

April 1, 2015

TO: CNCS Grant Recipients Contracting Channelers for Departmental Order FBI Checks
RE: Use of FBI Channelers for Departmental Order FBI Checks; Temporary Exemption

CNCS was notified that FBI Channelers were directed by the FBI to cease processing Departmental Order (DO) FBI checks for CNCS grant recipients. The abrupt nature of this change has created a great burden and unanticipated cost for many grantees, particularly coming at the peak of enrollment. We are following up on the matter and will provide updates on our [website](#).

Application. This **temporary exemption** applies to all grant recipients and subrecipients (“recipients”) using FBI Channelers for Departmental Orders (DO), as described below. It does not apply to grantees or subgrantees whose method of obtaining FBI criminal history record information was not disrupted by this change in the availability of channeler service.

FBI Check Exemption. Effective March 25, 2015, any recipient using an FBI Channeler to obtain Departmental Orders (DO) FBI checks for individuals in covered positions and whose service has been made abruptly unavailable is **temporarily exempt** from the requirement to obtain the FBI check for individuals who begin work or service on or after that date.

State Check Exemption. If your organization was conducting state checks prior to March 25, 2015, you must continue to do so. In all other cases, recipients are **temporarily exempt** from the state check requirement based on the burden, unanticipated cost, and timing associated with implementing such checks on such short notice. If your program is able to conduct any state checks we strongly recommend you to do so.

Certification requirement. You are **required** to have each individual in a covered position who begins work or service on or after March 25, 2015, self-certify that they have not been convicted of murder and maintain the documentation in the files of any covered individuals. Model self-certification language is available on our [website](#) and use of the model language form is sufficient to meet this certification requirement.

National Sex Offender Public Website (NSOPW) Check. Recipients must still conduct the [NSOPW](#) check before an individual in a covered position begins work/service.

Accompaniment. If your organization was conducting accompaniment as part of its program design, you must continue to do so until state checks have cleared. In all other cases, recipients are exempt from accompaniment requirements based on the burden, unanticipated cost, and late notice.

Further safeguards. CNCS **strongly recommends** recipients to screen individuals in covered positions in a prudent manner consistent with an individual serving or working in a position of great trust. Likewise, grantees should immediately assess the feasibility of conducting state checks through [CNCS-designated state repositories or alternatives](#).

These exemptions expire on March 31, 2016, unless specifically revoked or extended in writing by CNCS. Please contact your CNCS Program Officer with any questions.