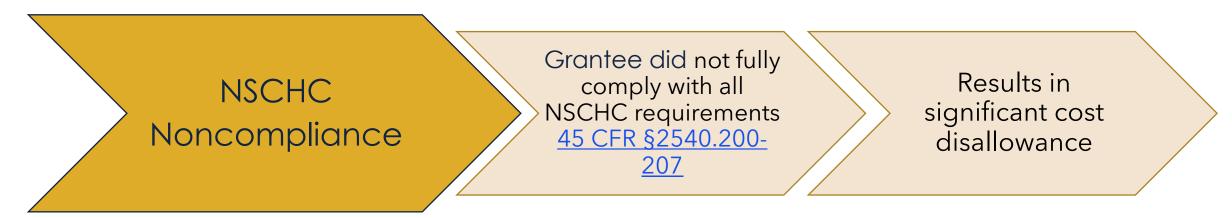
## Common Findings of National Service Criminal History Check (NSCHC) Noncompliance

AmeriCorps Office of Monitoring – created September 2023



- Refer to the NSCHC Manual (available on the <u>NSCHC webpage</u>), 'Administrative Remedies and Enforcement for Noncompliance' section for details on NSCHC cost disallowance.
- This resource only summarizes key guidance around top areas of NSCHC noncompliance. See the <u>NSCHC webpage</u> and <u>NSCHC Learning Path in Litmos</u> for complete guidance documents and resources.

## Pay special attention to avoid these common findings!

### Missing checks / unallowable source

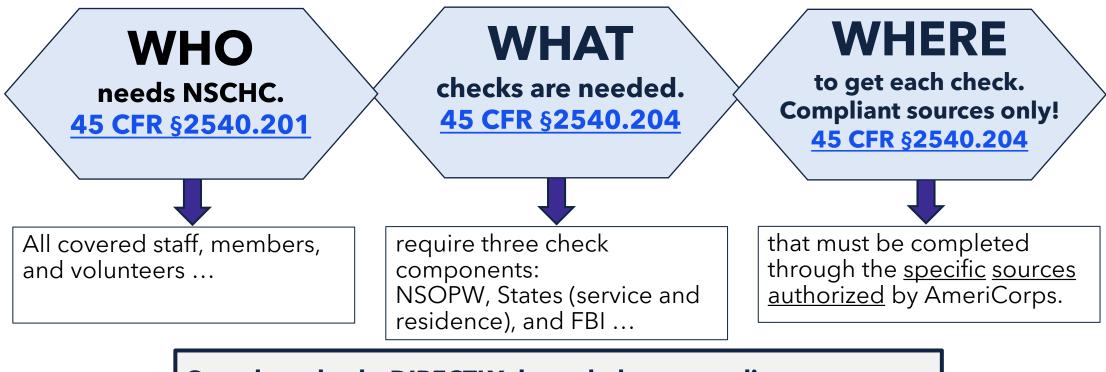
Missing documentation of review & eligibility decision (adjudication)

Wrong name on name-based checks / missing document to support name

Checks not completed & adjudicated before start (lateness)

## Know the Who - What - Where!

Avoid missing checks / unallowable check source



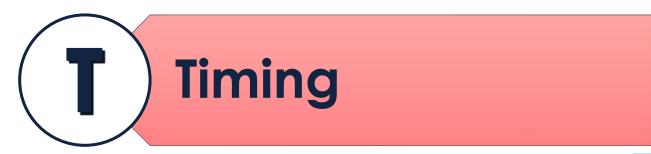
#### **Complete checks DIRECTLY through these compliant sources:**

- NSOPW: NSOPW.gov or Truescreen
- State: AmeriCorps identified state repository or Truescreen
- FBI: AmeriCorps identified state repository or Fieldprint

Avoid wrong name, missing adjudication, and lateness







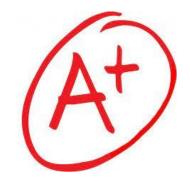
Avoid wrong name on name-based checks / missing document to support name





- ✓ Names must exactly match an allowable name document. See <u>NSCHC Manual</u> for allowable documents.
- ✓ *Maintain* the allowable name document.
- ✓ Document process to reconcile different names, if applicable.

Avoid missing documentation of review & eligibility decision (adjudication)



## ADJUDICATION

- ✓ Adjudicate: review all check results and make an eligibility determination.
- Clearly document your review and adjudication, including when it took place.

 Clearly document how you determined eligibility if Truescreen/Fieldprint result does not pass/clear the individual.

## **ADJUDICATION REMINDERS!**

A complete NSCHC includes a final, documented adjudication decision from YOU, the grant recipient. You must document your grantee adjudication for each check regardless of which source you use.

### Truescreen and Fieldprint:

- The approved vendors only provide an adjudication recommendation.
- Use the vendor systems to document YOUR review and adjudication decision.
- Refer to <u>Using AmeriCorps</u> <u>Approved Vendors Truescreen</u> <u>and Fieldprint Manual</u>!

### NSOPW.gov and State Repositories:

Refer to <u>Using NSOPW and State</u> <u>Repositories Manual</u> for details about documenting your review and adjudication using these sources!

#### Avoid checks not completed/adjudicated before start (lateness)



## ✓ Do it all on time!

 Review that checks are fully compliant and all requirements documented no later than the day BEFORE the individual's start date.

 ✓ If you encounter significant delays or barriers outside your control, consider requesting an *NSCHC waiver*, described in <u>NSCHC Manual</u>.



# Monitoring checks early is crucial to avoiding noncompliance and associated cost-based disallowance.

### **Self-monitoring resources:**

- Overview of Uniform Monitoring Package (UMP) Section 9: NSCHC, on Office of Monitoring webpage.
- <u>NSCHC Manual</u>: 'NSCHC Documentation' and 'Monitoring for Compliance' sections.
- Truescreen/Fieldprint monitoring reports: available in your vendor client portal. Use them to monitor early!