

Child Clearances

Overview:

All individuals who have a significant likelihood of interaction with children as part of an IRB approved protocol are required to obtain, at a minimum, **three clearances**. It is the responsibility of the principal investigator (PI) to ensure that the research team, including faculty, have these clearances prior to any interaction with children. In addition, the PI is responsible for ensuring that appropriate supervision, guidance, and training occurs. If this interaction with children occurs outside the state of Pennsylvania, it is the responsibility of the PI to obtain the appropriate clearances in compliance with the host state or country requirements. The definition of a child (age of majority) differs between states and countries and should be considered when determining when child clearances are required.

Description:

The following three clearances are required by Pennsylvania law and/or UPMC and University policies:

- Pennsylvania Department of Public Welfare Child Abuse Clearance History
- Pennsylvania State Police Criminal Record Check
- FBI Criminal Background Check

Many of the schools, departments, and centers have guidance documents related to child clearances posted on their websites. The Human Resources departments at both the University of Pittsburgh and UPMC have detailed information available. The University's Office of Human Resources is a designated fingerprinting location for the FBI clearance but other local sites are also available.

Failure to comply with these requirements could result in a finding of serious non-compliance and may require reporting to state and/or federal agencies.

Definitions:

Pennsylvania law defines a child as a person under 18 years of age.

Considerations:

- ✓ It is important to note that “interact” refers not only to face-to-face meetings but also extends to communication via phone (including text messaging), social media or internet. Conversely, a participating investigator or support staff member who does not have personal contact with children does not need to obtain clearances (e.g., statistician, non-clinical laboratory personnel, etc.). If your research study provides babysitting services, the babysitters must have the required child clearances.
- ✓ The requirement for child clearances does extend to clinical staff interacting with children. For instance, if a child undergoes a radiology procedure for research purposes, the individuals in that department would be required to have the child clearances.
- ✓ At the time of an audit or any monitoring visit, the PI may be required to provide a listing of all research team members who interact with children and documentation that all clearances have been obtained and verified.

OSIRIS:

Section 3, question 3.5.3.1 addresses child clearances

Note that this section includes a “Not Applicable” choice because some studies involving children do not include a personal interaction (e.g., medical record review). Research teams who choose this option will be asked to provide an explanation as to why the clearances are not required.

Additional Information:

Pennsylvania Department of Welfare Forms:

<http://www.dpw.state.pa.us/findaform/childabusehistoryclearanceforms/index.htm>

University of Pittsburgh Human Resources: <http://www.hr.pitt.edu/>

Policies and Procedures: <http://www.cfo.pitt.edu/policies/policies.html>

- [Procedure 06-04-01, Clearances for Adults with Significant Likelihood of Regular Contact with Children; Policy 06-04-01, Protection of Children from Abuse](#)

Protecting Children from Abuse Online Course: my.pitt.edu

UPMC Human Resources:

<http://www.upmc.com/careers/pathways/corporate/Pages/human-resources.aspx>