Bear Witness Doula Vetting and Onboarding Policy

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This policy governs how Bear Witness reviews, approves, and lists death doulas on the platform.

1. Purpose

Families come to Bear Witness at one of the most vulnerable moments in their lives. The platform's core promise is that every listed doula has been vetted for safety, competence, and trustworthiness. This policy exists so that promise is consistent, defensible, and not left to case-by-case judgment calls under pressure.

2. Eligibility Requirements

To apply, a doula must meet all of the following:

- Demonstrated experience in end-of-life care, doula work, hospice support, chaplaincy, or bereavement companionship, described in their own words and supported by at least one reference
- Passes the background check described in Section 4
- Agreement to Bear Witness's Terms of Service, code of conduct, and this vetting policy
- Physical service area within or adjacent to the current 203/914 corridor (see Section 8)

Formal certification (INELDA, NEDA, or similar) is not required to apply. Many practicing death doulas come to the work through apprenticeship, hospice experience, or self-directed training rather than a formal program. Where a doula does hold a certification, it's noted on their profile as an added credential, not treated as a gate.

Professional liability insurance is not currently a listing requirement. This is flagged in Section 9 as something to revisit as the platform scales, since it affects what Bear Witness can represent to families about a doula's coverage.

3. Application & Intake Process

1. Doula submits application (background and experience, training if any, references, service area)
2. Doula consents to and completes a Checkr background check
3. Application moves to Review (Section 5) once both steps above are

complete

No profile is published, and no doula is bookable, before both steps are complete.

4. Background Check Scope

Checkr checks run at minimum:

- County, state, and federal criminal record search (7-year lookback, or longer where state law permits and relevant)
- National sex offender registry
- Identity verification

5. Review Criteria

Not every flag is disqualifying, and not every clean report means automatic approval. Reviews should weigh:

- **Nature of the offense.** Anything involving violence, exploitation, theft from a vulnerable person, or offenses against children or elderly individuals is treated as a serious concern regardless of age of the record.
- **Relevance to the caregiving role.** A doula sits with grieving families in their homes. Offenses touching on trust, safety, or access to vulnerable people carry more weight than unrelated offenses.
- **Recency.** A single non-violent offense from many years ago carries different weight than something recent.
- **Pattern vs. isolated incident.** One flag is reviewed differently than a documented pattern.
- **Disclosure.** Whether the applicant disclosed the issue proactively versus it surfacing only through the check.

Automatic disqualification

- Any conviction involving violence, sexual offense, abuse or neglect of a child or dependent adult, or exploitation of an elderly or vulnerable person
- Active sex offender registry status
- Any offense committed in the course of caregiving or a position of trust

Requires manual review (does not automatically disqualify)

- Non-violent offenses older than 7 years
- Minor offenses (e.g., low-level misdemeanors, traffic-related, youthful records) with no pattern
- Pending charges with no conviction, evaluated on a case-by-case basis

6. Manual Review Process

When a check returns anything outside a clean report:

1. The flag is documented internally (what it is, source, date)
2. The applicant is given the opportunity to explain, consistent with

fair chance practices, before a final decision is made
3. If a decision to deny is reached, the pre-adverse action notice (Section 11) is sent first, followed by the final adverse action notice after the waiting period
4. A decision (approve, deny, or request more information) is made by the founder or designated reviewer, with the reasoning documented in writing
5. The applicant is notified of the outcome per the templates in Section 11

Every manual review decision should be logged, even informally, so there's a consistent record if a similar situation comes up later.

7. Approval & Listing

Once approved, a doula's profile goes live with:

- Confirmed background check status and date
- Training or certification, if any, noted as a credential
- Service area
- Bio, specialties, and any submitted references or testimonials

Background checks are re-run annually, or sooner if a concern is raised by a family or another doula.

8. Geographic Scope

- **In-corridor doulas (203/914):** free listing, background check cost covered by Bear Witness
- **Outside-corridor doulas:** upfront listing fee that covers background check cost, subject to the same vetting standard

As the corridor expands, this policy applies unchanged to new regions; only the fee structure is subject to review.

9. Ongoing Standards & Removal

A doula can be removed from the platform for:

- A new disqualifying background check result
- A credible complaint from a family involving safety, conduct, or professionalism
- Misrepresentation of experience or credentials on the application
- Violation of the Terms of Service or code of conduct

Removal decisions follow the same documentation standard as initial review: written reasoning, and where the removal is based on a new background check finding, the adverse action process in Section 11.

10. Policy Review

This policy should be revisited:

- After the first 10 doula approvals, to check whether the review criteria held up in practice
- Before expanding into a new geographic market
- After any incident involving a listed doula
- At minimum, annually

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11. Adverse Action Notice Templates

These templates are for use whenever a doula is denied listing, or removed from the platform, based on a background check finding. Federal law (FCRA) requires a two-step notice process whenever an adverse decision relies in whole or in part on a background check.

Step 1: Pre-Adverse Action Notice

Sent before a final decision, giving the applicant a chance to respond.

> Subject: Important Information About Your Bear Witness Application
>
> Dear [Name],
>
> We are considering not moving forward with your application to join Bear Witness based in whole or in part on information contained in a background check report obtained through Checkr, Inc.
>
> Attached is a copy of that report along with a copy of "A Summary of Your Rights Under the Fair Credit Reporting Act."
>
> No final decision has been made. You have the right to review this report and to contact us if you believe it is inaccurate or incomplete, or if you would like to provide additional context, before a final decision is made. Please respond within [5 business days] of this notice if you would like to do so.
>
> Sincerely, Bear Witness

Step 2: Final Adverse Action Notice

Sent only after the waiting period has passed, if the decision stands.

> Subject: Decision Regarding Your Bear Witness Application
>
> Dear [Name],
>
> After review, we have decided not to move forward with your application to join Bear Witness based in whole or in part on information contained in your background check report.
>
> This decision was made by Bear Witness, not by Checkr, Inc., the consumer reporting agency that provided the report. Checkr did not make this decision and cannot explain the reasons for it.
>
> Checkr, Inc. [Address / contact info] [Phone number]
>
> You have the right to dispute the accuracy or completeness of the report directly with Checkr, and to request a free copy of your report from Checkr within 60 days of this notice. You also have rights under the Fair Credit Reporting Act, as described in the summary previously provided to you.
>
> Sincerely, Bear Witness