

Must identify the covered individuals in each program:	Recurring Access to vulnerable populations	Date Covered Individual Hired or Service Began												
		Before November 23, 2007 ⁱ			November 23, 2007 – September 30, 2009			October 1, 2009 – April 20, 2011			On or after April 21, 2011 ⁱⁱ			
		N	S	F	N	S	F	N	S	F	N	S	F	
Program	AmeriCorps State/National	Yes	✓			✓	✓		✓	✓		✓	✓	✓
		No							✓	✓		✓	✓	
	FGP	Yes	✓			✓	✓		✓	✓		✓	✓	✓
		No							✓	✓		✓	✓	
	Senior Companion	Yes	✓			✓	✓		✓	✓		✓	✓	✓
		No							✓	✓		✓	✓	
	RSVP (excludes RSVP Vol.)	Yes							✓	✓		✓	✓	✓
		No							✓	✓		✓	✓	
	VISTA program grant staff	Yes							✓	✓		✓	✓	✓
		No							✓	✓		✓	✓	
	Learn & Serve	Yes							✓	✓		✓	✓	✓
		No							✓	✓		✓	✓	
	Other Grant Programs	Yes							✓	✓		✓	✓	✓
		No							✓	✓		✓	✓	

N = NSOPW; S = State registry check; F = FBI fingerprint check

ⁱ This applies to individuals who were enrolled or employed as of November 23, 2007, but were hired or enrolled prior to that date.

ⁱⁱ Compliance Alert issued September 12, 2011: The Corporation anticipates that the final rule will include a blanket exemption for the gap period from April 21, 2011 to the effective date of the rule:

Due to the significant period of time between April 21, 2011, and the effective date of the regulation (60 days after the final rule is published in the Federal Register), the Corporation is anticipating that the final rule will include a blanket, good cause exception, authorized by section 2540 (b) (4): An otherwise covered individual who was hired by, or enrolled in, a program on, or after, April 21, 2011, and then **departed** the program before the effective date of this regulation, is not subject to the heightened search requirement. The heightened search requirement is applicable to individuals who are hired or enrolled in a program on, or after, April 21, 2011. Notwithstanding this date, programs will have until 60 days after the publication of the final rule to **initiate** the heightened check requirement.