
To: Wx Subgrantees
From: Community Programs
Release Date: June 20, 2025
Effective Date: June 20, 2025
Subject: Revised Background Check Guidance

Program Guidance: WAP-2025-03

BACKGROUND

IHCDA is revising its guidelines for subrecipients regarding background checks for contractors. In section 6.8 of the IHCDA 2025 Wx manual, it states “Subrecipients must perform a criminal background check and employment verification prior to the employment of subrecipient/contractor employees planning to work with clients or in the unit of clients being rehabilitated or weatherized as a part of the Weatherization Assistance Program.” This is followed by what must be included in the background report. With this notice, it is the responsibility of each subrecipients to put in place sound screening practices and create their own background check policy.

NEW GUIDANCE

The Subrecipient shall use sound screening practices regarding the use of Contractors and accept responsibility for determining and approving the character and fitness of Contractors (including volunteers, agents, or representatives). Subrecipients are not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings. If it is later determined that a Subrecipient knowingly rendered a false positive determination of a Contractor’s fitness, chose not to conduct a criminal history/security background check, or failed to reasonably interpret the results in confirming a Contractors fitness to perform contracted duties, Subrecipient agrees to hold IHCDA harmless from any liability for injuries or damage resulting from a breach of this provision or Subrecipients actions in this regard. The Subrecipient shall provide immediate written notice to IHCDA if at any time the Subrecipient learns that determination of a Contractor’s fitness to perform the duties was erroneous or has changed by reason of changed circumstances.



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