

National Service Criminal History Check (NSCHC) Policy & Procedure Checklist

Serve WA requires all programs have a detailed policy and procedure on file outlining how to ensure NSCHCs are completed and adjudicated on time, every time. Failure to complete NSCHCs on time, every time may result in cost disallowances. For more information on NSCHCs: <https://www.nationalservice.gov/resources/criminal-history-check>

<input type="checkbox"/>	<p>Identifies which staff positions will complete the annual CNCS NSCHC eCourse.</p> <p><i>Staff positions identified as having a role or responsibility in conducting, documenting, and adjudicating NSCHCs should complete this training; while CNCS only requires one staff maintain annual certification, Serve WA believes it is critical that more than one person understand NSCHC compliance for the safety of communities and the continuity of program operations.</i></p>
<input type="checkbox"/>	<p>Defines which staff positions are covered positions, and notes <u>all</u> AmeriCorps members are in covered positions.</p>
<input type="checkbox"/>	<p>Specifies which check components are required. At minimum NSCHC requires:</p> <ol style="list-style-type: none"> 1) NSOPW 2) State of Service and State of Residence 3) FBI
<input type="checkbox"/>	<p>Defines which results would prevent an individual from employment or service.</p> <p><i>At minimum CNCS defines anyone listed or required to be listed on a sex offender registry ineligible to work/serve; anyone convicted of murder ineligible to work/serve, anyone refusing to undergo NSCHCs ineligible to work/serve, and anyone who makes false statements regarding their criminal history ineligible to work/serve.</i></p>
<input type="checkbox"/>	<p>Verifies the identity of the covered individual through government-issued photo ID. Program ensures the name on the government-issued photo ID matches exactly (name, spelling, hyphens, and characters) as the identity used for NSCHCs.</p> <p>If using vendors, such as Truescreen and Fieldprint, the following apply: <i>Truescreen</i> – Although the applicant will be required to upload a valid government-issued photo ID, this step is not yet complete. It is the responsibility of the program to enter the name and spelling exactly as it appears on the ID when initiating the check <u>and</u> to complete the electronic step that the ID has been verified. <i>Fieldprint</i> - The applicant will be required to present a valid government-issued photo ID at the time of fingerprinting. This step meets the requirement.</p>
<input type="checkbox"/>	<p>Obtains written consent from the covered individual to run NSCHCs.</p> <p>If using vendors, such as Truescreen and Fieldprint, the following apply: <i>For both Truescreen and Fieldprint consent is captured as part of the vendor process.</i></p>
<input type="checkbox"/>	<p>Documents candidate's understanding that their position is contingent on eligibility determination by the results of NSCHCs.</p> <p>If using vendors, such as Truescreen and Fieldprint, the following apply: <i>For both Truescreen and Fieldprint understanding is captured as part of the vendor process.</i></p>
<input type="checkbox"/>	<p>Allows the covered individual to review their own results if requested, especially in the case of ineligible results. Covered individuals are allowed to challenge the accuracy of the results if warranted.</p>

<input type="checkbox"/>	<p>Includes a process for how the program will determine which state is to be used for the State of Residence check (i.e. physical address on application).</p> <p><i>The State of Service check is pre-defined as a WA check using the WSP or via Truescreen. If the covered individual physically resides in WA at the time of application, the State of Service and State of Residence are the same.</i></p>
<input type="checkbox"/>	<p>When using vendors, such as Truescreen and Fieldprint, documents the step by step process for each vendor system (i.e. how to create or access accounts, log-in information, passwords, procedural steps to use the vendor system, etc.).</p>
<input type="checkbox"/>	<p>Includes steps for adjudication. Adjudication is one more step than simply running and looking at the check results (i.e. signing and dating adjudication has occurred).</p> <p>If using vendors, such as Truescreen and Fieldprint, the following apply: <i>Truescreen</i> – Manually complete this step electronically in the Truescreen system. Truescreen will capture time stamps of the process. Adjudication in Truescreen must occur BEFORE work/service. <i>Fieldprint</i> – Manually complete this step outside of the Fieldprint system. Define how the program will document this consistently (i.e. signing and dating a printout of results). Adjudication outside of Fieldprint must occur BEFORE work/service.</p> <p><i>Serve WA highly encourages all programs to complete and adjudicate ALL checks WELL BEFORE work/service, as part of the recruitment and selection process.</i></p>
<input type="checkbox"/>	<p>Determine records retention procedure and maintain confidentiality of Personally Identifiable Information or PII.</p> <p><i>If you are unaware of Serve WA records retention requirements, consult the program handbook or contact your program officer.</i></p>
<input type="checkbox"/>	<p>Determine if the Serve WA NSCHC Documentation Checklist will be used.</p> <p><i>The Serve WA NSCHC documentation checklist, found online under subgrantee resources, helps maintain basic compliance steps whether or not the program is using Truescreen/Fieldprint. It is a great tool for checks and balances and is often used as a secondary/final checklist before allowing covered individuals to work/serve. This secondary piece of documentation can support compliance efforts when primary documentation fails.</i></p>

Reminders

Reminders are intended to complement annual NSCHC training requirements, the CNCS NSCHC Manual, Truescreen/Fieldprint training materials, and the Serve WA program handbook. This is not a full list of instructions or requirements for compliant NSCHC. Please consult your Program Officer with any questions.

Verification of Identity

- It is important that programs are reviewing government-issued photo ID prior to initiating checks to verify exact name and correct spelling, including any hyphens or characters, are used.

Truescreen

- All Truescreen checks must be completed **before** the first day of work/service. Do not rely on a timestamp. Before means (at minimum) the day before.
- Be sure to always pick NSOPW+Washington from the drop-down menu when ordering checks.
- If out of state is required for state of residence, type that state into the request box.
- Always review the CNCS Truescreen ASP and CNCS state by state chart to determine if a state check is unavailable/waived by CNCS.
<https://www.nationalservice.gov/documents/2018/nschc-using-fieldprint-and-truescreen-manual>
- Completed checks include two parts in Truescreen:
 - ID verification in the system – review and take action
 - Adjudication in the system – review and take action
- Use the CNCS Monitoring Tool function to quickly assess if the ID was reviewed and adjudication completed, these dates must be **before** the first day of work/service.
- Retention: Truescreen retains records for 7 years. WA State retention requirements exceed federal requirements and range from 6-9 years. Programs are responsible for keeping grant records with the associated grant year until Serve WA notifies you of destruction timeline. Therefore, it is suggested programs download and retain Truescreen documentation.

Fieldprint

- FBI check must be completed **before** the first day of work/service. Do not rely on a timestamp. Before means (at minimum) the day before.
- Completed checks include two parts for Fieldprint:
 - Clear or Not Clear status in the system
 - Adjudication outside the system – document review (this is most easily completed by signing and dating a download of the results, or having a formal system in place to document results were received and reviewed)
- If an individual receives a “not clear” status, the program must take [additional steps](#) to verify eligibility and finalize adjudication. Consult with your Program Officer if you are unsure of those additional steps and documentation needed.
- Retention: Fieldprint has varied retention that has proven inconsistent. WA State retention requirements exceed federal requirements and range from 6-9 years. Programs are responsible for keeping grant records with the associated grant year until Serve WA notifies you of destruction timeline. Therefore, it is suggested programs download and retain Fieldprint documentation.

NSCHC Documentation Checklist

In addition, Serve WA provides a documentation checklist organizations/programs can use as an additional layer of protection, compliance and check/balance.