

Using AmeriCorps Approved Vendors Fieldprint and Truescreen for NSOPW, State and FBI Checks

Effective May 3, 2021 Updated January 26, 2022



250 E Street, SW Washignton, D.C. 20525 202-606-5000 / 800-942-2677



Contents

Change Log	3
Fieldprint and Truescreen	4
Using Fieldprint	4
Fieldprint Quick Facts	5
Fieldprint Checks	5
Fieldprint Process	5
Fieldprint Adjudication Recommendations	8
Fieldprint Accounts for Subgrantees	9
Using Truescreen	9
Truescreen Quick Facts:	9
Truescreen Checks	10
Truescreen Process	10
Truescreen Adjudication Recommendations	13
Truescreen Accounts for Subgrantees	14
Fieldprint and Truescreen Documentation and Compliance Checklist	14
FAQs	16
0.0 General	16
1.0 Fieldprint	17
2.0 Truescreen	21



Change Log

This table lists the changes made in the most recent revision of this document.

#	Date	Section or Page #	Change
1	11/1/21	P. 1	Document title changed from "Using Fieldprint and Truescreen for NSOPW, State and FBI Checks" to "Using AmeriCorps Approved Vendors Fieldprint and Truescreen for NSOPW, State and FBI Checks"
2	11/1/21	Fieldprint Process; Truescreen Process	Information reordered to begin with Creating an Account, followed by Conducting Checks and Adjudicating Results.
3	11/1/21	Throughout	Added clarification of ongoing Fieldprint enhancements.
4	11/1/21	Fieldprint Quick Facts	Added customer service contact for Fieldprint account management team.
5	11/1/21	Fieldprint Adjudication Recommendations; Truescreen Adjudication Recommendations	Added guidance regarding documenting eligibility when the vendor returns a "do not recommend" result.
6	11/1/21	Fieldprint Accounts for Subgrantees; Truescreen Accounts for Subgrantees	Added guidance for subrecipient organizations to create separate accounts for each program that is a subgrant.
7	11/1/21	Fieldprint and Truescreen Documentation and Compliance Checklist	Clarified grantee action required to document eligibility when the vendor returns a "do not recommend" result, in the Required Documentation and Compliance table.
8	11/1/21	FAQs	Added General section. FAQs organized into General, Fieldprint, or Truescreen section and renumbered accordingly.
9	11/1/21	FAQs	Added FAQs related to vendors previously located in the NSCHC FAQs and May 1 Rule Interim FAQs, noted by "Moved 11/1/21".
10	1/26/22	Throughout	References to ongoing Fieldprint enhancements changed to final enhancements.
11	1/26/22	Fieldprint Process: Completing Checks and Adjudicating Results	Added guidance to contact public sites in advance when using print cards. Added guidance on unreadable fingerprints and possibility of name-based FBI checks.
12	1/26/22	Truescreen Process: Completing Checks and Adjudicating Results	Updated name documentation guidance for Maine and Wisconsin.
13	1/26/22	FAQs	Updated FAQs #1.5, 1.8, 1.10, 1.11, 1.13, 1.14, and 2.12. Added FAQ #2.27.



Fieldprint and Truescreen

Fieldprint

In September 2015, AmeriCorps contracted Fieldprint, Inc., (Fieldprint) to provide FBI fingerprint-based checks (FBI checks) to grant and sub grant recipients (recipient(s)). This contract was renewed in 2021. Fieldprint is one of a limited number of vendors, called channelers, approved by the FBI to offer expedited access to the FBI's national criminal history information. Fieldprint is a vendor approved by AmeriCorps to provide fingerprint FBI checks and make adjudication recommendations of cleared and not cleared to recipients; provide pass or pre-adverse action notices; as of January 18, 2022, Fieldprint is capturing records of all relevant compliance steps of AmeriCorps recipients like viewing fitness determination results date, making adjudication decisions of pass or fail, and the dates and of these actions. Additionally, Fieldprint maintains records within the system for up to 7 years. Service to AmeriCorps recipients began in January 2016 and can be accessed here: www.fieldprintcncs.com.

Truescreen

In July 2018, AmeriCorps approved Truescreen to provide state and National Sex Offender Public Website (NSOPW) checks to recipients. Truescreen is a vendor approved by AmeriCorps to provide NSOPW and state criminal history checks; research source-level documentation when needed; make adjudication recommendations to recipients; facilitate compliance with the Fair Credit Reporting Act (FCRA), including pre-adverse and adverse action notices; provide time records of relevant compliance steps like adjudication; and maintain records for up to 7 years. All AmeriCorps recipients may use Truescreen. Service to AmeriCorps recipients began in November 2018 and can be accessed here: <u>https://applicationstation.truescreen.com</u>, using the AmeriCorps specific agreement code: CNCSAgreement.

Using Fieldprint

Recipients may use Fieldprint to obtain fingerprint-based FBI checks on individuals in covered positions. Recipients must establish accounts through Fieldprint's AmeriCorps specific webpage: www.fieldprintcncs.com. Fieldprint provides FBI checks only for individuals that have applied to work or serve in positions that receive an education award from AmeriCorps or an AmeriCorps grantfunded living allowance, stipend or salary.

A Waiver is not required to use Fieldprint.

Please note: Recipients may not use Fieldprint to conduct FBI checks on individuals that are not required to comply with NSCHCs, as such checks are not authorized by law.

Visit Fieldprint's AmeriCorps-specific webpage and click on "Set Up an Account" to begin the process.



Fieldprint Quick Facts

- Applicants for Fieldprint checks schedule appointments and AmeriCorps grantee's create accounts here: www.fieldprintcncs.com. Also learn about the process and read FAQs at www.fieldprintcncs.com.
- After creating an account, grantees access the client portal to view results and adjudicate checks here: https://reports.myfieldprint.com
- **Cost:** \$28.75
- Fieldprint Customer Service: Please note there are two separate customer service contacts.
 1. Account Management Team: for grantee administrative and account-related assistance. (Applicants should not contact the account management customer service; they should use the applicant call center contact below.) Phone: 888-472-8918 x 2440 Email: customerservice@myfieldprint.com
 2. Applicant Call Center: for assistance with scheduling and appointments. Monday through Friday
 8 a.m. to 10 p.m. ET Phone: 877-614-4364
 - Email: customerservice@fieldprint.com.
- Average Turnaround Time to obtain Adjudication Recommendation: 48 hours or 2 business days from the Livescan fingerprinting date. Note that turnaround times for ink fingerprinting will be longer due to mail processing time.

Fieldprint Checks

Fieldprint will provide a fingerprint FBI check with an adjudication recommendation (or fitness determination) for AmeriCorps recipients to consider in their eligibility determination. In addition, the Fieldprint process will capture the following information:

- Individual's consent to perform checks
- Notice to individual that selection to serve/work is based on the NSCHC results
- Notice to individual of reasonable opportunity to review and challenge the factual accuracy of a result before action is taken to exclude the individual from the position. Recipients may reference the <u>Fieldprint FAQs</u> for a description of the challenge process.
- Final grantee adjudication decision of Pass or Fail, which must be entered by grantee staff
- Timestamp documentation of Fieldprint procedural steps for viewing the fitness determination, as of June 19, 2021. Fieldprint also shows the timestamp of grantee action for selecting a final adjudication decision of Pass or Fail, for checks ordered on or after January 18, 2022.

Fieldprint Process

Fieldprint provides an online process for recipients to get fingerprint FBI checks.

Creating a Fieldprint Account

Be prepared and save time. Collect the following information before creating a Fieldprint account:



- Organization's legal name
- Organization address
- Organization phone number
- An estimate of the annual number of individuals you expect to check through this system. **This** is an estimate only. Provide your best estimate based on the information you have available at the time you sign up for an account. There are no negative repercussions for an incorrect estimate.
- DUNS number
- AmeriCorps grant number
- Grant end date/performance period end date
 - Please note that this information is provided because Fieldprint services are only for current grant recipients. A few weeks before the reported grant end date you will receive an email from Fieldprint asking for an updated grant end date/performance period end date. If you do not provide updated information to Fieldprint, Fieldprint will consider your grant closed and your account will also close. If needed, contact the account management team to re-active your account.
- The name, title, address, phone number, and email of the person who will be the primary contact for your account. Please ensure all contact information is current so that reminder emails go to the correct person.
- How you intend to pay for the checks. Fieldprint's system offers three payment options:
 - You can pay for the checks directly using a Mastercard, American Express, Discover, or Visa credit card.
 - Have your credit card information, if you choose to pay for the checks directly.
 - You can have applicants pay for the checks when they schedule an appointment and reimburse them at a later date.
 - You can set up an invoicing system, if you expect to conduct more than 100 checks annually or, in some cases, if your organization is a state or local government entity.

When you have the necessary information, set up your organization's account.

- 1. Go to <u>www.fieldprintCNCS.com</u> and click on "Set Up an Account." This process includes completing forms, setting up account permissions and signing off on agreements.
- 2. In one-to-two business days, you will receive an email with more information, including your Fieldprint Code and information on logging into your client portal, where you can review the status and results of all your checks.
- 3. When you receive this email, save your Fieldprint Code somewhere easily accessible. You will need to provide it to any individuals you direct to Fieldprint for an FBI check. Follow the instructions to create your password and log in to the client portal. If the DUNS number you provided was not on Fieldprint's list of approved organizations, you will be notified at this stage.



Completing Checks and Adjudicating Results

- The Fieldprint process begins with the applicant, the individual who will work or serve in the NSCHC-required position, providing all necessary information and scheduling a fingerprint appointment. Prepare your applicant for this process. The <u>Fieldprint FAQ's</u> detail the information the applicant will need to provide or bring. Have the applicant review all FAQ's.
- 2. Provide your Fingerprint Code to the applicant and direct them to <u>www.fieldprintcncs.com</u>. The applicant will set up an account, complete information, sign off on agreements and set up a Livescan fingerprint appointment.
 - a. A Livescan fingerprint is captured electronically, without the need for the more traditional method of ink and paper. If no Livescan locations are available, Fieldprint will show public sites where the applicant may complete ink fingerprints. If a public site is selected, Fieldprint will mail a printcard packet for the applicant to complete ink fingerprinting at a public site. The recipient or applicant should contact the public site beforehand to confirm fingerprint services are available.
- 3. The applicant will be fingerprinted at their Livescan appointment and will receive an email notification when the check is complete.
 - a. If print cards were requested to complete ink fingerprinting, once received, the applicant will bring the cards to the selected public site. The recipient or applicant should contact the public site beforehand to confirm fingerprint services are available.
 - b. Note: the required FBI check is a fingerprint-based check. However, it is possible that an individual's fingerprints may be unreadable and rejected by the check source. When using Fieldprint to conduct the FBI check, Fieldprint will automatically initiate a name-based check with the FBI after two separate sets of fingerprints are rejected. Grantees should maintain documentation of the rejection notification and name-based search (listed in the case's activity log in Fieldprint) with the individual's other NSCHC files as grant records. If the unreadable fingerprints necessitate the FBI check be name-based, the Name-based Checks guidance applies as described in the <u>NSCHC Manual</u>.
- 4. You will also receive an email when an individual's check is complete. In most cases, this should not take more than three business days if using Livescan electronic fingerprinting. Log in to your client portal (<u>https://reports.myfieldprint.com</u>) to see the results of the check.

Please note that after you receive the results, you must review the results (or Fitness Determination) and enter a final adjudication decision of Pass or FAIL into the Fieldprint system. These actions are performed using both the myFitnessDetermination and myFingerprints modules available within the Fieldprint system.

5. Refer to the Fieldprint AmeriCorps Grantee Guide, which is available in <u>Litmos</u> and includes step-by-step visual instructions for completing adjudication.



- 6. First, access the myFitnessDetermination module to view the Fitness Determination results (Cleared or Not Cleared) of the individual. Viewing the results within this module will create a timestamp of the date the results were viewed and, for checks ordered on or after January 18, 2022, the name of the individual who viewed them.
- 7. Then, access the myFingerprints module to enter a final adjudication decision (Pass or FAIL) for the individual. For checks ordered on or after January 18, 2022, selecting the final adjudication decision within this module will visibly show the timestamp of the date the decision was selected and the name of the individual who made the selection. The check is not complete until you enter a final adjudication decision, indicating that an eligibility determination has been made. Failure to adjudicate may result in a noncompliant check and you may incur a financial consequence. See below for details on adjudication.

Fieldprint Adjudication Recommendations

Neither AmeriCorps nor Fieldprint can release specific criminal history information obtained from the FBI to recipients. Instead, Fieldprint reviews the specific criminal history information against a set of criteria to generate one of two fitness determination recommendations: "Cleared" or "Not Cleared".

"Cleared" does not necessarily mean eligible. Similarly, "Not Cleared" does not necessarily mean ineligible. Organizations must use the recommendations in combination with other information obtained through the other required NSCHC components to make an informed choice before selecting an individual for work or service.

Cleared Recommendation

A "Cleared" recommendation means that an individual's FBI criminal history record information did not contain an indication that the individual may have been convicted of murder or be required to register as a sex offender. However, it does not necessarily mean an individual is eligible for work or service. No single source of criminal history record information is comprehensive. You must, at a minimum, conduct all required steps in the NSCHC process before determining that someone is eligible for work or service.

Not Cleared Recommendation

A "Not Cleared" recommendation indicates that the selecting organization needs more information before it can make a final determination as to the fitness of an applicant. It does not mean that an applicant is ineligible for work or service.

Making an Eligibility Determination

Regardless of the Fieldprint recommendation, the recipient **must** enter a final adjudication decision in their MyFieldprint account. If the recipient does not enter a final adjudication decision, the check cannot be deemed compliant without supplemental documentation verifying that an eligibility



determination was made outside of Fieldprint, such as printed, signed, and dated results from authorized staff indicating that the results were considered prior to the individual's start date.

If Fieldprint's adjudication recommendation is "Not Cleared", the recipient must have sufficient documentation that they confirmed there are no disqualifying convictions before clearing the individual to serve or work. Failure to clearly document that the candidate is eligible to serve/work if a vendor check's adjudication recommendation does not endorse the candidate for service/work cannot be deemed compliant.

If recipients reject an individual because of past criminal history or ineligibility, the individual may challenge the result. The challenge process is detailed in the Fieldprint <u>FAQs</u>. See also <u>Challenging A</u> <u>Not Cleared Recommendation</u>.

Fieldprint Accounts for Subgrantees

AmeriCorps is working with Fieldprint on system enhancements that will allow prime grantees, such as State Service Commissions, to link to their subgrantee's Fieldprint accounts for grant monitoring purposes. Note that if an organization uses one Fieldprint account for multiple AmeriCorps projects, linking the account with a prime grantee will result in the prime grantee having access to view all checks done through that account. For this reason, organizations with multiple projects should create separate Fieldprint accounts for each project that is a **subgrant** in anticipation of system enhancements that will link subgrant accounts with prime grantees. This will enable the prime grantee to link to the sub-organization's account specified for that subgrant, preventing unnecessary access to checks under other grants.

Using Truescreen

All recipients may use Truescreen to obtain NSOPW and/or State checks on individuals in covered positions. Recipients should refer to the pre-approved <u>NSCHC waiver Use of Truescreen for NSOPW</u> <u>and/or State Checks</u> before ordering checks.

Truescreen Quick Facts:

- Sign up here: <u>https://applicationstation.truescreen.com</u>
 - o Use agreement code: CNCSAgreement
- Order checks, access results, etc. here: <u>https://mytruescreen.com</u>
- **Cost:** See <u>https://americorps.gov/grantees-sponsors/history-check</u> for price list for all states.
 - **NSOPW**: \$7.50
 - State: \$19.50 + State Pass-through Fees (if applicable)
- Truescreen Customer Service: Monday through Friday, 3 a.m. to 10 p.m. ET Customer Service: Phone: 888-291-1369 ext. 0



Phone: 888-291-1369 ext. 2006

Email: <u>CNCShelp@truescreen.com</u>

Average Turnaround Time to obtain Adjudication Recommendation: 1-5 business days, see <u>https://americorps.gov/grantees-sponsors/history-check</u> for turnaround times for all states.

Truescreen Checks

Recipients may obtain NSOPW State and/or NSOPW checks with an adjudication recommendation from Truescreen. In addition, the Truescreen process will capture the following information:

- A copy of the documentation from the individual to determine the first and last name of the applicant that will obtain the most accurate criminal history records. Refer to agency NSCHC manual for information on name-based checks.
- Individual's consent to perform checks
- Individual's understanding that selection to serve/work is based on the NSCHC results
- Individual is informed of and given the ability to review challenge the factual accuracy of a result before action is taken to exclude the individual from the position, through Truescreen's Consumer Care Portal
- Anticipated start date
- State of residence at time of application
- States of service/employment
- Final recipient adjudication decision must be entered by recipient staff
- Timestamp documentation of Truescreen process step

Truescreen Process

Truescreen provides an easy and simple process for recipients to get state and NSOPW checks.

Creating a Truescreen Account

Be prepared and save time. Collect the following information before creating a Truescreen account:

- Company Name (Organization Legal Applicant Name)
- Company address
- Contact title, name, phone and email
- Billing contact name and contact information (if different)
- Contact info for additional check requesters (name, email, address, phone)
- AmeriCorps Project Name
- EIN number
- DUNS number
- Grant end date/performance period end date
 - Please note that this information is provided because Truescreen services are only for current grant recipients. For Truescreen, it is not necessary to send updated grant date information. The grant number entered for an individual when ordering their check is the grant number that will be associated with that record.



- Organization letter head and logo (This will be used during the Consumer Care Process that facilitates the pre-and post-adverse process)
- Credit Card Information
 - Recipients must pay for the checks directly and via credit card. MasterCard, American Express, Discover, or Visa credit cards are accepted.

When you have the necessary information, set up your organization's account.

- 1. To create your account visit: <u>https://applicationstation.truescreen.com</u>
 - a. Select "Sign Up" to set up register an account, create login and password
 - b. When prompted please enter Agreement Code: CNCSAgreement
 c. Once your credentials are established, go back to
 - <u>https://applicationstation.truescreen.com</u> and "Log In" as a returning user. d. When prompted please enter Agreement Code: **CNCSAgreement**
- Sign back into ApplicationStation to complete the Agreement. You will be in the ApplicationStation website once to create your account. This process includes completing forms, setting up account permissions and signing off on agreements. You will also be required to submit a letterhead and a signature for Action Letter and fax in credit card information.
 - a. When creating your account please note that:
 - i. No edits within the agreement are allowed and each section must be completed in its entirety.
 - ii. When submitting information:
 - 1. For the Permanent Resident Date, you can implement any date.
 - 2. Regarding user access, you can simply put any option on the agreement. Everyone will be set up exactly the same regarding access. All reports will be viewable for all users within the grantee organization.
 - b. Action Letters refer to the pre- and post-adverse letters that will be sent to the individual if they are denied the opportunity to serve. These letters will include your organization letterhead and signature. Truescreen will facilitate this denial process for you through their Consumer Care process.
 - i. It is not required to use the Truescreen pre- and post-adverse process. If you choose to opt-out, you must provide a reasonable opportunity for the person to review and challenge the factual accuracy of a result before action is taken to exclude the person from the position.
 - c. After you have completed the process, including submitting the billing and Action Letter information, it will take up to 5 business days to verify and create the account. Any delays in submitting the letter cover head and/or credit card information will result in delay in setting up your account.
- 3. After account set up, you will receive a series of four automated emails to set up your login and password for your client portal (<u>https://mytruescreen.com</u>). This is for security purposes.



4. Truescreen will also reach out to you after your account is set up to introduce you to your account manager, provide information and offer training. Please take the training!

Completing Checks and Adjudicating Results

- The Truescreen process begins with grantees ordering the necessary checks for the applicant, the individual who will work or serve in the NSCHC-required position. The training and information provided by your account manager will provide instructions on how to use their system to order checks, review results, and adjudicate. Note that an Applicant Guide and an Ordering Guide (for grantees) are available for download from your client portal (<u>https://mytruescreen.com</u>), under myLearning Center, Training Materials.
- 2. After the grantee orders the checks, the applicant will receive an email to complete their portion of the process. Prepare your applicant for this process. The individual will need to provide the following information to complete the Truescreen order. Please note that the individual will also be required to enter a signature with a finger or mouse during this process.
 - Legal first and last name
 - Address and residence since date
 - Social Security Number
 - DOB
 - Phone
 - Email
 - Indicate if you are: Member, volunteer or staff applicant
 - Disclose convictions of murder and/or sex offenses that require registration
 - If convicted, the information regarding the conviction is required: Conviction geographic information (country, state, county, city/town), charge, charge type, name of court, charge date, case number, sentence, details, probation, name used during arrest
 - A legible copy of the documentation from the individual to determine the first and last name of the applicant that will obtain the most accurate criminal history records. Refer to the AmeriCorps NSCHC Manual for information on name-based checks.
 - Please note: If your applicant provides a Maine government issued photo identification of any kind or a Wisconsin government issued photo identification card to verify first and last names, do not upload it. Instead, the applicant should provide another source of documentation in alignment with organization's policies and procedures. <u>Refer to AmeriCorps guidance on name-based checks in the NSCHC</u> <u>Manual.</u> If no other document is available, the applicant may proceed to the AmeriCorps Knowledge Network (<u>https://americorps.gov/grantees-sponsors/historycheck</u>) to complete and upload the State of Maine or Wisconsin Identification Form in the place of an identification.



3. You will also receive an email when an individual's check is complete. In most cases, this should not take more than three business days. Log in to your client portal (<u>https://mytruescreen.com</u>) to see the results of the check.

Please note that after you receive the results, you must review the results and enter a final adjudication decision into the Truescreen system.

4. The Ordering Guide available for download from your client portal (<u>https://mytruescreen.com</u>) includes the steps for completing adjudication. The check is not complete until you enter a final adjudication decision, indicating that an eligibility determination has been made. Failure to adjudicate may result in a noncompliant check and you may incur a financial consequence. See below for details on adjudication.

Truescreen Adjudication Recommendations

Truescreen will provide recipients with an adjudication recommendation ("Pass" or "Review") and recipients will be notified when the check is complete. Truescreen will provide the recommendation for convictions based off AmeriCorps eligibility criteria.

However, recipients will have access to individual applicant conviction data and can review the information and can accept or reject the individual according to their screening criteria.

"Pass" does not necessarily mean eligible. Similarly, "Review" does not necessarily mean ineligible. Organizations must use the recommendations in combination with other information obtained through the other required NSCHC components to make an informed choice before selecting an individual for work or service.

Regardless of the Truescreen adjudication recommendation, the recipient **must** enter a final adjudication decision in their MyTruescreen account. If the recipient does not enter a final adjudication decision, the check cannot be deemed compliant without supplemental documentation verifying that an eligibility determination was made outside of Truescreen, such as printed, signed, and dated results from authorized staff indicating that the results were considered prior to the individual beginning service/work.

If Truescreen's adjudication recommendation is "Review" instead of "Pass", the recipient must have sufficient documentation that they reviewed the results and confirmed there are no disqualifying convictions. Failure to clearly document that the candidate is eligible to serve/work if a vendor check's adjudication recommendation does not endorse the candidate for service cannot be deemed compliant.

If recipients reject an individual because of past criminal history or ineligibility, Truescreen will automatically enroll the individual in their Consumer Care process. Truescreen will walk the individual



through a process to challenge the factual accuracy of a result. Recipients will be informed of the entire process. The Consumer Care process is detailed in your Truescreen agreement. Contact your Truescreen account manager for more information.

Truescreen Accounts for Subgrantees

Prime grantees, such as State Service Commissions, may be linked to their subgrantee's Truescreen accounts for grant monitoring purposes. If an organization uses one Truescreen account for multiple AmeriCorps projects, linking the account with a prime grantee will result in the prime grantee having access to view all checks done through that account. For this reason, organizations with multiple projects should create separate Truescreen accounts for each project that is a **subgrant**. This will enable the prime grantee to link to the sub-organization's account specified for that subgrant, preventing unnecessary access to checks under other grants.

Fieldprint and Truescreen Documentation and Compliance Checklist

Recipients must follow these steps to document the NSCHC Process:

The grant recipient must maintain adequate documentation of their NSCHC process and practices as well as documentation of individual NSCHC grant records.

Evidence of adopted NSCHC Policies and Procedures

- Describes how grant recipient will address all NSCHC requirements, including the AmeriCorps approved sources to be used for conducting NSCHC and practices for documenting adherence to NSCHC eligibility determination and timing requirements
- Describes practices for protecting information related to NSCHC. Grant recipients must take reasonable steps to protect the confidentiality of any information relating to the criminal history check, consistent with authorization provided by the applicant.
- Describes adopted procedures for informing individuals of their rights related to NSCHC and how NSCHC results will be used by the program
- Where applicable, describes process for monitoring NSCHC of sub-recipients and/or service locations
- Describes how notice is provided to an individual that selection into the program is contingent upon the organization's review of the individual's NSCHC component results, if any; and
- Describes how the program complies with the requirements to provide a reasonable opportunity for the individual to review and challenge the factual accuracy of the result before action is taken to exclude the candidate from the position

Evidence of required annual staff training by retaining certificate of completion of the AmeriCorps e-course training

• Ensure staff retake the course prior to expiration of the certificate. Retain certificates of completion from each year as grant records.



Required Decumentation and Compliance	
Required Documentation and Compliance	How Iruescreen and Fieldprint can assist
	and Compliance requirements
Evidence that all required components	 Truescreen and Fieldprint maintain checks
(NSOPW, State(s), and FBI checks) were	in your electronic account for 7 years
completed and on file (45 CFR §2540.206)	
All required components (NSOPW, State(s), and	✓ Truescreen and Fieldprint ¹ provide grant
FBI) were conducted on time (45 CFR	recipients a process to electronically
§2540.205) and documentation reflects	document that the checks were reviewed
evidence of when checks were reviewed	and considered when making an eligibility
(adjudicated) and considered when making	determination
an eligibility determination	
All required components (NSOPW, State(s), and	✓ Truescreen and Fieldprint are approved
FBI checks) were conducted through sources	AmeriCorps sources
authorized by AmeriCorps (45 CFR §2540.204)	
and are consistent with the sources described	
in the grant recipient's adopted NSCHC	
policies and procedures	
Evidence that NSOPW results include searches	✓ Truescreen only provides NSOPW checks
from all States, Territories, and Indian Tribes (45	that include information from all States,
CFR §2540.204)	Territories, and Indian Tribes
Evidence that first and last names used on	 Truescreen allows applicants to upload
name-based checks reflect the current name	documentation into the system that grant
of the individual	recipients can use as documentation used
 Documents used to determine an 	to verify the first and last names used for
individual's first and last name must be	the individual's name-based check
consistent with sources described in the	
grant recipient's adopted NSCHC policies	
auidance on name-based checks in the	
NSCHC Manual.	
Documentation of consent from the candidate	✓ Truescreen and Fieldprint consent includes
to conduct State and FBI checks (45 CFR	 Documentation of notice to candidate
§2540.206)	that the national service position is
	contingent upon the organization's

Truescreen and Fieldprint assists grant recipients to document the NSCHC process for individual files:

¹ January 26, 2022, Update: As of January 18, 2022, Fieldprint system enhancements support full documentation of compliance steps for AmeriCorps recipients.



Required Documentation and Compliance	How Truescreen and Fieldprint can assist
	recipients with AmeriCorps Documentation
	and Compliance requirements
	 review of the individual's NSCHC component results, if any; and Documentation that the program complies with requirement to provide reasonable opportunity to candidate to review and challenge the factual accuracy of the result before action is taken to exclude the candidate from
	the position
 Documentation that the candidate is eligible to serve/work if a vendor returns a "do not recommend" result for the candidate (45 CFR §2540.206) 	 Truescreen and Fieldprint provide pass or pre-adverse action notices Applicants can use Fieldprint to request a personal copy of their FBI results to challenge a Not Cleared result
	Note that grant recipients must maintain adequate documentation of the process implemented to make an eligibility determination if the vendor result does not clear the individual. This may include a contemporaneously dated memo to the file documenting determination of the individual's eligibility.

FAQs

0.0 General

0.1 Can you adjudicate in the vendor systems? (Updated 11/1/21)

As of June 19, 2021, both AmeriCorps vendors, Truescreen and Fieldprint, provide processes to adjudicate in system. Prior to this date, this functionality was available only in Truescreen.

0.2 Can Commissions/Prime Grant recipients require subgrant recipients to use AmeriCorpsapproved vendors? (Moved 11/1/21)

A Commission may require the use of AmeriCorps approved vendors.



0.3 Are the agency-approved vendors required? (Moved 11/1/21)

Grant recipients have the option of using agency-approved vendors, Truescreen and Fieldprint, or going directly to <u>www.NSOPW.gov</u> and state repositories. The May 1, 2021 NSCHC rule allows both options.

0.4 Is it required to complete NSCHC components using either the AmeriCorps-approved vendors Truescreen and Fieldprint or NSOPW.gov and the state repository, or may programs use a combination of these approved sources? (Added 11/1/21)

Grant recipients may use any combination of AmeriCorps-approved sources to complete the NSCHC components. For example, it is acceptable to complete the NSOPW check through NSOPW.gov, conduct required state checks through the designated state repositories, and use Fieldprint to complete the FBI-fingerprint check. Regardless of the combination of approved sources used, grant recipients must complete and document each component required under the NSCHC Rule. Refer to <u>NSCHC Manual</u> for additional information about NSCHC Documentation.

0.5 Will AmeriCorps ever combine Truescreen and Fieldprint into one account/process? AmeriCorps will explore this possibility in the future.

1.0 Fieldprint

See also <u>Fieldprint FAQs</u> found on the Fieldprint webpage.

1.1 What happened with the FBI Channeler Exemption that AmeriCorps released on April 1, 2015?

In March 2015, the FBI limited recipients' ability to obtain FBI Departmental Order (DO) checks using a Channeler, which disrupted the operations of a number of recipients. In response, on April 1, 2015, AmeriCorps issued a temporary exemption ONLY for recipients that relied on an FBI Channeler to obtain FBI DO checks and could not continue to do so. This temporary exemption was set to expire on December 31, 2015. AmeriCorps extended this exemption until March 31, 2016, to allow recipients a smooth transition to Fieldprint's services. Recipients that relied on this exemption must now be prepared to obtain FBI checks, either using Fieldprint or by another means. AmeriCorps strongly encouraged recipients to transition to Fieldprint well in advance of March 31, 2016, to avoid any unexpected challenges or disruption to their programs. When this exemption expired on March 31, 2016, recipients became responsible for conducting all required components of the criminal history checks on individuals in covered positions who begin work or service after March 31, 2016. Failure to conduct all the required components will result in cost disallowance.

1.2 Who may use Fieldprint as a Channeler?

Recipients may use Fieldprint to obtain FBI checks on individuals in covered positions if the recipient cannot successfully receive this service from state repositories. This would include recipients that are operating in states where the criminal history repository does not offer FBI checks or cannot provide them in a timely manner, or will not adjudicate the results, or recipients that recruit individuals from



many different states such that dealing with many different state agencies is infeasible. In other words, if you're one of the many recipients that can obtain timely FBI checks through your state repository—keep using it! If not, use Fieldprint.

1.3 Who may receive an FBI check through Fieldprint?

Fieldprint can provide FBI checks on individuals that have applied to work or serve in positions that receive an education award from AmeriCorps or an AmeriCorps grant-funded living allowance, stipend or salary. As explained in the Code of Federal Regulations (45 CFR 2540.201), these positions, known as "covered positions," are required by law to undergo a National Service Criminal History Check. Use of the FBI's information in this way is only permissible when authorized by law.

1.4 Who may not receive an FBI check through Fieldprint?

Recipients may not use Fieldprint to conduct FBI checks on individuals that are not in covered positions, as such checks are not authorized by law.

1.5 What if applicants don't live near one of Fieldprint's local service providers? (Updated 1/26/22)

In these situations, applicants would establish an account online with Fieldprint, and then receive information on other public sites nearby that can capture fingerprints using paper cards. These are often law enforcement agencies. If the applicant selects a law enforcement agency, Fieldprint will mail a packet to the applicant with the information necessary for an individual to get their fingerprints taken at one of these locations, including the fingerprint card. The recipient or applicant should contact the public site directly to confirm fingerprint services are available. The applicant would then mail this card to Fieldprint, using instructions provided in the information packet. Once Fieldprint receives the fingerprints, the rest of the process is identical to that experienced by other applicants. Due to the need for fingerprints to reach Fieldprint through the mail, these checks may take more time to complete.

1.6 Do applicants have an opportunity to challenge the factual accuracy of a result? (Updated 11/1/21)

Yes, if recipients reject an individual because of past criminal history, the applicant has 45 calendar days to challenge the factual accuracy of the result and must contact the selecting organization to initiate this challenge. This process is detailed in the <u>Fieldprint FAQs</u>.

1.7 Will Fieldprint provide rap sheets? (Moved 11/1/21)

Fieldprint is prohibited by the FBI from providing FBI rap sheets to grant recipients. Fieldprint will provide an adjudication recommendation of "cleared" or "not cleared" based off of criteria that includes murder and offenses that require registration on a sex offender registry.



1.8 Does Fieldprint have monitoring reports? (Updated 1/26/22)

Yes, there are several reports available to grantees under myTools, including the TCN Status Report as of December 30, 2021. Refer to the Fieldprint AmeriCorps Grantee Guide available in <u>Litmos</u> for details.

1.9 Why do I need to adjudicate Fieldprint's "Cleared" recommendation? (Added 11/1/21)

Recipients **must** provide a final adjudication decision. Recipients are required to review and consider the results of the NSCHC when selecting the individual. Fieldprint does not make a selection decision but only provides an adjudication recommendation. A complete NSCHC includes a final adjudication from the recipient. A Fieldprint check without a final adjudication decision from the recipient cannot be deemed compliant without supplemental documentation verifying that an eligibility determination was made outside of Fieldprint, such as printed, signed, and dated results from authorized staff indicating that the results were considered prior to the individual beginning service/work.

1.10 What Fieldprint enhancements are available to support documentation of our steps to review and consider Fieldprint results in an eligibility determination? (Updated 1/26/22) Refer to the Fieldprint AmeriCorps Grantee Guide available in <u>Litmos</u> for more details and visual instructions.

In June 2021, Fieldprint added enhancements to the system that allow grantees to document their review and adjudication in Fieldprint. Fieldprint added the following fields in the myFingerprints and my FitnessDetermination modules:

- Viewed Fitness Determination Date (view only) This date will be auto-populated after a user has accessed the myFitnessDetermination module and viewed Fieldprint results for the individual applicant (Cleared or Not Cleared).
- Grantee Adjudication Decision (editable in myFingerprints; view only in myFitnessDetermination) User selects either Pass or FAIL, upon review and consideration of the Fieldprint fitness determination.
- Applicant Challenge Date (editable in myFingerprints; view only in myFitnessDetermination) If applicable, users enter the date an applicant notified grantee of their intent to challenge the Fieldprint results, or the actual challenge date (if known).

As of January 18, 2022, Fieldprint system enhancements support full documentation of compliance steps for AmeriCorps recipients. Fieldprint has the following additional fields in the myFingerprints and myFitnessDetermination modules. Check orders created prior to January 18, 2022 will not have these new fields.

- Fitness Determination Viewed By (view only) This field will auto-populate the name of the user who viewed the results in the myFitnessDetermination module.
- Grantee Adjudication Decision Made Date (view only) This field will auto-populate the date the grantee adjudication decision is made. After the Grantee Adjudication Decision of Pass or



FAIL is selected and the record is saved and closed, the system will capture and record this date.

 Grantee Adjudication Decision Made By (view only) – This field will auto-populate the name of the user who entered the grantee adjudication decision. After the Grantee Adjudication Decision of Pass or FAIL is selected and the record is saved and closed, the system will capture and record this name.

1.11 How do I adjudicate a check in Fieldprint? (Updated 1/26/22)

In June 2021, Fieldprint added enhancements to the system that allow grantees to document their review and adjudication in Fieldprint. As of January 18, 2022, Fieldprint system enhancements support full documentation of compliance steps for AmeriCorps recipients. To document adjudication in Fieldprint, first, view the individual's results of "Cleared" or "Not Cleared" in the *myFitnessDetermination* module. Then, adjudicate the record in the *myFingerprints* module by selecting "Pass" or "Fail" and saving the record. Note that the *myFingerprints* module does not include the result of "Cleared" or "Not Cleared". You must first view the result in *myFitnessDetermination* before completing the adjudication in *myFingerprints*. Refer to the Fieldprint AmeriCorps Grantee Guide available in Litmos for step-by-step visual instructions.

1.12 Does the Viewed Fitness Determination Date change if I go back to the myFitnessDetermination module? (Moved 11/1/21)

No, the first date that is auto-populated in the Viewed Fitness Determination Date field will not change after a user views the Fieldprint Fitness Determination within the *myFitnessDetermination* module.

1.13 Does Fieldprint allow me to change the Grantee Adjudication Decision status after I have already selected Pass or FAIL? (Updated 1/26/22)

Yes, users are able to change the Grantee Adjudication Decision after an original selection of Pass or FAIL has been made. Note that after saving the change, the *Grantee Adjudication Decision Made Date* will be updated in the system, but the new date will not display until the user closes and reopens the module. Users that make changes to the Grantee Adjudication Decision status after the initial decision is selected in Fieldprint should ensure their grant records for the applicant clearly document initial decisions, dates, and justification for the changes. Edits to the Grantee Adjudication Decision field are recorded in the Activity log found on both modules.

1.14 I cannot view all of the records for individuals with results in Fieldprint. How do I edit or expand the Fieldprint viewing options? (Updated 1/26/22)

Refer to the Fieldprint AmeriCorps Grantee Guide available in Litmos for visual instructions.



2.0 Truescreen

2.1 Who is my Truescreen account manager?

After creating an account, your Truescreen Account manager will reach out to you to introduce themselves, provide information and offer training. If you cannot find their contact information, contact Truescreen Customer Service at 888-291-1369 ext. 0.

2.2 How can an organization pay for the checks?

Only recipients that are account holders may pay for the checks. MasterCard, American Express, Discover and Visa are accepted. Truescreen does not accept payment via cash or check. Invoicing options may be available in limited circumstances. Please contact your Truescreen account manager for details.

2.3 Are Truescreen checks fingerprint state checks?

No, the Truescreen state and NSOPW checks are name-based.

2.4 I have screening criteria above and beyond AmeriCorps eligibility criteria. Can Truescreen adjudicate against my organization's standards?

Truescreen will adjudicate convictions based off of AmeriCorps eligibility criteria; however, recipients will have access to individual applicant conviction data and can review the information and can accept or reject the individual according to their screening criteria. If you reject a candidate, the candidate will go through the Consumer Care process (allows applicant the opportunity to challenge the factual accuracy of the result) and may take several weeks to resolve.

2.5 Do applicants have an opportunity to challenge the factual accuracy of a result?

Yes, if recipients reject an individual because of past criminal history, Truescreen will automatically enroll the individual in their Consumer Care process. Truescreen will walk the individual through a process to challenge the factual accuracy of a result. Recipients will be informed of the entire process. The Consumer Care process is detailed in your Truescreen agreement. Please note this process may take several weeks to resolve. Contact your Truescreen account manager for more information

2.6 Why do I need to adjudicate Truescreen's "pass" recommendation? (Updated 11/1/21)

Recipients **must** provide a final adjudication decision. Recipients are required to review and consider the results of the NSCHC when selecting the individual. Truescreen does not make a selection decision but only provides an adjudication recommendation. A complete NSCHC includes a final adjudication from the recipient. A Truescreen check without a final adjudication decision from the recipient cannot be deemed compliant without supplemental documentation verifying that an eligibility determination was made outside of Truescreen, such as printed, signed, and dated results from authorized staff indicating that the results were considered prior to the individual beginning service/work.



2.7 Why do I need to sign off on agreements and disclosures for states I do not operate in?

Recipients or applicants may see agreements to states that they do not operate, serve or work in. These are standard agreements that Truescreen is required to issue because of state and federal laws.

2.8 Why are there references to credit reports, character references or information beyond a NSOPW or state check?

Truescreen also conducts credit and other employment screening reports and require all clients to agree to standard language required by state and federal laws. AmeriCorps recipients are not ordering, and applicants will not undergo a credit checks, employment history checks, or any check other than the state or NSOPW check that is ordered. If recipients would like to engage Truescreen in their other services, they may do so outside the AmeriCorps contract.

2.9 Why does the NSOPW check cost \$7.50 when it is free search?

The Truescreen NSOPW check provides more than the results of a NSOPW search. The Truescreen NSOPW search includes an adjudication recommendation and Truescreen will research source-level documentation when needed; make adjudication recommendations to recipients; facilitate compliance with the Fair Credit Reporting Act (FCRA), including pre-adverse and adverse action notices; provide time records of relevant compliance steps like adjudication; and maintain records.

2.10 I am having some technical issues, who should I contact?

If you are having a technical issue, take a screenshot of the error message and send to Truescreen Phone: 888-291-1369 ext. 2006

Email: <u>CNCShelp@truescreen.com</u>

2.11 What if my applicant does not have an email address?

You may use your email or set up another email to initiate the process for the applicant. The email is only used once to send the applicant link to ApplicationStation.

2.12 What if my applicant is technology illiterate or does not have access to a computer? (Updated 1/26/22)

You are welcome to assist your applicant through the process. The applicant is required to enter a digital signature with a mouse or finger (on a touch screen). The applicant will also be required to upload the document reflecting the first and last names that you, the grantee, used on the name-based check. If you continue to have difficulties, contact your Truescreen Account Manager.

2.13 Is Truescreen mobile friendly?

Yes! All Truescreen sites are mobile friendly.



2.14 What is the difference between <u>https://applicationstation.truescreen.com</u> and <u>https://mytruescreen.com</u>?

You will use Application Station once to create an account. You can always log back in to review Truescreen agreements.

Your applicants will use Application Station to complete their application.

You will use MyTruescreen to order checks, review results and pull reports. Most of your time will be spent in your MyTruescreen account.

2.15 Can the home-tab of <u>https://mytruescreen.com</u> be customized to AmeriCorps NSCHC requirements?

Unfortunately, the home tab of the <u>https://mytruescreen.com</u> cannot be customized. However, take some time and explore that tab. It provides a lot of information about screening law and best practices. Truescreen will review the home tab during training. Take advantage of Truescreen training!

2.16 Why is my account set up taking longer than 5 days?

Registration will run most smoothly if you come prepared with your organization's letterhead, a credit card to keep on file, and authorization to sign the company's Terms and Conditions. You may contact Truescreen directly for a copy of the Terms and Conditions to begin any formal clearance process within your organization. There is no cost for registration itself. If you have any questions regarding your account set up or Truescreen services, contract your Truescreen account manager right away.

2.17 Why is Truescreen taking longer than 5 days to return results and an adjudication recommendation?

One possible explanation is that the applicant has a conviction related to murder and/or a registerable sex offense. Truescreen may be researching that conviction before delivering the results to you.

Monitor your account and contact your Truescreen account manager if you believe your check is taking longer to return and for any concern.

2.19 Can applicants disclose previous convictions?

Yes, applicants have the opportunity to disclose convictions of murder and/or registerable sex offense only during the Application Station Process. You should be aware that if the applicant indicates that he or she has been convicted of a murder and/or registerable sex offense under a different alias, **you will be charged for an additional check to be run under that alias**.

2.20 I have a lot of applicants to be screened. Is there a bulk upload process?

Yes, bulk upload options are available. Contact your Truescreen Account manager.



2.21 Does Truescreen verify social security numbers?

No, Truescreen does not verify that the social security number is connected to your applicant. Truescreen only verifies that the social service number exists.

2.22 Can I still use Truescreen for positions that are not required to comply with NSCHC? Is it an allowable cost? (Updated 11/1/21)

Grant recipients may use Truescreen for positions that are not required to comply with NSCHC. It is an allowable cost. Note that recipients may not use Fieldprint to conduct FBI checks on individuals that are not in covered positions, as such checks are not authorized by law.

2.23 What states, territories, and Tribes are included in a Truescreen NSOPW check? (Moved 11/1/21)

A Truescreen NSOPW check includes all reporting states, territories, and Tribes. Truescreen will not provide a NSOPW checks that is incomplete.

2.24 Truescreen still includes language specific to the 2012 NSCHC rule, specifically, that a government-issued photo ID must be uploaded. Is it still required for applicants to upload a government-issued photo ID to Truescreen? (Added 11/1/21)

The new NSCHC rule does not require ID verification with a government-issued photo ID. However, AmeriCorps expects that grant recipient staff will undertake reasonable due diligence to determine the current first and last name to conduct name-based checks. Grantees should ensure the document used to verify the current legal name of the applicant is uploaded to Truescreen. The Office of Monitoring will use the name verification document to confirm the first and last names on the check match the applicant's legal name. Refer to AmeriCorps guidance on name-based checks in the NSCHC Manual.

AmeriCorps is working Truescreen to clarify the system's language and process to align with the new NSCHC rule.

2.25 Is it still required to check the "ID Verified" box in Truescreen to document verification of ID? (Updated 1/26/22)

The new NSCHC rule does not require written documentation of ID verification with a governmentissued photo ID. Completing the ID verification check-box in Truescreen is no longer required. AmeriCorps is working with Truescreen to clarify the system's language and process to align with the new NSCHC rule.



2.26 All three NSCHC checks are required for all covered positions under the new NSCHC rule. What should I select for "Access to Vulnerable Populations" when ordering checks? (Added 11/1/21)

Grantees may select any response to Access to Vulnerable Populations for individuals started on or after May 1, 2021. This information will not be used by the Office of Monitoring. AmeriCorps is working with Truescreen to clarify the system's language and process to align with the new NSCHC rule.

2.27 I am a program staff required to undergo NSCHC. Can I order a check for myself in Truescreen? (Added 1/26/22)

For security reasons, Truescreen is not permitted to process a request when the name of the subject matches the name of the requester. A separate authorized user must order the check. It may be necessary to add another authorized user to your account for this purpose. It is recommended to always have at least two authorized users for AmeriCorps-approved vendor accounts to prevent loss of account access.