Housing Supports
Background Check Guidance for Tenancy Providers
8/7/2025

Overview: This guidance document has been created to clarify the background check requirements for Tenancy Services Providers (e.g., pre-tenancy and tenancy sustaining) in the NJ FamilyCare Housing Supports Program. During the credentialing process, MCOs require that Tenancy Services Providers ("providers") attest that all staff providing direct physical Housing Supports services receive fingerprint-based background checks.

Context: Fingerprint-based background checks are required across many DMAHS programs to protect vulnerable members, including individuals experiencing homelessness, children, and disabled adults. Housing case managers provide 1:1 service to members inside and outside the home. Fingerprint-based background checks have greater accuracy in screening for criminal histories than name-based checks.

Important note: Consistent with initial program guidance, providers will attest to meeting these standards during MCO credentialing. We recognize that current MCO attestation forms may not clearly state program rules consistent with this guidance. DMAHS and the MCOs are working to update these forms accordingly. If you have questions about the disconnect between this guidance and what is stated on the MCO's attestation forms, please contact that MCO to discuss the best path forward.

Included in this document:

- **Program Guidance**: Provides guidance detailing who must be fingerprinted, vendor selection, frequency of checks, disqualifying offenses, and database used to conduct the checks
- **Step-by-Step Instructions**: Details instructions for how providers and their staff complete fingerprint-based background checks
- **FAQ:** Answers to common provider questions about the fingerprinting and background check process

Program Guidance:

Program Element	DMAHS guidance
Type of background check	Fingerprint-based background checks are required.
Required staff	All staff physically delivering services must complete fingerprint-based checks. Staff without direct member contact (e.g., administrative staff) or who are not delivering Housing Supports services (e.g., receptionists) are not subject to this guidance.
Frequency of signing MCO attestation form	Providers must re-sign the attestation form during credentialing and every three years thereafter during re-credentialing.
Frequency of staff background check	New employees must complete a background check prior to employment *(see FAQ for exceptions)*. Currently employed staff must have completed a fingerprint-based background check within the past 3 years to remain compliant during credentialing or re-credentialing.
Disqualifying offenses	Providers have discretion in determining disqualifying offenses and necessary rehabilitation decisions, consistent with applicable state and federal laws. Please reference FAQ #4 for more details on comparable state guidelines.
Database accessed	Background checks should review criminal history using New Jersey state database, but FBI checks are also permissible

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Step-by-step instructions to obtain fingerprint-based background checks:

Note: These instructions outline how providers can obtain fingerprint-based background checks. However, providers may use other approaches that comply with the requirements described above.

1. **Provider initiates background check:** Provider gives their staff the service code (2F1BF3) and Case Contributor Number (EMPLOYER) and instructs them to schedule an appointment by calling or visiting IdentoGO's website.
    - These specific codes indicate that the NJ State Police will conduct the check and results are returned to the employer.
    - Note: The CCN is the word "EMPLOYER", not the name of your company.

2. **Employee schedules fingerprinting appointment:** Employee contacts IdentoGO and provides them with the service code and CCN noted above, a form of payment, and employer details to schedule fingerprinting.
    - IdentoGO is the preferred partner of NJ State Police for fingerprinting.
    - Required employer details: Employer name and mail-to address (it is crucial the mail-to address is correct because this is where results will be sent if a criminal history is identified).
    - Employers have the option to set up a "coupon code" through IdentoGO to handle payment, avoiding employee charges, by calling IdentoGO.
    - Cost per employee: $45.73 (as of July 24th, 2025).
    - Useful resources:
        1. You can register and schedule your appointments in advance at: https://uenroll.identogo.com/
        2. Read more about the process at NJ State Police website: https://www.nj.gov/njsp/criminal-history-records/chri-nj-res.shtml

3. **Employee completes fingerprinting:** Employee attends the scheduled appointment at an IdentoGO location (appointments typically available ~2 weeks from scheduling) and receives a receipt when the appointment is complete which provides information for accessing results.
    - Take note of the documentation you will be required to present at your appointment (e.g., photo ID).
    - The employee should retain the receipt provided by IdentoGO (or record the PCN/TCN listed on it) and share this with their employer, as it will be required to access the online portal to view background check results.

4. **Employer reviews background check results:** Employer can view the results of the background check in the online portal (see below for instructions) and if a criminal record is found, the details of that record will be mailed to the provided employer mail-to address.
    - Directions to access online portal:
        1. After 24-72 hours, results will be available in the online portal. Be sure to have the Personal Control Number (PCN)/Transaction Control Number (TCN) from IdentoGO's receipt and navigate to the NJ State Police Personal Records Request website: https://www.njportal.com/NJSP/prr
        2. Enter the PCN/TCN, applicant last name, and applicant date of birth to access results

5. **Employer completes MCO attestation forms:** Employer submits MCO background check attestation forms after verifying all required employees have completed background checks.

FAQ:

Q1: Do I need a service code for fingerprinting background checks?
A1: Yes. Employees must provide a service code when completing their check with IdentoGO. For an employer-sponsored check, use service code "2F1BF3" and Case Contributor Number "EMPLOYER" (exact wording, not your organization's name).

Q2: Does Tenancy Services have a license code?
A2: No. Tenancy Services does not have a license code as it does not have a state-managed health care license. Ensure IdentoGO is correctly referencing the "service code" mentioned above.

Q3: Can I enroll in continuous monitoring with IdentoGO for ongoing employee criminal checks?
A3: No. Continuous monitoring is only available for state-licensed programs. For details on the required frequency of conducting backgrounds, please see the above guidance.

Q4: How do I determine if an offense is disqualifying or if an applicant is rehabilitated?
A4: Providers have discretion in this decision. To help inform this decision, providers can reference disqualification and rehabilitation criteria from similar state programs such as Standards for Children's Shelter Facilities (N.J. Admin. Code § 3A:53-3.8), Intensive In-Community Mental Health Rehab (N.J. Admin. Code § 10:77-5.15), Agencies under contract with DDD (N.J.A.C 10:48A), Personal Care NJ Rev Stat § 26:2H-83 (2024), or NJ Department of Children and Families (NJ Revised Statutes Title 9 Section 9:3A-14).

Q5: Do the MCOs have the right to audit employee background check results?
A5: Yes. MCOs have the right and responsibility to periodically audit provider attestation forms. Therefore, providers must retain all background check results. If an employee with a criminal history is employed, documentation of the rationale or proof of rehabilitation should also be maintained.

Q6: Can staff work conditionally until background checks are completed?
A6: Yes. A new employee can work for up to 6 months before background checks have been completed if employer receives and documents a sworn statement that the employee has not been convicted of any disqualifying crimes. This approach is consistent with Developmental Disabilities guidelines (N.J.A.C 10:48A).

Q7: Does this guidance apply to all Housing Supports providers?
A7: No. This guidance applies specifically to providers offering pre-tenancy and tenancy-sustaining services. Providers conducting Residential Modifications and Remediation and Move-in Supports follow a separate MCO credentialing process consistent with non-traditional MLTSS providers, which remains unchanged by this guidance.

Q8: Are volunteers required to complete fingerprint-based background checks?
A8: These standards do not apply for volunteers, unless they perform regular or unsupervised functions equivalent to those performed by required employees