

Criminal Background Checks

Frequently Asked Questions

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Who should get a Criminal Background Check (CBC)? In order to promote safety, and to endeavor to protect all members of Girl Scouts of Central Texas (GSCTX), GSCTX reserves the right to disqualify or restrict the volunteer duties of any person who has a history of criminal activity. Therefore, all potential volunteers for GSCTX are required to participate in a background check screening process.

If I have adults (members or non-members) in my troop that are not identified as volunteers, when should they get a CBC? If an adult will be interacting with girl members in any capacity, they should be motivated to “claim” a volunteer role in the troop and get a CBC. Examples of activities where a CBC is required or strongly encouraged:

- Girl Scout troop meetings
- Day trips or overnight Girl Scout campouts
- Troop, service unit, or council-led Girl Scout events
- Troop or service unit bank account access
- Day camp or summer resident camp
- Driving girl members or handling troop finances
- Cookie sale booths

There are differences in how CBCs are processed for potential volunteers, adult members, or non-members. For more information, see below.

Do youth/minors ever need to get a CBC? In rare instances, such as working at a resident camp, minors less than 18 years of age may need a CBC. GSCTX’s CBC vendor requires the parent or guardian of the minor to sign a consent form in order for the CBC to be processed. Contact [GSCTX Customer Care](#) for more information.

Which vendor does GSCTX use to process CBCs? GSCTX uses Sterling Volunteers, formerly known as Sterling Volunteers, one of the two preferred vendors GSUSA allows to integrate with the Volunteer Systems membership database. Sterling Volunteers is backed by Sterling, a leading industry provider of screenings for employers.

What are the benefits of utilizing Sterling Volunteers as the Criminal Background Check provider for GSCTX?

- **ONLINE** - Which means volunteers can order a background check anytime, anywhere. They can also log into their account at a later date to see the status of their CBC. Information entered online directly by the volunteer will be accurate, complete, and confidential.
- **SHARE** - With the “Volunteer Fast-Pass,” volunteers are able to share their CBC report (for a small fee) with a growing network of other organizations, including many other Girl Scout councils.
- **SECURE** – Sterling Volunteers’ system is secure and private. CBCs will be re-checked monthly for the first year to ensure quality reporting. GSCTX only has access to the final report, not the most confidential information provided to create the report (e.g. a volunteer’s full social security number).
- **PREFERRED** - GSUSA has required all Girl Scout councils to work with one of two preferred CBC providers which will allow integration with membership and volunteer database platforms.
- **REPORTING** – There’s no need for staff to try and maintain a separate record offline of all CBCs. The CBCs for members are integrated into member records in the Council membership database (Volunteer Systems).

- EASY- CBCs are integrated as part of the registration process for volunteers. CBCs needed mid-membership year, or by those not identified as volunteers, can open a [GSCTX Customer Care](#) case to get a CBC invitation.

How does Sterling Volunteers create a criminal background check report? Sterling Volunteers follows Fair Credit Reporting Act (FCRA) Federal and State guidelines which determine whether records are reportable or not. They check the 50 State Department of Justice Sex Offender Database (RSO DJO), the Government Watch List Search (OFAC), and the National Criminal Database. In addition, Sterling Volunteers does a “primary source” check of county records where the volunteer resides, meaning they may email/fax/call/send a courier to the courthouse to look for any criminal activity, including:

- Convictions
- Guilty pleas
- No Contest or “*nolo contendere*” pleas
- Probation
- Deferred adjudication
- Pending criminal charges with no disposition
- Open warrants for arrest

While the average turnaround time for most CBC reports is 2-3 business days, because Sterling Volunteers takes the extra step of contacting courthouses directly, some individual reports can take longer.

Why does the online consent from Sterling Volunteers mention credit history reports? Does GSCTX look at credit history? Sterling Volunteers follows FCRA guidelines and their consent form must include this language, by law. To be clear, other background checks such as credit history, DMV report, etc. are not run by GSCTX (GSCTX does not pay for these as part of our standard reporting package) and will not be used in determining volunteer eligibility.

What are the types of volunteer restrictions someone might get as a result of their criminal background check report? Per Fair Credit Reporting Act (FCRA) guidelines, each report is looked at individually on its own merit and a determination is made. Some examples of restrictions that might be placed on a potential volunteer:

- Cannot hold administrative roles
- Cannot supervise/work with girls
- Cannot drive
- Cannot handle finances
- Cannot meet in the volunteer’s home

Restrictions placed on volunteering may be of varying length of time, based on the nature of the report.

How is someone informed if there is a restriction placed on their ability to volunteer? Each Criminal Background Check report that has any activity identified is reviewed by staff members tasked with making eligibility determinations. This process is confidential to ensure the applicant’s privacy is protected.

If an applicant is considered “Eligible,” no communication will be sent out to them by GSCTX. Each adult who runs a criminal background check may log into their Sterling Volunteers account to check on the status of their background check at any time.

In the case of disqualification or restriction on volunteering, the applicant will be informed by USPS mail. The letter will contain the initial adverse action letter, a copy of the CBC report, and a copy of the Fair Credit Reporting Act. During the time period in which the initial letter goes out and a prospective volunteer has a chance to respond, the CBC status will be considered “In Process/Pending”. No information will be released to other staff members or volunteers other than the fact that the CBC is “In Process/Pending” until the applicant has had a chance to appeal the decision.

The applicant will have two weeks from the date of the letter to respond. Prospective volunteers may choose to ignore the letter, or respond with additional information, at which time the decision can be re-reviewed. If the initial letter is ignored, the restriction on volunteering stands. Whether a re-review occurs or the letter is ignored, a final letter will be sent to the applicant. At this point:

- Appropriate Membership Department staff at GSCTX will be notified regarding the status of the applicant via email with a copy of the restriction letter attached. Staff will then notify the appropriate Troop Leader and Service Unit Director about the restriction.
- The only information that is provided in any notifications to others are the restrictions themselves. At no time are contents of CBC reports or the specifics of any criminal charge or activity shared with other volunteers or staff members, outside of those tasked with making eligibility determinations.
- Any adult violating terms of their restriction are subject to immediate dismissal and disqualification of all volunteer capacity, and this may also include removal of membership from GSUSA.

How does a potential volunteer get a Criminal Background Check (CBC)? CBCs are integrated fully into our Council membership database, Volunteer Systems. During registration for a membership, an adult is asked if he or she wishes to be an “adult” or a “volunteer” member. Choosing volunteer and selecting a volunteer role associated with a troop or service unit (such as “Troop Leader” or “Troop Friends and Family”) will initiate Volunteer Systems to automatically check to see if there is an eligible, unexpired CBC on file for that volunteer. If not, the system will automatically authorize Sterling Volunteers (GSCTX’s third-party CBC vendor) to send the volunteer an email invitation to complete a CBC.

How does an adult member not listed as a volunteer get a CBC? If someone only chooses to be an adult member, and does not select a volunteer role, the system will not automatically check to see if he or she has an eligible background check on file. For these adults, if they really do require a CBC because they will be interacting with girl members (such as on a campout or helping sell cookies at a booth), they should log into Volunteer Systems and claim a volunteer role for their troop. Even if it’s not during membership registration, this will also prompt Volunteer Systems to authorize the member to receive a CBC invitation if there is not a CBC on file or the CBC is expired. “Troop Friends and Family” is the volunteer role that most adult members are comfortable with claiming in this case.

What about adults that have not purchased a membership, how do they get a CBC? Sometimes an adult who typically has no interaction during the membership year with girl members ends up attending one event or campout that requires a CBC. GSCTX encourages anyone in this situation to purchase a membership, because of the benefit this provides, such as member insurance and member rates for GSCTX programs. However, GSCTX ultimately does not restrict non-members from getting a CBC. Non-members will need to open a case with [GSCTX Customer Care](#) in order for a manual, non-integrated invitation to be sent to complete a CBC.

What if a volunteer’s CBC expires in the middle of the membership year? Sometimes a volunteer has a current, unexpired CBC, but it will expire soon after registering and/or claiming a volunteer role (i.e. mid-membership year). In this case, the volunteer should contact [GSCTX Customer Care](#) and request to get a CBC invitation manually sent to him or her.

How long are CBCs valid? Eligible CBCs are considered good for three (3) years at GSCTX. The only exception to this would be for those volunteering at one of our Girl Scout Resident or Day Camps, in which case, state regulations require that the all camp volunteers must complete a CBC annually.

I have a criminal background check report from another non-profit or my place of work. Do I need to do another CBC with GSCTX? Not all background checks go into the same depth when searching for criminal records. In order to have consistency and confidence in the screening process, GSCTX requires that all background checks be completed through Sterling Volunteers. Volunteers transferring from other Girl Scout councils that have already have a CBC report with Sterling Volunteers may share the report with GSCTX, as long as it is “Level 2” or higher.

What does a CBC cost? The current cost of the CBC is \$8 (will increase to \$8.25 starting 10/1/2019). and is being paid for by GSCTX; however, volunteers are given the opportunity to help assist with the cost, if they wish. Thousands of dollars have already been saved by volunteers paying for their own CBCs. It should be noted that if a volunteer goes directly to Sterling Volunteers on their own and starts the criminal background check process, he or she will be asked to pay for a “full price” CBC entirely themselves, which runs upwards of \$25-\$45. Therefore, volunteers must follow the processes explained in this FAQ document to receive an email invitation from Sterling Volunteers.

I'm concerned about sharing my personal data online. What security does Sterling Volunteers provide? Sterling Volunteers is backed by Sterling, a leading industry provider of screenings for employers. It is secure, and arguably more secure than our previous process a few years ago of utilizing paper CBC forms. Paper forms turned into a service unit may go through a few sets of hands before being received at a Council office, and with the previous vendor GSCTX used, a social security number was required to process the background check. With Sterling Volunteers, social security numbers are strongly encouraged to avoid any mix-up with a person having a similar name and date of birth. However, social security numbers are not absolutely required to process background checks. Also, if one is provided by a customer, GSCTX can only see the last four digits. For more information, visit the [Sterling Privacy Policy online](#).

Can someone complete a CBC on behalf of another volunteer? GSCTX prefers that each individual submit a request for a CBC themselves. This ensures that GSCTX has the legal name and correct email address, which is important for processing a background check properly. However, spouses, staff, troop leaders, and service unit leaders may submit a request for a CBC on behalf of another volunteer. GSCTX will authorize Sterling Volunteers to send a CBC invitation by email to the actual volunteer. In no circumstances may an invitation be sent by Sterling Volunteers directly to someone on behalf of another volunteer, therefore the email address provided must always belong to the volunteer who needs the CBC. This is due to the fact that submitting the CBC will require personal information that must be provided directly by the volunteer, as well as electronic signatures (which are recognized as legal signatures).

What about paper forms? We do have a paper CBC form available in Spanish, as Sterling Volunteers does not currently have an online Spanish option. We also have an English form available for volunteers that do not have access to a smartphone or computer, and/or have no email address. You can request these forms by contacting [GSCTX Customer Care](#).

I'm a Service Unit Director or Troop Leader – how do I know who has a current, unexpired CBC? Service Unit Directors receive a quarterly report showing the status for members identified as belonging to their service unit. Troop Leaders can see the CBC expiration dates next to each of the adult members and volunteers in their troop when they log into MYGS (Volunteer Systems) and click on the “Troop” tab. Troop Leaders and Service Unit Directors can also open a [GSCTX Customer Care](#) case if they have a list of adults that they need CBCs “looked up.” GSCTX staff will be happy to help.

If I have more questions about CBCs, who can I contact? Please direct all inquiries to our GSCTX Customer Care Team by visiting www.gsctx.org/ContactUs (preferred), emailing customercare@gsctx.org, or calling 1-800-733-0011. Someone will be delighted to assist you.

