

Social Security Administration

Security & Suitability

BUSINESS PROCESS GUIDE

for contractors & Affiliates



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Contents

[Introduction 2](#_Toc513630979)

[Process Overview 3](#_Toc513630980)

[Contractor Personnel (Applicant) Workflow 4](#_Toc513630981)

[Suitability Process (New Applicants and Reciprocity^ Requests) 4](#_Toc513630982)

[Beginning Work (Systems Access) 10](#_Toc513630983)

[Exceptions (i.e. Quick Checks for Very Short Term Contractor Personnel (e.g., 3 days) or Emergencies) 12](#_Toc513630984)

[Current Contractor Personnel Moving to Another Contract (Rollover) 15](#_Toc513630985)

[Unsuitable Determinations 16](#_Toc513630986)

[Lost, Stolen, or Damaged PIV Card 16](#_Toc513630987)

[Name Change Process 16](#_Toc513630988)

[Credential (PIV) Renewal Process 17](#_Toc513630989)

[Re-Investigations 17](#_Toc513630990)

[Notification Requirements for Contractor Personnel 17](#_Toc513630991)

[Separation Process 18](#_Toc513630992)

[Reference Information 18](#_Toc513630993)

[Glossary 18](#_Toc513630994)

[Key Participants 19](#_Toc513630995)

[Contact Information 20](#_Toc513630996)

[Investigation Types & Risk Levels 21](#_Toc513630997)

[References & Guides 21](#_Toc513630998)

[**Encrypted Email Procedures** 21](#_Toc513630999)

[**Software Exception Requests** 22](#_Toc513631000)

[Forms 23](#_Toc513631001)

[Background Information on HSPD-12 23](#_Toc513631002)

# Introduction

This business process guide documents the Social Security Administration’s (SSA) suitability process for contractor personnel and affiliates (e.g., other non-Federal personnel representing SSA awarded grants, Federally Funded Research and Development Center participants, etc.).

In accordance with SSA’s agency specific (AS) clause 2352.204-1, Security and Suitability Requirements, a background investigation is required for all contractor personnel who will require any type of access to an SSA facility, site, system, or information, whether or not a Personal Identity Verification (PIV) credential is required. We also require that any SSA agreements that involve affiliates personnel needing access to an SSA facility, site, system, or information incorporate and adhere to AS clause 2352.204-1-related policy.

SSA personnel may not allow contractor personnel or affiliates access to an SSA facility, site, information, or system until SSA’s Office of Human Resources, Office of Personnel, Center for Suitability and Personnel Security (CSPS) issues a current, favorable suitability determination for the applicant (i.e. contractor personnel or affiliates). A suitability determination letter issued by CSPS is valid only for the applicant named to perform under that contract, award, or agreement, as specified in the letter. Even if an individual previously worked on an SSA contract, they must still go through the suitability process to return to work on the contract or work on a new contract (see [Contractor Personnel (Applicant) Workflow](#_Contractor_Personnel_(Applicant)_1) or [Current Contractor Personnel Moving to Another Contract (Rollover Request)](#_Current_Contractor_Personnel_1) for the applicable steps and stages).

The contracting officer’s representative-contracting officer’s technical representative (COR-COTR) (or equivalent) is responsible for submitting the required paperwork received from the company point of contact (CPOC) **at least 30 business days** prior to the date contractor personnel are to begin work. The suitability process will not begin until CSPS receives accurate and complete documents. Therefore, please plan accordingly.

We recommend the CPOC and the COR-COTR review this business process guide in its entirety as it provides a chronological order of the security and suitability process, and identifies the SSA responsible party to assist you at each process stage. Please contact DCHR.OPE.Suitability@ssa.gov with any questions regarding SSA’s suitability process.

**Failure to follow the chronological process detailed in this document may result in delays to the security and suitability process, and delays in contractor and affiliate personnel being permitted to perform their required services.**

# Process Overview

The following is a high-level overview of SSA’s security and suitability requirements.

[See the subsequent [Contractor Personnel (Applicant) Workflow](#_Contractor_Personnel_(Applicant)) for the full step-by-step guidance.]

1. Upon contract, grant, or agreement award, the **CPOC** submits the suitability package to the **COR-COTR** via [secure email](#_Encrypted_Email_Procedures):
	1. An Electronic Questionnaires for Investigations Processing (e-QIP) [applicant listing](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/e-QIP%20Applicant%20Listing.xlsx) including the contract number, contract points of contact, and information on the applicants identified to work on the contract;
	2. Completed [Optional Form (OF) 306, Declaration for Federal Employment](https://www.opm.gov/forms/pdf_fill/OF0306.pdf);
	3. [Fair Credit Reporting Act (FCRA) Authorization Form](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Fair%20Credit%20Reporting%20Act%20Authorization%20Form.pdf); and
	4. Work authorization for non-United States (U.S.) born applicants, if applicable.
2. The **COR-COTR** emails the required paperwork from their SSA email account to **^DCHR OPE Suitability** for processing.
3. **CSPS** verifies if the applicant already has the appropriate background investigation on record, or, if applicable, initiates the applicant in the e-QIP application. **CSPS** emails the e-QIP invitation and instructions for electronic fingerprinting to the **CPOC and COR-COTR** for distribution to the applicant.
4. **CPOC** forwards e-QIP invitation link to the applicant.
5. **Applicants** have ten (10) days to complete e-QIP and submit electronic fingerprints.
6. **CSPS** makes an initial suitability determination (as applicable, reviews form submissions, resolves any discrepancies, releases investigation to the Office of Personnel Management (OPM), and moves the Electronic Personal Enrollment Credential System (EPECS) form to the Sponsor stage for credentialing) and releases the applicable suitability determination letter to the **CPOC and COR-COTR**.
7. **COR-COTR** adds applicant to the contract in EPECS (required for all personnel) via the ‘Contractor Enrollment’ section. This includes situations when contractor personnel do not require a logical or physical credential or when contractor personnel need access sporadically or for less than 30 days.
8. For those requiring a credential (PIV card):
	1. **COR-COTR** escorts **applicant** to applicable Parking and Credentialing Office (**PCO**) to be sponsored in EPECS.
	2. **COR-COTR** submits a new hire request for initial access in [Systems Access Management (SAM)](https://sso.ba.ssa.gov/sam/HomeView) (requires SSA systems access).
	3. **Component/Regional Security Officer** approves the SAM request and notifies the **COR-COTR** that the network personal identification number (PIN) request was completed.
	4. **CSPS** processes EPECS action to the Issuer stage.
	5. **Card printing vendor** creates and mails PIV card to applicable **PCO**.
	6. **PCO** issues PIV card to **applicant (PCO will contact applicant when the credential is ready)**.
9. **OPM** completes the full background investigation. **CSPS** reviews and adjudicates the background investigation.

# Contractor Personnel (Applicant) Workflow

\* Timeframes below are the estimated time it takes to complete the activity.

NOTE: Disability Determination Services (DDS) applicants must follow the [DDS HSPD-12 Tier 2 New Hire Business Process](http://sharepoint.ba.ssa.gov/dco/ODD/ddas/_layouts/WordViewer.aspx?id=/dco/ODD/ddas/HSPD12/DDS%20HSPD%2012%20Tier%202%20New%20Hire%20Business%20Process%20Guide.docx&Source=http%3A%2F%2Fsharepoint%2Eba%2Essa%2Egov%2Fdco%2FODD%2Fddas%2FHSPD12%2FForms%2FAllItems%2Easpx&DefaultItemOpen=1) (requires SSA systems access).

## Suitability Process (New Applicants and Reciprocity^ Requests)

*^Under Federal reciprocity guidelines, SSA will utilize a prior/reciprocal investigation if one is on record, rather than initiating a new background investigation with OPM.*

| Step | Responsible Party | Activity | Timeframe\* | Tips and Follow-Ups |
| --- | --- | --- | --- | --- |
| 1 | CPOC | 1. Provides the [OF-306, Declaration for Federal Employment](https://www.opm.gov/forms/pdf_fill/OF0306.pdf) and [FCRA forms](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Fair%20Credit%20Reporting%20Act%20Authorization%20Form.pdf) to the *applicant* to complete and return to CPOC.
2. Requests work authorization documentation for non-U.S. born applicants, if applicable.
 |  | Name on forms must match the legal name, including middle name or initial (if initial only) as it appears in SSA’s official record.Forms must be complete and accurate. Acceptable work authorization documentation for non-U.S. born applicants; e.g., permanent/temporary resident card, I-94 form, employment authorization card, etc. |
| 2 | Applicant | Completes and returns the [OF-306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf), [FCRA form](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Fair%20Credit%20Reporting%20Act%20Authorization%20Form.pdf), and work authorization documentation (if applicable) to the CPOC. Applicants must complete the OF-306 accurately, thoroughly, and honestly. “Yes” answers to questions 9 – 15 must be explained in the #16 Remarks field.  |  | Carefully read the OF-306 question instructions to ensure all requested information is provided. [OF-306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf) must be completed thoroughly and all questions answered including the Selective Service question and the Military Service question for all applicants including females.Failure to answer questions accurately and provide required details will result in CSPS re-contacting the applicant for additional clarification, which may delay the process and may be grounds for finding the applicant unsuitable.  |
| 3 | CPOC | 1. Submits a completed [e-QIP Applicant Listing form](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/e-QIP%20Applicant%20Listing.xlsx)

with the scanned, completed [OF-306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf)(s), [FCRA](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Fair%20Credit%20Reporting%20Act%20Authorization%20Form.pdf)(s), and work authorization documentation (if applicable). 1. Save scanned documentation as a PDF with the naming convention of *Last name, First name 306* **or** *Last name, First name FCRA.*
2. Send[e-QIP Applicant Listing form](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/e-QIP%20Applicant%20Listing.xlsx) with [306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf)(s) and [FCRA](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Fair%20Credit%20Reporting%20Act%20Authorization%20Form.pdf)(s) to the COR-COTR via a secure or password encrypted email.
 |  | CPOC should review these forms to ensure they are complete and signed before scanning them.Note: SSA can only receive up to 10MB in a single email.On the subject line, enter: *New Contractor Suitability Applicant Listing and Forms (Contract #\_\_\_\_)*If the CPOC does not have an SSA email account, the CPOC must submit the documentation in an encrypted, password protected email. See [Encrypted Email Procedures](#_Encrypted_Email_Procedures) for details. The CPOC may use the same password for multiple submissions to the COR-COTR.  |
| 4 | COR-COTR | 1. Ensures CPOC provided e-QIP Applicant Listing form.
2. Ensures CPOC provided [OF-306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf)(s), [FCRA](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Fair%20Credit%20Reporting%20Act%20Authorization%20Form.pdf)(s), and immigration documentation, as applicable, for applicants in the required format.
3. Ensures all forms are complete.
4. Forwards email to ^DCHR OPE Suitability. Sends separate email to ^DCHR OPE Suitability with the password.
 | Applications should be submitted to CSPS at least **30 business days** prior to the date contractor personnel are to begin work. | Note: COR-COTRs should **not** maintain separate files of the OF-306 and FCRA. The COR-COTR’s role is to ensure the suitability applications follow the instructions as stated in this guide. If the COR-COTR needs to follow up on any applications, they may refer to the email sent to DCHR.OPE.Suitability@ssa.gov within their secure SSA email account. COR-COTR should notify CPOC if documents are not accessible from our SSA computers (unable to open encrypted documents), and request they resubmit utilizing an approved form of encryption. See [Software Exception Requests](#_Software_Exception_Requests) below.  |
| 5 | CSPS | 1. Reviews applicant’s investigation history to verify if a sufficient investigation is on record (i.e. reciprocity).
2. If the applicant already has a reciprocal investigation on file, CSPS will issue the preliminary suitability determination letter at this stage and proceed to Step 8.
3. If not, initiates the applicant in e-QIP. Provides e-QIP invite with e-QIP registration codes, e-QIP instructions, and electronic fingerprinting services information to COR-COTR and CPOC for dissemination to applicant.
 | Within 4 business days | **COR-COTR/CPOC**: The e-QIP invitation email will be sent from the SSA Contractor Suitability System (CSS), dchr.ope.css@ssa.gov mailbox. This mailbox is NOT monitored. **COR-COTR/CPOC**: If you do not receive the e-QIP link within 5 business days, please send a followup to ^DCHR OPE Suitability with email Subject line: *e-QIP invite followup request*. Attach the email with the [e-QIP Applicant Listing Form](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/e-QIP%20Applicant%20Listing.xlsx) and forms (Step 4). |
| 5a | OPM System (automated process) | Emails e-QIP registration code to applicant’s email account as indicated on the [e-QIP Applicant Listing form](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/e-QIP%20Applicant%20Listing.xlsx). | 1 day (within 24 hours after step 5)  | **Applicants**: In addition to the email instructions received from your CPOC, you may also receive the e-QIP registration code directly from do-not-reply@e-qip.opm.gov or on behalf of do-not-reply@registration.opm.gov. If you receive the automated email, but do not receive the instructions from your CPOC, please follow up with your CPOC to ensure you receive the instructions timely.  |
| 6 | CPOC | Notifies applicant of the requirement to:1. complete the e-QIP form (provides the e-QIP registration code) and
2. submit fingerprints electronically.
 |  |  |
| 7 (Preferred Method) | Applicant | 1. Completes e-QIP form and electronically signs e-QIP signature pages.

Go to:<https://nbib.opm.gov/e-qip-background-investigations/> for “click to sign” instructions and more e-QIP guides.1. **AFTER** completing e-QIP and releasing, makes appointment with electronic fingerprint services provider and submits fingerprints. Refer to [Contractor Personnel Fingerprint Instructions](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Links%20for%20Agency%20Specific%20Clause%202352_204-1%20Post%2010012017.htm) document.
 | Up to 10 days after step 5 | Note: As instructed within the e-QIP invitation email, applicants receiving a Tier 2 investigation will need to complete and upload OPM’s “Additional Questions for Moderate Risk Positions” document to e-QIP before releasing.In e-QIP, click on the Release button so it is released to CSPS. If the release button is not clicked within e-QIP, CSPS will not be able to access the form. For assistance with e-QIP, call 1-844-874-9940 between 8 a.m. and 4:30 p.m. Eastern Standard Time.e-QIP application will time out if it is not completed timely. Retain user name and password exactly as entered in order to return to e-QIP later, if needed.Note: The applicant is responsible for paying the $16.50 fee when scheduling their electronic fingerprinting appointment. |
| 7a (Alternate Fingerprint Option) | Applicant | Visit the local sheriff’s office or police department to be fingerprinted on paper form Field Division-258 and mail the form via priority delivery to Social Security Administration, Security and Suitability Office, Attn: Personnel Security Officer, 6401 Security Boulevard, 2246 Annex Building, Baltimore, MD 21235. |  | **This option will add considerable delays and is not preferred.** This option is used if the applicant does not use SSA’s electronic fingerprint services contract (Step 7). In this situation, the envelope must include the [Contractor Personnel Suitability Cover Sheet-Fingerprint Cards](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Contractor%20Suitability%20Personnel%20Cover%20Sheet.docx). Most fingerprint locations (e.g., local police stations) charge a higher fee for fingerprinting than the electronic fingerprint service. The applicant is responsible for any fingerprint costs. The applicant should also notify DCHR.OPE.Suitability@ssa.gov with a cc to their CPOC and COR-COTR that the fingerprints are being mailed. |
| 8 | CSPS | 1. Reviews all provided documentation.
2. Follows up with applicant on any discrepancies or issues. If the applicant does not comply timely, CSPS may issue a “pre-screen” denial letter.
* The pre-screen denial is a final warning that the applicant must timely comply or CSPS will cancel the applicant’s suitability application. The applicant is not permitted to work for SSA unless they comply and subsequently receive a suitable determination letter.
1. Issues suitability determination letter (suitable or unsuitable).
* If suitable, processes fingerprints to the Sponsor stage in EPECS (in preparation for Step 9) and releases investigation request to OPM.
* If unsuitable, cancels investigation request in e-QIP.
 | Up to 15 business days from release of e-QIP form and submission of electronic fingerprints | **COR-COTR/CPOC/Applicants**: For status checks after 15 business days, call CSPS’ Hotline at 1-844-874-9940.**Applicants**: Applicants must submit any additional requested supporting documentation (e.g., Federal debt payment plans, payment history, etc.). Refusal to provide the requested documentation will result in a denial of suitability.  |
| 9 | COR-COTR | 1. Adds the contract number to the applicant’s profile in EPECS. **Note: This is required for all personnel regardless of whether they need systems access or a PIV card.**
2. If the applicant needs a credential, escorts applicant to PCO for Sponsor.
 |  | **COR-COTR**: See [EPECS Training - Contractor Enrollment](https://hspd12.ba.ssa.gov/hspd12/links.htm) (Intranet website, requires SSA systems access) for step-by-step instructions or contact ^HSPD12 Training for assistance.**PCO**: If the applicant does not appear in the Sponsor queue within EPECS, please email ^DCHR OPE Suitability.On email Subject line, enter: *Contractor – Status for Sponsoring in EPECS* **Applicant**: Bring the [required forms of identification](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/List%20of%20Acceptable%20Documents.pdf) to the PCO. |
| 10 | CSPS | Moves the applicant’s form to Issuer in EPECS. | Up to 3 business days after Step 9 |  |
| 11 | PCO | Issues PIV card to applicant.  | About 2 weeks after Step 10 |  |
| 12 | OPM | Conducts Subject Interview, if applicable, and completes full background investigation. | Up to 1 year after Step 8 | As applicable, an OPM Investigator will contact the applicant to schedule an investigative interview. Note: The applicant, if determined suitable, is able to work under the SSA contract/award during this OPM investigation.  |
| 13 | CSPS | Confirms if the applicant is still active on an SSA contract. Contacts the applicant if additional information is needed to make an adjudicative decision. Reviews and takes necessary actions to adjudicate the background investigation.  | Up to 90 days from the date OPM completes the investigation (Step 12) | If CSPS is unable to reach the applicant or resolve the issue after two attempts, CSPS will contact the COR-COTR/CPOC for assistance. **Applicants**: Comply with CSPS requests and inquiries to ensure a timely determination. Failure to do so may result in an unfavorable determination and removal from any SSA contracts. |

## Beginning Work (Systems Access)

For contractor personnel and affiliates requiring SSA systems access, please follow these steps to request systems access. This section also includes information regarding the steps and timeline for receiving a PIV card.

| Step | Responsible Party | Activity | Timeframe\* | Tips and Follow-Ups |
| --- | --- | --- | --- | --- |
| 1 | SSA Systems (automated process) | Generates a network PIN for the contractor personnel after sponsoring in EPECS and releases the network PIN to the Top Secret hold zone. | 1 day after Step 9 of the Suitability Process, above  |  |
| 2 | COR-COTR | Submits a contractor personnel network PIN request for *Initial Access* using the [Systems Access Management (SAM)](https://sso.ba.ssa.gov/sam/HomeView) (requires SSA systems access) Intranet security portal. In SAM, select: *Request New Access for Someone Else.*Annotate the contractor personnel’s network PIN that appears on the *Initial Access Request Submission* page **after** entering the contractor personnel’s Social Security number (SSN). |  | ***Note:*** This is the first point where the COR-COTR sees the contractor personnel’s network PIN. This activity **must** occur 1 day after Step 1. If SAM does not identify you as a COR-COTR, send an email to the [Component/Regional Security Officer](http://security.ssahost.ba.ssa.gov/Resources/csolist.htm) (requires SSA systems access) regarding procedures for adding an appropriate SAM profile to your user PIN.  If you do not see the user’s name or network PIN in SAM, send an inquiry to the ^SAM (SAM@ssa.gov) mailbox. Please contact your Component/Regional Security Officer regarding any systems profiles.  |
| 3 | Component/ Regional Security Officer | 1. Approves the SAM request, activates the network PIN, and sends email to the COR-COTR informing them that the requested SAM action for the contractor personnel has been completed and an email account can be created.
2. Creates an Outlook email account for the contractor personnel.
 | 1 day after Step 3 | **COR-COTR**: Check on the status of the request by selecting the *My Submitted Requests* tab in SAM. A status of “Completed” shows that the request was completed.  Receiving the email from IDM.Security.Alert@ssa.gov with subject line *SAM Request Completion* indicates that the network PIN is now active. If the email is not received within 1 business day of the SAM request, send an email to the component/regional security mailbox to inquire about the status.  |
| 4 | COR-COTR | Communicates the network PIN information to the contractor personnel. |  | **Contractor personnel**: The default password is 8 characters long: First name initial followed by Last name initial followed by the last 6 digits of the SSN. For John Smith, with SSN: 012-345-6789, the default password will be: JS456789.  |
| 5 | Card Printing Vendor (managed by PCO) | Generates a PIV card and mails card to PCO for issuance.  | 7 to 10 business days after Step 10 of the Suitability process, above | Cards are created once a week and mailed. The standard mailing time is 7 – 10 business days of card generation. Send questions on PIV card status to ^HSPD12 Training (HSPD12.Training@ssa.gov). |
| 6 | PCO | Issues and finalizes PIV card to the contractor personnel.  |  | **COR-COTR/Contractor personnel**: Send questions on PIV card issuance to ^HSPD12 Training. |
| 7 | Contractor Personnel | Enrolls in Enterprise Single Sign-On (ESSO), which is SSA’s mandatory sign-on process. Uses PIV card to log on. PIV card usage is mandatory. [ESSO Instructions](http://sharepoint.ba.ssa.gov/dcs/otso/dissao/SDB/SSO/default.aspx) (Internal SharePoint site, SSA systems access required) |  | The effect of ESSO is that you can only log on to the network using your PIV card (credential) and the 6 to 8-digit PIN number you set for your PIV card. Your regular network user PIN and password will no longer work.Contact the National Help Desk at 1-877-697-4889 for assistance.If you have forgotten or lost your PIV card, please follow the steps in the “Temporary Exception Request” section of the ESSO instruction guide.  |
| Ongoing | COR-COTR | Ensure personnel complete the annual Security Awareness Certification, SSA Form-222, through EPECS. |  | See [HSPD-12 EPECS 3\_0 COR-COTR 222 Process with Manage Certificates](file:///%5C%5Cs3e1a66%5CHSPD12%20Publications%5CEPECS%20documentation%5CHSPD-12%20EPECS%203_0%20COR-COTR%20222%20Process%20with%20Manage%20Certificates.pptx) (SSA Systems Access Required). |

## Exceptions (i.e. Quick Checks for Very Short Term Contractor Personnel (e.g., 3 days) or Emergencies)

Before submitting documentation under these procedures, the COR-COTR should email ^DCHR OPE Suitability to confirm if a “quick check” is appropriate for your circumstances. Include the contract number, duration and frequency of the work to be performed, location of work (headquarters, Region I, etc.), nature of work, and type of emergency, as applicable. CSPS will provide you with a point of contact (POC) in CSPS to expedite processing. If CSPS sees a pattern of quick checks that demonstrate continued access for a particular contractor, CSPS may request the individual go through the full suitability process.

A Quick Check:

* May not be used to request a PIV credential.
* Is only used for emergencies or for infrequent, short-term, escorted access.
* If approved, only allows the applicant access to an SSA facility or site for a specified time period. Individual must be escorted on SSA premises.

| Step | Responsible Party | Activity | Timeframe\* | Tips and Follow-Ups |
| --- | --- | --- | --- | --- |
| 1 | CPOC | 1. Provides the [OF-306 Declaration for Federal Employment](https://www.opm.gov/forms/pdf_fill/OF0306.pdf) to *applicant* to complete and return to CPOC.
2. Requests work authorization documentation for non-U.S. born applicants, if applicable.
 |  | Name on forms must match the legal name, including middle name or initial (if initial only) as it appears in SSA’s official record. Forms must be complete and accurate. Acceptable work authorization documentation for non-U.S. born applicants; e.g., permanent/temporary resident card, I-94 form, employment authorization card, etc.  |
| 2 | Applicant | Completes and returns the [OF-306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf) and work authorization documentation (if applicable) to the CPOC. Applicants must complete the OF-306 accurately, thoroughly, and honestly. “Yes” answers to questions 9 – 15 must be explained in the #16 Remarks field.  |  | Carefully read the OF-306 question instructions to ensure all requested information is provided. [OF-306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf) must be completed thoroughly and all questions answered including the Selective Service question and the Military Service question for all applicants including females.Failure to answer questions accurately and provide required details will result in delays and may be grounds for finding the applicant unsuitable.  |
| 3 | CPOC | 1. Reviews forms to ensure they are complete and signed before scanning them.
2. Saves scanned documentation ([OF-306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf) and work authorization documentation) as a PDF with the naming convention; e.g., Last name, First name 306.
3. Sends documentation to the COR-COTR via a secure or password encrypted email with the duration of work, location of work, contract number, nature of work/type of emergency, etc.
 |  | On the subject line, enter: *Quick Check (Contract #\_\_\_\_)*Note: SSA can only receive up to 10MB in a single email.If the CPOC does not have an SSA email account, the CPOC must submit the documentation in an encrypted, password protected email. See [Encrypted Email Procedures](#_Encrypted_Email_Procedures) for details. The CPOC may use the same password for multiple submissions to the COR-COTR.  |
| 4 | COR-COTR | 1. Ensures CPOC provided [OF-306](https://www.opm.gov/forms/pdf_fill/OF0306.pdf) and work authorization documentation as applicable in the required format.
2. Ensures the required information (contract number, location of work, duration of work, etc.) is included.
3. Ensures all forms are complete.
4. Forwards to CSPS POC with a cc to ^DCHR OPE Suitability. Sends password via a separate email.
 |  | Must include a justification for the quick check to include: duration of work, type of emergency, location of work, contract number, nature of contract work, etc. Note: COR-COTRs should not maintain separate files of the OF-306. The COR-COTR’s role is to ensure the suitability applications follow the instructions as stated in this guide. If the COR-COTR needs to follow up on any applications, they may refer to the email sent to DCHR.OPE.Suitability@ssa.govwithin their secure SSA email account. COR-COTR should notify CPOC if documents are not accessible from our SSA computers (unable to open encrypted documents), and request they resubmit utilizing an approved form of encryption. See [Software Exception Requests](#_Software_Exception_Requests) below.  |
| 5 | CSPS | 1. Reviews all provided documentation.
2. Follows up with applicant on any discrepancies or issues.
3. Emails response of favorable or unfavorable “Quick Check”, contract number, and approval timeframe, if applicable.
 | After 5 business days of Step 4 | **COR-COTR/CPOC/Applicants**: Applicants must not begin work until a CSPS approval is received.  |
| 6 | COR-COTR | Adds the contract number to the applicant’s profile in EPECS. Note: This is required for all personnel regardless of whether they need systems access or a PIV card. |  | **COR-COTR**: See [EPECS Training - Contractor Enrollment](https://hspd12.ba.ssa.gov/hspd12/links.htm) (requires SSA systems access) for step-by-step instructions or contact ^HSPD12 Training for assistance. |

# Current Contractor Personnel Moving to Another Contract (Rollover)

If current contractor personnel and affiliates are to perform work under a new contract, CSPS must review the individual contractor’s suitability to work on the new contract. As applicable, CSPS will issue a suitability letter for the contractor personnel to work on the new contract, or notify the CPOC and the COR-COTR of any additional required steps for the suitability review.

| Step | Responsible Party | Activity | Timeframe\* | Tips and Follow-Ups |
| --- | --- | --- | --- | --- |
| 1 | CPOC | Submits a fully completed, legible [Contractor Rollover Request Form](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Contractor%20Rollover%20Request%20Form.docx) to the COR-COTR of the new contract.  |  | If the CPOC does not have an SSA email account, the CPOC must submit the documentation in an encrypted, password protected email. See [Encrypted Email Procedures](#_Encrypted_Email_Procedures) for details. |
| 2 | COR-COTR | 1. Reviews the form to ensure it is complete and accurate.
2. Forwards to CSPS POC with a cc to ^DCHR OPE Suitability. Sends separate email with password.

If you do not know who your CSPS POC is, please email the ^DCHR OPE Suitability and request the name of your POC.  |  | It is very important that the form has the correct contract number. If the COR-COTR needs to follow up on any applications, they may refer to the email sent to ^DCHR OPE Suitability within their secure SSA email account.  |
| 3 | CSPS | Reviews contractor personnel to ensure they have the appropriate background investigation to perform work on the new contract. 1. If suitable, releases a suitability determination letter for the new contract.
2. If the contractor personnel does not have the proper investigation on record, CSPS will notify the CPOC and COR-COTR of the requirement to go through the full suitability process.
 | Within 5 business days of Step 2 | **COR-COTR/CPOC**: If CSPS notifies you the contractor personnel does not have the proper investigation for the new contract, see Step 1 of the Suitability Process, above, to begin a new suitability review for that contractor personnel.  |

# Unsuitable Determinations

When an individual (applicant or current contractor personnel) is determined unsuitable, CSPS will send a letter notification to the COR-COTR and CPOC to be issued to the individual. There is **no** appeals process; however, the individual may request clarification (see paragraph i. of [AS clause 2352.204-1](https://www.ssa.gov/oag/acq/oagacq_security.htm)). Details are provided in the letter.

The individual must submit requests for clarification for unsuitable determinations in writing within 30 days of the date of the unsuitable determination to dchr.ope.suitclarify@ssa.gov.

Individuals must file their own requests; CPOCs may not file requests on behalf of the individual.

Through the [Freedom of Information Act process](https://nbib.opm.gov/foia-privacy-acts/requesting-and-amending-my-records/#CopyofBI), the individual can request in writing a copy of their investigation from OPM. The written request must prominently note “Freedom of Information Act Request” and describe in detail the records needed. This will assist OPM with locating the records in a reasonable amount of time.

# Lost, Stolen, or Damaged PIV Card

* The PIV cardholder should report all lost, stolen, or damaged PIV cards to the HSPD-12 Help Desk at 1-877-697-4889, in order to ensure the replacement PIV card workflow (cancellation, reordering) is accurately tracked and executed in the card management system.
	+ Individuals can also visit the PCO to report their PIV card as lost, stolen, or damaged. The PCO will cancel the old credential and order a new credential.
	+ The PIV cardholder is also responsible for notifying their CPOC/COR-COTR.
* The PCO will not reactivate any PIV cards found after being reported lost.

# Name Change Process

* In the event of a name change, the contractor personnel will need to report to a local SSA field office to update their legal name.
* The contractor personnel will then need to report to the PCO with their updated legal identifications or documents for sponsoring of a new credential.
* The PCO will re-sponsor the individual with their new name in EPECS. The PCO will select “name change” in EPECS when sponsoring them and include the new name.
* The contractor personnel shall provide any prior PIV cards to the PCO.

# Credential (PIV) Renewal Process

If the contractor personnel are issued a credential, the PIV card is good for 3 years before expiring and a new card is re-issued. Per Executive Orders (E.O.) 13488 and 13467, as amended, cardholders may be subject to additional screening requirements for retention of a PIV card.

The cardholder’s PCO automatically receives the HSPD-12 PIV card every 3 years.

* The cardholder will receive an email approximately 12 weeks prior to the expiration date on their credential.
* The email notification will contain a link to a self-help page where the cardholder has the opportunity to update their DOORS office code if they are working in a different office (contact the COR-COTR if you need any assistance).
* The cardholder has 4 weeks to make any changes.
* Eight weeks prior to the expiration date, the new card is mailed to the PCO for issuance to the cardholder. The PCO will contact the cardholder by email to pick up the new credential.

NOTE: The cardholder should reach out to the PCO within at least 2 weeks of card expiration if they have not been notified to pick up their new PIV card.

* The cardholder shall provide any prior PIV cards to the PCO.

# Re-Investigations

Contractor personnel may be subject to re-investigations every five (5) years from the date of their last completed background investigation. CSPS will notify the COR-COTR/CPOC when an individual is due for re-investigation.

Contractor personnel must comply with any requests from the COR-COTR and CSPS in order to remain active on an SSA contract. The notification will detail the steps and requirements for the re-investigation.

# Notification Requirements for Contractor Personnel

The CPOC shall notify the COR-COTR and CSPS at DCHR.OPE.Suitability@ssa.gov within one (1) business day if any contractor personnel is arrested or charged with a crime during the term of this contract, or if there is any other change in the status of the contractor personnel (e.g., leaves the company, no longer works under the contract, the alien status changes, etc.) that could affect their suitability determination (see paragraph j. of [AS clause 2352.204-1](https://www.ssa.gov/oag/acq/oagacq_security.htm)).

The CPOC must provide in the notification as much detail as possible, including, but not limited to:  name(s) of contractor personnel whose status has changed, contract number, the type of charge(s), if applicable, date of arrest, the court date, jurisdiction, and, if available, the disposition of the charge(s).

# Separation Process

When a contractor personnel’s status changes with SSA, the CPOC and COR-COTR, per [Federal Information Processing Standards Publication (FIPS Pub) 201](http://nvlpubs.nist.gov/nistpubs/FIPS/NIST.FIPS.201-2.pdf), must take appropriate actions within 18 hours of receiving notice of the change in status. Examples of a change in status are retirement, dismissal, long-term absence, contract termination, or denial of systems access (e.g., unfavorable determination from CSPS).

The **COR-COTR** should complete the following steps, as applicable, within 18 hours of receiving notification of separation:

* Email the applicable CSPS POC with a cc to ^DCHR OPE Suitability with the name (as it appears on the PIV card) and the SSN of the individual who separated. If the background investigation is in process, CSPS will cancel the investigation.
* Remove the individual from the contract in EPECS and perform revocation using EPECS Complete Cardholder Termination of the contactor (See [EPECS Contractor Termination](file:///%5C%5Cs3e1a66%5CHSPD12%20Publications%5CEPECS%20documentation%5CEPECS%20Contractor%20Termination.pptx) available on the EPECS site (requires SSA system access).
* If a PIV card was issued, collect the PIV card as part of the routine separation procedures and return (or mail) the PIV card to the applicable PCO.

# Reference Information

## Glossary

**Contract** **Number** – SSA contractor personnel and affiliates (e.g., personnel working on SSA- awarded grants, SSA agreements with non-Federal agencies, etc.) are associated with a contract (or agreement) number for processing in EPECS and for suitability processing.

**Credential** – See Personal Identity Verification (PIV) card.

**Electronic Personal Enrollment Credential System (EPECS)** – An SSA system used to transmit fingerprints to the Federal Bureau of Investigation (FBI) to obtain results and facilitate the steps of the credentialing process stages (enrollment, sponsorship, registrar determination, and issuance of the HSPD-12 card). This system is used by CSPS and the PCO during the chronological stages of the process.

**Electronic Questionnaires for Investigations Processing (e-QIP)** – An OPM system used for entering and submitting all information into the electronic SF 85, 85P, and 86.

[**Acceptable Identification Documents**](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/List%20of%20Acceptable%20Documents.pdf) – List of acceptable documents used for proof of identity. The names on the suitability documents provided must match each other and SSA’s official record in order to process HSPD-12 credentials and for OPM to process the necessary background investigation.

**Issuer** – A phase in EPECS that involves PIV card generation consisting of a face-to-face meeting between a representative in the PCO and the contractor personnel to perform fingerprint comparison, validation of identity documents, assignment of 6 – 8-digit PIV PIN number, and activation of the credential.

**Personal Identity Verification (PIV) card** – A secure and reliable form of identification issued by the Federal Government to its authorized personnel as the common means for accessing Federal facilities, networks, and information systems. Other generic terms that are interchangeable with “PIV card” include credential, badge, or smart card.

**Profile** – A security access control role that is assigned to contractor personnel for specific job functions.

**Sponsor** – A phase in EPECS that involves a face-to-face meeting between a representative in the PCO and the individual contractor to scan [Acceptable Documents](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/List%20of%20Acceptable%20Documents.pdf), scan two fingerprints, capture photograph, and sign the EPECS form for CSPS to process.

**Top Secret –** A commercial access-control software package modified to fit SSA’s unique requirements and operating environment, which provides security for SSA systems.

## Key Participants

**Company Point of Contact (CPOC)** – Representative for the awarded contract company.

**Contracting Officer (CO) –** Enters into, administers, or terminates contracts and makes related determinations and findings, as delegated.

**Contracting Officer Representative-Contracting Officer Technical Representative (COR-COTR)** – Representative authorized and designated in writing by the CO to perform certain technical or administrativefunctions as they relate to a contract.

**Contractor** – Any entity having a relationship with SSA because of a contract. This term includes, but is not limited to, corporations, limited liability partnerships, and sole proprietorships.

**Contractor Personnel** – Employee(s) of the contractor, employee(s) of the subcontractor, any consultant retained by the contractor or subcontractor, any volunteer or intern of the contractor or subcontractor, and if the contractor or subcontractor is a sole proprietorship, it refers to the sole proprietorship.

**Office of Budget, Finance, and Management (OBFM), Office of Acquisition and Grants** – Awards and administers SSA contracts, orders, and grants and issues SSA's acquisition policies and procedures.

**OBFM, Office of Security and Emergency Preparedness, Office of Protective Security Services** – Point of contact for enrollment, EPECS functionality, shipping of credentials, and the PIV card issuance process. Includes the Parking and Credentialing Office (PCO) (see definition, below).

**Office of Human Resources, Office of Personnel, Center for Suitability and Personnel Security (CSPS)** – Screens SSA employees, contractors, and affiliates. Initiates background investigations and makes suitability determinations. Point of contact for risk level designation, form completion, the OPM investigation process, fingerprint responses from FBI, name discrepancies between identification documents and SSA’s records, the Registrar/Determination Officer phase of the credentialing process, e-QIP issues, final adjudication upon completion of the OPM investigation, and ongoing assessments as necessary. Send questions related to these topics to ^DCHR.OPE.Suitability@ssa.gov.

**Office of Personnel Management (OPM), National Background Investigations Bureau** – The Federal agency that conducts the background investigation after the completion of e-QIP.

**Parking and Credentialing Office (PCO) –** is the point of contact for sponsorship and replacement credentials. Send questions related to these topics to HSPD12.Training@ssa.gov.

## Contact Information

**CSPS**

* Contact the **CSPS Hotline at 1-844-874-9940** for status inquires on pending contractor suitability requests and e-QIP assistance.
* Contact**DCHR.OPE.Suitability@ssa.gov** and your CSPS POC regarding questions on SSA’s suitability process and the OPM investigation process.
* CSPS Sites:
	+ [CSPS Intranet Site](http://personnel.ba.ssa.gov/ope/csps/) (SSA systems access required)
	+ [CSPS COTR SharePoint Site](http://sharepoint.ba.ssa.gov/DCHR/OPE/CSPS/CSPSCOTR/SitePages/Home.aspx) (SSA systems access required; COR-COTRs Only)

**EPECS and Credentialing Process (COR-COTRs Only)**

**^HSPD12 Training** **or 877-697-4889, Option 6** – EPECS training, questions on account setup and documentation, and procedural and policy questions for EPECS users.

For COR-COTR access in EPECS, please see [EPECS Account Requests](file:///%5C%5Cs3e1a66%5CHSPD12%20Publications%5CEPECS%20documentation%5CEPECS%20Account%20Requests.pptx) for detailed instructions.

In order to access the EPECS “Contract and Contractor Queries” section, the COR-COTR will need to submit a Systems Access Management (SAM) Automated Resources Access System (ARAS) request at <https://sso.ba.ssa.gov/sam/HomeView>.

The COR-COTR will need to request profile **P30375P**. This profile allows the user to view contracts/contractors that he/she is responsible for.

The COR-COTR will also need to request profile **P10301P (Contractor/Contract Initiator)**. This profile allows the user to add contract information into EPECS and assign/remove contractors to/from contracts.

**PCO**

SSA Headquarters: Parking.and.Credentialing@ssa.gov or 410-965-5910.

Second Support Center (formerly Research Triangle Park): SSC.Parking.and.Credentialing@ssa.gov or 877-586-6650, extensions 25206 or 25207.

Regional Security Offices – See Appendix in [AS clause 2352.204-1, Security and Suitability Requirements](https://www.ssa.gov/oag/acq/oagacq_security.htm).

**SAM@ssa.gov**(**^SAM****) (COR-COTRs Only)** – SAM procedures and status questions on new account requests.

## Investigation Types & Risk Levels

OPM updated the investigative case types for their government-wide investigations. The following chart includes the old and new case types by risk level:

|  |
| --- |
| Federal Investigation Standards |
| Consideration For | Suitability | National Security Access |
| Position Risk Level | Low Risk | Moderate Risk Public Trust | High Risk Public Trust | Confidential | Secret | Top Secret | SCI |
| Position Sensitivity | Non-Sensitive | Non-Critical Sensitive | Critical Sensitive | Special Sensitive |
| New Tiered Investigation Case Type | Tier 1 | Tier 2 | Tier 4 | Tier 3 | Tier 5 |
| Prior Equivalent Investigation Case Type/Level | NACI (Level 1) | MBI (Level 5)  | BI (Level 6)  | NACLC/ANACI (Level 2) | SSBI (Level 3 & 4) |
| Standard Form Used Within e-QIP | SF-85 | SF-85P | SF-86 |

Depending on when the investigation was initiated by OPM, the suitability determination letter may refer to e.g., MBI or Tier 2 for a moderate risk-level investigation.

## References & Guides

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### **Encrypted Email Procedures**

For your convenience, we have included the following instructions to send emails with sensitive documentation or messages containing personally identifiable information (e.g., SSNs, etc.) securely to an SSA email address. Consult your local information technology staff for assistance. If you utilize an alternate secure method of transmission, we recommend contacting the recipient to confirm receipt.

#### **To Encrypt a File using WinZip**

* + 1. Save the file to your hard drive
		2. Open Windows Explorer and locate the file
		3. Right click on the file
		4. Select “WinZip”
		5. Select “Add to Zip File”
		6. An Add box pops up. Near the bottom of the box you will see an “Options” area
		7. Click the “Encrypt added files” checkbox
		8. Click the “Add” button
		9. Check the “Hide Password” checkbox if not already checked
1. Enter a string of characters as a password composed of letters, numbers, and special characters (minimum 8 characters – maximum 64)
2. Select the 256-Bit AES encryption radio button
3. Click “OK”
	* 1. You have successfully encrypted the new Zip file that can now be attached to an email.

#### **Providing the Recipient with the Password**

Send the password to the intended recipient in a separate email message prior to sending the encrypted file or after sending the encrypted file. Do not send the password in the same email message to which you attached the encrypted file.

If possible, it is recommended to provide the password to the COR-COTR by telephone or establish a predetermined password between the contractor and the COR-COTR.

The COR-COTR should also submit the password in a separate email from the documentation when submitting to ^DCHR OPE Suitability. Due to the large volume of submissions, the COR-COTR must always provide the password to ^DCHR OPE Suitability in a separate email, even if it is a pre-established password for a contract.

#### **Sending an encrypted Zip File via email:**

1. Compose a new message
2. Attach the Zip File
3. Send message

### **Software Exception Requests**

If the contract company is unable to use WinZip, they may be able to use <https://www.7-zip.org/> (free software). This does require the COR-COTR to submit a security exception request.

Any SSA computer users who need to use the software should file an exception at <http://ois.ssahost.ba.ssa.gov/dse/continuous_monitoring_compliance/exception_process.htm>.

**EPECS User Guides (COR-COTRs ONLY)** – See “EPECS Trainings” for “Contractor Enrollment,” “EPECS Contractor Termination,” “COTR Logical Access Update,” “222 Process,” etc.) on <https://hspd12.ba.ssa.gov/hspd12/links.htm> (SSA systems access required).

**e-QIP User Guides –** <https://nbib.opm.gov/e-qip-background-investigations/>

**PII Portal Website (SSA Intranet Site) –** <http://eis.ba.ssa.gov/pii/>

**SAM User Guides (COR-COTRs ONLY) –**<http://sharepoint.ba.ssa.gov/DCS/OIS/OIS%20Public%20Library/Forms/AllItems.aspx?RootFolder=%2FDCS%2FOIS%2FOIS%20Public%20Library%2FSAM%20Systems%20Access%20Management%2FSAM%20User%20Guides&InitialTabId=Ribbon%2EDocument&VisibilityContext=WSSTabPersistence> (SSA systems access required)

**AS clause 2352.204-1, Security and Suitability Requirements** – The clause language should be included in your contract. See <https://www.ssa.gov/oag/acq/oagacq_security.htm> for the detailed language.

## Forms

[**e-QIP Applicant Listing Form**](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/e-QIP%20Applicant%20Listing.xlsx) – The **CPOC** is responsible for completing this form and submitting it to their COR-COTR (following the detailed steps in the [Contractor Personnel (Applicant) Workflow](#_Contractor_Personnel_(Applicant)_1)) in order for CSPS to initiate the applicable suitability screening/background investigation and make an initial suitability determination.

[**Declaration for Federal Employment (OF-306)**](https://www.opm.gov/forms/pdf_fill/OF0306.pdf) – Form required for SSA’s assessment of an individual’s suitability for access to Federal systems, information, data, or premises and required for an OPM background investigation. See [Contractor Personnel (Applicant) Workflow](#_Contractor_Personnel_(Applicant)_1) for detailed instructions and tips on completing and submitting this form.

[**FCRA Authorization Form**](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Fair%20Credit%20Reporting%20Act%20Authorization%20Form.pdf)– A consent form authorizing the collection of credit information associated with the background investigation. See [Contractor Personnel (Applicant) Workflow](#_Contractor_Personnel_(Applicant)_1) for detailed instructions on how to submit this form.

[**Contractor Rollover Request Form**](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Contractor%20Rollover%20Request%20Form.docx) – If current contractor personnel are to perform work under a new contract, the **CPOC** must submit this form to the COR-COTR of the new contract. The COR-COTR must then submit the form to CSPS for processing. CSPS will notify the CPOC and the COR-COTR of suitability to work on the new contract. See [Current Contractor Personnel Moving to Another Contract (Rollover Request)](#_Current_Contractor_Personnel_1) for detailed instructions on how to submit this form.

[**Cover Sheet**](https://www.ssa.gov/oag/acq/ASC_2352_204-1_Security_and_Suit_Reqrmts_Post_10012017/Contractor%20Suitability%20Personnel%20Cover%20Sheet.docx)– If an **applicant** does not use SSA’s electronic fingerprint services option, they must use this cover sheet to mail hardcopy fingerprint cards. See [Contractor Personnel (Applicant) Workflow](#_Contractor_Personnel_(Applicant)_1) for detailed instructions on when and how to submit this form.

## Background Information on HSPD-12

On August 27, 2004, President Bush signed HSPD-12, Policy for a Common Identification Standard for Federal Employees and Contractors. Based upon this directive, the National Institute for Standards and Technology (NIST) developed FIPS Pub 201 including a description of the minimum requirements for a Federal PIV system. HSPD-12 directs the implementation of a new standardized badging process, which is designed to enhance security, reduce identity fraud, and protect the personal privacy of those issued government identification. SSA began implementing the HSPD-12 program department-wide on October 27, 2005. Only those individuals who meet the minimum requirements under the PIV process will be issued an SSA HSPD-12 credential. Per E.O. 13488 and E.O. 13467, as amended, individuals may also be subject to ongoing assessments to ensure individuals continue to meet the applicable standards for possessing a PIV card.

[Homeland Security Presidential Directive 12 (HSPD-12), Policy for a Common Identification Standard for Federal Employees and Contractors](https://www.dhs.gov/homeland-security-presidential-directive-12)

NIST developed [FIPS Pub 201](http://nvlpubs.nist.gov/nistpubs/FIPS/NIST.FIPS.201-2.pdf) including a description of the minimum requirements for a Federal PIV system.

[E.O. 13488 and E.O. 13467, as amended](https://obamawhitehouse.archives.gov/the-press-office/2017/01/17/amending-civil-service-rules-executive-order-13488-and-executive-order), state that vetting includes all steps in the end-to-end process, including determining need (appropriate position designation), validating need (existence of a current investigation or adjudication), collecting background information via standard forms, investigative activity, adjudication, providing administrative due process or other procedural rights, and ongoing assessments to ensure that individuals continue to meet the applicable standards for the position for which they were favorably adjudicated.

[Internal Revenue Service Publication 1075](https://www.irs.gov/pub/irs-pdf/p1075.pdf), as amended, requires anyone with access to Federal Tax Information to undergo a minimum of a Tier 2 (Moderate Risk) investigation.