

LiftFund comments to:

OMB CONTROL NUMBER: 3045-0150

ICR REFERENCE NUMBER: 202205-3045-001

TITLE: National Service Criminal History Checks Recordkeeping Requirement

As a new grantee of the AmeriCorps program, the 2021-2022 fiscal year was our first experience conducting the National Service Criminal History Check (NSCHC). We respectfully respond to the Office of Management and Budget's request for comment on the NSCHC requirement and process with details of our experience and recommendations to the prompts included in the Supplementary Information section of the request.

Prompt #1: *Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of CNCS, including whether the information will have practical utility*

We acknowledge the importance of ensuring that grantee staff and service members do not have a criminal record given the nature of the work they are engaged in and the private information they have access to; however, this same outcome could be accomplished in a less burdensome way through a single employment screening service such as the one our organization currently uses for all employees, or by AmeriCorps facilitating the screenings of accepted applicants through the ePortal prior to placement.

Prompt #2: *Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions*

The agency's estimate of 5 minutes per individual is a gross underestimate of the actual time spent. We estimate the time spent to be 5 hours per individual spread out over a period of 3-4 weeks. This includes:

1. Accept service member in ePortal and await results for SSN and citizenship check- 15 minutes
2. Set-up of individual secure physical and electronic files and checklist for NSCHC- 15 minutes
3. Set-up of consent to background check form in DocuSign- 15 minutes
4. Individual's completion of consent form and upload of photo ID- 30 minutes
5. Input of Individual's information in background screening service to obtain state criminal check results; review, print, sign, file results- 45 minutes
6. Input of individual's information in NSPOW.gov search (all names), print, sign, file results- 15 minutes
7. Prepare instructions and send correspondence to individual on process for completing FBI fingerprints- 30 minutes
8. Individual's completion of fingerprint appointment form, average drive, wait, and fingerprint time- 60 minutes

9. Review, print, sign and file fingerprint results; process payment and corresponding financial reconciliation- 30 minutes
10. Review and discuss any findings with individuals and managers- 30 minutes
11. Certify NSCHC in ePortal- 15 minutes

This time estimate does not include the time spent reviewing the NSCHC training materials, corresponding with the AmeriCorps Portfolio Manager and vendors when questions arise, nor coordination amongst staff involved in process.

It also does not account for time creating and revising NSCHC policy documents and responding to monitoring requests.

Prompt #3 *Propose ways to enhance the quality, utility, and clarity of the information to be collected.*

We propose AmeriCorps create a standardized form to be sent to each individual required to complete NSCHC that outlines specific instructions and upload of documents to the MyAmeriCorps ePortal. We propose that AmeriCorps conduct screenings per their standards and then notify the grantee of an individual's eligibility for placement. This would ensure that all related documentation is in one secure place that is accessible by the agency, the individual, and the grantee, and would eliminate so much back and forth between parties.

Prompt #4 *Propose ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.*

See recommendation above. Additionally, we propose the agency accept the "Date adjudicated" field from the Fieldprints report, "Search performed" field on National Sex Offender Public Website, and "Report Date" field on the State Criminal Database Search as sufficient demonstration of when the searches were conducted and adjudicated, as opposed to requiring a dated signature.

Additional feedback:

- We found that the NSCHC process required dedication of 2 staff members over the period of 4 weeks prior to the members service start date in order to perform and certify checks on 7 individuals prior to their service start date (all at the same time). We did not receive a grantee checklist until June of 2022 and had to create our own.
- We were told it was acceptable to use our own screening service to complete the state criminal background checks, in combination with the NSOPW.gov search and Fieldprint service for FBI Fingerprints. Our monitoring results indicated that we were not in compliance because we did not use Truescreen.
- We used our own screening service that we use to screen all full-time employees as an efficiency and cost-saving measure, knowing that it checked against the designated state repositories. We called for quotes on a new account with Truescreen and never received a call back nor email.

- We made an error in conducting national criminal background checks instead of state criminal background checks. Once we realized our error, we self-reported to the portfolio manager and immediately re-ran state checks. We will still be issued a cost-disallowance, which is a substantial financial loss to our non-profit organization, despite our best-faith efforts as a new grantee to complete the NSCHC.

Thank you in advance for considering our feedback and recommendations.