

DETERMINING IF SUBGRANTEE IS REQUIRED TO HAVE A SUITABILITY TO INTERACT WITH MINORS POLICY

Will the Subgrantee provide any grant funded activity under any DOJ grant which will benefit a set of individuals under 18 years of age (including any consultant, contractor, employee of a contractor, trainee, volunteer, or teacher)?



DOES the interaction with minors include any of the following:

- Physical contact
- Communication, written or oral; or
- Transmission of images and sound.



Submit written policies to KGGP that include **A, B, and C.**



Subgrantee activity involves **NO CONTACT** with minors or **ONLY** involves the following interaction with minors:

- Brief unintentional contact; or
- Personally-accompanied contact.



Submit certification on agency letterhead to KGGP.

A. DETERMINATION TIMELINES

INITIAL:

- Within six months of required searches

UPDATES AND REEXAMINATIONS:

- At least every five years; and
- Upon learning information that reasonably suggests unsuitability.

B. CURRENT AND APPROPRIATE INFORMATION

The following searches **MUST** be conducted by current and previous names/aliases, using fingerprints when possible:

- Public sex offender and child abuse websites/registries;
 - Dru Sjodin National Sex Offender Public Website;
 - Public registries for each state or tribe the individual has been connected to in the past five years (lived, worked, or attended school); and
 - Public registries for each state or tribe the individual will likely interact with a participating minor related to the grant award.
- Criminal history registries:
 - Public registries for each state the individual has been connected to in the past five calendar years preceding the date of the search request (lived, worked or attended school); and
 - Public registries for each state the individual will likely interact with a participating minor related to the grant award.

C. DETERMINATION OF SUITABILITY

An individual **CANNOT** be determined suitable if the individual:

- Withholds consent to a criminal history search;
- Knowingly makes (or made) a false statement that affects, or is intended to affect any required search;
- Is listed as a registered sex offender on the Dru Sjodin National Sex Offender Public Website;
- To the knowledge of the Subgrantee, has been convicted of any of the following crimes (or substantially equivalent criminal offense):
 - Sexual or physical abuse, neglect, or endangerment of a person under age 18;
 - Rape/sexual assault, including conspiracy;
 - Sexual exploitation;
 - Kidnapping;
 - Voyeurism; or
 - Is determined by a federal, state, tribal, or local government not to be suitable.

REVIEW OF DETERMINATIONS

SUBGRANTEE RESPONSIBILITY

Provide a list of covered individuals and the following information about each covered individual to KGGP:

- Name
- Position/Role
- Format of Determination (form, letter, email, etc.) – **MUST BE IN WRITING**
- Date(s) of search results
- Determination

*Search results **SHALL NOT** be provided to KGGP.

KGGP PARAPROFESSIONAL RESPONSIBILITY

1. Select five or five percent (whichever is greater) of the covered individuals and review the following:
 - Timely determination (made within six months of the searches); Timely redetermination (every five years); and
 - Re-examinations (information becomes available to suggest unsuitability);
 - Determination; and
 - Back up documentation.
2. Review Subgrantee policies, and request additional information as needed;
3. Sign, date, and file the checklist; and
4. Inform the Subgrantee and Analyst by email when the review is complete.

*Search results **SHALL NOT** be provided to KGGP.