



CORPORATION FOR NATIONAL & COMMUNITY SERVICE

June 13, 2019

Dear Grant Recipients,

In November, 2018, CNCS's Chief Executive Officer, Barbara Stewart, shared the availability of new tools and policies to support the agency's National Service Criminal History Check (NSCHC) program. Our priorities remain to ensure the safety of vulnerable populations throughout the communities we serve by eliminating barriers to compliance with NSCHC, reducing NSCHC noncompliance, and reducing the monitoring burden on grantees and CNCS.

In support of these goals, CNCS: 1) identified a vendor to support the agency's current FBI channeler contract to provide grantees with all three components of NSCHC; 2) established an Exemption Period to allow for NSCHC rechecks; and 3) provided funding to support rechecks of individuals working or serving in covered positions. As we announced in November, and in subsequent communications, CNCS will implement a new policy for NSCHC enforcement at the conclusion of the Exemption Period. This policy includes new compliance remedies and a cost-based disallowance structure. The shift away from the NSCHC mitigation matrix will better align the disallowance associated with NSCHC noncompliance with the importance the agency places on this critical safety requirement.

The revised NSCHC Guide to Enforcement Action (the Guide), will go into effect July 1, 2019 and is available for your review here:

<https://www.nationalservice.gov/CHCEnforcement>

This Guide represents significant changes from the current NSCHC Enforcement Guide for Staff and Grantees.

Important elements include:

- Disallowance for NSCHC noncompliance will be based on costs expended.
- Disallowance amounts will generally be calculated on costs expended within a six-month period. If the period of work or service is less than six months, or if the period of noncompliance is less than six months, the cost will be adjusted to coincide with the period of service, work, or period of noncompliance.
- CNCS may disallow costs for more than six months if facts and circumstances further CNCS compliance objectives.
- Disallowance amounts will be calculated as follows:
  - Cost Reimbursement Grants: Salary/Stipend/Living Allowance and FICA for period of noncompliance/six months
  - Fixed Amount Grants: Share of the cost/MSY proportional to the period of noncompliance/six months
- The Guide includes the following additional enforcement actions to be applied to noncompliance, as applicable:
  - Required use of CNCS-approved contracts with Truescreen and Fieldprint
  - Impact on future CNCS awards
  - Manual hold
  - Restriction of funds
  - Grant suspension
  - Grant termination
- CNCS requires all prime grantees to implement this Guide for NSCHC disallowance.

For more information, please refer to NSCHC resources on the CNCS Knowledge Network. Questions may be directed to [chc@cns.gov](mailto:chc@cns.gov).

Thank you,

Lori Giblin

Chief Risk Officer

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