National Service Criminal History Checks (NSCHC)
Agenda

• Why do they Matter?
• Who needs them?
• Your Responsibility
• Ineligibility
• Checks
• Accompaniment
• Resources
• Group Activity
Why Do NSCHC Matter?
Why does NCHC Matter?

- Responsibility to protect our vulnerable population.
- It required by law
- Cost disallowance and other consequences for noncompliance will occur.
Who need NCHC?

• Covered Positions-Anyone receiving:
  – Salary
  – Stipend
  – Education Award
• Costs may be from match, CNCS, or both
• Fixed Amount: Any individual performing activities described in the application.
Your Responsibility

- Do the right Checks
- Do Them on TIME! Every Time!
- Document your Actions!
Your Responsibility: Consent and Identity

1. **DO**
   - Step 1: Do Verify Identity
   - Step 2: Do Obtain Consent
   - Step 3: Do Clarify Understanding of Contingency of position

2. **Date**
   - Step 1: COMPLETE NSOPW BEFORE start of hours.
   - Step 2: INITIATE State and/or FBI checks NO LATER THAN THE FIRST DAY.

3. **Document**
   - Step 1: DOCUMENT copy of government issued ID or key information
   - Step 2: DOCUMENT written consent.
   - Step 3: DOCUMENT understanding of contingency of position.
Ineligibility: Who Can’t Serve or Work

- Anyone who refuses to undergo the check is ineligible.
- Anyone who makes a false statement in connection with a program’s inquiry concerning their individual’s criminal history is ineligible.
- Anyone listed, or required to be listed, on a sex offender registry is ineligible.
- Anyone convicted of murder as defined and described in 18 U.S.C. § 1111 is ineligible.
What Checks are Required?

1. National Sex Offender Public Website
2. State Checks
3. FBI Checks
National Sex Offender Public Website (NSOPW)

- Nationwide search from the U.S. D.O.J.
- Name-based check of public information.
- Must clear all “hits” on a name.
- Must obtain all states.
State Checks

- Checks from official CNCS-designated sources (and only designated sources).
- BOTH State of Service and State of Residence required.
- List of designated sources at: http://www.nationalservice.gov/resources/criminal-history-check
FBI Checks

• Fingerprint-based, nationwide check.

• **MUST** go through State repository.

• If you have an ASP, there are alternative methods available. (“Departmental Orders”)
Vendors

• Vendors may address all or some of the components of the National Service Criminal History Check.

• It is the **SUB-GRANTEE’S** responsibility to ensure Vendors meet CNCS requirements

*Tip: See “Vendor Guidance” document from CNCS for more information.*
ACCOMPANIMENT
ACCOMPANIMENT

- Accompaniment **MUST** be performed when individuals are in contact with **vulnerable populations** while State and FBI checks are pending.

- An individual is accompanied when he or she is in the **physical presence** of a person cleared for access to a vulnerable population.

- Accompaniment can cease when either a State or FBI check is cleared.
Types of Coverage

• **No Access or Episodic Access:** Access that is not a regular, scheduled, and anticipated component of an individual’s position.

• **Recurring Access:** The ability on more than one occasion to approach, observe, or communicate with an individual, through physical proximity or other means, including but not limited to, electronic or telephonic communication.
Lessons Learned

- 2015-16 Grant year Review
  - There was 6 citings related to NSCHC that resulted in Disallowance cost to programs

- 2016-17 Grant year Review
  - There was 3 citings related to NSCHC that resulted in Disallowance cost to programs.
    - Late NSOPW Check
    - Limiting the NSOPW Check to State of Missouri instead of Performing a Nationwide Search.
    - No Documentation that NSCHC was initiated before members began service.
Resources

• Best resources to guide you successfully through NCHC:
  – Website- CNCS( knowledge network)
  – Handbook
  – Program Officer

Tip if a mistake does occur self disclose to your Program Officer. Leniency is allowed for Disallowed cost when program self identifies.
Q&A