

Fieldprint and Truescreen Exemption Period

Frequently Asked Question Supplemental as of June 19, 2019

Fieldprint and Truescreen Exemption Period Guidance, Instructions and FAQs can be found here:

<https://www.nationalservice.gov/documents/2018/2018-exemption-period>

New as of 5/2/19! Truescreen has a new customer service email for CNCS grant recipients!

- Truescreen questions can be referred to CNCShelp@truescreen.com
- Truescreen account set up questions can be referred to your Truescreen Account Manager.
- NSCHC compliance questions can be directed to CHC@cns.gov

- 1. If I need to conduct a recheck from a state that participates in the FBI's National Fingerprint File Program (NFF), do I still need to run a separate state check for the NFF state in addition to an FBI fingerprint check for individuals that started work or service prior to the NFF ASP effective date of September 24? (December 14, 2018)**

No. You may rely on the Pre-Approved NFF ASP for rechecks conducted during the Exemption Period. There is no need to run a separate state check from a state that participates in the NFF if you conduct a Fieldprint FBI check during the Exemption Period. Rechecks must still include a check of the NSOPW regardless of a state's participation in the NFF Program.

- 2. If a program attempts to conduct a full recheck of covered individuals serving or working in covered positions on or after November 15, 2018, but an individual in a covered position refuses to participate in the recheck, will the program lose the Exemption Period benefit referenced in FAQ 5? (December 14, 2018, updated May 2, 2019)**

FAQ 5 states: "If a grant recipient conducts a full recheck on all covered individuals serving within the parameters of the Exemption Period, enforcement action will not be taken for noncompliant files of individuals no longer working or serving at the time of the Exemption Period."

The Exemption Period and opportunity to recheck individuals in covered positions was established to ensure the safety of beneficiaries and to increase compliance with CNCS requirements. *It is CNCS's expectation that grant recipients participating in the Exemption Period who are seeking the benefit of conducting the full recheck should make every effort to recheck all individuals working or serving within the parameters of the Exemption Period.* In circumstances where an individual in covered position refuses to undergo a recheck, CNCS will consider allowing the grant recipient the full benefit of the Exemption Period if:

- The grant recipient conducted rechecks within the parameters of the Exemption Period for covered individuals for whom it was possible to conduct a recheck, and

- The individual refusing a recheck is **not** an employee or participant of the grant recipient or program but is an individual over which the grant recipient does not have authority, such as a staff at an operating site whose time is counted as match, **and**,
- The grant recipient provides CNCS documentation of the refusal, including the role of the individual and the reason for the refusal.

3. If an individual exits the program during the Exemption Period but prior to the completion of the rechecks, does the grant recipient need to conduct the recheck? (December 14, 2018, May 2, 2019)

It is not necessary to recheck individuals in covered positions who are no longer working or serving. If a grant recipient conducts a full recheck on all covered individuals serving within the parameters of this Exemption Period, enforcement action will not be taken for noncompliant files of individuals no longer working or serving at the time of the Exemption Period.

(Updated May 2, 2019) CNCS will determine the population of individuals who must have rechecks in order for the grant recipient to be considered as fully participating in the Exemption Period as: all individuals working/serving on a CNCS grant on or after November 15, 2018 and still working/serving on a CNCS grant at the end of the Exemption Period on June 30, 2019.

If an individual exits the program during the Exemption Period but prior to the completion of the rechecks, the program does not need to conduct a recheck on that individual. Grant recipients should not wait until the end of the Exemption Period to begin conducting rechecks, as all rechecks must be complete (adjudicated) prior to the end of the Exemption Period.

4. When ordering rechecks in Truescreen, what date should I put as an individual's Anticipated Start Date? What if I put in the wrong start date? (December 14, 2018, updated May 2, 2019)

For rechecks, grant recipients should enter the individual's actual start date in this field.

(Updated May 2, 2019) The anticipated start date, if correct, will be helpful for CNCS monitoring officials. However, during monitoring, this date will be validated by primary source documentation that details the actual start date of the individual in a covered position. Primary source documentation can include an application, offer letter, MyAmeriCorps portal, etc.

5. Do Fieldprint and Truescreen provide a "rap sheet"? (December 14, 2018)

For Fieldprint (FBI check): grant recipients will receive an adjudication recommendation of cleared/not cleared based on CNCS's adjudication criteria.

For Truescreen (NSOPW and state check): grant recipients will receive an adjudication recommendation based on CNCS's adjudication criteria as well as access to review the criminal history information provided by Truescreen.

6. How do the changes with NSCHC impact the required annual ecourse? (December 14, 2018)

Grant recipients should proceed with using the current version of the required ecourse at this time and have it completed in accordance with their timing requirement (all grant recipients must have one person with a current certification of completion). The ecourse refers primarily to statutory and regulatory requirements and those have not changed.

7. Does each individual being checked or rechecked need their own email address for Fieldprint and Truescreen? (December 14, 2018, updated January 28, 2019, updated May 2, 2019)

For Fieldprint, an individual will need an email address. Grant recipients working with covered individuals who do not have email addresses can work with these individuals to set up a free email account used only for Fieldprint and Truescreen account set-up and can then work with the individuals to complete the applicant information portion of the systems as needed.

For Truescreen, the applicant, him or herself, will need to provide the "wet signature" on the screen, as grant recipient staff cannot enter into agreements on behalf of participants. Because of the Personally Identifiable Information (PII) being provided via the established participant accounts in these systems, it is not recommended to use one email address to establish accounts for multiple individuals, even if the Fieldprint or Truescreen technology will allow it.

(Updated 1/28/19) In recognition that CNCS grant recipients may engage with applicants who have limited access to or proficiency with technology and do not have an email address, grant recipients may use one grant recipient email address to work with applicants to complete the applicant portion of during the Truescreen application process, rather than requiring each applicant to have a unique email address.

The individual at the grant recipient organization who is requesting the background report may have an applicant's ApplicationStation email sent to the requestor's email address when the purpose is to mitigate issues of technological access and proficiency. While this functionality is available for grant recipients, CNCS strongly encourages grant recipients to continue to have applicants use a unique email address in order to most fully protect personally identifiable information and applicant privacy.

Grant recipient organizations are prohibited by law from signing disclosure and authorization for applicants. Applicants must complete and sign their own Disclosure and Authorization forms prior to the ordering of their background check.

Care must be taken to ensure each user who orders/monitors background reports has his or her own user account and does not share these credentials.

Truescreen will not be responsible nor liable whatsoever if an individual shares his or her credentials with anyone else, or allows another applicant to view personal information of another individual via the Truescreen website. Note that such conduct is considered unlawful and could lead to civil and/or criminal penalties.

Truescreen will provide an alternative paper process for participants who cannot access email or who otherwise need it. This alternate process will **significantly** increase turnaround times.

(Updated May 2, 2019)

Grant recipients using the functionality referenced above, where the individual at the grant recipient organization who is requesting the background report may have an applicant's ApplicationStation email sent to the requestor's email address, must ensure that the information being entered matches the individual tied to the application.

The email with the link to ApplicationStation is unique to the individual whose criminal history is being checked. The email will be addressed to a specific person and will be associated with a case number tied to that specific person. When an application is being completed, please be sure that the information entered is the information for the person to whom the email is addressed.

If you are not careful to ensure that the email and case number are directly tied to the individual you are checking, you will complete the entire application, including all compliance sections, for the wrong individual.

8. The Truescreen account set-up asks for a grant number. What do I enter if I have more than one CNCS grant? Do I need to set up multiple accounts, one for each program or grant? (December 14, 2018)

Grant recipients with more than one program or more than one grant can elect to establish one account with Truescreen or multiple accounts. When setting up one account for multiple grants, enter one grant number at the time of account set-up. The grant number at account set-up helps CNCS confirm the entity is a grant recipient.

The ordering screens, where you will order the checks for a specific individual, also have a field for grant number, and it is there where you can put in the grant number(s) tied to that particular individual being checked. If entering more than one grant number, use comma space before entering another.

9. For individuals who are starting work or service during the Exemption Period, will a grant recipient need to conduct rechecks via Truescreen and Fieldprint in order to get the full benefit of the Exemption Period? (December 14, 2018)

Individuals who begin work or service during the Exemption Period are required to undergo national service criminal history checks in accordance with CNCS requirements. While we strongly encourage grant recipients to take advantage of Fieldprint and Truescreen for initial checks in order to help to ensure compliance with NSCHC, use of these vendors is not required for initial checks. If a grant recipient is conducting compliant checks from existing sources, they can elect to continue working with those sources moving forward.

The Exemption Period applies to **rechecks** of individuals who will be serving on or after November 15, 2018. If an individual begins work or service during the Exemption Period and the grant recipient conducts a compliant check initially, no recheck is needed. For noncompliant initial checks conducted during the Exemption Period, grant recipients may conduct a recheck within the parameters of the Exemption Period.

In order to take advantage of the Exemption Period, grant recipients must use CNCS contracts with Fieldprint and Truescreen to conduct required **rechecks**.

10. Why does Truescreen ask for a word copy of my letterhead and a signature? When will the letterhead and signature be used? (January 28, 2019, Updated February 20, 2019)

Truescreen will only send out letters on your organization's letterhead when required to do so by law. State and Federal law require that certain notifications be issued to individuals regarding criminal history checks. Truescreen will provide these notifications on behalf of the grant recipient in order to be compliant with state and federal law. There are two instances when notification is required:

- California, Minnesota, New York, and Oklahoma state laws require that individuals are provided with a consumer notification that a check is being conducted. Truescreen will notify the individual on your organization's letterhead.
- The Federal Credit Reporting Act (FCRA) requires that individuals who are not approved to serve/work as a result of criminal history check results receive notices of potential adverse actions against them. Truescreen will contact the individual on your organization's behalf, on your organization's letterhead, per FCRA. This action will be prompted by the grant recipient and the grant recipient will have copies of the process in their MyTruescreen account.

(Updated February 20, 2019)

Please see below for the situations when the template letters will be delivered. This table is in your Truescreen agreement. Please note the End-User refers to the organization that signed the agreement.

| Notification Type | Trigger to send |
|--------------------------------|---|
| FCRA Pre-Adverse Action Letter | When requested by End-User via <i>mytruescreen.com</i> site |

| | |
|--|--|
| Additional Pre-Adverse Action Documents/State-Local Compliance | At the same time as the FCRA Pre-Adverse Action Letter, if requested, uploaded, and approved by End-User via <i>mytruescreen.com</i> site. |
| FCRA Final Adverse Action Letter | <p>Either 5 business days after consumer accesses the FCRA Pre-Adverse Action Letter electronically or 5 business days after FCRA Pre-Adverse Action Letter is mailed to the Consumer – provided no dispute/statement has been initiated by the Consumer(s).</p> <p>**Important Note: if the Consumer initiates a dispute/statement, Provider will not automatically send the FCRA Final Adverse Action Letter. Upon resolution of the Consumer dispute/statement, Provider will provide End-User an updated copy of the report and, if desired, End-User will manually request the Final Adverse Action Letter be sent via the <i>mytruescreen.com</i> site.</p> |
| Additional Adverse Action Documents/State-Local Compliance | At the same time as the FCRA Final Adverse Action Letter, if requested, uploaded, and approved by End-User via <i>mytruescreen.com</i> site |
| California Report Copy | Upon delivery of report to End-User where applicant's current residence address is California |
| Oklahoma Report Copy | Upon delivery of report to End-User where applicant's current residence address is Oklahoma |
| Minnesota Report Copy | Upon delivery of report to End-User where applicant's current residence address is Minnesota |
| NY Article 23A Notification | Upon delivery of report to End-User where criminal records are being reported and applicant's current residence address is New York |

10.1. I am not allowed to provide letterhead and signature to Truescreen, can I still use Truescreen? (February 20, 2019)

Yes, you may still use Truescreen. Inform your Account Manager that you will opt out of the process. Please know that your organization will assume responsibility for complying with the Federal Credit Reporting Act (FCRA), including, but not limited to, any required FCRA notifications, state consumer reporting/credit laws, and CNCS regulations.

11. Which states require additional steps to conduct state checks via Truescreen? (January 28, 2019, updated May 2, 2019)

As described in the trainings conducted in November and December of 2018, several states require additional steps to conduct a state check via Truescreen. These steps are mandated by state law. Recorded trainings can be found here:

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

(Updated May 2, 2019) Georgia and Mississippi: These states require applicant to submit an additional form before completing a state check. You may submit these forms when ordering the checks (these can be found on the myLearningCenter on the myHome page of your Truescreen account) and/or Truescreen will prompt you to submit these forms via email.

Illinois, Indiana, Missouri, Pennsylvania and Washington: In rare cases, these states may require applicants to submit fingerprints to fully process the state check. Circumstances that may lead to the required submission of fingerprints include but are not limited to the

following: 1) the name is common and the state cannot conduct the check without more information, 2) the information provided by the applicant does not match what the state has in its system and the state needs more information to conduct the check on the correct person and/or 3) there is potential criminal/conviction information that requires more information before the check is complete.

Truescreen will inform grant recipients via email if fingerprints are required. Please note that fingerprinting will extend the turnaround time for receiving the results.

12. Why do Truescreen agreements refer to “employment” instead of “volunteerism”? (January 28, 2019)

Truescreen is bound by the Fair Credit Reporting Act (FCRA), the primary federal law regulating employment background checks. For FCRA, references to employee and employment purposes were determined by the Federal Trade Commission (FTC) to include volunteers, so the FCRA disclosures apply to both volunteers as well as paid employees. FCRA requires very specific disclosures, and Truescreen is not able to make revisions to required FCRA disclosures.

13. Which name should I enter in Truescreen to conduct an NSOPW and/or State check? (January 28, 2019, Updated on February 20, 2019, Revised May 2, 2019)

At the start of the Exemption Period, the Truescreen system was set up to run checks based on all primary names entered. Until March 6, 2019, if the grant recipient and applicant enter two separate names, the grant recipient was charged for checks of both names. During that time, this FAQ instructed grant recipients to ensure that the name entered by the grant recipient and the applicant were identical, including spaces and hyphens, in order to avoid charges for different primary names.

As of March 6, 2019, Truescreen will run searches only on the first and last name entered into the system by the grant recipient (and AKAs entered by the grant recipient, as applicable). The only exception to this process rule will be when the applicant indicates a murder conviction and/or a sex offense conviction under a different name. In these cases additional checks will be run on the name(s) that the murder conviction and/or sex offense conviction were rendered to affirm the convictions.

It is the grant recipient responsibility to conduct state and/or NSOPW checks on the first and last name as it appears on the government-issued photo ID. Middle name is an optional field for Truescreen searches.

(Updated on February 20, 2019)

Clarification on the name used for Truescreen checks: For checks conducted via Truescreen the grant recipient and applicant must enter the first and last name as it appears on the government-issued photo identification. Middle names are not a required field in Truescreen’s

system but may be entered. Truescreen will conduct the check on the first and last name provided by the grant recipient. If the state source requires additional search information (DOB, SSN, middle name, etc.), Truescreen will provide that information to the state source. If there is a conviction on the criminal history record, Truescreen will use information such as the DOB, SSN, middle name, initial, suffixes, or other information to verify the identity of the individual who was convicted of the crime.

On May 2, 2019, this question was substantively revised and the FAQ language in earlier versions of this was based on system functionality that has been discontinued.

14. Who can adjudicate the Truescreen checks? Can I adjudicate my own recheck? (January 28, 2019)

Grant recipients should have internal controls in place to prevent fraud, safeguard assets, and ensure integrity of records. This includes having the appropriate systems in place to adjudicate criminal history reports. An individual in a covered position should be not be responsible for adjudicating their own check.

15. What rechecks do I need to conduct for the Exemption Period if I had/have an ASP/Exemption when the original check was conducted? (January 28, 2019, Updated May 2, 2019)

CNCS strongly encourages grant recipients to use this Exemption Period and the associated funding to conduct the check components required by the individual's current access to vulnerable populations.

For purposes of the Exemption Period, grant recipients should conduct NSCHC with the components required under the CNCS **regulation** at the time of application or the date the individual was assigned to the grant.

(Updated May 2, 2019) For purposes of the Exemption Period, grant recipients should, for the recheck, conduct NSCHC with the components required under the CNCS regulation at the time the individual started working or serving in a covered position. With the exception of the national fingerprint file (NFF) states noted in FAQ 1 of this document and the Truescreen Alternative Search Procedure (ASP), Exemption Period rechecks should include the components required under the regulation in place at the time the individual started, regardless of whether the grant recipient had an ASP, at that time, that exempted a specific component of the check.

See the effective dates reflected here for information regarding the specific components required at the time of application:

https://www.nationalservice.gov/sites/default/files/documents/NSCHC_manual_final_11-15-18_508.pdf.

16. How will CNCS determine whether a program participated fully in the Exemption Period? (February 20, 2019, Updated May 2, 2019)

If a grant recipient conducts a recheck on all covered individuals serving within the parameters of this Exemption Period, enforcement action will not be taken for noncompliant files of individuals no longer working or serving at the time of the Exemption Period.

(Updated May 2, 2019) It is not necessary to recheck individuals in covered positions who are no longer working or serving as of November 15, 2018 or during the Exemption Period. If a grant recipient conducts a full recheck on all covered individuals serving within the parameters of this Exemption Period, enforcement action will not be taken for noncompliant files of individuals no longer working or serving at the time of the Exemption Period.

Grant recipients should not wait until the end of the Exemption Period to begin conducting rechecks, as all rechecks must be complete (adjudicated by the grant recipient) prior to the end of the Exemption Period.

In determining whether to take disallowance enforcement action on noncompliant files of individuals no longer serving or working at the time of the Exemption Period, CNCS will define full participation in the Exemption Period as follows:

Program Participants:

- Rechecks must be conducted on all individuals in a covered position who have been working/serving on a CNCS grant on or after November 15, 2018. If an individual exits the program during the Exemption Period but prior to the completion of the rechecks, the program does not need to conduct a recheck on that individual.
- CNCS will determine the population of individuals who must have rechecks in order for the grant recipient to be considered as fully participating in the Exemption Period as: all individuals working/serving on a CNCS grant on or after November 15, 2018 and still working/serving on a CNCS grant at the end of the Exemption Period on June 30, 2019.

Grants and Subgrants

- For direct grant recipients that do not issue subgrants, full participation in the Exemption Period will be defined at the grant level.
 - For example: if a grant recipient organization has two grants and chooses to conduct rechecks for all individuals working or serving as of November 15, 2018 on one grant and not the other, the grant on which the rechecks were conducted is eligible for exemption from disallowance enforcement action being taken on previous noncompliance as defined in the Exemption Period guidance.
- For sub recipients, full participation in the Exemption Period will be defined at the sub recipient level.
 - If one of ten Commission sub recipients conducts rechecks for all individuals working or serving as of November 15, 2018, this sub recipient is eligible for

exemption from disallowance enforcement action being taken on previous noncompliance as defined in the Exemption Period guidance and the other sub recipients are not.

17. What documentation do I need to maintain from a Truescreen and/or Fieldprint check? Do I need to maintain all NSCHC documentation from the initial check and recheck? (February 20, 2019)

The documentation requirements for NSCHC have not changed. Truescreen and Fieldprint will capture many compliance requirements on your behalf. Review the Truescreen and Fieldprint Documentation Compliance table on page 17 in the NSCHC Using Fieldprint and Truescreen manual: <https://www.nationalservice.gov/documents/2018/nschc-using-fieldprint-and-truescreen-manual>

18. Why do the criminal history reports have a red box with an "X" and a "review" status on them when I receive them from Truescreen? Why does a red box with an "X" and "review" status appear next to subject data? (February 20, 2019)

In order to provide a visual prompt to grant recipients to make the final adjudication determination in Truescreen, Truescreen will mark all reports with a red box with an "X" and a "review" status on the subject data. The red box with an "X" and "review" status on the subject data is not related to the adjudication of a criminal history record. It is merely a visual flag to prompt grant recipients to make the final adjudication determination in the Truescreen system.

Truescreen will continue to provide an adjudication recommendation on criminal history information and that recommendation can still be found on the report.

Grant recipients must continue to review the results and make their final adjudication decision.

19. Why do Truescreen templates include language mentioning employment, personal references, credit reporting agencies, character, personal characteristics, mode of living, etc.? (February 20, 2019)

Truescreen is open to conversations with grant recipients regarding language changes on the template letters (these are the letters with agency letterhead). Please contact your Account Manager to make edits.

20. How do I order state and NSOPW checks using Truescreen? (May 2, 2019)

There is a step by step guide on the Truescreen process available in the myLearningCenter on the myHome tab in your MyTruescreen account. The CNCS Ordering Guide provides screenshots and instructions on how to use Truescreen.

You can order state and NSOPW checks in the MyRapidRequest module. You will be required to enter:

- First name
- Last name
- Grant number (multiple grant numbers can be entered)
- Anticipated start date
- Yes/no to whether the individual has access to vulnerable populations
- Applicant Email (twice)

There is a drop down box titled “report level.” You can select the type of checks (state only, state + NSOPW or NSOPW). You enter the state of residence in the Notes box.

If a grant recipient does not enter all required information, the system will redirect to MyRapidRequest and the report level (check that was ordered) will default to a NSOPW only check. Grant recipients should review all selected fields prior to submitting the check. If a grant recipient believes it made a selection in error, it can review the ordered check on the myInProgress Report module on the myReports tab. Checks can be canceled before they are processed by Truescreen.

21. What if an individual fails to show up to a Fieldprint appointment or cancels with less than 24 hours of notice? (May 2, 2019)

Per the FAQs on the Fieldprint website, if an individual does not show up for an appointment, or cancels the appointment, less than 24 hours before the scheduled date and time, the organization will be charged a rescheduling fee of \$17.50. The grant recipient can elect to pay the fee, as an allowable grant cost, or require the individual who rescheduled or missed the appointment to pay this fee.

22. What if an incorrect ID was uploaded to the Truescreen site? (May 2, 2019)

If an incorrect identification was uploaded, contact Truescreen at CNCSHelp@Truescreen.com. Truescreen can upload the correct identification onto the individual’s file. This document will not show in myApplication Station but will appear on the individual’s Investigation Information, in the Actions box, under View Authorizations.

23. When using the Fieldprint’s paper fingerprint cards, will these individual Fieldprint fingerprint cards correspond to unique individuals? (May 2, 2019)

Fieldprint paper fingerprint cards are coded to specific individuals (the information is coded to a barcode during the set-up process). Do not duplicate the cards, tamper with the barcode on the fingerprint card, or use any fingerprint card other than the fingerprint card provided by Fieldprint. Only place the fingerprints of the individual for whom the card was provided on the individual’s card.

Duplicating, tampering, providing non-Fieldprint fingerprint cards, or submitting fingerprints for the wrong individual will result in Fieldprint shredding the card, and a FBI check will not

be conducted. In these cases, the applicant would need to begin the process again in order to obtain a Fieldprint FBI check.

24. My organization has a staff person who is an individual in a covered position but is paid by multiple grants. How do I conduct a check for this person? (May 2, 2019)

The NSCHC requirements have not changed. The grant recipient must conduct compliant NSCHC for individuals in covered positions. Grant recipients with individuals who are in covered positions under multiple grants will only need to recheck the individual one time.

Grant recipients can enter multiple grant numbers when ordering checks in the Truescreen system. That is, one recheck can be associated with multiple grants in the Truescreen system. For Fieldprint checks, grant recipients may maintain the Fieldprint record in the individual's file.

25. What do I need to do if an individual in a covered position receives a “not cleared” recommendation by Fieldprint? (May 2, 2019, Updated on May 21, 2019)

See Fieldprint FAQs (#27-31) for more information on “not cleared” recommendations here: https://fieldprintncs.com/SubPage_FullWidth.aspx?ChannelID=414

Any individual receiving a “not cleared” determination can choose to challenge the factual accuracy of the determination and must be given the opportunity to do so. Whether an individual is fit to work or serve with a selecting organization is a matter of discretion for the selecting organization, even though an individual may otherwise be eligible. Selecting organizations have a right and a duty to exercise their discretion in a manner that promotes a safe and effective program, mindful of state and federal nondiscrimination laws. Any eligibility determination must be dated contemporaneously with the determination and must be maintained as a grant record.

(Updated May 21, 2019) Fieldprint provides an adjudication recommendation of “Cleared” or “Not Cleared” based on CNCS’s statutory eligibility criteria:

- Anyone who is listed, or required to be listed, on a sex offender registry is ineligible to serve or work in a covered position.
- Anyone convicted of murder (as defined in 18 U.S.C. § 1111) is ineligible to serve or work in a covered position.

“Not Cleared” does not necessarily mean ineligible to serve. Some circumstances when an individual eligible to work or serve may receive a “Not Cleared” result include:

- The individual's FBI Criminal History Record Information 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.

- Individuals may receive a "Not Cleared" recommendation for any crime related to sex offenses or neglect, cruelty or endangerment, even though those offenses do not always result in a requirement to register as a sex offender.
- The individual's FBI Criminal History Record Information may contain a charge for a potentially disqualifying offense without clearly indicating a conviction or final outcome.

"Cleared" and "Not Cleared" recommendations must be used 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. Grant recipients and subrecipients are responsible for ensuring that an individual is eligible to work or serve in a covered position.

Information about resolving "Not Cleared" results can be found here in the NSCHC Using Fieldprint and Truescreen Manual: <https://www.nationalservice.gov/documents/2018/nschc-using-fieldprint-and-truescreen-manual>

For "Not Cleared" results received on rechecks conducted during the NSCHC Exemption Period, the grant recipient may be able to resolve the "Not Cleared" recommendation using information from an initial FBI fingerprint check conducted when an individual began work or service, provided that individual has worked or served without a break in work/service since the initial check was run.

The program should ensure that its processes include reviewing whether an individual's criminal convictions would require registration on a sex offender registry. Since the NSOPW check only identifies people who have registered, the grant recipient should review criminal history information to check for any offenses for which the candidate was required to register under state law. Individuals who are required to listed on sex offender registry are ineligible to serve/work on CNCS grants.

26. What if an individual received a Fieldprint "Not Cleared" adjudication recommendation or is going through the Truescreen Adverse Action process, and the steps to resolve these statuses are not complete by June 30, 2019? (June 19, 2019)

CNCS expects that grant recipients will resolve Fieldprint "Not Cleared" recheck adjudication recommendations and Truescreen Adverse Action processes and that they will begin the resolution processes promptly upon review of check results. To fully participate in the Exemption Period, grant recipients must have, at a minimum, reviewed each recheck by June 30, 2019, even if the resolution process for Fieldprint "Not Cleared" adjudication recommendations or Truescreen Adverse Action processes is not complete until after June 30, 2019.

27. I ordered a State of Service check in Truescreen, rather than both a State of Service and State of Residence check. The state I ordered appears as State of Residence on my Monitoring Report. What should I do? (June 19, 2019)

Provided the correct checks were ordered and adjudicated, no action is needed. For purposes of monitoring, CNCS will review the State of Residence and State of Service of the individual serving or working in a covered position and will verify that the correct state checks were conducted. If you find that you failed to conduct a required check, you should conduct the required check.

28. I noticed that the grant number or organization name associated with some of my checks is inaccurate. What do I do? (June 19, 2019)

If the grant number or other grant recipient information is not accurate, you must correct this information. You can correct this information by emailing Truescreen at CNCSHelp@truescreen.com with the case number and the correct information. You cannot make any corrections to information entered by the applicant such as the designation of the individual as a volunteer, member or staff person.

Please note that changes to accounts or corrections to order information entered by the grantee may result in a reset of adjudication. Review your checks after corrections or changes are made.

29. Can Commissions or prime grant recipients with subrecipients conduct monitoring of subrecipients in the Fieldprint system as they can in Truescreen? (June 19, 2019)

No.

In Truescreen, Commissions or direct grantees with subrecipients can have subrecipients mapped to a monitoring account and review subrecipient compliance from this monitoring account. This same functionality is not present in Fieldprint. The subrecipient can receive check results in the Fieldprint system, but they must still document that the results of this check were reviewed. Commissions will not have access to subrecipient Fieldprint accounts and will need to monitor these checks outside that system.