



Alternative Search Procedure (ASP) Changes



CEO National Service Criminal History Check Strategy

- Additional funding for AmeriCorps State and National and Senior Corps grantees to use Truescreen and/or Fieldprint to obtain compliant checks on individuals serving or working in covered positions.
- An exemption period during which CNCS will not take administrative enforcement action for noncompliance for grantees that conduct rechecks of covered positions, using Truescreen and/or Fieldprint.

CEO National Service Criminal History Check Strategy



- Phase out most of the currently approved Alternative Search Procedures (ASPs) at the end of calendar year 2019.
- Implement a process where a manual hold may be placed on grant funds for grantees who are found to be noncompliant with the NSCHC requirement until grantees are able to obtain compliance using the agency's approved vendors.
- Implement a new cost-based disallowance policy to replace the current NSCHC Disallowance Matrix.

National Service Criminal History Check Goals



Eliminate
barriers to
compliance

Reduce
noncompliance

Minimize
monitoring
burden

Expiring ASPs: 12/31/19



- All ASPs/Exemption approvals are expiring on 12/31/19
- Pre-Approved ASPs are expiring on 12/31/19

Expiring Pre-Approved ASPs: 12/31/19

- **Ceasing Accompaniment**
 - A grantee may cease accompaniment of the individual when it has received results clearing the individual through either:
 - BOTH of the State checks (State or residence AND State of service checks) OR
 - The fingerprint-based FBI check. An organization does not need to receive State AND FBI checks before ceasing accompaniment.
- **Maintaining Clearance Letters in Lieu of Actual NSCHC Results**
 - Partner with another organization that conducts some or all of the components, but not permitted to review the results
 - Maintain Clearance Letter by entering into a written agreement with the organization conducting the checks.

Expiring Pre-Approved ASPs: 12/31/19

- Prohibited by State Law from Maintaining Results or Sharing Results
 - If State law prohibits your organization from maintaining or sharing results of the state or FBI checks,:
 - You must document that you are prohibited by State law from maintaining results and/or prohibited from sharing those results.
 - You must maintain a memo in the individual's file
- Unreadable Fingerprint Rejected during Department Order FBI Checks
 - If your organization has an ASP for the Departmental Orders” (DO) method, you may cease attempting to conduct a fingerprint-based check after two separate unsuccessful attempts due to unreadable fingerprints.

Pre-Approved ASPs: Use of Truescreen for NSOPW and/or State Checks

Grantees who use Truescreen must abide by the following:

- Set up an account with Truescreen through <https://applicationstation.truescreen.com> with the CNCS specific agreement code.
 - **TRUESCREEN OFFERS TRAINING**
- Complete Truescreen checks for individuals in covered positions before the start of work or service.
 - A complete Truescreen check is defined as a check that is adjudicated by the grantee.
 - Individuals in covered positions may not begin work or service until the Truescreen checks are complete.

Pre-Approved ASPs: Use of Truescreen for NSOPW and/or State Checks

- Use of Truescreen does not provide information for the following states and territories:
 - California, Delaware, Louisiana, Nevada, New Hampshire, New Mexico, Virginia,
 - American Samoa, Guam, Northern Mariana Islands, Puerto Rico, Virgin Islands

Grantees using Truescreen will not be required to get a check from an unavailable state/territory for individuals in a covered positions if they have

- obtained an NSOPW check from Truescreen
- obtained any required state checks that are available from Truescreen, and
- conducted a fingerprint-based FBI check.

Pre-Approved ASPs: National Fingerprint File

The National Fingerprint File (NFF) allows the FBI and the States to exchange criminal history records for noncriminal justice purposes authorized by federal or state law, such as background checks for governmental licensing and employment.

- If a required state check is from a state that participates in the NFF, then the grantee does **not need** to conduct the check in that NFF state if they have conducted a fingerprint based FBI check.

The following 20 states participate in the NFF Program:

Colorado, Florida, Georgia, Hawaii, Idaho, Iowa, Kansas, Maryland, Minnesota, Missouri, Montana, North Carolina, New Jersey, New York, Ohio, Oklahoma, Oregon, Tennessee, West Virginia, Wyoming

Pre-Approved ASPs



- Disability Accommodation
 - CNCS will exempt the fingerprint FBI check requirement for individuals in covered positions (who have recurring access to vulnerable populations) if conducting a fingerprint check is a physical impossibility as a result of disability, such as the absence of limbs.
 - The grantee is still required to conduct NSOPW and name-based state check(s) on the individual.

Resources

- Training:

<https://www.nationalservice.gov/CHCVideoLibrary>

- Knowledge Network Page:

<https://www.nationalservice.gov/resources/criminal-history-check>

- Pre-approved ASPs:

<https://www.nationalservice.gov/ASPExemptionsGuidance>

- NFF and Truescreen ASP Table:

- <https://www.nationalservice.gov/documents/2018/nschc-using-fieldprint-and-truescreen>

Questions?

