

Using AmeriCorps Approved Vendor Truescreen for NSOPW, State, and FBI Checks

Effective Sept. 26, 2024

Produced and published at US taxpayer expense.



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AmeriCorps.gov



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Introduction

This manual provides guidance for using Truescreen, AmeriCorps' approved vendor for conducting National Service Criminal History Checks (NSCHC). Please see AmeriCorps' NSCHC webpage, https://americorps.gov/grantees-sponsors/history-check, for additional guidance on NSCHC requirements.

Overview of Truescreen and Fieldprint

Truescreen

Truescreen is a vendor approved by AmeriCorps to provide National Sex Offender Public Website (NSOPW) checks, state criminal history checks, and FBI fingerprint-based checks to AmeriCorps grantees. Truescreen provides FBI checks through its subcontractor, Fieldprint, described below. Truescreen researches source-level documentation when needed; makes adjudication recommendations to grantees; facilitates compliance with the Fair Credit Reporting Act (FCRA), including pre-adverse and adverse action notices; provides time records of relevant compliance steps like adjudication; and provides AmeriCorps and grantees direct access to records in its website for five years from when the check was completed. All AmeriCorps grantees may use Truescreen. Service to AmeriCorps grantees began in November 2018 with the state and NSOPW checks. Truescreen later subcontracted with Fieldprint to include the FBI check in the Truescreen system; this service became available August 12, 2024.

Fieldprint

Fieldprint is a vendor approved by AmeriCorps to provide fingerprint FBI checks, which grantees order in Truescreen. 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. In September 2015, AmeriCorps directly contracted Fieldprint to provide FBI checks to grantees. In 2024, the Fieldprint FBI check was merged with Truescreen to facilitate all required checks under one system. As of December 1, 2024, AmeriCorps grantees no longer complete FBI checks directly through Fieldprint.

Access legacy FBI checks ordered directly through Fieldprint accounts before December 2024 at <u>https://reports.myfieldprint.com</u>. For assistance accessing legacy accounts, contact <u>customerservice@myfieldprint.com</u>. See section <u>Maintaining System Documentation Before Vendor</u> <u>Retention Ends</u> for Fieldprint records details.

Using Truescreen

All grantees may use Truescreen to obtain NSOPW, state, and fingerprint-based FBI checks on individuals applying to serve or work in positions requiring NSCHC per <u>45 CFR § 2540.201</u> ("covered positions"). Note that Fieldprint provides the fingerprinting services for FBI checks ordered in Truescreen. Grantees should refer to the pre-approved NSCHC waiver "Use of Truescreen for NSOPW and/or State Checks" in the *NSCHC Manual*, found on the <u>NSCHC webpage</u>, before ordering checks.



Grantees **may not** use Truescreen to conduct FBI checks on individuals that are not required to comply with NSCHC, as such checks are not authorized by law.

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 acceptable source documents to verify names for name-based checks.
- Individual's consent to perform checks
- Individual's understanding that selection to serve/work is based on the NSCHC results
- Truescreen's adjudication recommendation of "Pass" or "Review"
- Individual is informed of and given the ability to review and challenge the factual accuracy of a result before action is taken to exclude the individual from the position, through Truescreen's Consumer Care Portal
- Final grantee adjudication decision must be entered by grantee staff
- Timestamp documentation of Truescreen process steps

Truescreen Quick Facts

- New organizations sign up through ApplicationStation:
 - https://applicationstation.truescreen.com
 - Use agreement code: AMERICORPSAGREEMENT
- Order checks, access results, adjudicate checks, pull reports in your myTruescreen client portal: <u>https://mytruescreen.com</u>
- Cost: See <u>AmeriCorps NSCHC webpage</u> for Truescreen Price and Average Turnaround Time list for all states.
 - **NSOPW**: \$7.50
 - State: \$19.50 + any applicable state pass-through fees
 FBI: \$28.75
- 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: AmeriCorpsSupport@truescreen.com
- Fingerprinting Applicant Call Center (Fieldprint): for assistance with FBI check fingerprint scheduling and appointments. Monday through Friday
 8 a.m. to 10 p.m. ET
 Phone: 877-614-4364
 Email: customerservice@fieldprint.com
- Amount of Time for New Organization Account Setup: 5 business days once all information is submitted, including emailing your billing information and letterhead.



- Average Turnaround Time to Obtain Adjudication Recommendation: 1-5 business days, see <u>AmeriCorps NSCHC webpage</u> for Truescreen Price and Average Turnaround Time list for all states. Note that turnaround times for FBI checks completed through mailed card ink fingerprinting, rather than electronic Livescan printing, will be longer.
- Amount of Time Grantees Can Access Records in Client Portal: 5 years from the date the check was completed. See <u>Maintaining System Documentation Before Vendor Retention Ends</u> section below.
- Truescreen AmeriCorps User Guides Available in Litmos:
 - Grantee Agreement Guide: instructions for setting up a new organization account.
 - Grantee FBI Amendment Guide: instructions for adding the FBI check option to accounts created before August 12, 2024.
 - Grantee User Guide: shows Truescreen system features and the process for grantees to order and adjudicate checks; lists important steps for managing your Truescreen account.
 - Applicant User Guide: instructions for applicants to complete their portion of the Truescreen order and schedule fingerprinting with Fieldprint.
- Additional Applicant Resources on <u>AmeriCorps NSCHC webpage:</u>
 - Truescreen AmeriCorps Applicant FAQs
 - Challenging a Not Cleared Recommendation describes the process for applicants to obtain a copy of their criminal history from the FBI after Truescreen's FBI check result is "Review" (not cleared).

Creating a Truescreen Organization Account

You must first complete the AmeriCorps-specific electronic user agreement to set up an account with Truescreen. Follow the instructions in the Truescreen AmeriCorps Grantee Agreement Guide, available in <u>Litmos</u>. Be prepared and save time. Collect the following information before creating a Truescreen account for your organization:

- Company Name (Organization Legal Applicant Name)
- Company address
- Title, name, phone and email of primary contact
 - The primary contact can add new staff users and make changes to the account. The primary contact will also be notified before the grant end date expires.
- Billing contact name and contact information (if different)
- Contact info for additional check requesters (name, email, address, phone)
- AmeriCorps project title
- AmeriCorps grant number(s)
 - If you are a direct grantee of AmeriCorps, the grant number can be found on your Notice of Grant Award (NGA) as the "Agreement Number." This is often a 10-digit code made up of letters and numbers, such as "18ASBCD001. If you are subrecipient, contact the prime grant recipient if you do not know your grant number.



- You may use the same account for multiple grant projects, or you may create multiple, separate accounts if needed or preferred. Note that subrecipient/operating site accounts mapped to a prime grantee must only be used for projects under that prime grantee. Prime grantees should not have access to checks for other grants. See <u>Truescreen Accounts for Subgrantees and Prime Mapping</u> section.
- EIN number
 - An Employer Identification Number (EIN), also known as a Federal Tax Identification Number, used to identify a business entity.
- Unique Entity Identifier (UEI) number
 - The Unique Entity Identifier (UEI) is a 12-digit alphanumeric identifier provided by SAM.gov to all entities who register to do business with the federal government. The UEI can be found in your organization's SAM.gov entity registration record. Every recipient of federal funding, including pass through entities, prime grant recipients and subrecipients, are required to have these numbers.
- Grant end date/performance period end date
 - If you are a direct grantee of AmeriCorps, the grant end date can be found on the Notice of Grant Agreement (NGA) listed as the Performance Period. The end date of the Performance Period is the date on which your grant ends. Most often, but not always, it is three years after the date of award. If you are subrecipient, contact your prime grant recipient if you do not know the grant end date/performance period end date.
 - Please note that this information is provided because Truescreen FBI check services are only for current grantees. A few weeks before the reported grant end date you will receive an email from Truescreen asking for an updated grant end date/performance period end date. If you do not provide updated information, Truescreen will consider your grant closed and will remove the FBI check option from your organization account. If needed, contact <u>mcarnation@truescreen.com</u> with updated grant information to re-activate the FBI check option in your account. Allow up to five business days for the FBI check option to re-appear.
- Organization letterhead
 - Truescreen will use your organization letterhead to generate the adverse action letters during their Consumer Care applicant challenge process.
- Credit Card Information
 - Grantees must pay for the checks directly. MasterCard, American Express, Discover, or Visa credit cards are accepted. Invoicing options may be available in limited circumstances. Contact Truescreen's account manager for details.

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

See the Truescreen AmeriCorps Grantee Agreement Guide, available in <u>Litmos</u>, for new account setup instructions.



After you have completed the agreement process, including emailing your billing information and letterhead, it will take up to five business days to verify and create the account. Any delays in emailing your organization letterhead and/or credit card information will result in delay in setting up your account.

In some cases, Truescreen may need to confirm your grantee status with AmeriCorps. If this happens, you may receive an email from AmeriCorps staff to confirm you are an AmeriCorps grant recipient or subrecipient before your account can be created.

After account set up, you will receive a series of four automated emails from Truescreen (accountsetup@truescreen.com) to set up your login and password for your client portal (<u>https://mytruescreen.com</u>). This is for security purposes.

Truescreen will also reach out to you after your account is set up to introduce you to your account manager and provide materials for using Truescreen.

Truescreen Accounts for Subgrantees and Prime Mapping

Truescreen account mapping may apply to State Service Commissions or direct grantees ("prime grantees") with subrecipients or operating sites ("programs") that conduct checks from their own Truescreen accounts. Truescreen, may link ("map") prime grantee staff to their programs' Truescreen accounts for grant monitoring purposes. This allows prime grantee staff *view-only* access to all checks conducted under the mapped accounts. Under this mapping, prime grantee staff *do not* have the ability to order or adjudicate checks on behalf of their programs.

Need for Separate Accounts for Subgrantees

Programs must create and use separate Truescreen accounts for any grants that will be mapped to a prime grantee for monitoring purposes. This will enable the prime grantee to link to the program's account specified for their subgrant(s), preventing unnecessary access to checks under other prime grantees. If an organization uses one Truescreen account for multiple AmeriCorps grants, linking the account with a prime grantee will result in the prime grantee having access to view all checks done through that account. Prime grantees should not have access to checks under other prime grantees.

Prime Grantee Mapping Instructions

Both the prime grantee and the program must take action for mapping.

Prime Grantee Setup

Prime grantees must first establish monitoring users with Truescreen before program accounts can be mapped. Prime grantees may email Truescreen's account manager, Mike Carnation, at <u>mcarnation@truescreen.com</u>, to initiate this setup for the first time. Truescreen will request user information, such as name and email address, of the prime grantee staff who will need monitoring access. Please allow three business days for Truescreen to process the request.

Once a prime grantee has established monitoring users with Truescreen, they may direct programs to request mapping following the program instructions listed below.



Program Instructions

Mapping takes place after organization account set up. Reminder: do not map an existing account if it has been used for other grants. Program staff who are active Truescreen users request mapping by emailing Truescreen's account manager, Mike Carnation, at mcarnation@truescreen.com with the following information:

- Program's Organization Name: (example: We Help Kids, Inc.)
- Account "Division Number": (always begins with "947-", can be found on your AmeriCorps Monitoring Report, your user agreement, or individual case records)
- Prime Grantee to Map to: (example: "Georgia Commission")

Program staff should 'cc' their prime grantee contact when emailing Truescreen for mapping. Please allow three business days for Truescreen to process the request.

Program staff or the mapped prime grantee staff may contact Truescreen to remove mapping access.

Completing Checks and Adjudicating Results

- The Truescreen process for conducting checks begins with grantee staff ordering the necessary checks for the applicant, the individual who will work or serve in the NSCHCrequired position. The Truescreen AmeriCorps Grantee Guide provides instructions on how to order checks, review results, and document your adjudication. The Grantee Guide and the Truescreen AmeriCorps Applicant Guide are available for download from your client portal (https://mytruescreen.com) and on Litmos.
- After you order the checks, the applicant will receive an email to complete their portion of the process. Prepare your applicant for this process and provide them a copy of the Truescreen AmeriCorps Applicant Guide. 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 past residence; Social Security Number; date of birth; phone number; email address.
 - Indicate their AmeriCorps role: AmeriCorps member, AmeriCorps Seniors volunteer, or grantee staff.
 - 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. If no other document is available, the applicant may proceed to the <u>AmeriCorps NSCHC webpage</u> to complete and upload the State of Maine or Wisconsin Identification Form in the place of an identification.

- 3. If you ordered an FBI check for the individual, they will be directed to Fieldprint's website to schedule their fingerprinting at the end of their Truescreen application.
 - At the end of their Truescreen application, the applicant will be provided a unique fingerprint code and a link to Fieldprint's scheduling website. The applicant should record their fingerprint code for reference. If the applicant does not proceed to Fieldprint's website to schedule their fingerprint appointment at that time, they may do so later. If they misplace their fingerprint code, they can return to their Truescreen application at any time to get the code.
 - At Fieldprint's scheduling website, the applicant will set up an account, sign required authorizations, and set up a Livescan fingerprint appointment.
 - A Livescan fingerprint is captured electronically, without the need for the more traditional method of ink and paper. If no Livescan locations are available within 35 miles, Fieldprint will show public locations where the applicant may complete ink fingerprints. If a public location is selected, Fieldprint will mail a print card packet for the applicant to complete ink fingerprinting at a public site. The grantee or applicant should contact the public location beforehand to confirm fingerprint services are available and if additional fees apply.
- 4. The applicant will be fingerprinted at their Livescan appointment.
 - If the applicant requested mailed print cards to complete ink fingerprinting, once received, the applicant will bring the cards to the selected public location. The grantee or applicant should contact the public location beforehand to confirm fingerprint services are available and if additional fees apply.
 - 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 name-based search (listed in the AmeriCorps Monitoring Report) 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 NSCHC Manual.
- 5. You will receive an email when all checks on the individual's order are 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(s).



Please note that after you receive the results, you must review the results and enter a final adjudication decision into the Truescreen system. You will enter one adjudication decision for all checks on the order after all check results are returned.

6. The Truescreen AmeriCorps Grantee Guide includes the steps for reviewing results and completing your adjudication. The check is not complete until you enter a final grantee 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. The next section provides additional guidance on adjudicating checks in Truescreen.

Truescreen Adjudication Recommendations

Truescreen provides you with an adjudication recommendation ("Pass" or "Review") for each check component you order (NSOPW, state, and FBI checks) and notifies you when the check is complete. Truescreen provides the recommendation for convictions based off AmeriCorps NSCHC eligibility criteria (see <u>45 CFR § 2540.202</u>).

In addition, you will have access to applicant conviction details for any state checks you ordered. You can review that information if you have screening criteria beyond AmeriCorps minimum eligibility criteria. See section on "Suitability" in the *NSCHC Manual*. Note that the FBI prohibits Truescreen from providing you the conviction details for FBI checks.

Truescreen's recommendation "Pass" on a single check component (NSOPW, state, or FBI check) does not necessarily mean eligible. Similarly, Truescreen's adverse (not cleared) recommendation "Review" does not necessarily mean ineligible. Organizations must use each recommendation in combination with other information obtained through all required NSCHC components to make an informed choice before selecting an individual for work or service.

Pass Recommendation

A "Pass" recommendation means that an individual's criminal history record information for that check component did not contain an indication that the individual may have been convicted of murder, crimes related to sex offenses, or crimes of neglect, cruelty, or endangerment, 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.

Please note the following important points:

- A "Pass" recommendation does not mean that an individual has no criminal record. For example, an individual convicted of manslaughter, attempted murder, fraud, domestic violence, theft, or driving under the influence may receive a "Pass" recommendation.
- This recommendation is not a statement of suitability to serve with a particular organization. An organization may conduct additional criminal history screening beyond what is required by AmeriCorps (<u>45 CFR §§2540.200-207</u>).



Review Recommendation

A "Review" recommendation indicates that the selecting organization needs more information before it can make a final determination as to the fitness of an applicant, described in the next section. It does not automatically mean that an applicant is ineligible for work or service.

Any of the following situations will lead to a "Review" recommendation:

- An individual's check record indicates that they have been convicted of murder. Murder is the unlawful killing of a human being with malice aforethought (18 U.S.C. 1111). Offenses that result in the death of an individual such as manslaughter or vehicular homicide are not murder. Attempts or conspiracies to commit murder are not murder.
- An individual's check record indicates they are registered or are required to be registered as a sex offender.
- An individual's check record indicates that they have been convicted of a crime that may
 involve a sex offense, or a crime of neglect, cruelty, or endangerment. A "sex offense" is any
 offense that is, by its nature, sexual. Sexual assault, rape, lewd or lascivious acts, indecent
 child contact, solicitation, and other related offenses are examples of sexual offenses. "A
 crime of neglect, cruelty or endangerment" is a crime that involves the willful or
 unreasonable endangerment or abuse of individuals or animals. Kidnapping, abuse of a
 child, neglect or abandonment, and exploitation of an elderly person are examples of
 crimes of neglect, cruelty or endangerment.
- An individual's check record contains a charge for either murder or a crime that may involve a sex offense, or a crime of neglect, cruelty, or endangerment without clearly indicating that the individual was not convicted of that charge.

Making an Eligibility Determination

Regardless of the Truescreen adjudication recommendation, you **must** enter a final adjudication decision in your <u>MyTruescreen</u> account. If you do 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", **you must have sufficient documentation that you reviewed the results and confirmed there are no disqualifying convictions**. Failure to clearly document that the candidate is eligible to serve/work if Truescreen's adjudication recommendation is "Review" cannot be deemed compliant.

The process for you to determine eligibility for a "Review" recommendation depends on which check component had the adverse result.

• NSOPW or state check is "Review": Truescreen provides the results of the NSOPW search and the rap sheet results provided by the state source in the screening report. Review the details in the screening report to understand why Truescreen did not clear the individual. You may be able to confirm the individual is eligible from the screening report details. If you cannot confirm



eligibility, select "Pre-adverse" as your adjudication decision to automatically start Truescreen's Consumer Care applicant challenge process. Truescreen will mail a hard copy of your pre-adverse letter to the applicant, with a copy of their NSOPW or state check result.

• FBI check is "Review": Truescreen cannot provide the rap sheet for the FBI check result due to FBI restrictions. The applicant will need to obtain a review copy of their FBI check to demonstrate their eligibility. This process is described in the *Challenging A Not Cleared Recommendation* resource for applicants. If the FBI check is result is "Review", select "Pre-adverse" as your adjudication decision to automatically start Truescreen's Consumer Care applicant challenge process. Truescreen will mail the applicant your pre-adverse letter with instructions to obtain a review copy of their FBI result to challenge the factual accuracy before you reject them for work or service.

Pre-Adverse Applicant Challenge Process

If you intend to reject an individual because of past criminal history or ineligibility, selecting "Preadverse" will result in Truescreen automatically enrolling the individual in their Consumer Care applicant challenge process and mailing the applicant your pre-adverse letter. The pre-adverse letter walks the individual through the process to challenge the factual accuracy of a result and connects them to the *Truescreen AmeriCorps Applicant FAQs* on the <u>NSCHC webpage</u> for more information. The Consumer Care process is detailed in your Truescreen agreement. Contact your Truescreen account manager for more information. After the applicant challenge process, enter your final adjudication decision in Truescreen before the individual begins work or service:

- Select "Pass" if the applicant proved their eligibility and maintain documentation of how you confirmed their eligibility.
- Or select "Final Adverse" if the applicant was confirmed ineligible or did not successfully challenge the result; Truescreen will mail a hard copy of your final adverse letter to the applicant to inform them of the outcome. Maintain documentation of the process and outcome.

Truescreen Documentation and Compliance Checklist

Grantees 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 the grantee 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. Grantees 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 subrecipients 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.
- 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 Documentation and Compliance	How Truescreen can assist grantees with AmeriCorps Documentation and Compliance requirements	
 Evidence that all required components (NSOPW, State(s), and FBI checks) were completed and on file (45 CFR §2540.206). 	 Truescreen maintains checks in your electronic account for 5 years. For any records needed longer than these timeframes, please see <u>Maintaining System</u> <u>Documentation</u> section below for detailed guidance. 	
All required components (NSOPW, State(s), and FBI) were conducted on time (45 CFR §2540.205) and documentation reflects evidence of when checks were reviewed (adjudicated) and considered when making an eligibility determination.	 Truescreen provides grantees a process to electronically document that the checks were reviewed and considered when making an eligibility determination. 	
All required components (NSOPW, State(s), and FBI checks) were conducted through sources authorized by AmeriCorps (45 CFR §2540.204) and are consistent with the sources described in the grantee's adopted NSCHC policies and procedures.	✓ Truescreen is an approved AmeriCorps source.	
Evidence that NSOPW results include searches from all States, Territories, and Indian Tribes (45 CFR §2540.204).	 Truescreen only provides NSOPW checks that include information from all States, Territories, and Indian Tribes. 	

Truescreen assists grantees to document the NSCHC process for individual files:



Required Documentation and Compliance	How Truescreen can assist grantees with AmeriCorps
 Evidence that first and last names used on name-based checks reflect the current name of the individual. Documents used to determine an individual's first and last name must be consistent with sources described in the grantee's adopted NSCHC policies and procedures. Refer to AmeriCorps guidance on name-based checks in the NSCHC Manual. 	 ✓ Truescreen allows applicants to upload documentation into the system that grantees can use as documentation used to verify the first and last names used for the individual's name-based check.
Documentation of consent from the candidate to conduct State and FBI checks (45 CFR §2540.206).	 Truescreen consent includes: Documentation of notice to candidate that the national service position is contingent upon the organization's 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 provides pre-adverse or adverse action notices based on grantee adjudication decisions. Applicants can use Fieldprint to request a personal copy of their FBI results to challenge a "Review" (not cleared) result. Note that grantees must maintain adequate documentation of the process implemented to make an eligibility determination if Truescreen's result does not clear the individual (Truescreen recommends "Review" for any check component). This may include a contemporaneously dated memo to the file documenting determination of the individual's eligibility.



Maintaining System Documentation Before Vendor Retention Ends

Truescreen

You can access Truescreen records in your electronic account for five years from the date the check was completed, as long as you have an active user on the account. If you need to retain an individual's Truescreen records longer than **five** years from the date the check was completed, the AmeriCorps Monitoring Report may serve as documentation **from the Truescreen system**. You will need to download the AmeriCorps Monitoring Report before the five-year access period expires. This report may serve as documentation of the first and last name checked, which checks were completed, Truescreen's adjudication recommendation of "Pass" or "Review", and your grantee adjudication decision and timing.

In certain circumstances, you will need to save check documentation from the Truescreen system in addition to the AmeriCorps Monitoring Report. For this reason, AmeriCorps recommends saving the Case Summary Page and Adjudicate This Case page for all individuals, in addition to the AmeriCorps Monitoring Report. Those pages are one way to document the checks conducted and their results. Other documentation from the Truescreen system may also serve this purpose.

- It is recommended to save a locked copy the AmeriCorps Monitoring Report Excel document to avoid unintentional edits.
- You do not need to save the Truescreen consent forms because consent is integrated into the application process.
- The AmeriCorps Monitoring Report displays the most recent grantee adjudication or case note action and date. If you edited or reset your grantee adjudication decision or added a case note at a later date, the Report will show the later date. In these cases, you will need to save the check record with Adjudication History from the system to show the check was adjudicated on time.
- You must maintain a copy of the document used to verify the individual's name. You will need to save the name document the applicant uploaded to Truescreen if you do not have a copy on file.
- The AmeriCorps Monitoring Report only lists the individual's primary name from the check order. If multiple names or "AKAs" were checked on the same order, you may need to save documentation from the Truescreen record showing the AKAs checked.
- Reminder: For any individuals whose Truescreen adjudication recommendation is "Review", you must also have adequate documentation of how you determined that the candidate is eligible to work or serve. If you have documented this in the Adjudication Case Notes section of the Truescreen record, you will need to save those Case Notes from the system if they are not on the AmeriCorps Monitoring Report.
- Saving the Truescreen report results ("screening report" or "rap sheet") is not required, but your organization may elect to save the results for your records. It is prudent to save the rap sheets for any individuals whose Truescreen adjudication recommendation is "Review".
- You must also maintain any other documentation that you have **from outside the system**, such as name reconciliation process, applicant challenge details, supplemental eligibility documentation, etc.



Fieldprint

Access legacy FBI checks ordered directly through Fieldprint accounts before December 2024 at <u>https://reports.myfieldprint.com</u>. For assistance accessing legacy accounts, contact <u>customerservice@myfieldprint.com</u>.

For legacy checks ordered directly through Fieldprint prior to December 1, 2024, you can access Fieldprint records in your <u>electronic account</u> for seven years from when the check was completed, as long as you have an active user on the account. If you need to retain an individual's Fieldprint check record longer than **seven** years from the date the check was completed, the TCN Status Report may serve as documentation from the Fieldprint system. You will need to download the TCN Status Report before the seven-year access period expires. This report may serve as documentation that the FBI check was completed, documentation of Fieldprint's adjudication recommendation of "Cleared" or "Not Cleared", and, for individuals starting after the 2021 system enhancements, it may document your grantee adjudication decision and timing.

In certain circumstances, you will need to save check documentation from the Fieldprint system in addition to the TCN Status Report. For this reason, AmeriCorps recommends saving the myFitnessDetermination module for all individuals, in addition to the TCN Status Report.

- It is recommended to save a locked copy of the TCN Status Report Excel document to avoid unintentional edits.
- You do not need to save the Fieldprint consent forms because consent is integrated into the application process.
- The TCN Status Report displays the most recent grantee adjudication action and date. This
 means that if you edited or reset your grantee adjudication decision at a later date, the
 Report will show the later date. In these cases, you will need to save the
 myFitnessDetermination page with Activity Log from the system to show the check was
 adjudicated on time.
- Reminder: For any individuals whose Fieldprint adjudication recommendation is "Not Cleared", you must also have adequate documentation of how you determined that the candidate is eligible to work or serve.
- You must also maintain any other documentation that you have **from outside the system**, such as applicant challenge details, adjudication documentation for individuals before the 2021 enhancements, supplemental eligibility documentation, etc.



Frequently Asked Questions (FAQs)

See also Truescreen AmeriCorps Applicant FAQs found on the NSCHC webpage.

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1.0 General

1.1 When did AmeriCorps combine Truescreen and Fieldprint into one account/process?

In 2024, AmeriCorps contracted with Truescreen to provide all three check components (NSOPW, state, and FBI checks) through one system. This change was implemented from August through November 2024. Prior to this change, the Truescreen and Fieldprint systems were separate; grantees used Truescreen to conduct NSOPW and state checks and used Fieldprint to conduct FBI checks. AmeriCorps provided guidance for using the separate systems in the Using AmeriCorps Approved Vendors Fieldprint and Truescreen Manual, archived in the NSCHC Archive section of the <u>NSCHC</u> webpage.

1.2 Can Commissions/Prime Grant recipients require subgrant recipients to use AmeriCorps-approved vendors?

A Commission may require the use of AmeriCorps approved vendors.

1.3 Is the agency-approved vendor required?

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

1.4 Is it required to complete all NSCHC components using either the AmeriCorps-approved vendor Truescreen or NSOPW.gov and the state repository, or may programs use a combination of these approved sources?

Grantees 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 Truescreen to complete the FBI-fingerprint check. Regardless of the combination of approved sources used, grantees must complete and document each component required under the <u>NSCHC Rule</u>. Refer to the *NSCHC Manual* for additional information about NSCHC Documentation.



1.5 Can I still use Truescreen for positions that are not required to comply with NSCHC? Is it an allowable cost?

For positions that are not required to comply with NSCHC, grantees may use Truescreen to conduct NSOPW and/or state checks **only**. It is an allowable cost. Note that grantees may **not** use Truescreen to conduct **FBI checks** on individuals that are not in covered positions, as such checks are not authorized by law. See <u>45 CFR §2540.201</u> for covered positions that require NSCHC.

1.6 Who is my Truescreen account manager?

AmeriCorps' Truescreen account manager is Mike Carnation (<u>mcarnation@truescreen.com</u>). For general support, please contact <u>AmeriCorpsSupport@truescreen.com</u>.

2.0 Account Management and Setup

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

2.2 Why are there references to credit reports, character references or information beyond the NSOPW, state, or FBI check we are ordering?

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 grantees are not ordering, and applicants will not undergo a credit checks, employment history checks, or any check other than the NSOPW, state, or FBI check that is ordered. If grantees would like to engage Truescreen in their other services, they may do so outside the AmeriCorps contract.

2.3 Is Truescreen mobile friendly?

Yes! All Truescreen websites are mobile friendly.

2.4 What is the difference between https://applicationstation.truescreen.com and https://mytruescreen.com?

You will use ApplicationStation once to create your organization account. You can always log back in to review your Truescreen agreements. You will then use MyTruescreen to order checks, review and adjudicate results, and pull reports. Most of your time will be spent in your MyTruescreen account. Your applicants will use ApplicationStation to complete their portion of the application, after you start the check order.



2.5 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 other than customizing your grid view. However, take some time and explore that tab. It provides a lot of information about screening law and best practices.

2.6 Why is my account set up taking longer than five 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 Truescreen'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. If you have questions regarding your account set up or Truescreen services, contact your Truescreen account manager right away.

In some cases, Truescreen may need to confirm your grantee status with AmeriCorps after you submit your agreement. If this happens, you may receive an email from AmeriCorps staff to confirm you are an AmeriCorps grant recipient or subrecipient before your account can be created. AmeriCorps staff will request basic information such as your grant number, whether you are a recipient from another organization such as a State Commission, etc.

3.0 Ordering Checks

3.1 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 email to Truescreen.
Phone: 888-291-1369 ext. 2006
Email: <u>AmeriCorpsSupport@truescreen.com</u>

3.2 How can an organization pay for the checks?

Only grantees 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.

3.3 When we will be charged for the checks?

Your credit card will be charged when Truescreen returns the results for all check components on the order (or "case"). You are charged once for the full amount of the order. If you are invoiced, the charge will appear on the next invoice after the order is completed.

3.4 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. However, the applicant must have their own email address to schedule FBI check fingerprinting through Fieldprint. This is due to



consumer protections around privacy and consent for fingerprint information. See the Truescreen AmeriCorps Grantee Guide, "Assisting Applicants without Email Addresses" section.

3.5 What if my applicant is technology illiterate or does not have access to a computer?

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. See the Truescreen AmeriCorps Grantee Guide, "Assisting Applicants without Email Addresses" section.

3.6 Can applicants disclose previous convictions?

Yes, applicants can disclose convictions of murder and/or registerable sex offense only during the ApplicationStation 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 name, **you will be charged for an additional check to be run under that name**.

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

Yes, bulk upload options are available and described in the Truescreen AmeriCorps Grantee Guide. Contact your Truescreen Account manager to get started.

3.8 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 security number exists.

3.9 Is it still required for applicants to upload a government-issued photo ID to Truescreen?

The new <u>NSCHC rule</u> does not require ID verification with a government-issued photo ID, specifically. However, AmeriCorps expects that grantees 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, either by the applicant or grantee staff. As of the 2.0 system update that took place May 23, 2022, grantees may upload documents to check records. During oversight activities, AmeriCorps 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*.

3.10 Is it still required to check the "ID Verified" box in Truescreen to document verification of ID? The new <u>NSCHC rule</u> 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 as of May 1, 2021. This check box was removed from Truescreen with the 2.0 system update that took place May 23, 2022.



3.11 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?

"Access to Vulnerable Populations" selection was removed from Truescreen with the 2.0 system update that took place May 23, 2022. Prior to this, grantees may have selected any response for individuals starting on or after May 1, 2021. This information will not be used by the Office of Monitoring for individuals starting on or after May 1, 2021.

3.12 I am a grantee staff required to undergo NSCHC. Can I order a check for myself in Truescreen?

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.

3.13 When ordering checks, the FBI check options are not listed. Why doesn't my account have the FBI check option?

If you created the Truescreen account before August 12, 2024, the FBI check was not automatically included. You must complete an updated user agreement to add the FBI check option. See the instructions in the Truescreen AmeriCorps Grantee FBI Amendment Guide available in Litmos. Contact your Truescreen account manager with questions.

4.0 FBI Checks and Fingerprinting

See also Truescreen AmeriCorps Applicant FAQs document found on the <u>NSCHC webpage</u>.

4.1 If Truescreen is the AmeriCorps approved vendor, why do I see references to Fieldprint? How is Fieldprint related to Truescreen?

Fieldprint provides the fingerprinting services for FBI checks ordered through Truescreen. Truescreen subcontracts with Fieldprint to provide this service. Although grantees order and adjudicate all checks in Truescreen, applicants will schedule their fingerprinting through Fieldprint's website. You will see references to Fieldprint around Livescan locations and completing fingerprinting for FBI checks ordered through Truescreen.

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

In March 2015, the FBI limited grantees' ability to obtain FBI Departmental Order (DO) checks using a Channeler, which disrupted the operations of a number of grantees. In response, on April 1, 2015, AmeriCorps issued a temporary exemption ONLY for grantees 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 grantees a smooth transition to Fieldprint's services. Grantees that relied on this exemption must obtain FBI checks either using Fieldprint (now through Truescreen) or by another means. AmeriCorps strongly encouraged grantees 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, grantees 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.

4.3 Who may use Truescreen to obtain FBI checks?

Grantees may use Truescreen to obtain FBI checks on individuals in covered positions if the grantee cannot successfully receive this service from state repositories. This would include grantees 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 grantees 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 grantees that can obtain timely FBI checks through your state repository—keep using it! If not, use Truescreen.

4.4 Who may receive an FBI check through Truescreen?

Truescreen 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 (<u>45 CFR §2540.201</u>), 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.

4.5 Who may not receive an FBI check through Truescreen?

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

4.6 What if applicants don't live near one of Fieldprint's local Livescan fingerprinting providers?

If there is no Fieldprint Livescan location within 35 miles of the address searched, Fieldprint will provide information on other public locations 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 fingerprint cards and information necessary for an individual to get their fingerprints taken at one of these locations. The grantee or applicant should contact the public location 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.

4.7 What is FBI Criminal History Record Information?

FBI Criminal History Record Information is the result of a fingerprint-based criminal records check conducted through the FBI's automated fingerprint information system. This report contains what is often referred to as a "rap sheet" or a listing of information retained by the FBI in connection to arrest



information, such as agency name, date of arrest, the arrest charge, and the disposition of the arrest, if known by the FBI.

5.0 State and NSOPW Checks

5.1 Are state checks conducted through Truescreen fingerprint checks?

No, the Truescreen state and NSOPW checks are name-based. Note that some state sources may require an applicant to submit fingerprints if there is a possible name match. FBI checks conducted through Truescreen are fingerprint-based, unless two sets of fingerprints are rejected/unreadable.

5.2 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 grantees; 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.

5.3 What states, territories, and Tribes are included in a Truescreen NSOPW check?

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

6.0 Results and Adjudication

6.1 I have screening criteria above and beyond AmeriCorps eligibility criteria. Can Truescreen adjudicate against my organization's standards? (Updated DATE)

Truescreen's adjudication recommendation cannot be customized under the AmeriCorps agreement. Truescreen will adjudicate convictions based on AmeriCorps eligibility criteria (<u>42 U.S.C.</u> § <u>12645g</u>). However, grantees will have access to individual applicant conviction data for any state checks and can review the information and can accept or reject the individual according to their screening criteria, if above AmeriCorps' minimum eligibility criteria. See section on "Suitability" in the *NSCHC Manual*. If you reject a candidate, the candidate will go through Truescreen's Consumer Care process which allows the applicant the opportunity to challenge the factual accuracy of the result. This may take several weeks to resolve.

6.2 Will Truescreen provide a rap sheet for the state check results?

Yes, Truescreen will provide the full results report provided by the state source, which will include any information the state allows to be shared.

6.3 Will Truescreen or Fieldprint provide rap sheets for the FBI check?

Truescreen and Fieldprint are prohibited by the FBI from providing FBI rap sheets to grantees. Truescreen will provide an adjudication recommendation of "pass" or "review" based on AmeriCorps



criteria that includes murder and offenses that require registration on a sex offender registry, including certain crimes of neglect, cruelty, or endangerment.

6.4 Why do I need to adjudicate Truescreen's "pass" recommendation?

Grantees **must** provide a final adjudication decision. Grantees are required to review and consider the results of the NSCHC when selecting the individual. Truescreen does not make a final selection decision but only provides an adjudication recommendation. A complete NSCHC includes a final adjudication from the grantee. A Truescreen check without a final adjudication decision from the grantee 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.

6.5 Why is Truescreen taking longer than five 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. Or the state source may require more information from the applicant, such as fingerprints. If the FBI check is pending, it is possible the individual's fingerprints were rejected and a name-based check or reprinting may be required.

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

6.6 Are there any situations where an individual would not be cleared but that individual is actually eligible for work or service?

(cross-listing: Truescreen AmeriCorps Applicant FAQs)

Yes. There are three situations when someone who is actually eligible to work or serve would receive a "Review" (not cleared) recommendation from Truescreen:

- The individual's check record may contain a factual error.
- The individual may have been convicted of an offense that relates to a sex offense or a crime of neglect, cruelty, or endangerment, but did not actually result in a requirement to register as a sex offender. To ensure safety, Truescreen will make its best effort to return an adverse recommendation for a broad array of crimes associated with sex offenses or crimes of neglect, cruelty, or endangerment. Individuals may receive an adverse recommendation for any crime related to sex offenses or neglect, cruelty, or endangerment to register as a sex offender. In these cases, an individual could be eligible to work or serve in an AmeriCorps-funded program.
- The individual's check record may contain a charge for a potentially disqualifying offense without clearly indicating that the individual was convicted of that offense. The final outcome of the case may not be noted, or it may not be clear if the final outcome was that the individual was convicted. In these cases, the individual could still be eligible to work or serve.



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

Yes, if you reject an individual because of past criminal history by selecting "Pre-adverse" as your adjudication decision, Truescreen will automatically enroll the individual in their Consumer Care process by mailing the applicant your pre-adverse letter. The pre-adverse letter walks the individual through the process to challenge the factual accuracy of a result. 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.

It is not required to use the Truescreen pre- and post-adverse letter process, but it is strongly encouraged. If you choose to opt-out of this process, 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 **and document this process on your own**.

6.8 We initiated the pre-adverse process for an applicant. What should we do next?

AmeriCorps recommends contacting the applicant to let them know to expect a letter from Truescreen in the mail regarding their check or to confirm they received the letter. The letter notifies applicants to respond within five business days if they wish to challenge the result through Truescreen's Consumer Care process. You can review the check status in your <u>myTruescreen</u> portal to confirm whether the individual started the Consumer Care process. If you are unable to contact the applicant or see that they have not started the Consumer Care process within a reasonable timeframe - *at minimum*, you must allow five business days *plus* allowing for mail processing time - you may proceed with your final rejection of the applicant in Truescreen.

Change Log

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

# Dai	ate S	ection or Page #	Change