fingerprinting procedure to all prospective volunteers during initial interviews held to determine the volunteer's suitability for work in BHRS. Supervisors shall consider the costs/benefits of the volunteer placement before initiating

the fingerprinting process with the payroll/personnel specialist. Volunteers with limited time availability or unable to make a service commitment for a significant period of time may not be ideal candidates for work in our system.

Independent contractors who are participants in the Behavioral Health Organized Health Care Agreement (OHCA) are licensed practitioners subject to scrutiny, including fingerprinting, by their licensing boards. This fingerprinting policy does not apply to these individuals.

Information received (from the applicant or Employee and Public Services Department) by BHRS concerning prior criminal history information will be held confidential. For every category of members of the workforce, the Personnel Committee will evaluate any negative information in terms of its relationship to the duties of the position and whether or not a specific conviction will affect the qualification of the potential intern, trainee, peer counselor, family partner or volunteer for the position. The nature of the conviction, how recent, severe and repetitive the conviction(s), and the disclosure of the facts surrounding the conviction by the applicant will be considered. A prior criminal history, of and by itself, will not always be grounds for a negative decision about establishment of a service relationship with an individual.

In the event of a finding by the Personnel Committee recommending against placement, the individual may appeal this decision to the Behavioral Health and Recovery Services' Director. The opinion of the Director shall be final.

#### B. Fingerprinting Requirements for Licensure

BBS covered clinicians must submit LiveScan prints to the BBS if they have not previously done so, and even those with inactive licenses must be fingerprinted. For the detailed rules, BBS covered clinicians should go to the following website prior to their license renewal date: [www.bbs.ca.gov](http://www.bbs.ca.gov) and read the section *New Fingerprint Requirement for Licensees and Registrants*.

The California Board of Registered Nursing (BRN) now requires that any nurse who has not previously submitted his or her fingerprints to the BRN must do so at their next renewal. For more information, nurses should go to: [www.rn.ca.gov/index.shtml](http://www.rn.ca.gov/index.shtml)

All clinical staff, regardless of discipline, should understand what specific fingerprinting rules apply to them and make sure they are complying with the requirements.

Approved \_\_\_\_\_  
*Signature on File at BHRS Admin.*  
Stephen Kaplan, Director  
Behavioral Health and Recovery Services