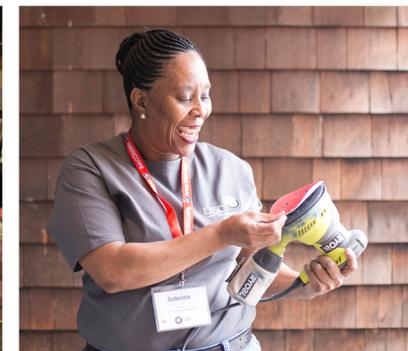




National Service
Criminal History
Check 101:
On Time, Every Time
Liz Jung



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Agenda

- Why conduct National Service Criminal History Checks (NSCHC)?
- What is NSCHC?
- Who needs NSCHC?
- When to conduct NSCHC
- How to conduct and complete NSCHC
- Documentation
- Resources



Outcomes

- Understand NSCHC requirements
- Understand how to conduct a National Sex Offender Public Website (NSOPW) check
- Understand how to conduct a state and FBI check



Why NSCHC?

- Protect Vulnerable Populations
- Vulnerable populations are children age 17 years or younger, individuals age 60 or older, or individuals with disabilities
- Individuals who are ineligible to serve or work on CNCS grants are those who:
 - Refuse to consent to NSCHC
 - Make false statements in connection with their NSCHC
 - Are registered or required to be registered on a sex offender registry
 - Have been convicted of murder (18 USC § 1111)



What is NSCHC?



National Sex Offender
Public Website (NSOPW)



State Checks



FBI Check

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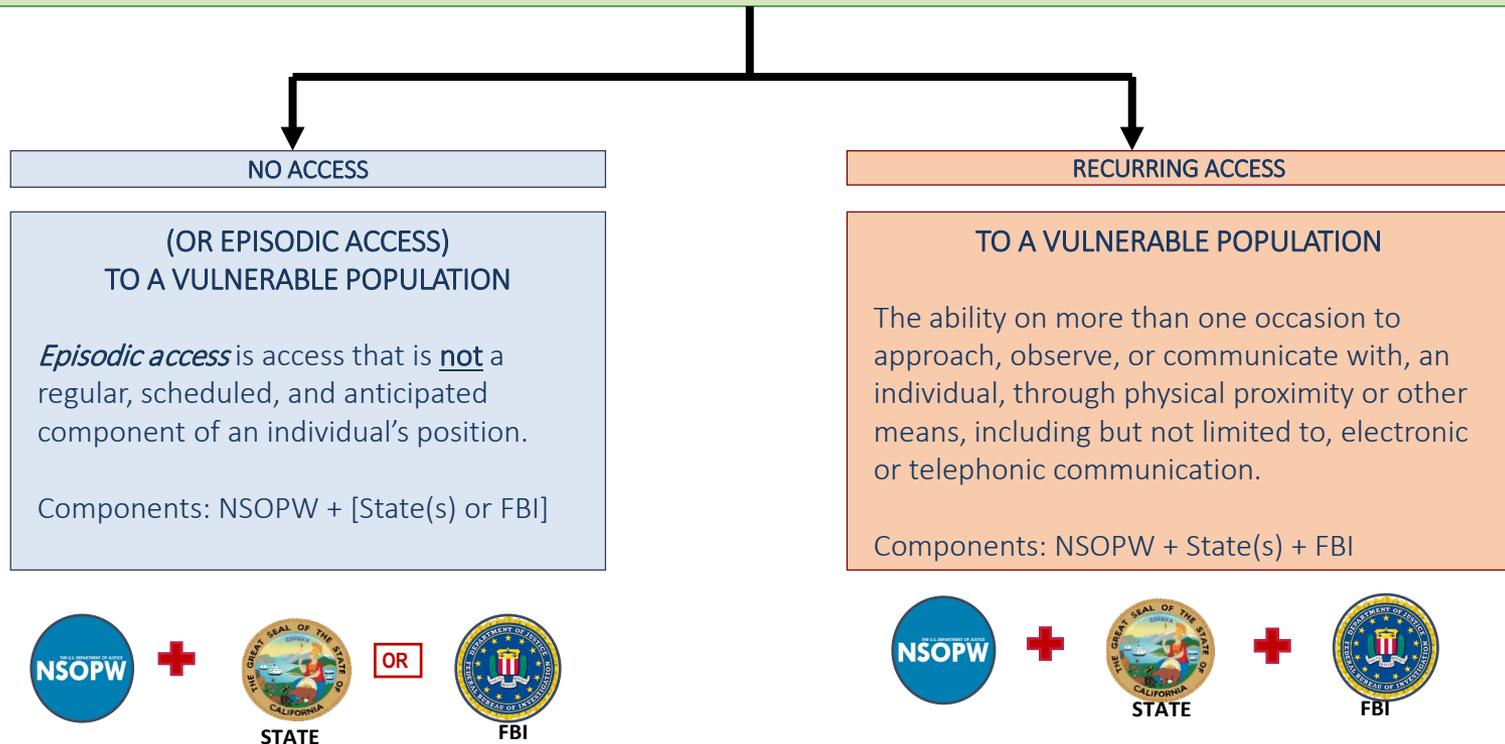


Who needs NSCHC?

INDIVIDUAL IN A COVERED POSITION

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.



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Individuals in Covered Positions

Service To vs. Service With

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

Yes: Full- Cost Fixed Amount Grants: Any individual performing program activities described in the application.

Yes: Includes national service participants and grant-funded staff.

No: Contractors and Indirect Costs: **Not covered.** (2C.F.R. § 200.22)

Activity: Who needs to be checked?

- Individuals in Covered positions (Paid by federal share, match or both):
 - Who? Members? Staff?
 - How many?
 - Who has access to vulnerable populations? Is it episodic? Is it recurring?

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When to do NSCHC

- NSOPW: **completed before** the start of work/service/hours*
- State**/FBI: **initiated** no later than the start of work/service/hours*
 - *includes CNCS funded orientation hours
 - ** Truescreen Pre-Approved ASP
- Initiation?
 - CNCS: One documented step beyond permission
 - You: define it in your policies and procedures

Activity:

How do you define initiation?

Which check when? By whom?

How's it documented?

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Accompaniment

What is accompaniment?

- A person is accompanied when in the physical presence of a person cleared for access to a vulnerable population.

Who can perform accompaniment?

- Covered position on NSCHC Grant: Already cleared NSCHC needed for recurring access
- Not a covered position on NSCHC 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
 - *Pre-Approved Alternative Search Procedure: Ceasing Accompaniment

How do you document it?

- Best Practice: Time sheet

Activity: What are your accompaniment polices/procedures?

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How to conduct NSCHC

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graph TD; A[How to conduct NSCHC] --- B[NSOPW.gov and State Repository]; A --- C[CNCS Vendors: Truescreen and Fieldprint]
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NSOPW.gov and
State Repository

CNCS Vendors:
Truescreen and
Fieldprint



How: NSOPW Check

Click to [NSOPW.gov](https://www.nsopw.gov)

1. Go to NSOPW.gov and enter first and last name as shown government issued photo ID
2. Ensure check is complete
(all states, territories and Indian Country are reporting)
 1. If check is not complete, you can go directly to the source or wait until all registries are reporting

1. Review results and adjudicate
2. Maintain results

Activity:

Who, how, when does NSOPW check take place?

How is it adjudicated?

How is it documented?

Truescreen

1. Order check and enter first and last name as shown government issued photo ID
2. Review adjudication recommendation and make final adjudication decision in the Truescreen system
3. Truescreen will maintain results for up to 7 years

Review the Truescreen
Pre-approved ASP

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How: State Check

State Repository

1. Identify which source for state checks.
 1. Must come from official CNCS-designated sources (and only designated sources)
2. Follow state process to order checks
3. Review results and document adjudication
4. Maintain results

Activity:

Who, how, when does State check take place?

How is it adjudicated?

How is it documented?

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Truescreen

1. Order check by entering the first and last name as shown on government issued photo ID
2. Review adjudication recommendation and make final adjudication decision in the Truescreen system
3. Truescreen will maintain results for up to 7 years

Review the Truescreen
Pre-approved ASP



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Use of Truescreen for NSOPW and/or State Checks

Pre-Approved Alternative Search Procedure

Grantees who use Truescreen must:

1. Set up a Truescreen account with CNCS agreement code
2. Complete Truescreen checks before the start of work/service (adjudicated by grant recipient)

Truescreen does not provide information for the following states and territories:
California, Delaware, Louisiana, Nevada, New Mexico, Virginia, Massachusetts, Mississippi, Guam, N. Mariana Islands, Puerto Rico

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:

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



National Fingerprint File (NFF)

Pre-Approved Alternative Search Procedure

The National Fingerprint File (NFF) is an electronic information sharing system maintained by the Federal Bureau of Investigation (FBI). The 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.

Therefore,

- 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.
- If a required state check is from a state that **does not participate in the NFF**, then this pre-approved ASP is not applicable and the grantee must obtain the appropriate NSCHC state check(s).

Following 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

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Truescreen

- Approved by CNCS to provide NSOPW and State checks
- NSOPW check: \$7.50
- State Check: \$19.50+
- Average Turnaround Time: 1-14 days
- Online process

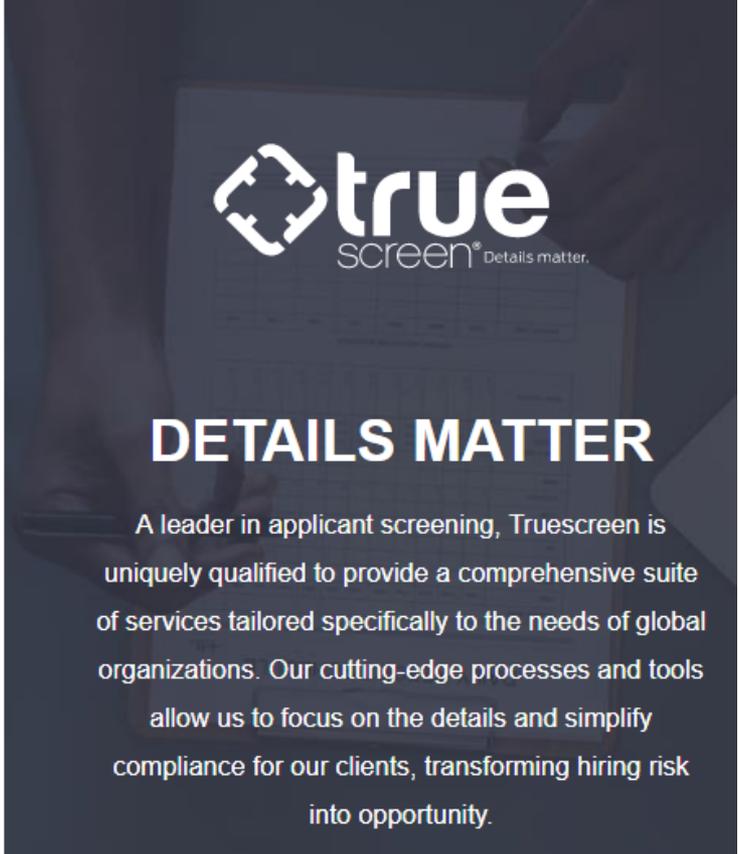
www.mytruescreen.com

Toll-free phone: (877) 614-4364

CNCSHelp@truescreen.com

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The image shows a promotional graphic for Truescreen. At the top left is the Truescreen logo, which consists of a stylized white 't' inside a square frame made of four interlocking shapes, followed by the word 'true' in a bold, lowercase sans-serif font and 'screen' in a smaller, lowercase sans-serif font below it. To the right of 'screen' is the tagline 'Details matter.' in a very small font. Below the logo, the text 'DETAILS MATTER' is written in large, bold, white, uppercase letters. Underneath this, a paragraph of white text reads: 'A leader in applicant screening, Truescreen is uniquely qualified to provide a comprehensive suite of services tailored specifically to the needs of global organizations. Our cutting-edge processes and tools allow us to focus on the details and simplify compliance for our clients, transforming hiring risk into opportunity.' The background of the graphic is dark blue with a faint image of a person's hands holding a tablet.

true
screen® Details matter.

DETAILS MATTER

A leader in applicant screening, Truescreen is uniquely qualified to provide a comprehensive suite of services tailored specifically to the needs of global organizations. Our cutting-edge processes and tools allow us to focus on the details and simplify compliance for our clients, transforming hiring risk into opportunity.



How: FBI Check

State Repository

1. Identify which source for state checks
 1. Must come from official CNCS-designated sources (and only designated sources)
2. Follow state process to order checks
 1. Identify fingerprint station
 2. Applicant completes information and makes appointment to get fingerprinted
 3. Applicant gets fingerprinted and results are sent to FBI
 4. Receive results
3. Review results and adjudicate
4. Document adjudication
5. Maintain results

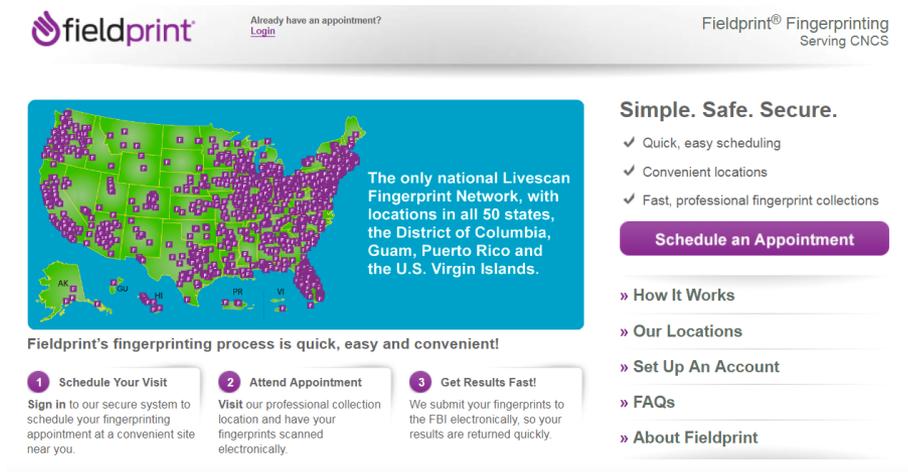
Fieldprint

1. Follow Fieldprint process to order checks
 1. Provide your Fieldprint code to applicant
 2. Applicant completes information and makes appointment to go to Livescan location
 3. Applicant gets fingerprinted and results are sent to FBI
 4. You are notified when results are ready for review
2. Document review of results
3. Fieldprint will maintain results for up to 3 years



Fieldprint

- FBI Channeler approved by CNCS to provide FBI checks with an adjudication recommendation
- \$28.75
- Turnaround time: 48 hours
- Locations in all 50 states, DC, Guam, Puerto Rico and Virgin Islands
- Electronic Live Scan
- Schedule appointments online



fieldprint Already have an appointment? [Login](#) Fieldprint® Fingerprinting Serving CNCS

The only national Livescan Fingerprint Network, with locations in all 50 states, the District of Columbia, Guam, Puerto Rico and the U.S. Virgin Islands.

Fieldprint's fingerprinting process is quick, easy and convenient!

- 1 Schedule Your Visit**
Sign in to our secure system to schedule your fingerprinting appointment at a convenient site near you.
- 2 Attend Appointment**
Visit our professional collection location and have your fingerprints scanned electronically.
- 3 Get Results Fast!**
We submit your fingerprints to the FBI electronically, so your results are returned quickly.

Simple. Safe. Secure.

- ✓ Quick, easy scheduling
- ✓ Convenient locations
- ✓ Fast, professional fingerprint collections

[Schedule an Appointment](#)

- » How It Works
- » Our Locations
- » Set Up An Account
- » FAQs
- » About Fieldprint

www.fieldprintCNCS.com
Toll-free phone: (877) 614-4364
CustomerService@fieldprint.com

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Fieldprint Fingerprint Cards Public Service Announcement

- Grant recipient who are more than 35 miles from a Fieldprint Livescan location can receive fingerprint cards.
- Fieldprint paper fingerprint cards are coded to specific individuals (the information is coded to a barcode during the set-up process).
 - Do not duplicate the fingerprint cards.
 - Do not tamper with the barcode on the fingerprint card.
 - Do not use any fingerprint card other than the fingerprint card provided by Fieldprint.
 - Do not fingerprint other individuals on the fingerprint card coded for the specific individual.
 - Only place the fingerprints of the individual for whom the card was provided on the individual's card.

Duplicating, tampering, providing non-Fieldprint fingerprint cards, or submitting fingerprints for the wrong individual will result in Fieldprint shredding the card, and a FBI check will not be conducted.

In these cases, the applicant would need to begin the process again in order to obtain a Fieldprint FBI check.

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Documentation Requirements

NSOPW.gov + State Repository

1. NSCHC Policies and Procedures
2. Definition of Initiation for state and FBI checks
3. Document that you initiated the checks
4. Document that you adjudicated the results of the checks
5. Document that the individual understands selection is subject to Check results
6. Document that you verified the individual's identity with a government-issued photo ID
7. Document and obtain written authorization prior to initiating checks
8. Document accompaniment while checks are pending and the individual has access to vulnerable populations
9. Maintain the results of the Check components: NSOPW, State(s), FBI
10. Approved ASP documentation (several ASPs expiring 12/31/19)

Truescreen and Fieldprint

1. NSCHC Policies and Procedures
2. Definition of Initiation for FBI Checks
3. Document Fieldprint FBI checks are initiated
4. Document that you adjudicated the Fieldprint FBI results
5. Maintain the results of the Fieldprint FBI results (after 3 years) and Truescreen results (after 7 years)

Activity:

When does documentation for each step occur?

Where is it stored?



Why NSCHC?

- What?
 - Up to 3 different checks 45 CFR§2540.200-207
 - From CNCS approved sources 45 CFR§2540.200-207
- When?
 - Timing is critical! 45 CFR§2540.200-207
- Document!
 - Start of service/work 45 CFR§2540.200-207
 - Initiation and Adjudication 45 CFR§2540.200-207
 - Maintain documentation 45 CFR§2540.200-207

The National and Community
Service Act of 1990 as
amended by the Serve
America Act



Requirements

- Serve America Act: 42 USC 12645g Sec 189D. Criminal History Check: <https://www.congress.gov/111/plaws/publ13/PLAW-111publ13.pdf>
- Regulations: 45 CFR §2540.200-207: <https://www.ecfr.gov/cgi-bin/text-idix?SID=f18603dfc0ed8573d5a6254c0e71eae7&mc=true&node=pt45.4.2540&rgn=div5Terms and Conditions>
- Terms and Conditions: <https://www.nationalservice.gov/resources/financial-management/terms-conditions-and-certifications-assurances-cnccs-grants>
- CNCS NSCHC Resources: <http://www.nationalservice.gov/resources/criminal-history-check>



Resources

- CNCS Knowledge Network
 - NSCHC Manual
 - NSCHC Using NSOPW and State Repositories
 - NSCHC Using Fieldprint and Truescreen
 - Annual Online Training and other Training
 - Exemption Period
 - Alternative Search Procedures
 - Email: CHC@cns.gov
- CNCS Vendors:
 - Truescreen
 - Phone: 800-803-9042, dial 0
 - Email: CNCSHelp@Truescreen.com
 - Fieldprint
 - Phone: 877-614-4364
 - Email: customerservice@fieldprint.com

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

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