

To: Ohio AmeriCorps Programs
Re: NSCHC National Fingerprint File Alternative Search Procedure
Date: April 12, 2019
From: Director of AmeriCorps

Ohio AmeriCorps Programs:

The Corporation for National and Community Service (CNCS) has approved Alternative Search Procedures (ASP) that grantees can use to comply with the National Service Criminal History Check (NSCHC) requirements without additional approval in writing from CNCS or ServeOhio. These ASP's are termed "pre-approved ASPs". AmeriCorps programs are not required to request permission to use these pre-approved ASPs. Programs may use them, provided they abide by the [conditions described here](#) and NSCHC requirements. However, noncompliance with any NSCHC regulations or with the requirements of a pre-approved ASP may result in cost disallowance.

Most applicable to Ohio AmeriCorps programs is the National Fingerprint File (NFF). NFF is an electronic information sharing system maintained by the Federal Bureau of Investigation (FBI). The NFF allows the FBI and the States to exchange criminal history records for noncriminal justice purposes authorized by federal or state law, such as background checks for governmental licensing and employment. States that participate in the NFF respond to record requests for all authorized noncriminal justice purposes and, as such, the FBI ceases to maintain duplicate criminal history data for these states.

When a state participates in the NFF system, an FBI fingerprint check is duplicative of the search of a state's criminal history record repository. An FBI fingerprint check eliminates the need for programs to conduct duplicative state criminal history record checks in states that participate in the NFF system.

Therefore:

- If a required state check is from a state that participates in the NFF, the program does not need to conduct the check in that NFF state if they have conducted a fingerprint based-FBI check.
- If a required state check is from a state that does not participate in the NFF, then this pre-approved ASP is not applicable and the program must obtain the appropriate NSCHC state check(s).

The following 20 states participate in the NFF program:

- Colorado
- Florida
- Georgia
- Hawaii
- Idaho
- Iowa
- Kansas
- Maryland
- Minnesota
- Missouri
- Montana
- North Carolina
- New Jersey
- New York
- **Ohio**
- Oklahoma
- Oregon
- Tennessee
- West Virginia
- Wyoming

Here are a few examples:

Example A - One state participates in the NFF: An individual in a covered position with recurring access to vulnerable populations will serve in Maine (state of service does not participate in NFF) and resides in Colorado at time of application (state of residence does participate in the December 20, 2018 NFF). The program must conduct an NSOPW check, a fingerprint-based FBI check, and a Maine state criminal history check. The grantee does not need a separate state of residence criminal history check from Colorado. The Colorado criminal history record information is included in the fingerprint-based FBI check.

Example B - Both states participate in the NFF: An individual in a covered position with recurring access to vulnerable populations will serve in Ohio (state of service does participate in NFF) and resides in Iowa at time of application (state of residence does participate in the NFF). The program must conduct an NSOPW check and a fingerprint-based FBI check. No separate state checks are required. Ohio and Iowa criminal history record information is already in the fingerprint-based FBI check.

Example C - No states participate in the NFF: An individual in a covered position with recurring access to vulnerable populations will serve in Wisconsin (state of service does not participate in NFF) and resides in New Mexico at time of application (state of residence does not participate in the NFF). The program must conduct an NSOPW check, a fingerprint-based FBI check, a Wisconsin state criminal history check, and a New Mexico state criminal history check.

Using this pre-approved ASP does not require the use of the CNCS-contracted vendors Truescreen and/or Fieldprint. Ohio programs can implement the NFF pre-approved ASP immediately for the 2018-2019 and 2019-2020 program years. All other CNCS and ServeOhio NSCHC requirements remain in effect including the mandate that all Ohio AmeriCorps members are considered to have recurring access to vulnerable populations.

Please contact your Program Officer if you have questions or need additional information.

In service,

A handwritten signature in green ink that reads "Mary E. Cannon". The signature is written in a cursive, flowing style.

Mary E. Cannon

CC: ServeOhio Program Officers