National Service Criminal History Check (NSCHC) Self-Audit
Overview for Programs

Background: National Service Criminal History Check (hereafter referred to as "NSCHC") regulations have been in effect since November 2007 when two-part checks were first required under specific programs, and only on individuals in recurring contact with a vulnerable population. Yet NSCHC regulations have grown increasingly stringent over the years, requiring AmeriCorps and other national service programs to implement new screening processes to ensure the safety of vulnerable populations and other communities served by AmeriCorps members. Beginning April 21, 2011, the Corporation for National and Community Service (CNCS) began the process of implementing a new law which requires that programs conduct three-part checks, including FBI, statewide repository and sex offender registry checks, on individuals who will have recurring contact with vulnerable populations. While the final rule and detailed guidance related to this new law has not yet been released, it is scheduled to be released in 2012.

Objective: In light of this forthcoming new rule, and given the Corporation's increased focus on NSCHC monitoring findings and compliance, OneStar is conducting a new NSCHC Self-Audit process across the AmeriCorps*Texas portfolio in 2012. This self-audit will allow OneStar staff to work collaboratively with AmeriCorps*Texas grantees to have them self-identify any gaps within their current criminal history check processes and systems, in order to troubleshoot and correct these issues *proactively* and ensure a higher level of compliance across all Texas programs.

Scope of Process: OneStar requires all 2011-12 AmeriCorps*Texas grantees to participate in this self-audit, which will include review of members who were actively serving November 23, 2007 – present. Former grantees and National programs will also be invited to participate at their option.

Activities/Timeline: OneStar will use the following timeline to issue the NSCHC Self-Audit Tool for programs to use, complete, and send back to their Program Impact Specialists for review, analysis of findings, and coaching. Participating programs will have the option to choose from 2 different submission deadlines as indicated below.

- **January 30-31, 2012:** OneStar announces the NSCHC Self-Audit initiative during required Grantee Call.
- **February 1-March 14:** OneStar will develop and pilot a test of the NSCHC Self-Audit tool and accompanying documents.
- **March 27-28:** Time will be dedicated to discuss the NSCHC Self-Audit process and related issues at the 2012 All-Grantee Meeting.
- **April 3-4:** All participating programs will receive the Self-Audit materials, instructions and deadlines, and list of member names from OneStar.
- **April:** Programs will be able to ask questions related to this process during their Monthly Support calls with their Grants Officers.
- **April 11 & 12:** Optional grantee webinar to ask questions regarding the Self-Audit materials or process.
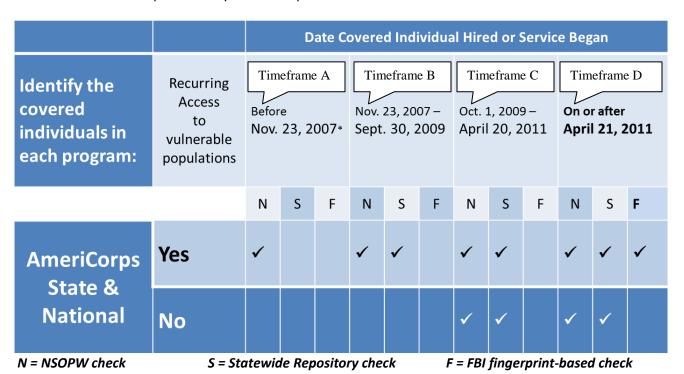
- **May 9:** Intake questionnaire due. Programs may also submit completed NSCHC Self-Audit spreadsheet tool as early as May 9 at their option.
- **June 15:** Priority deadline for programs to submit the completed audit tools and materials. *This deadline is strongly suggested for programs with an August 1st start date and for non-continuing programs.*
- **July 13:** Final deadline for programs to submit the completed audit tools and materials.
- **August 31, 2012:** Resolution deadline for any lingering items from programs' NSCHC Self-Audit results and findings.

Common Terminology & Definitions: Please see attached document for OneStar's 2012 guide to NSCHC terminology, definitions, and related acronyms for the purposes of this self-audit process.

Detailed Instructions: Please see the comments and notes in the attached NSCHC Self-Audit tool (an Excel-based spreadsheet) for detailed instructions on how to complete the tool. Please note that your Grants Officers will pre-populate the tool for your specific program and will segment members between Timeframes A, B, C and D depending on their enrollment dates. If you have any questions about this or find an error, please contact your Grants Officers.

Please also note that Timeframes A, B, C and D on this spreadsheet are aligned with the most recent timeframe clarification published by CNCS in September 2011:

		Date Covered Individual Hired or Service Began										
Identify the covered individuals in each program:	Recurring Access to vulnerable populations	Timeframe A Before Nov. 23, 2007*			Timeframe B Nov. 23, 2007 – Sept. 30, 2009			Timeframe C Oct. 1, 2009 – April 20, 2011			Timeframe D **On or after April 21, 2011**		
		N	S	F	N	S	F	N	S	F	N	S	**F**
AmeriCorps State & National	**Yes**	✓			✓	✓		✓	✓		✓	✓	✓
	No							✓	✓		✓	✓	

N = NSOPW check   S = Statewide Repository check   F = FBI fingerprint-based check

Projected Outcomes of this Project: OneStar anticipates that the NSCHC Self-Audit process will produce benefits and positive outcomes for AmeriCorps*Texas programs and the overall portfolio alike. Examples of potential outcomes at the end of this project include:

- ✓ Updated/enhanced program policies
- ✓ Improved NSCHC procedures
- ✓ Correction/clarification of member files with missing/insufficient documentation
- ✓ Clear audit trail of gaps found and verification of corrective actions taken
- ✓ Prevention of future disallowed costs

Resources and Related Links:

CNCS' web page dedicated to providing news and updates on criminal history check requirements:
http://www.nationalservice.gov/for_organizations/manage/history_checks.asp

National Service Resource Center web page dedicated to providing official CNCS materials:
http://www.nationalserviceresources.org/national-service-criminal-history-check-resources

Copy of the proposed three-part check rule from July 2011 (not yet finalized):
http://www.nationalserviceresources.org/files/fr_notice_july_6_2011_proposed_rule_request_for_comments.pdf

NSOPW website:
http://www.nsopw.gov/Core/Portal.aspx

Texas Department of Public Safety Crime Records Service website:
http://www.txdps.state.tx.us/administration/crime_records/pages/index.htm

FBI website:
http://www.fbi.gov/about-us/cjis/background-checks