



# Tulsa Police Department

This policy statement and the procedures thereunder are intended for Police Department use only. The policies, procedures, and regulations are for internal Police Department administrative purposes and are not intended to create any higher legal standard of care or liability in an evidentiary sense than is created by law. Violations of internal Police Department policies, procedures, regulations, or rules form the basis for disciplinary action by the Police Department. Violations of law form the basis for civil and/or criminal sanctions to be determined in a proper judicial setting, not through the administrative procedures of the Police Department.

**Policy #** 146

**Effective Date** 10/24/2025

**Policy Name** Determination of Suitability to Interact with Participating Minors

**Approved Date** 10/23/2025

**Approved by** Dennis Larsen, Chief of Police

**Previous Date** 10/25/2022

## PURPOSE OF CHANGE:

New policy to come into compliance with federal grant requirements.

## POLICY:

As part of the requirements of being a grantee of federal grant funds, The Tulsa Police Department must make determinations of suitability before participants in a federal grant may interact with participating minors. This requirement applies to those who are specified as being participants in the federal grant being applied for. When department personnel are named in a grant application those named have to have been cleared to interact with minors that may be participants that the grant applies.

## SUMMARY:

**APPLIES TO:** All police personnel.

## DEFINITIONS:

**COVERED INDIVIDUAL** – any individual (other than a participating minor, as defined in this condition, or a client of The Tulsa Police Department who is expected, or reasonably likely, to interact with any participating minor (other than the individual's own minor children). A covered individual need not have any particular employment status or legal relationship with a Police Officer. Such an individual might be an employee of The Tulsa Police Department, but also, might be (for example) a consultant, contractor, employee of a contractor, trainee, volunteer, or teacher.

**PARTICIPATING MINOR** – all individuals under 18 years of age within the set of individuals described in the scope section of this condition as it appears on the award document are participating minors.

**INTERACTION** – physical contact, oral and written communication, and the transmission of images and sound, and may be in person or by electronic (or similar) means. But "interaction" does not include:

1. brief contact that is both unexpected by participating officers and unintentional on the part of the covered individual, such as might occur when a postal carrier delivers mail to an administrative office.
2. personally accompanied contact, that is, infrequent or occasional contact (for example, by someone who comes to make a presentation) in the presence of an accompanying adult, pursuant to written policies and procedures of The Tulsa Police Department that are designed to ensure that, throughout the contact, an appropriate adult who has been determined to be suitable pursuant to this condition will closely and personally accompany, and remain continuously within view and earshot of, the covered individual.

## PROCEDURES:

1. The Tulsa Police Department will not permit any covered individual to interact with any participating minor in the course of activities under the award unless The Tulsa Police Department has made a written determination of the suitability of that individual to interact with participating minors.

2. In addition to information resulting from checks or screening required by applicable federal, state, tribal, or local law, and/or by The Tulsa Police Department written policies and procedures, current and appropriate information includes the results of all required searches listed below, each of which must be completed no earlier than six months before the determination regarding suitability.
3. Public sex offender and child abuse websites/registries including:
  - a. The Dru Sjodin National Sex Offender Public Website ([www.nsopw.gov](http://www.nsopw.gov))
  - b. The website/public registry for each state (and/or tribe, if applicable) in which the individual lives, works, or goes to school, or has lived, worked, or gone to school at any time during the past five years; and
  - c. The website/public registry for each state (and/or tribe, if applicable) in which the individual is expected to, or reasonably likely to, interact with a participating minor in the course of activities under the award.
4. Criminal history registries and similar repositories of criminal history records for each covered individual at least 18 years of age, a fingerprint search (or, if the subgrantee documents that a fingerprint search is not legally available, a name-based search, using current, and if applicable, previous names and aliases) –encompassing at least the time period beginning five calendar years preceding the date of the search request –of pertinent (and if applicable, local and tribal) criminal history registries or similar repositories, including:
  - a. the criminal history registry for each state in which the individual lives, works, or goes to school, or has lived, worked, or gone to school at any time during the past five years; and
  - b. the criminal history registry for each state in which he or she is expected to, or reasonably likely to, interact with a participating minor in the course of activities under the award.
5. The Tulsa Police Department Grants Coordinator will update the searches described above, by reexamining the individual's participating directly in the federal grant to determine suitability in light of those search results, and, if appropriate, modify or withdraw that determination.
6. The Tulsa Police Department Grants Coordinator will also reexamine a covered individual's suitability determination upon learning of information that reasonably may suggest unsuitability and, if appropriate, modify or withdraw that determination.
7. In particular (unless applicable law precludes it), with respect to either an initial determination of suitability or a subsequent reexamination, The Tulsa Police Department may not determine that a covered individual is suitable to interact with participating minors in the course of activities under the award if the covered individual:
  - a. Withholds consent to a criminal history search required by this condition.
  - b. Knowingly makes (or made) a false statement that affects, or is intended to affect, any search required by this condition.
  - c. Is listed as a registered sex offender on the Dru Sjodin National Sex Offender Public Website.
  - d. To the knowledge of The Police Department, has been convicted, whether as a felony or misdemeanor, under federal, state, tribal, or local law of any of the following crimes (or any substantially equivalent criminal offense, regardless of the specific words by which it may be identified in law):
    - 1) sexual or physical abuse, neglect, or endangerment of an individual under the age of 18 at the time of the offense.
    - 2) rape/sexual assault, including conspiracy to commit rape/sexual assault.
    - 3) sexual exploitation, such as through child sexual abuse material or sex trafficking.
    - 4) kidnapping.
    - 5) voyeurism; or
  - e. Is determined by a federal, state, tribal, or local government agency not to be suitable.

8. Nothing in this condition shall be understood to authorize or require The Tulsa Police Department, or any person or other entity, to violate any federal, state, tribal, or local law, including any applicable civil rights or nondiscrimination law.

**REGULATIONS:**

None.

**REFERENCES:**