

November 6, 2025

Susan Dunkin
Alaska Department of Health
susan.dunkin@alaska.gov

RE: Solicitation for Public Input – Background Check Program Regulatory Revisions

Dear Ms. Dunkin,

For over 70 years, the Alaska Hospital & Healthcare Association (AHHA) has served as a non-profit trade association representing Alaska's hospitals, nursing homes, and a growing number of healthcare partners across the continuum of care. AHHA members play an invaluable role, both as community providers and essential employers, in cities, towns, and villages across Alaska.

Per the public notice dated October 3, 2025, the Department of Health (DOH) is undertaking a solicitation process to ask the public for ideas, suggestions, and input concerning potential regulatory changes to the Background Check Program. The following represents AHHA's recommendations to improve the program's efficiency and reduce the administrative burden on both the State and our member organizations.

Program Review and Administrative Burden

While the purpose of the Background Check Program (BCP) system is critical, the process is heavily dependent on BCP staffing levels and infrastructure. In recent years, this has caused significant delays. When the State's system was hacked during the pandemic, all background check processing stopped for several weeks, halting hiring during a time of extreme workforce need. Even now, when the program experiences staffing shortages, system issues, or training gaps, background check processing can take up to two weeks or longer.

These delays make it difficult for facilities to hire and retain staff. Often, by the time a provisional or final clearance is issued, applicants have accepted other jobs.

We believe reasonable process improvements can greatly reduce the administrative burden placed on organizations. To achieve this, we recommend standing up a formal Task Force to complete a comprehensive review of the BCP and its associated processes (e.g., fingerprinting). We recommend the creation of an integrated taskforce, comprising of industry and State experts, to look at the legal requirements versus



current processes and determine ways to simplify and more effectively leverage technology to reduce the burden and improve the processes.

Fingerprint Submission and Processing

To modernize background checks and reduce delays and mailing costs, we recommend improvements to the submission and tracking process. AHHA specifically recommends the State of Alaska implement electronic fingerprint submissions (live scan) for its fingerprinting requirement, and retain paper prints for outlying communities as needed. This should be coupled with improved visibility during processing, specifically through a portal that allows organizations to verify receipt and status. Ideally, this portal will also enable access to results rather than requiring organizations to wait for mailed hard copies.

A Working Alternative

During the system outage in the pandemic, the state temporarily allowed providers to use accredited private background check companies to meet hiring requirements. This approach proved effective—(1) processing times were dramatically shorter; (2) the cost per check was around \$15, reducing the financial burden on both providers and applicants; (3) providers continued to verify applicants were not listed on prohibited registries, such as the federal List of Excluded Individuals and Entities (LEIE) and other State-maintained exclusion lists for abuse, neglect, or Medicaid fraud.

This offers a potential path forward. Allowing providers to permanently use State-approved third-party background check companies—while maintaining Department of Health oversight—could reduce administrative delays and staffing pressures on the State while speeding up hiring for critical healthcare positions and saving money for both the State and employers.

Clearance and Renewal Efficiency

AHHA believes the clearance and renewal procedures can be streamlined for greater efficiency. In terms of renewal, we recommend ending the current process in favor of annual verification of continued employment. When the verification process was introduced several years ago, it was presented as an alternative to the renewal process. Instead, it was added on top of it, and clearances were reduced from six to five years, increasing the frequency of renewals. If this is not an option, we recommend extending the clearance timeline and eliminating the annual verification steps.

AHHA also recommends making provisional clearances eligible for full connection across employers, similar to final clearances. The current system creates a downside to



connecting to work in progress, as employers must wait for a final clearance before receiving the benefit of the provisional status from other employers.

Thank you again for soliciting public input and considering our comments. This is a worthwhile effort to improve the efficiency of the Background Check Program, and we look forward to working with the Department of Health on these critical updates.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Kosin'.

Jared C. Kosin, JD, MBA
President & CEO