

**TITLE:** Fingerprinting and Criminal Background Compliance for Contractors

**NUMBER:** BUL-3872.2

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**ROUTING**  
All Employees  
All Locations

**DATE:** August 11, 2025

**POLICY:** This bulletin outlines Los Angeles Unified School District (“District”) policy, guidelines, and procedures for conducting criminal background checks on contractors who provide services to the District. In accordance with the requirements of California Education Code (“Education Code”) sections [45125.1](#) and [45125.2](#).

**MAJOR CHANGES:** This bulletin replaces BUL-3872.1 Fingerprinting and Criminal Background Compliance for Contractors, dated December 16, 2024. This version provides an update on the process by which Contractor’s become authorized to conduct criminal offender record information background checks. Contractors may no longer submit paper applications, rather applications must be submitted virtually.

**PURPOSE:** The primary objective of this policy is to ensure the safety and well-being of students, school employees, and the school community by evaluating the criminal history of contractors before allowing them to interact with students.

**BACKGROUND:** This policy bulletin reflects changes in the law through the implementation of [AB 949](#), [AB 130](#), and [SB 531](#).

[AB 949](#) amended Education Code section [45125.1](#) to mandate that a sole proprietor contracting with a school district be considered an employee of the district for purposes of criminal background checks. As a result, a school district is required to collect and submit fingerprints of any employee of a sole proprietor to the Department of Justice for background screening.

Effective January 1, 2022, [AB 130](#) revised Section [45125.1](#) to require all school district contractors to ensure that any contractor who interacts with students, outside of the immediate supervision and control of the student's parent or guardian or a school employee, is subjected to a criminal background check. This extends to providers of online/virtual services.

[AB 130](#) also eliminated the "limited contact" standard from the law. Nevertheless, school districts may still avail themselves of the pupil safety alternatives in Education Code section [45125.2](#) for contracts involving construction, reconstruction, rehabilitation, or repair of a school facility.

Finally, [SB 531](#) exempts an employee of any entity, contracting with a school district, that offers work experience opportunities or workplace placements as part of transition services identified in a student's individualized education plan (IEP), from the requirement to have a valid criminal records summary if certain requirements are met. These conditions include at least one supervisor in the workplace who has direct contact with the student has a valid criminal records summary and that the student's parent/guardian has signed a consent form regarding the student's work placement.

**GUIDELINES:** The following are guidelines for fingerprinting and background checks for contractors.

## I. INTRODUCTION

- A. Education Code section [45125.1](#) requires any Contractor with the District ensure that its employees who interact with students outside the immediate supervision and control of the student's parent or guardian or school employee are fingerprinted and background checked in a manner authorized by the Department of Justice ("DOJ"). The District requirements for compliance with Education Code section [45125.1](#) are outlined

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in this bulletin. This policy also applies to affiliated charter schools.

**B. Definitions**

1. Contract: For the purpose of this bulletin, “contract” refers to any service agreement, Memorandum of Understanding (MOU), or purchase order.
2. Construction Contract: Contract for construction, reconstruction, rehabilitation, or repairs (“CRRR”).
3. Contract Sponsor: The District School or Office requesting the contract for services to be performed either on a school site or directly to students.
4. Contractor/Vendor/Entity: A person or business that enters into a contract with the District to perform a service or provide materials.
5. California Department of Justice (DOJ): The DOJ is mandated to maintain the statewide criminal record repository for the State of California. The DOJ disseminates these records for use in law enforcement and employment, among other purposes. This criminal background information serves as a critical tool for evaluating applicants in positions of trust, especially those working with vulnerable populations in California, such as students.
6. Sole Proprietor: An individual who is the exclusive owner of an unincorporated business that has a contract with the District. A sole proprietor, contracting with the District, is considered an employee of the district for purposes of criminal background checks. As a result, the District is required to collect and submit fingerprints of any employee of a sole proprietor to the Department of Justice for background screening.
7. Originating Agency Identifier (ORI): ORI is a unique code assigned by the DOJ to identify the specific organization that is requesting or submitting fingerprint or criminal background information. The ORI ensures that the criminal

history information is routed to the correct organization, such as the Contractor/Vendor or the District, in the case of a sole proprietor.

8. Custodian of Record: The Custodian of Record for a contractor ensures compliance with laws regarding background checks, maintains, and secures the required records, and serves as the contact point for all issues related to the background check process for that entity. This includes confirming that employees with criminal history prohibitions are not assigned to work in positions where they might interact with students. The Custodian of Record communicates with the District regarding the clearance status of employees as required by the contract.

## II. STATUTORY REQUIREMENTS

### A. Contracts (Non-Construction)

The School/Office requesting the contract (“Contract Sponsor”) shall ensure that the contracting entity (“Contractor”) certifies via the Fingerprint and Criminal Background Check Certification form (Attachment A) that any of its employees who may interact with students outside of the immediate supervision and control of a parent/guardian or school employee, have been fingerprinted and have not been convicted of a serious or violent felony (Education Code section [45125.1](#), Penal Code sections [667.5](#) and [1192.7](#)), unless the employee has received a certificate of rehabilitation and a pardon.

### B. Construction, Reconstruction, Rehabilitation, or Repair Contracts (“CRRR”)

1. All District Contractors performing construction, reconstruction, rehabilitation, or repair of a school facility, where the employees of the entity will have contact, other than limited contact (see 2, below), shall ensure the safety of students by one or more of the following methods (see Education Code section [45125.2](#)):
  - a. The installation of a physical barrier at the worksite to limit contact with students.

- b. Continual supervision and monitoring of all employees of the entity by an employee of the entity whom the DOJ has verified has not been convicted of a violent or serious felony. The Custodian of Records shall submit their fingerprints to the DOJ for processing.
    - c. Surveillance of employees of the entity by school personnel.
  2. An entity that contracts with the District for CRRR services is not required to comply with the requirements of Education Code section [45125.1](#) (section IIA, above) if one or more of the methods described in section IIB1, above, is used.
  3. Upon determination that the contractor performing CRRR services satisfies the requirements of this section, the Contract Sponsor shall confirm the exemption in writing, using the *Attachment A – Fingerprint and Criminal Background Check Certification* and take appropriate steps to protect the safety of any students that may come in contact with the Contractor’s employees.

**C. Exemptions to Sections II, A and B above**

The fingerprinting requirements shall not apply if the Contract Sponsor determines and confirms in writing, via *Attachment A – Fingerprint and Criminal Background Check Certification*, that the Contractor provides services in an emergency or exceptional situation, such as when student health or safety is endangered or when repairs are needed to make school facilities safe and habitable.

**III. PROCEDURES AND RESPONSIBILITIES FOR BACKGROUND CHECKS**

**A. Entity Type - Corporation (all forms), Partnership, or Limited Liability Company:**

1. Contract Sponsor Responsibilities
  - a. Submit a Request for Procurement Action (RFPA) or Purchase Requisition (PR) or MOU to Procurement Services Division (“Procurement”) to initiate the contract.

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- b. Obtain the *Attachment A – Fingerprint and Criminal Background Check Certification* from the contractor, prior to services being performed, and retain a copy of the form on site. Or, alternatively, ensure that the Contractor/Vendor is supervised at all times and certify it by completing *Attachment B – Certification of Vendor Supervision* and submitting a copy to Procurement and Risk Management.
  - c. Ensure that only contractors and their employees, volunteers, and agents, who have passed the background check and are listed on *Attachment A – Fingerprint and Criminal Background Check Certification*, enter the school site or interact with students in performance of their contract duties (including those through online services such as tutoring).
2. Procurement Services Division Responsibilities:
    - a. Provide *Attachment A – Fingerprint and Criminal Background Check Certification* to the Contractor.
    - b. Receive a copy of the signed *Attachment A – Fingerprint and Criminal Background Check Certification* from Contractor and upload to the specified vendor account in Ariba.
    - c. Update Ariba as changes to Contractor employee clearance occur.
  3. Contractor/Vendor Responsibilities:
    - a. Contractors should refer to the DOJ guidelines at: <https://oag.ca.gov/fingerprints/agencies> for information, including instructions on obtaining an Organization Record Identifier (“ORI”) number. Contractors must use the DOJ Agency Authorization Portal to submit applications (<https://aajc.doj.ca.gov/aapportal/>).
    - b. Contractors other than sole proprietors are responsible for conducting background checks on their employees

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and subcontractors, who will be performing the work under a contract with the District.

- c. The Contractor shall execute and return *Attachment A – Fingerprint and Criminal Background Check Certification* to the Contract Sponsor, school site where services are performed, and Procurement Services Division (“Procurement”), ensuring that only those employees, volunteers, and agents who have passed the background check and are listed on *Attachment A – Fingerprint and Criminal Background Check Certification* enter the school site or interact with students (including through online services such as tutoring).
- d. Contractors are required by law to apply for subsequent arrest notifications with the DOJ to receive subsequent background reports for their employees and immediately provide any subsequent arrest or conviction information it receives to the District. It is the responsibility of the Contractor to update *Attachment A – Fingerprint and Criminal Background Check Certification* and submit the changes to the Contract Sponsor, school site where services are performed, and Procurement when employee changes occur.
- e. A Contractor engaged in the construction, reconstruction, rehabilitation, or repair of a school facility is not required to complete employee background checks if the Contractor qualifies for one or more of the preventive methods, which are only applicable to CRRR contracts:
  - i. Installation of a physical barrier.
  - ii. Continuous supervision and monitoring of all employees of the Contractor by an employee of the Contractor who has not been convicted of a serious or violent felony as ascertained by the DOJ.
  - iii. Surveillance of employees of the entity by school personnel (use *Attachment B – Certification of Vendor Supervision*).

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**B. Entity Type - Sole Proprietor**

1. Contract Sponsor Responsibilities
  - a. Submit a Request for Procurement Action (RFPA) or Purchase Requisition (PR) to Procurement to initiate the contract. The Contract Sponsor is responsible for notifying the Sole Proprietor of his/her, and employees, of the fingerprinting obligations.
  - b. Ensure that only sole proprietors and their employees, volunteers, and agents, who have passed the background check, are permitted to enter the school site or interact with students (including through online services such as tutoring) in performance of their contracts. Or, alternatively, ensure that the sole proprietors and their employees are supervised at all times and certify it by completing the *Attachment B – Certification of Vendor Supervision* and submitting a copy to Procurement and Risk Management.
  - c. Upon separation from District service, the Contract Sponsor will notify Procurement that the Sole Proprietor, or their employees, is no longer contracted with the District.
  - d. Provide evidence that the Sole Proprietor, their employees, volunteers, and agents have passed the background check prior to entering the school site or interact with students (including through online services such as tutoring).
2. Procurement Responsibilities
  - a. Inform the Office of Employee Relations (“Employee Relations”) when a Sole Proprietor is set to enter into a contract with the District.
  - b. Notify the Contract Sponsor of the Sole Proprietor and employees that are cleared to provide services.
  - c. Upon separation from District service, Procurement will notify Employee Relations so that the DOJ can be

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contacted to cease transmission of any subsequent arrest/conviction notifications (“cancel fingerprints”) to the District for the Sole Proprietor.

3. Employee Relations Responsibilities
  - a. Check for fingerprint clearances in the District’s recruitment system as provided in *Attachment C – Sole Proprietor Fingerprint and Background Check Process*. Both DOJ and FBI fingerprint clearances are needed before the Sole Proprietor can commence work at any District site or otherwise interact with students (e.g., providing online services).
  - b. Once the Sole Proprietor’s fingerprints are received by Employee Relations (i.e., DOJ and FBI clearance, fingerprint delay, fingerprint disqualification). Employee Relations will input the information into the District’s background clearance system.
  - c. Notify Procurement, Risk Management, and the Sole Proprietor of the fingerprint results.
  - d. Upon receiving notice of any subsequent arrest/conviction, Employee Relations will immediately notify Procurement, Risk Management, and the Contract Sponsor of the subsequent arrest/conviction results. The Contract Sponsor shall consult with Risk Management and Procurement to determine whether the Contractor’s employee(s) will be allowed to continue to work at District work sites or interact with students or will be barred from both.
4. Sole Proprietor Responsibilities
  - a. Create a candidate profile in the District’s background clearance system, SuccessFactors system, as required in *Attachment C – Sole Proprietor Fingerprint and Background Check Process*.
  - b. Schedule and pay for a fingerprint appointment with their preferred third-party live scan provider listed on the applicant services site.

- c. Inform the Contract Sponsor when employee changes occur.
- d. Sole Proprietor shall not interact with students until informed by the Contract Sponsor that the contract is signed, and the fingerprints/background check have cleared.

#### **IV. WORK EXPERIENCE PROGRAMS**

- A.** If a contractor provides work experience opportunities for students, including, but not limited to, workplace placements as part of a student's individualized education program (IEP), the employee of the contractor is not required to have a valid criminal records summary pursuant Sections I and II, above if all of the following requirements are met:
  - 1. At least one adult employee in the workplace during the student's work hours, who has direct contact with the student and has been designated by the employer as the employee of record who is responsible for the safety of the student, has a valid criminal record summary as described in Section [44237](#).
  - 2. A staff representative of the District makes at least one visit every three weeks to consult with the student's workplace liaison, observe the student at the workplace, and check in with the student to ensure the student's health, safety, and welfare, including by addressing any concerns the student has raised.
  - 3. The parent or guardian of the student has signed a consent form regarding the student's work placement, attesting that the parent or guardian understands the duties assigned to the student and the nature of the workplace environment.
- B.** The specific types of educational programs that are included in this provision are listed in Subsection (b)(2) of Section [45125.1](#).

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**V. INDEPENDENT STUDY AND TUTORING PROGRAMS**

If a student participates in services provided by a contractor as part of an independent study or tutoring program and the student is under the immediate supervision and control of his or her parent or guardian during the provision of those services, the Contract Sponsor shall verify completion of a valid criminal records summary for all employees of the contractor who interact with the student by obtaining a copy of the completed *Attachment A – Fingerprint and Criminal Background Check Certification* from the contractor and keeping a copy on file at the school.

**VI. OTHER EXEMPTIONS**

The Superintendent or designee may determine that criminal background checks will not be required if the Superintendent or designee determines that the contracting entity is providing services in an emergency or exceptional situation, such as when student health or safety is endangered or when repairs are needed to make school facilities safe and habitable.

On a case-by-case basis, the District may require an entity with whom it has a contract, other than those identified in Education Code section [45125.1](#), to undergo fingerprinting and a background check following the procedures outlined in Sections III, IV, and V, above, as applicable.

**VII. ADDITIONAL INFORMATION****A. Contractors Living Outside of California**

If living outside California, Contractors must submit rolled fingerprints on paper fingerprint cards obtained through a local law enforcement agency and pay all appropriate fees. The following steps should be followed:

1. Contractors must contact the local law enforcement agency for fingerprinting services and
2. Execute and submit a completed fingerprint hard card to an authorized agency.

3. The authorized agency will review the card for completeness and accuracy, and then mail the fingerprint card, appropriate forms, and fees to the DOJ.
4. For more information, please see the following link:  
<https://oag.ca.gov/fingerprints/agencies>

**B. Fingerprinting Services Information**

Fingerprinting services are available at most local police departments, sheriff's offices, or any public Live Scan sites. To find the site nearest to you and a listing of fees, see [Applicant Live Scan Sites](#) on the DOJ website.

The application instructions and procedures for subsequent arrest notifications are available at the following link:

<https://oag.ca.gov/fingerprints/agencies>

For DOJ contact information, please follow the link below:

<https://oag.ca.gov/fingerprints/contactus>

**AUTHORITY:** This is a policy of the Board of Education of the City of Los Angeles.

**RELATED RESOURCES:**

- Education Code sections [45125.1](#), [45125.2](#), and [44237](#)
- Assembly Bill [AB 949](#) and [AB 130](#)
- Senate Bill [SB 531](#)
- Penal Code sections [667.5](#) and [1192.7](#)
- DOJ General Fingerprinting Information and DOJ Applicant Agencies: <https://oag.ca.gov/fingerprints/agencies>
- Live Scan Sites: <https://oag.ca.gov/fingerprints/locations>
- DOJ Contact Information: <https://oag.ca.gov/fingerprints/contactus>
- [BUL-6825.0](#) Records Retention and Destruction (Other than Pupil Records), dated February 13, 2017

**ATTACHMENTS:** Attachment A – Fingerprint and Criminal Background Check Certification  
Attachment B – Certification of Vendor Supervision  
Attachment C – Sole Proprietor Fingerprint and Background Check Process

**ASSISTANCE:** For assistance or further information please contact:

- Risk Management Department  
(213) 241-0329 or [riskfinance@lausd.net](mailto:riskfinance@lausd.net)
- Procurement Services Division  
(213) 241-3087 or [procurement@lausd.net](mailto:procurement@lausd.net)
- Human Resources Division, Office of Employee Relations  
(213) 241-6591 or [employeeerelations@lausd.net](mailto:employeeerelations@lausd.net)

### LOS ANGELES UNIFIED SCHOOL DISTRICT POLICY BULLETIN



**TO:** Los Angeles Unified School District  
Procurement Services Branch

333 S Beaudry Ave. 28<sup>th</sup> Floor, LA, CA 90017

**FROM:** Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_  
State: \_\_\_\_\_ Zip: \_\_\_\_\_

### FINGERPRINT AND CRIMINAL BACKGROUND CHECK CERTIFICATION

*In accordance with the Department of Justice (DOJ) fingerprint and criminal background investigation requirements of Education Code section 45125.1 et seq.*

**Vendor Name:** \_\_\_\_\_ **Contract #:** \_\_\_\_\_  
**Subcontractor Name:** \_\_\_\_\_ **ORI #:** \_\_\_\_\_

With respect to the Agreement (Number \_\_\_\_\_) between the Los Angeles Unified School District ("DISTRICT") and the individual, \_\_\_\_\_ the company or contractor named ("VENDOR") for the provision of \_\_\_\_\_ services.

**PLEASE CHECK ALL APPROPRIATE BOXES AND SIGN ON PAGE 2:**

**REQUIREMENTS SATISFIED:**

- A) The VENDOR hereby certifies to the DISTRICT'S governing board that it has completed the criminal background check requirements of Education Code (EC) sections 45125.1 and 45125.2 and that none of its employees that may interact with DISTRICT students have been convicted of a violent felony listed in Penal Code section 667.5(c) or a serious felony listed in Penal Code section 1192.7(c). The vendor shall report all subsequent arrest notifications to the District Administrator within 24 hours of being notified by the Department of Justice.

List below or attach, all employee(s) names that have successfully completed the fingerprinting and criminal background check clearance in accordance with the law:

**Date Subsequent Arrest Notifications were processed:** \_\_\_\_\_

	Last Name	First Name	Date Fingerprints Submitted to DOJ	Date DOJ Clearance Received
1.	_____	_____	_____	_____
2.	_____	_____	_____	_____
3.	_____	_____	_____	_____
4.	_____	_____	_____	_____
5.	_____	_____	_____	_____
6.	_____	_____	_____	_____
7.	_____	_____	_____	_____
8.	_____	_____	_____	_____
9.	_____	_____	_____	_____
10.	_____	_____	_____	_____

*(CONTINUED ON PAGE 2)*

**FINGERPRINT AND CRIMINAL BACKGROUND CHECK CERTIFICATION (CONTINUED)**

**EXCEPTIONS**

*Note: Any exceptions below must be authorized in writing by the Contract Sponsor.*

- B) The VENDOR qualifies for a waiver of the Department of Justice (DOJ) fingerprint and criminal background investigation for the following reason(s) permitted by Education Code section 45125.1 of 45125.2
  - The VENDOR and its employees will have NO INTERACTION with students (No school services will be provided).
  - The services provided by the VENDOR are for an "EMERGENCY OR EXCEPTIONAL SITUATION," such as when student health or safety is endangered or when repairs are needed to make school facilities safe and habitable" [EC 45125.1(b)].
  - The VENDOR and its employees will have LIMITED CONTACT with students (attach information about length of time on school grounds, proximity of work area to student areas; whether VENDOR/its employees will be working by themselves or with others, and any other factors that substantiate limited contact) [EC 45125.2 (c) – only applicable for construction, reconstruction, rehabilitation, or repair contracts].
  - The VENDOR will ensure that ONE (1) OR MORE of the following methods is utilized to ensure student safety [EC 45125.2 (a) - only applicable for construction, reconstruction, rehabilitation, or repair contracts].

**Check all methods to be used:**

- 1) Installation of a physical barrier at the worksite to limit contact with students.
- 2) Continual supervision and monitoring of all employees of the VENDOR by an employee of the VENDOR who has not been convicted of a serious or violent felony as ascertained by the DOJ.

*Signature of Contract Sponsor is required for any exceptions:*

Printed Name	Title	Signature	Date
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By signing below, under penalty of perjury, I certify that the information contained on this certification form is accurate. I understand that it is the VENDOR'S sole responsibility to maintain, update, and provide the District with a current "Fingerprint and Criminal Background Check Certification", throughout the duration of VENDOR-provided services.

Printed Name	Title	Signature	Date
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**SOLE PROPRIETOR FINGERPRINT AND BACKGROUND CHECK PROCESS**

**Step 1.** Complete LAUSD’s Sole Proprietor Fingerprint and Background Check Form at the following link: <https://forms.office.com/r/b2EQS6X8Rw>

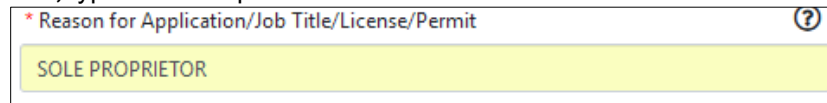
**Step 2.** Create a candidate profile in the SuccessFactors system.  
Link to SuccessFactors system:

<https://career41.sapsf.com/sfcareer/jobreqcareerpvt?jobId=727&company=losangeles01&st=AA80BD900D17FDC1F9682E4DF232015867A7E2D2>

**Step 3.** Register for your background check, schedule your fingerprint appointment, and pay your fees at the following link:  
<http://www.ApplicantServices.com/LAUSOL>

**\*\* Important instructions when filling out the application form \*\***

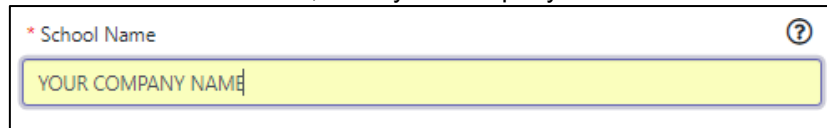
A. In the “Reason for Application/Job Title/License/Permit” field, type “Sole Proprietor.”



\* Reason for Application/Job Title/License/Permit ?

SOLE PROPRIETOR

B. In the “School Name” field, enter your company name.



\* School Name ?

YOUR COMPANY NAME

C. Ensure that you record your ATI number, for reference and to follow up with fingerprinting result if needed.

**Step 4.** The Contract Sponsor/School will notify you of the employee background check results and when services involving interaction with students can begin.

**Step 5.** Please inform Procurement Services Department and Risk Management Department if any employee changes occur by sending an email to the procurement contract analyst and [riskfinance@lausd.net](mailto:riskfinance@lausd.net). Include the District Contract Number in the Subject line.