

Executive Board

05/19/26

Administration Support Committee

05/18/26

Item of Consideration: Recommendation to amend Policy 526 - Background Checks

**Highest Authority
For this item:** Executive Board

Originating Source: General Counsel

Background: In May of 2022, the Executive Board amended Policy 526 to authorize background checks for independent contractors and members of the Executive Board in certain situations. Since this time, however, not all Executive Board members have submitted to background checks.

The proposed changes would make it clear that every Executive Board member is subject to a background check for each 3-year term as a requirement to serve on the Board. It would also increase the instances in which volunteers and independent contractors may be required to submit to a background check.

Background Attachments: A redline version of Policy 526 is included below.

Recommendation: We recommend amending the BGCT's background check policy to ensure background checks are conducted on all members serving on Executive Board and to increase the criteria for when background checks are conducted on independent contractors and volunteers.

526 BACKGROUND CHECKS

The BGCT is committed to safeguarding attendees and participants in its activities and functions. To meet reasonable care standards, the BGCT establishes that all BGCT employees must submit to a background investigation under Policy 822 and Executive Board members must submit to a background check at least every three years., In addition, Independent Contractors and Executive Board members, as well as volunteers who meet any of the four three background check inclusions must submit to a background check at least every three years. These background inclusions are:

- A. Have supervisory or nonpublic interaction with children, youth, or individuals with special needs,

- B. Handle cash, credit cards or checks on behalf of the BGCT and/or,
- C. Drive a vehicle to fulfill the responsibilities of their role.
- D. Represent, in an official capacity, the BGCT to churches, ministers, partners, or the public.

The background check vendor must meet the following minimum requirements:

- A. Credible standing with knowledgeable of background checks and child protection methods
- B. Administer comprehensive background checks and child protection training that meets minimum state and federal law requirements
- C. Comply with Fair Credit Report Act (FCRA) by producing accurate, verifiable results
- D. Online access to and secure storage of confidential information, background check results, and child protection training
- E. Churches and other organizations conducting their own background checks must select a vendor meeting the same minimum requirements. In addition, churches and other organizations must provide evidence of a credible background check by presenting a copy of the background check or by completing the background check compliance form prior to service.

Privacy / FCRA compliance:

- A. Volunteer coordinators shall not provide information, orally or in writing, to any party without the specific written consent of the individual who submits to the background check. No information will be provided in any other way than that described in this policy.
- B. If an individual is disqualified based on the results of a background investigation, the individual will be provided a copy of the consumer report upon request in compliance with the FCRA.
- C. Background checks and compliance forms containing personal and/or confidential information will be redacted/de-identified and retained in a confidential file for two years after background checks are completed. Background check compliance forms will be shredded two years after background checks have been completed.

Preclusions from service:

Individuals who have been convicted, charged, or received deferred adjudication for any of the following crimes are precluded from serving in a volunteer role with access to children:

- A. Title 4 – 9 as outlined in the Texas Youth Camp Law,
- B. acts of violence,
- C. substance abuse,
- D. theft or misappropriation of funds,
- E. or any other like offense under the law of another state or under federal law. Other criminal offenses are subject to background check committee review.

Child Sexual Abuse Awareness:

In an effort to increase child sexual abuse awareness, the BGCT will refer churches for additional training and resources to guide ministry leaders and pastors in best practices related to activities and functions that involve children, youth, or individuals with special needs. BGCT senior leadership has established additional guidelines for BGCT staff responsible for volunteers.

~~5/24/2022~~ 5/19/2026