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SERVE WISCONSIN

Date: April 27, 2020

To: Serve Wisconsin AmeriCorps Programs

From: Jeanne Duffy, Executive Director
Steven Yule, Senior Program Officer
Alexis Matthews, Program Officer

Re: COVID-19 Program Guidance Memo #2 – NSCHC FBI Fingerprint Checks & Deadline for Submitting Budget Modification Requests for 2019-2020 Program Year

Summary: This second memo related to COVID-19 circumstances is for the purpose of: (1) making changes to FBI Fingerprint check requirements due to widespread closure of Fieldprint electronic fingerprinting services locations and (2) for extending the deadline for cost-reimbursement programs to request a budget modification for the 2019-2020 program year.

NSCHC FBI Fingerprint Checks

Serve Wisconsin's NSCHC Policy includes the following regarding FBI Fingerprint checks:

3) FBI Fingerprint Check – **Applies to all AmeriCorps Members and Grant-Funded Employees who will have recurring access to vulnerable populations (children age 17 or younger, individuals age 60 and older, and/or individuals with disabilities):**

Recurring access is defined as the ability on more than one occasion to approach, observe, or communicate with an individual through physical proximity or other means, including but not limited to electronic or telephonic communication.

- Beginning with the start of the CNCS Fieldprint and Truescreen Exemption Period in November 2018 programs funded through Serve Wisconsin are required to obtain all FBI fingerprint checks through the CNCS-contracted Fieldprint FBI fingerprint channeler services. Information is available at: www.fieldprintcnscs.com. **If an FBI fingerprint check is applicable, an individual must not serve or work in a covered position prior to completion of the FBI fingerprint search component.**
- Prior to the requirement to use CNCS-contracted Fieldprint services, Serve Wisconsin offered programs the option of obtaining FBI fingerprinting services through an existing



statewide state government contract or programs could use an alternate means of obtaining FBI fingerprint checks.

Serve Wisconsin's NSCHC policy also does not allow for accompaniment, as defined in CNCS NSCHC guidance.

Due to widespread closure of Fieldprint FBI fingerprinting services locations across the country, Serve Wisconsin is temporarily suspending the prohibition on accompaniment. Programs will be allowed to use accompaniment in cases where a prospective AmeriCorps member's or new grant-funded staff person's NSOPW and Wisconsin state criminal history checks have been completed and adjudicated through Truescreen and the FBI fingerprint check has been initiated through Fieldprint or paper fingerprint cards (see below).

Initiation of checks is defined by CNCS on this COVID-19 page of their website <https://www.nationalservice.gov/documents/2020/cnsc-general-questions> and includes in part the following:

Please note: Grant recipients who use Truescreen need to refer to the Truescreen pre-approved ASP (NationalService.gov/CHCFAQs). The criminal history information components (state of service check, state of residence check, and FBI checks) of the NSCHC must be initiated no later than the first day of the start of service or work. Checks that are not within these time frames are noncompliant.

Initiating state and FBI checks is going one step further than getting permission to conduct an NSCHC. This could include, for example, fingerprinting, sending requests to a state repository to get checks, or having candidates fill out official forms for getting the required checks. You must be able to document how and when checks were initiated. You must have policies and procedures outlining how you initiate checks and apply them consistently.

Ordering fingerprint cards or scheduling a Livescan appointment may be considered initiation of a check.

Again, Serve Wisconsin is temporarily allowing accompaniment in cases where the FBI fingerprint check has been initiated. Truescreen NSOPW and state criminal history check services are not being affected and must be completed before a member can begin service or grant-funded staff person can begin work.

If desired, programs could use paper fingerprint cards for initiating the FBI check if there is a local law enforcement agency that has resumed doing fingerprinting for the general public. FBI checks via this method would require the program to have an active account with the WI Department of Justice; the fingerprint cards would be submitted to the WI DOJ to conduct state and FBI fingerprint checks under the authority of the National Volunteers for Children Act. Using this method would require the program to pay for the Wisconsin state criminal history check and the FBI fingerprint check. A program using this method rather than using the CNCS Fieldprint services could also be subject to inquiry from CNCS monitoring officials if they found that the program had enrolled members without using the CNCS Fieldprint services while the program also enrolled members who have CNCS Fieldprint FBI check results for the current program year.

Deadline for Submitting Budget Modification Requests for 2019-2020 Program Year

Serve Wisconsin's Budget Modification Guidance for the 2019-2020 program year set a deadline of May 1, 2020 for submitting budget modification requests.

Due to CNCS waiving match requirements for the 2019-2020 program year due to COVID-19 related circumstances, but not yet issuing implementation guidance for the match waiver as of the date of this memo, and due to many grantee organizations continuing to encounter new operational challenges due to COVID-19 (e.g., staff furloughs, staff salary cuts, etc.), Serve Wisconsin is extending the deadline to **June 15, 2020** for cost-reimbursement programs to submit a budget modification request to Serve Wisconsin.

Please contact your assigned Serve Wisconsin Program Officer if you have any questions about the information included in this guidance memo.