

Date: Fri, Apr 29, 2016

Subject: Criminal History Checks in IPT

Many of you are aware of the information I will be outlining in this email from a conversation we had at the Pacific Region Conference, but please note this email will serve as the official notice moving forward.

In order to avoid a myriad of state and federal regulations involved in storing criminal history check information electronically, the state Department of Technology Services (DTS) has been working with the state Bureau of Criminal Identification (BCI) to determine exactly what is allowed to be kept in the IPT system related to this and have recently notified our office regarding the final determination.

Approval has been given to store just page 1 of the criminal history check in IPT and we have been given September as our deadline to ensure compliance with this requirement as well as removal of all Social Security Numbers (SSN's) from the system. I realize in a perfect world this discussion and decision would have taken place prior to January when we asked all of you to review member files for criminal history check information. Please know that we understand your frustrations and are greatly appreciative of your patience through all of this, but unfortunately decision making with this process has been completely out of UServeUtah's hands.

With that being said the following is new guidance for storing criminal history information, removal of all SSN's and a timeline for implementation;

- No Social Security Numbers will be stored in the IPT system in any capacity. All SSN's that were collected previously by the system have been purged.
- No later than August 15, 2016, program must ensure that SSN's on any documents (current or future) and in any other location are removed or redacted prior to uploading of the document into the IPT System.
- No later than August 15, 2016, all member files (active and inactive) in IPT must be reviewed to ensure that only Page 1 of the BCI criminal history check is being stored in the IPT system. (For those of you who don't receive the BCI check documentation this is not applicable)
- For all member files the program must ensure that the criminal history documentation (BCI or other) is uploaded to the appropriate field for either the state check or FBI check. The document should be in only one location, not both.
- The language below is now required to be included on page 1 of the BCI criminal history check for all members enrolled after the date of this email. The program will select either *state only* or *state & FBI* for this statement. This language replaces all previously required language. Please note that in Commission monitoring visits you may be required to provide the electronic results of a member's criminal history check in order to determine compliance with the federal regulations.

A (state only or state & FBI) criminal history check was conducted through the Utah State Bureau of Criminal Identification. The results of this check were reviewed and used in determining eligibility for an AmeriCorps position.

This criminal history check was performed in accordance with the Serve America Act to determine eligibility for service in an AmeriCorps program. Any further dissemination or use of this check is prohibited by state statute 53-10-108.

- For programs that provide an approved alternate document for criminal history check verification in the IPT system, the follow language must be on the document for all members enrolled after the date of this email. The program will select either *state only* or *state & FBI* for this statement. This language replaces all previously required language.

A (state only or state & FBI) criminal history check was conducted in accordance with the CNCS approved Alternate Search Protocol. The results of this check were reviewed and used in determining eligibility for an AmeriCorps position.

As you may have noticed the deadline listed is a bit earlier than we originally discussed. This is to allow for an additional review of the system requested by DTS prior to our hard deadline in September. I believe this should still allow sufficient time to complete all the requirements, but please let me know if there are any concerns. Thank you again for your efforts in this process and for the great work you do throughout Utah!

Yours in Service,

LaDawn Stoddard

Director, UServeUtah

Lt. Governor's Commission on Service & Volunteerism

300 S. Rio Grande St.

Salt Lake City, UT 84101

[801-245-7223](tel:801-245-7223)

Cell-[801-214-8301](tel:801-214-8301)

Fax-[801-355-3081](tel:801-355-3081)

www.userve.utah.gov