

Mitigation Rating Worksheet

The Corporation for National and Community Service (CNCS) has developed this job aid to help Monitoring Officials and other interested parties apply the National Service Criminal History Check Interim Disallowance Guide (“Disallowance Guide”), published in August 2015. This tool is provided for the purposes of assisting Monitoring Officials in implementation of the Disallowance Guide and its use is not required unless stipulated by a Monitoring Official in accordance with other CNCS policies and procedures. In the event that anything in this worksheet appears inconsistent with the content of the Disallowance Guide, the Disallowance Guide is the controlling document. Please direct all comments or questions to CHC@cns.gov.

Instructions to use this worksheet:

1. Begin by using Table 3 on the other side of this document. You can edit any of the gray boxes you see in the table. First, indicate the level of access to vulnerable populations of the individual whose file you are reviewing in Row 1 by adding an “X” or checkmark in the appropriate box.
2. Then put an “X” or checkmark in the appropriate box of Table 3 for each mitigation factor that is found in that file, including whether it was conducted on-time or late, differentiated by Column A and Column B.
3. When you have completed the worksheet, return to this page and use the keys below to determine the mitigation rating for that file. Note that individuals with recurring access and those with episodic or no access have different keys. CNCS recommends you determine the mitigation rating in the following way:
 - a. Begin by assessing whether or not the file meets the standards for **Substantial Mitigation**. If all of the required criteria have been met, this file should be considered to have Substantial Mitigation. Disregard any extra checks that may be present – it does not further increase an individual’s mitigation to have two forms of adjudicated sex offender checks, for example.
 - b. If the file does not qualify for Substantial Mitigation, assess whether it qualifies for **Moderate Mitigation**. Again, “extra” mitigation factors do not influence the final rating, unless they meet the criteria for Substantial Mitigation.
 - c. If the file does not meet the standards for Substantial Mitigation or Moderate Mitigation, it should be classified as **Low Mitigation**. Always double-check your work before logging the mitigation rating.
4. Log the appropriate mitigation rating in Row 5, Column B of Table 3.

TABLE 1: MITIGATION RATING KEY (NO/EPISODIC ACCESS)	
For individuals with no or episodic access to vulnerable populations...	
Substantial Mitigation requires...	A check in Column A, Row 2 AND a check in either Column of Row 3. Row 4 is not applicable.
Moderate Mitigation requires...	A check in either Column of Row 2 AND a check in either column of Row 3. Row 4 is not applicable.
All other combinations of factors are classified as Low Mitigation	

TABLE 2: MITIGATION RATING KEY (RECURRING ACCESS)	
For individuals with recurring access to vulnerable populations	
Substantial Mitigation requires...	A check in Column A of Row 2, a check in Column A of Row 3, and a check in either column of Row 4.
Moderate Mitigation requires	Either: <ol style="list-style-type: none"> 1. A check in Column A of Row 2 and a check in either column of Row 3 OR <ol style="list-style-type: none"> 2. A check in Column A of Row 3 and a check in either column of Row 4.
All other combinations of factors are classified as Low Mitigation	

TABLE 3: Mitigation Factor Log

		Column A	Column B
Row 1	Level of Access to Vulnerable Populations (Circle one.)	<input type="checkbox"/> Episodic/None	<input type="checkbox"/> Recurring
Mitigation Factors		On-Time	Late
Row 2	Sex Offender Check	NSOPW (Complete or Downed States)	<input type="checkbox"/>
		Vendor national sex offender registry check	<input type="checkbox"/>
		Fingerprint-based FBI check*	<input type="checkbox"/>
Row 3	Other Mitigating Checks	CNCS-designated repository in State of Service OR State of Residence	<input type="checkbox"/>
		Nationwide search of criminal history information (Other than designated repositories)	<input type="checkbox"/>
		Fingerprint-based FBI check*	<input type="checkbox"/>
The following is relevant ONLY for individuals with recurring access to vulnerable populations.			
Row 4	Accompaniment	Not Required	Required and Performed/Documented**
		<input type="checkbox"/>	<input type="checkbox"/>
Use the keys on the back of this document to identify the correct mitigation rating and note it below.			
Row 5	Mitigation Rating		<input type="checkbox"/>
<p>*Note that a fingerprint-based FBI check provides two kinds of mitigation. If you indicate it is present in one row, be sure to note that in the other row as well. However, in one instance it may be on time, and in another, late. A fingerprint-based FBI check must be complete before the start of work or service to be “on time” for the purposes of an adjudicated sex offender check (Row 2). However, it only needs to be initiated before the start of work or service to be considered mitigation for other purposes (Row 3).</p> <p>**For the purposes of mitigation, utilizing a program model where accompaniment is a standard mitigation process is considered sufficient evidence to conclude that accompaniment has been performed. Documenting the time and date of accompaniment and the person who was accompanying the individual is also considered sufficient evidence.</p>			