New AmeriCorps Program Staff Orientation
July 27, 2017
Welcome!
New AmeriCorps Program Staff Orientation

We’ll get started in just a couple of minutes.

Please open the Conversation feature in Skype. Click the icon in the lower left of the screen to open the feature.

Please mute your Skype’s microphone and turn your speakers up to hear the audio.
BRITNEY TONNING
PROGRAM OFFICER

✓ Works with national direct programs and state commissions

✓ Returned Peace Corps Volunteer, AmeriCorps State, and VISTA Alum

✓ Background in Environmental Education, Volunteer Management, and Program Development
Technology Check

• ON THE PHONE:
The phone lines are muted; the lines will be opened for Q&A at the end of the presentation.

• ON SKYPE:
We will use the Conversation box on the left side of your screen throughout the presentation. Also, feel free to provide input or ask a question at any time during the presentation. Please test the Conversation box now with a short greeting to your colleagues.

• REPLAY:
Today’s presentation will be posted on the National Service Knowledge Network: www.nationalservice.gov/resources
The New AmeriCorps Program Staff Series is designed to help new CNCS grantees launch successful AmeriCorps programs. The 2017 summer series will include:

- **Session 1 – July 13, 2017**
  Orientation to CNCS; Introduction to AmeriCorps Member Recruitment; Introduction to Criminal History Checks

- **Session 2 – July 27, 2017**
  Recruiting Members with Disabilities; Criminal History Checks, Financial Management Systems

- **Session 3 – August 10, 2017**
  AmeriCorps Member Orientation and Training; Financial Management

- **Session 4 – August 24, 2017**
  AmeriCorps Member and Site Monitoring and Reporting Requirements
Today’s Agenda

• Introductions
• AmeriCorps Member Recruitment
• Introduction to Financial Management
• National Service Criminal History Checks
• Q&A
• Closing Remarks
Introductions

• Please use the Conversation box to answer these questions:
  • What is your name?
  • What is the name of your agency, AmeriCorps program, or state commission?
  • Where are you right now?
  • What is your favorite thing about summer?
Example

- Britney
- CNCS
- Washington, DC
- Outdoor music concerts with the pup!
Your turn!

• Please use the Conversation box to answer these questions:
  
  • What is your name?
  • What is the name of your agency, AmeriCorps program, or state commission?
    • Where are you right now?
  • What is your favorite thing about summer?
Target Audience

• **Prime Grantees:** Today’s session is designed for new staff and national, multi-state, or tribal AmeriCorps programs.

• **CNCS Contacts:** You’ll hear references to your CNCS Program Officer (PO) or Grants Officer (GO) throughout the presentation.

• **Subgrantee Applicability:** For participants who are subgrantees of state commissions (i.e., state or local programs), the requirements and resources discussed will apply to your work as well.

  – And please note that you may have additional requirements and resources provided by your state commission. Be sure to talk with your commission contact about any questions or needs you have.
Introduction to Member Recruitment

• Variety of positions, start dates, service terms
• Minimum AmeriCorps eligibility requirements
• Program-specific eligibility requirements
• Standard recruitment steps:
  – Define member position description
  – Identify potential sources of member candidates
  – Create marketing materials
  – Train staff, partners to recruit
  – Promote available positions in all appropriate ways
  – Conduct screening process to select members
Introduction to Member Recruitment

• Variety of positions, start dates, service terms
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  – Define member position description
  – *Identify potential sources of member candidates*
  – Create marketing materials
  – Train staff, partners to recruit
  – *Promote available positions in all appropriate ways*
  – Conduct screening process to select members
Pools of AmeriCorps Candidates

- Depending on your program model and member position description, some or all of these may apply:
  - Schools (high schools, colleges, vocational schools)
  - Senior Centers
  - Businesses (retiring employees, family members)
  - Faith-based Organizations
  - Volunteer Centers (traditional volunteers often make outstanding AmeriCorps members)
  - Organizations that serve/work with people with disabilities
Resources to Help Recruit and Support Members with Disabilities

- The AmeriCorps State and National Disability Knowledge Network:
  - 5 E-courses – most relevant are the “Making Reasonable Accommodations” and Recruitment do’s and don’ts from the “Why people with disabilities benefit your program” webinar
  - 25 Disability Inclusion Tips (and related resources)
  - Forms for reimbursement for accommodation expenses
  - [www.nationalservice.gov/resources/disability-inclusion](http://www.nationalservice.gov/resources/disability-inclusion)
Resources to Help Recruit and support Members with Disabilities

• Key contacts:
  – Job Accommodation Network information (JAN): One-on-one, confidential, free consulting on all things disability & accommodation.
    • Check out JAN’s website, www.askjan.org, for one pagers on each disability type (“A-Z” catalog)
  – Corporation for National and Community Service Disability and Inclusion Advisor Stephanie Enyart: Support and consultation on reasonable accommodation process/disability issues.
    • Contact Stephanie at disability@cns.gov
TRACEY SEABOLT
GRANTS MANAGEMENT SPECIALIST

♦ Grants Officer for AmeriCorps State and National
♦ Joined CNCS staff in 2006
  ♦ Learn and Serve America
  ♦ DC Program Office
  ♦ Office of Grants Management
♦ Program and grants management experience in nonprofit and public sectors
Notice of Grant Award

**Grantee**

**Award Information**
- Agreement No.: [Redacted]
- Amendment No.: 0
- CFDA No.: 94.006

**Award Description**
This award funds the approved 2015-16 Amendment date of the member enrollment period. You monitor your regulatory and budgetary match.

**Purpose**
The purpose of this award is to assist the grantee in carrying out the requirements of the Community Service Act of 1990, as amended.

**Funding Information**

<table>
<thead>
<tr>
<th>Year 1</th>
<th>Previously Awarded This Year</th>
<th>This Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Obligated by CNCS</td>
<td>$0</td>
<td>$272,000</td>
</tr>
<tr>
<td>Grantee's Unobligated Balance (Carryover)</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Total Available</td>
<td>$0</td>
<td>$272,000</td>
</tr>
<tr>
<td>Cumulative Funding for Project Period</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Awarded in Previous Amendments</td>
<td>$0</td>
<td>$272,000</td>
</tr>
<tr>
<td>Total CNCS Funds Awarded to Date</td>
<td>$272,000</td>
<td></td>
</tr>
</tbody>
</table>

**Funding Source and Amount**
- 2015-OPE1-E11-OPO-23000-4101
- $272,000.00

**Special Conditions**
The grantee must submit the following items by 08/01/2015 to the CNCS Program Officer for review before members will be allowed to start: sample position descriptions, member service agreement, member timesheet, criminal history check procedures, and host site memo of agreement.

**Terms of Acceptance:** By accepting funds under this grant, recipient agrees to comply with General Terms and Conditions found at https://egrants.cns.gov/termsandconditions/GeneralTermsAndConditions20150403.pdf, and the Program Terms and Conditions found at https://egrants.cns.gov/termsandconditions/Revised2015FinalAmeriCorpsTandC20160509.pdf. Recipient also agrees to comply with assurances and certifications made in the grant application, and applicable federal statutes, regulations and guidelines. Recipient agrees to administer the grant in accordance with the approved grant application, budgets, supporting documents, and all other representations made in support of the approved grant application.
Terms and Conditions

- CNCS Issued
- Guiding Principles
- Program and Financial
- Grantee and Subgrantee
Efficient financial management systems identify:

- Grant vs. non-grant related expenditures
- CNCS vs. grantee share
- Costs by program year
- Budget categories
- Direct and indirect costs

All grant-related costs must be supported by clear documentation.
National Service Criminal History Checks

On time.

Every time.
Financial Management Resources

♦ Regulations, Terms and Conditions, FAQs

www.nationalservice.gov/build-your-capacity/grants/managing-americorps-grants

♦ Trainings

www.nationalservice.gov/resources/financial-management
CINDY GALYEN
PORTFOLIO RISK AND COMPLIANCE SPECIALIST

✓ Works with all grantees and most CNCS departments to provide training and technical assistance on National Service Criminal History Checks

✓ On CNCS staff since August 2015 (previously with AmeriCorps State and National)

✓ VISTA/VISTA Leader Alumna, WA & ND
Why?

- Safety
- Taxpayer Dollars
- The Law
- Consequences
## Safeguarding & Prevention – Beyond NSCHC Screening

### Screening
- NSCHCs are necessary but are only one component of a protection system
- Supplement with additional screening (reference checks, abuse registry searches, etc.)

### Guidelines on Interactions Between Individuals
- Define Abuse
- Avoid isolated, one-on-one contact
- Code of Conduct
  - Policies regarding interactions at the program site
  - Policies for ensuring safe environments - contact outside of the program – rides after hours, texting, and social media contact
  - Policies on monitoring behaviors

### Training
- Culture of Zero Tolerance
- Train on Prevention as topic generally, and your organization’s safeguards specifically
- Train staff and volunteers
- Train vulnerable individuals in abuse prevention strategies

### Plan for Reported Abuse
- *See something, say something*
- Mandatory Reporters
- Relevant contact details for social and human services, police, and telephone hotlines should be available
- Responding to all allegations and complaints of abuse
Preventing Child Abuse:

**National Sex Offender Public Website**
https://www.nsopw.gov/en/Education

**Centers for Disease Control and Prevention**
https://www.cdc.gov/ViolencePrevention/

*Rape Prevention and Education Program* encourages the development of comprehensive prevention strategies through a continuum of activities that address all levels of the social ecological model.

*Sexual Violence section* provides general and scientific information, risk factors, protective strategies, consequences, applicable reports/studies, and featured resources.

**Darkness to Light (D2L)** is a nonprofit organization with the mission of reducing the incidence of child sexual abuse through public awareness and education. The D2L programs raise awareness of the prevalence and consequences of child sexual abuse by educating adults about the steps they can take to prevent, recognize, and react responsibly to the reality of child sexual abuse.

Preventing Elder Abuse:

- **National Center on Elder Abuse:** [https://ncea.acl.gov/](https://ncea.acl.gov/)
- **Centers for Disease Control and Prevention**

CNCS does not endorse, approve, certify or control external websites.
Types of Checks

- National Sex Offender Public Website (NSOPW)
- State Checks
- FBI Checks
An individual in a covered position may be paid wholly from federal share, wholly from matching dollars, or from a mixture of federal and non-federal funds.

The source of the funds has no impact on the status of the position as covered or not covered.

Episodic access is access that is not a regular, scheduled, and anticipated component of an individual’s position.

Components: NSOPW + [State(s) or FBI]
The intent of the rule was to protect the vulnerable populations that were beneficiaries of service.

Access to individuals in covered positions does not establish a need to conduct a “Recurring Access to Vulnerable Populations” check.
All individuals in a **covered position** are subject to NSCHC requirements.

- **Fixed Amount:** Any individual performing activities described in the application.

- **Includes national service participants and grant-funded staff.**

**FAQ 3.7:** The NSCHC only applies to people who receive a national service education award, stipend, living allowance, or salary from CNCS. Community volunteers do not receive this kind of compensation.

- **Contractors and Indirect Costs:** **Not covered.**

**FAQ 3.12:** NSCHC requirements do not apply to individuals providing services under a contract, as defined under 2C.F.R. § 200.22. If your organization enters into a contract with an entity to provide services, the NSCHC requirements do not apply to the contractor because payments made by your organization to the contractor are not grant-funded living allowances, stipends, or salaries.
When? Timing of Checks

NSOPW
These checks must be **completed before** the start of work/service/hours.

STATE REPOSITORY CHECK(S)
These checks must be **initiated no later than** the start of work/service/hours.

FBI CHECK
**Must be initiated no later than** the start of work/service/hours.

RESULTS
Maintain results. Document that you considered them before selecting the candidate. Cease accompaniment.

ACCOMPANIMENT
Provide and document each and every day that you give access while checks are pending.
Accompaniment

What is accompaniment?
• A person is accompanied when he or she is in the physical presence of a person cleared for access to a vulnerable population.

Who can perform accompaniment?
• Covered position on CNCS Grant: Already cleared NSCHC needed for recurring access
• Not a covered position on CNCS Grant: Clearance for access established by placement site’s rules

Who is required to be accompanied?
• Individuals in covered positions with recurring access to vulnerable populations

When does it need to occur?
• Start: Access to vulnerable populations
• Stop: State (both state of residence and service) or FBI checks are returned and cleared

How do you document it?
• Best Practice: Time sheet
Break in employment/service: A person is no longer providing service through or receiving salary from a program. Temporary interruption without termination of employment or service is not a break in service.

The break in service period is **120 days**.

There is no break in service if the person comes back for a consecutive term within 120 days.
# How? – Compliance Checklist

<table>
<thead>
<tr>
<th>Federal Compliance Requirements</th>
<th>✔</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complete NSOPW check before work begins</td>
<td>✔</td>
</tr>
<tr>
<td>Determine how and from where (sources) the checks must be obtained</td>
<td>✔</td>
</tr>
<tr>
<td>Verify identity with government photo identification</td>
<td>✔</td>
</tr>
<tr>
<td>Pay for the checks</td>
<td>✔</td>
</tr>
<tr>
<td>Perform accompaniment while checks are pending</td>
<td>✔</td>
</tr>
<tr>
<td>Maintain the results of the checks</td>
<td>✔</td>
</tr>
<tr>
<td>Provide opportunity for review of findings</td>
<td>✔</td>
</tr>
<tr>
<td>Keep information confidential</td>
<td>✔</td>
</tr>
<tr>
<td>Maintain Documentation (see below)</td>
<td>✔</td>
</tr>
</tbody>
</table>

**Documentation: What You Must Create and Retain**

- Document that you verified the individual’s identity with a government-issued photo ID
- Document and obtain written authorization prior to initiating checks
- Document that the individual understands selection is subject to Check results
- Document accompaniment while checks are pending and the individual has access to vulnerable populations
- Document that you conducted the checks
- Document that you considered the results of the checks
- Maintain the results of the Check components: NSOPW, State(s), FBI
How? – Vendors

It is the **grantee’s** duty to ensure that their vendor complies with NSCHC requirements.

- Which CHC **component** will you use the vendor for?
- Will the vendor use the **correct source**?
- Does the vendor **limit data** to 7 years?
- Does the vendor maintain the **results**?

Vendor products may address all or some of the components of the National Service Criminal History Check. If the vendor’s product deviates from the National Service Criminal History Check procedures, the check result will not be compliant. Many vendors also offer more comprehensive searches than CNCS requires. You may use these for additional screenings at your own discretion.

http://www.nationalservice.gov/resources/criminal-history-check:
Look for “Vendor Guidance”
How? – Alternatives and Exemptions

- Possible to submit Alternative Search Procedures (ASPs) and requests for exemptions
- Pre-Approved ASPs
- Visit CNCS website for more information

Pre-Approved ASPs as of February 2016 address the following situations:

<table>
<thead>
<tr>
<th>Situations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organizations that receive clearance letters from partners, in lieu of actual results</td>
</tr>
<tr>
<td>Unreadable fingerprints</td>
</tr>
<tr>
<td>Prohibited by State law from sharing or maintaining results</td>
</tr>
<tr>
<td>Using a vendor for NSOPW results</td>
</tr>
</tbody>
</table>

http://www.nationalservice.gov/resources/criminal-history-check:  
Look for “ASP and Exemption Guidance”
### Common Compliance Findings

<table>
<thead>
<tr>
<th>Time</th>
<th>Documentation</th>
<th>Understanding</th>
</tr>
</thead>
</table>
| • Failure to perform the search of individuals on the national sex offender public website BEFORE service begins  
• Failure to initiate State/FBI checks on time | • Failure to document their own review of check results and grantee suitability considerations, as necessary  
• Failure to document the initiation of State/FBI checks  
• Failure to retain results of State/FBI checks | • Failure to assess and hire vendors who can perform fully compliant checks  
• Lack of awareness that checks are required for their own staff  
• Lack of compliance with accompaniment requirements (staff who work with vulnerable populations and whose checks are pending must be accompanied by a clear individual until the check is complete)  
• Inability to update grantee specific NSCHC policies to coincide with the revised CNCS regulations |
# Ineligibility vs. Noncompliance

<table>
<thead>
<tr>
<th>Ineligible to serve/work on CNCS grant</th>
<th>Eligible to serve/work</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Refuses to undergo check</td>
<td>• Convicted of crimes others than murder and sex offenses that require registration</td>
</tr>
<tr>
<td>• Makes false statement in connection with a criminal history check</td>
<td>• False statements not related to criminal history checks</td>
</tr>
<tr>
<td>• Convicted Murderer</td>
<td></td>
</tr>
<tr>
<td>• Registered or required to be registered on a sex offender list</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Eligible and Noncompliant NSCHC:</td>
</tr>
<tr>
<td></td>
<td>• Late criminal history check component</td>
</tr>
<tr>
<td></td>
<td>• Missing criminal history check component</td>
</tr>
<tr>
<td></td>
<td>• Criminal history check from no approved source</td>
</tr>
<tr>
<td></td>
<td>• Missing documentation</td>
</tr>
<tr>
<td></td>
<td>• Missing accompaniment documentation</td>
</tr>
<tr>
<td></td>
<td>• Criminal history check not adjudicated</td>
</tr>
</tbody>
</table>

Report confirmed ineligible individuals to CHC@cns.gov with a cc to your PO and GO.
National Service
Criminal History
Check Enforcement
Guide
National Service Criminal History Check Enforcement Guide

Grantees can find training (presentation PowerPoints and recordings), tools, and templates on the National Service Criminal History Check Enforcement Guide (effective April 1, 2017) [here](https://www.nationalservice.gov/NSCHCEnforcement).
• **Mitigation**: Action of reducing the severity of something
  • Mitigation = Grantee effort
• **Monitoring Official**: Program Officers and Grants Officers of the Corporation for National and Community Service (CNCS), other grantee staff members responsible for monitoring and enforcing compliance, and any other individuals who monitor and enforce compliance with the NSCHC requirements
• **Disallowance**: Financial penalty assessed for noncompliance with the NSCHC requirements
Three instances in which you will interact with the CNCS NSCHC Enforcement Guide:

1. Ineligible to Serve Individual
   • Disallow all costs
   • Report to CHC@cns.gov
   • Ineligibility Documentation

2. Self-Report NSCHC Noncompliance
   • Self-Report Disallowance Rate!
   • Self-Report Documentation
   • Use Mitigation Matrix
   • Disallowance Documentation

3. Oversight/Monitoring Activity
   • Use Mitigation Matrix
   • Disallowance Documentation
1. Confirm Ineligibility
2. Remove from service
   • Must retain service and NSCHC documentation
3. Disallow ALL costs
   • Includes stipend, salary, fringe benefits, or education award (including match funds)
4. Recipient must report to CHC@cns.gov
   • Report must be made by prime, sub-recipients
   • Copy CNCS Program Officer and Grant Officer
   • Subject: Ineligible Individual Notification
   • Specific Documentation Requirements (Section 6)
**Guide Section 5: Self Reporting**

**Recipient** reports own noncompliance before it receives written notice of a future oversight or monitoring activity

- Self-reporting is intended to incentivize identification of the noncompliance by the recipient
- A prime recipient reporting to CNCS that it discovered noncompliance at its subrecipients is not considered self-reporting.

Immediately document that the recipient has self-reported noncompliance:

- Date of notification
- Date the recipient discovered their noncompliance
- Nature of the noncompliance
- Scope of the noncompliance, to the extent it’s known
- How the recipient identified the noncompliance
- What corrective actions the recipient took, if any
Guide Section 6: Disallowance Documentation


2. For each individual file with NSCHC noncompliance, monitoring officials must:
   a) contemporaneously document a written assessment of the deficiency,
   b) assign and document the appropriate mitigation ratings, and
   c) assess an associated disallowance amount.

A documented written assessment of the deficiency must include:
- date of notification of monitoring, date of monitoring or date of self-review, whichever is earlier,
- the name of the individual,
- start date of work/service on the grant,
- level of access to vulnerable populations,
- when checks (NSOPW, State of residence, State of service, FBI) were initiated,
- what other checks/conditions were present and relied on in determining the assigned mitigation rating (e.g., vendor checks),
- when results were adjudicated,
- whether accompaniment was performed,
- when accompaniment ceased, and
- which checks were missing, incomplete, or late.

3. Payment Request process: CNCS will issue Debt Notification letter.
Disallowance is based on:
- Self reported vs. discovered during official monitoring visit
- Individuals
- Mitigation rating
  - High
  - Moderate
  - Low
- Access to vulnerable populations

Mitigation: Action of reducing the severity of something
Guide Section 4: Calculating Disallowance

No Access to Vulnerable Populations

TIME is the difference here between High and Moderate

- Adjudicated and On-time Sex offender check
- Initiated:
  - State check
  OR
  - FBI check
  OR
  - Vendor check
- Adjudicated Sex offender check
- Initiated late:
  - State check
  OR
  - FBI check
  OR
  - Vendor check

### NSCHC MITIGATION MATRIX

<table>
<thead>
<tr>
<th>Disallowance for each individual for whom…</th>
<th>Self-Reporting</th>
<th>Standard Disallowance</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Mitigation is present</td>
<td>$250</td>
<td>$500</td>
</tr>
<tr>
<td>Moderate Mitigation is present</td>
<td>$500</td>
<td>$1000</td>
</tr>
<tr>
<td>Low Mitigation is present</td>
<td>$750</td>
<td>$1500</td>
</tr>
</tbody>
</table>

### MITIGATION RATING

- **High Mitigation**
  - Program adjudicated a sex offender check before the individual began work or started service on the grant AND at least one of the following is present, even if late:
    - Initiated a vendor check that included a nationwide search of state criminal history information; OR
    - Initiated the State of Service or State of Residence check through CNCS designated sources; OR
    - Initiated a fingerprint-based FBI check.

- **Moderate Mitigation**
  - Program adjudicated a sex offender check AND at least one of the following is present, even if both are late:
    - Initiated a vendor check that included a nationwide search of state criminal history information; OR
    - Initiated the State of Service or State of Residence check through CNCS designated sources; OR
    - Initiated a fingerprint-based FBI check.

- **Low Mitigation**
  - Any other combination of factors that does not meet the requirements for Moderate Mitigation or High Mitigation.

This Matrix does not preclude CNCS from implementing other remedies for noncompliance or taking other measures as authorized by law. CNCS may update this Matrix at any time. The disallowance amount is a remedy for noncompliance per 2 C.F.R. §200.338.
## NSHC MITIGATION MATRIX

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<td></td>
</tr>
<tr>
<td></td>
<td>$750</td>
<td>$1500</td>
</tr>
</tbody>
</table>

### MITIGATION RATING
- **NO ACCESS OR EPISODIC ACCESS TO VULNERABLE POPULATIONS**
  - Program adjudicated a sex offender check before the individual began work or started service on the grant; AND at least one of the following is present, even if late:
  - Initiated a vendor check that included a nationwide search of state criminal history information; OR
  - Initiated the State of Service or State of Residence check through CNCS designated sources; OR
  - Initiated a fingerprint-based FBI check.

- **RECURRING ACCESS TO VULNERABLE POPULATIONS**
  - Program met the requirements of 1, 2, and 3:
    1. Performed accompaniment (if required); AND
    2. Adjudicated a sex offender check before the individual began work or started service on the grant; AND
    3. Initiated one of the following on time:
      - A vendor check that included a nationwide search of state criminal history information; OR
      - A State of Service or State of Residence check through CNCS designated sources; OR
      - A fingerprint-based FBI check.

### High Mitigation
- Program adjudicated a sex offender check AND at least one of the following is present, even if both are late:
- Initiated a vendor check that included a nationwide search of state criminal history information; OR
- Initiated the State of Service or State of Residence check through CNCS designated sources; OR
- Initiated a fingerprint-based FBI check.

### Moderate Mitigation
- Program adjudicated a sex offender check AND at least one of the following is present, even if both are late:
- Initiated a vendor check that included a nationwide search of state criminal history information; OR
- Initiated the State of Service or State of Residence check through CNCS designated sources; OR
- Initiated a fingerprint-based FBI check.

### Low Mitigation
- Any other combination of factors that does not meet the requirements for Moderate Mitigation or High Mitigation.

### Difference between High and Moderate
- Accompaniment performed
- Adjudicated and on time sex offender check
- Initiated on time:
  - State check OR
  - FBI check OR
  - Vendor Check

### 2 OPTIONS:
1. Accompaniment performed and one of the following initiated on time:
   - Vendor state check OR
   - State check OR
   - FBI check
2. On time sex offender check and completed even if late:
   - Vendor state check OR
   - State check OR
   - FBI check

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This Matrix does not preclude CNCS from implementing other remedies for noncompliance or taking other measures as authorized by law. CNCS may update the Matrix at any time. The disallowance amount is a remedy for noncompliance per 2 C.F.R. § 200.338.
# Example 1

<table>
<thead>
<tr>
<th>Self Reported</th>
<th>Self Reported Rate!</th>
<th>Low Mitigation Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access to vulnerable populations</td>
<td>3 checks needed + documented accompaniment</td>
<td>$750 Disallowance*</td>
</tr>
<tr>
<td>NSOPW late but cleared</td>
<td>NSOPW is noncompliant. Late “sex offender check”</td>
<td>*Standard Disallowance = $1,500</td>
</tr>
<tr>
<td>State Check Initiated on time and cleared 2 weeks after start of service/work</td>
<td>Compliant!</td>
<td>- No mitigated accompaniment</td>
</tr>
<tr>
<td>FBI Check initiated on time and adjudicated 2 weeks after start of service/work</td>
<td>Compliant! Late “sex offender check” (adjudicated after start of service/work)</td>
<td>- No sex offender check adjudicated before start of service/work</td>
</tr>
<tr>
<td>No documented accompaniment</td>
<td>Noncompliant Accompaniment is not Standard Process</td>
<td>Remember:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Corrective Action!</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- 2 or more cases -&gt; expand scope</td>
</tr>
</tbody>
</table>

\*Low Mitigation Rating = $750 Disallowance

Remember:
- Corrective Action!
- 2 or more cases -> expand scope
Example 2

**Self-Reported**

- No access to vulnerable populations

**NSOPW on time and cleared**

- FBI check initiated on first day of service/work, results 2 days later = grand theft auto arrest, possession conviction, murder conviction

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**Ineligible**

**Disallow all costs!**

- Report to CHC@cns.gov
- CC’ PO and GO
- Provide Ineligible Documentation

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**Recipients may establish additional screening procedures and criteria.**
Where can I find more information & training on the NSCHC Enforcement Guide?

The NSCHC Enforcement Guide is located here:
https://www.nationalservice.gov/CHCEnforcement

Previous Guide training for AmeriCorps State and National grantees:
https://www.nationalservice.gov/CHCTrainings
(scroll to the middle of the page and look under “NSCHC Enforcement Guide Training for CNCS Recipients”)

NSCHC Resources

1. CNCS Knowledge Network
   • Annually required E-course for CNCS staff and grantees
   • FAQs
   • State by State Guide and repository list
   • FBI and Fieldprint guidance
   • Enforcement Guide
   • Enforcement Guide Tools and Templates
   • Vendor Guidance
   • Checklists

2. CNCS Program Officer

https://www.nationalservice.gov/resources/criminal-history-check
Today’s Key Points

• Include individuals with disabilities in your member recruitment plan
• Get to know your Notice of Grant Award and Grant Terms and Conditions very, very well
• Complete the required NSCHC E-course
• Get to know the National Service Criminal History Check Enforcement Guide
• Use NSCHC resources to set up and complete all required member screening steps
Today’s Resources

• Recruiting individuals with disabilities:

• Financial management:

• National Service Criminal History Checks:
What questions do you have?
Wrap Up

• New AmeriCorps Program Staff Trainings:
  – www.nationalservice.gov/resources/americorps/2017-new-americorps-program-staff-series

• Next Session:
  – AmeriCorps Member Orientation and Training; More on Financial Management
  – August 10, 3:00 – 4:30 pm Eastern
Thank You!