

Fact Sheet: Conducting FBI Checks Through Fieldprint, Exemptions and Alternative Search Procedures

Overview

In September 2015, the Corporation for National and Community Service (CNCS) executed a contract with Fieldprint, Inc., (“Fieldprint”) to provide grantees with FBI fingerprint-based national criminal history background checks (“FBI checks”). A limited number of contractors like Fieldprint, called “Channelers,” are approved by the FBI to channel requests for checks from grantees through the FBI’s background check system. Service is expected to begin in January 2016. The addition of Fieldprint’s services means that all grantees and subgrantees (collectively, “grantees”) will have a clear path to obtain timely FBI checks.

This document explains (1) how grantees can access Fieldprint’s services and what grantees should expect from Fieldprint; (2) how the availability of Fieldprint’s services will affect exemptions to the FBI Checks; and (3) how the availability of Fieldprint’s services will affect Alternative Search Procedures (ASPs) related to the FBI Departmental Order (DO) process. While more information on using Fieldprint will be provided closer to the service launch, *all exemptions related to FBI checks based on a lack of access through state repositories will sunset and grantees will be required to obtain FBI checks.*

NOTE: National Service Criminal History Checks (NSCHC) have up to four components: a nationwide check of the National Sex Offender Public Website (www.NSOPW.gov), state criminal history checks for the individual’s state of residence and state of work/service, and a fingerprint-based FBI criminal history check. Regardless of whether your program uses Fieldprint or another means to conduct an FBI check, you **MUST still conduct a nationwide NSOPW check and, in appropriate circumstances, state checks in the individual’s state of residence and state of service. Failure to do so will result in cost disallowance.**

1. Conducting FBI Checks Through Fieldprint

1.1. Who may use Fieldprint as a Channeler?

Grantees may use Fieldprint to obtain FBI checks if the grantee cannot successfully receive this service from state repositories. This would include grantees that are operating in states that do not offer FBI checks or cannot provide them in a timely manner, or will not adjudicate the results, or grantees that recruit individuals from many different states such that dealing with many different state agencies is infeasible. In other words, if you’re one of the many grantees that can obtain timely FBI checks through your state repository—keep using it! If not, use Fieldprint.

1.2. Will using Fieldprint require an Alternative Search Procedure or rejection letter from a state repository?

No. Grantees may establish an online account with Fieldprint to use its services without an approved Alternative Search Procedure or documentation of rejection from a state repository. The system will require confirmation that an organization is an active grantee or subgrantee of CNCS. CNCS will provide more information on this confirmation process prior to the beginning of services.

1.3. How will a grantee sign up for services with Fieldprint?

Fieldprint will soon offer a website to register a new account. Fieldprint will also offer customer service for its web portal via a toll-free number that is available from 8 a.m. to 10 p.m. ET, Monday through Friday. CNCS will provide more information on how to contact Fieldprint for support prior to the beginning of services.

1.4. Who pays for the FBI checks obtained through Fieldprint?

While this contract relies on CNCS's legal authority to allow Fieldprint to provide grantees with adjudicated FBI checks, grantees will work with and pay Fieldprint directly. Costs of FBI checks conducted through Fieldprint are allowable grant costs. As with any other component of the NSCHC process, grantees must pay for each check conducted on an individual seeking to work or serve within their program. Programs may ask a candidate to pay for checks conducted through Fieldprint as long as the program reimburses the applicant for the cost of conducting the check.

1.5. How can a grantee pay for the FBI checks?

Fieldprint will offer three payment options.

1. A grantee can register a credit card with their account, which will be automatically charged with each check.
2. Grantees can request that applicants pay for the checks initially, provided that they reimburse those individuals in a reasonable timeframe consistent with their own policies and procedures. (See Question 1.4, above.)
3. Grantees that process more than 100 checks in a year may also establish an invoicing system with Fieldprint.

1.6. How does an applicant get fingerprinted?

After a grantee establishes an account, Fieldprint will provide that grantee with a "Fieldprint code," which is used to link and track individual requests to grantees. Grantees will then provide this code to applicants and direct them to a web site where applicants can establish an account and schedule an appointment online with a local fingerprint service provider. Fieldprint maintains partnerships with more than 1,100 service providers nationwide, which capture fingerprints electronically.

Applicants will schedule an appointment online, visit the fingerprint service provider, and receive an automatic notification when their check is complete. The grantee will receive a notification both when the applicant schedules an appointment and when results are received. Both the grantee and the applicant can review adjudications as soon as they are received via their online accounts.

The process is slightly different for the small share of individuals that do not live within a reasonable distance of one of Fieldprint's local service providers. (See Question 1.7 below.)

1.7. What if applicants don't live near one of Fieldprint's local service providers?

In these uncommon situations, applicants would establish an account online with Fieldprint, and then receive information on other sites nearby that can capture fingerprints using paper cards. These are often law enforcement agencies. If the applicant selects a law enforcement agency, Fieldprint will mail a packet to the applicant with the information necessary for an individual to get their fingerprints taken at one of these locations, including the fingerprint card. The applicant would then mail this card to Fieldprint, using instructions provided in the information packet. Once Fieldprint receives the fingerprints, the rest of the process is identical to that experienced by other applicants, as described in Question 1.6 above. Due to the need for fingerprints to reach Fieldprint through the mail, these checks may take more time to complete.

1.8. How much will one FBI check cost?

When conducted through one of Fieldprint's local service providers (the process described in Question 1.6 above), each check will cost \$30.25, inclusive of all taxes and fees. When fingerprints are collected by a site that is not one of Fieldprint's local service providers (the uncommon situation discussed in Question 1.7, above), the fingerprinting agency may charge a small additional fee for its services. This would be the case only when an applicant does not live near one of Fieldprint's local service providers.

1.9. How do I know whether an applicant clears the FBI check?

Applicants and grantees will receive a "cleared" or "not cleared" notification from Fieldprint. A "cleared" notification confirms that the FBI's records do not contain any information to indicate that the individual is ineligible based only on

the criteria in [45 CFR 2540.202](#) (i.e., according to FBI records, the individual has neither been convicted of murder nor should be registered as a sex offender). A “not cleared” indicates that criminal history record information was found that indicates that the individual may be ineligible. CNCS will provide more information about what specific situations will lead to a “not cleared” determination prior to the beginning of services by Fieldprint.

NOTE:

An FBI check alone is not enough to confirm a person’s eligibility. Grantees must conduct the other required components of the NSCHC on time to confirm eligibility and to avoid cost disallowance.

1.10. What should I do if I want to know more about my applicant than just a “cleared” or “not cleared” determination?

Grantees may supplement the checks required by the NSCHC regulations to obtain whatever additional information the grantee may need to screen applicants. For example, grantees may supplement the required checks with a check conducted by a commercial background check provider. These checks may not be used in lieu of the NSCHC procedures without prior written approval from CNCS.

Organizations that articulate a sufficient business case for requiring more detailed criminal history record information from the FBI may still request approval to meet the FBI check requirement by using the FBI Departmental Order process, which can provide detailed conviction information. CNCS will approve use of the Departmental Order process on a case-by-case basis through the Alternative Search Procedures process. See Questions 3.1 and 3.2 below for more information.

1.11. How long will it take to receive a determination?

CNCS expects that the vast majority of checks conducted electronically will take no more than five business days from the date the fingerprints are captured. Checks that require additional research on the part of Fieldprint and checks that rely on paper cards may take slightly longer. (See Question 1.7 for more information on checks when an individual does not live within a reasonable distance of an electronic fingerprinting site.)

1.12. Will applicants have a way to appeal a determination?

Yes, applicants will have an opportunity to appeal results. CNCS will provide more information about how an applicant can appeal results prior to the beginning of services by Fieldprint.

2. Exemptions to the FBI Check

2.1. What will happen with the FBI [Channeler Exemption](#) that CNCS released on April 1, 2015?

In March 2015, the FBI limited grantees’ ability to obtain FBI Departmental Order (DO) checks using a Channeler, which disrupted the operations of a number of grantees. In response, on April 1, 2015, CNCS issued a temporary exemption ONLY for grantees that relied on an FBI Channeler to obtain FBI DO checks and could not continue to do so. This temporary exemption was set to expire on December 31, 2015.

CNCS has extended this exemption until March 31, 2016, to allow grantees a smooth transition to Fieldprint’s services. Grantees that rely on this exemption must be prepared to obtain FBI checks by this date, either using Fieldprint or by another means. CNCS **strongly** encourages grantees to transition to Fieldprint well in advance of March 31, 2016, to avoid any unexpected challenges or disruption to their programs.

When this exemption expires on March 31, 2016, grantees are responsible for conducting all required components of the NSCHC on individuals in covered positions who begin work or service after March 31, 2016. Failure to conduct all the required NSCHC components will result in cost disallowance.

2.2. Are grantees required to conduct FBI checks on individuals who did not receive an FBI check due to the April 1, 2015, Channeler exemption?

No, though grantees are encouraged to do so for participants or staff that are expected to continue working or serving for any duration. The costs of such checks are allowable grant costs.

2.3. My organization received an exemption from FBI checks from CNCS, based on the fact that we were unable to obtain these checks through the state repository. Is that exemption still valid?

All exemptions that CNCS has provided are valid until the expiration date noted on the exemption itself, but they are not likely to be renewed or extended. Review the decision letter that you received to verify this expiration date. Once your exemption expires, you will be required to obtain an FBI check, either through Fieldprint or another means. CNCS **strongly** encourages grantees to transition to Fieldprint well in advance of the expiration date of their exemption to avoid any unexpected challenges or disruption to their programs. Once your exemption expires, you will be responsible for conducting all required components of the NSCHC on individuals in covered positions who begin work or service after the expiration date. Failure to conduct all the required NSCHC components will result in cost disallowance.

2.4. Will CNCS renew these exemptions in the future, or issue new exemptions based on a denial from a state repository?

Probably not. CNCS anticipates nearly all of its grantees will now be able to obtain an FBI check, either through Fieldprint or their state repository. Any new request would have to demonstrate that an organization cannot obtain an FBI check from either source.

2.5. My organization has used an exemption from FBI checks in the past based on a denial from a state repository. We intend to use Fieldprint going forward. Are we required to conduct FBI checks on individuals who did not receive an FBI check at their start of work or service based on this exemption?

No, though grantees are encouraged to do so for participants or staff that are expected to continue working or serving for any duration. The costs of such checks are allowable grant costs.

2.6. Our organization has not budgeted for FBI checks, as we have utilized an exemption in the past. What are our options?

There may be options for your program if you did not originally budget the costs for conducting FBI checks because you had an exemption from CNCS in the past. If you would like to discuss these options, please contact your CNCS Grants Officer.

3. Alternative Search Procedures (ASPs) / FBI Departmental Orders

3.1. My organization has used the “blanket” ASP issued by CNCS to conduct FBI checks through the Departmental Orders process, based on a rejection letter from the state repository. May we continue to use this process?

Based on the barriers programs faced in obtaining timely FBI checks, CNCS had authorized programs to use the FBI Departmental Order (DO) process instead. In our FAQs, we permitted programs denied access to the FBI check through their state repository to obtain a DO from the FBI without obtaining written permission from CNCS in advance through our Alternative Search Procedure (ASP) process. (This is referred to as a “blanket” ASP.)

This blanket ASP will be revoked on March 31, 2016. If a grantee wishes to use the Departmental Orders process after that date, it must submit an Alternative Search Procedure request with a detailed explanation of why it needs to conduct the FBI check through the DO method, instead of through Fieldprint. (See question 1.10 for more information.)

**3.2. My organization received approval to use the Departmental Orders process for FBI checks via an ASP.
Can I continue to use this process?**

Separate from the blanket DO approval described in Question 3.1, above, certain grantees requested and received CNCS-approved ASPs to use the FBI DO process. Organizations that have received an ASP decision authorizing use of Departmental Orders (DO) may continue to use that process.

CNCS **strongly** encourages grantees to reassess whether they could obtain FBI checks using Fieldprint instead of relying on the DO process. Fieldprint will be able to process most FBI checks within five business days, whereas the DO process is presently taking 11-13 weeks. No CNCS approval is required for an organization with an ASP for DO checks to switch to using Fieldprint.