FOR: CIVILIAN PERSONNEL POLICY COUNCIL MEMBERS

FROM: Defense Civilian Personnel Advisory Service Director, Ms. Michelle LoweSolis

SUBJECT: Temporary Procedures for Personnel Vetting and Appointment of New Employees during Maximum Telework Period due to Coronavirus COVID-19

ACTION:
- Disseminate to Appropriated and Nonappropriated Department of Defense (DoD) Human Resources Practitioners.
- Request each Component/DoD Agency/Field Activity comply with the assessment requirements as outlined in reference c, with a courtesy copy to dodhra.mc-alex.dcpas.mbx.hrops-lerd-suitability@mail.mil

SUSPENSE: April 30, 2020

REFERENCES:
- c. e-Fingerprint Service Providers (attached)

BACKGROUND/INTENT: OPM issued guidance (reference a) allowing deferral of fingerprint requirements if unable to secure them due to impacts of COVID-19. Subsequently, the USD(I&S) released guidance (reference b) asserting “DoD has the resources and capabilities to continue collecting fingerprints, albeit under difficult circumstances.” Thus, DoD will continue to meet fingerprint requirements for hiring, security, suitability/fitness, and credentialing, to include contractors, to the maximum extent possible. Attached is a list of e-Fingerprint Service Providers (reference c) to assist in alleviating fingerprint collection constraints. The USD(I&S) memorandum states “The DCSA has issued separate technical guidance,” this guidance (reference d) does not apply to DoD, resulting in the need to conduct assessments.

POINT OF CONTACT: Ms. Melissa Rubenstein, Labor and Employee Relations, Melissa.a.Rubenstein.civ@mail.mil

Attachment(s):
As stated
MEMORANDUM FOR: HEADS OF DEPARTMENTS AND AGENCIES

FROM: MICHAEL J. RIGAS, ACTING DIRECTOR

SUBJECT: Temporary Procedures for Personnel Vetting and Appointment of New Employees during Maximum Telework Period due to Coronavirus COVID-19

Vetting and Appointment Procedures Involving Fingerprinting

While agencies continue to onboard personnel, particularly for mission-critical functions, many Federal, state, and local offices that take fingerprints are temporarily closed due to measures associated with COVID-19.

As a result, Federal agencies are experiencing challenges collecting fingerprints to meet existing requirements for a fingerprint check of the Federal Bureau of Investigation’s (FBI) criminal history records (“FBI fingerprint check”) as part of vetting new hires1 (including for waivers of pre-appointment investigative requirements) and contractors, appointment to the civil service2, and determining eligibility for issuance of Personal Identity Verification (PIV) credentials3.

To permit continued onboarding of Federal and contract personnel when fingerprinting is not immediately available, the following guidance is effective until agencies are otherwise notified in writing.

- Agencies that are able to collect and process fingerprints will continue to do so and to follow established guidance for vetting new hires and determining eligibility for issuance of PIV credentials.
- Agencies that are unable to collect and process fingerprints due to measures associated with COVID-19 (e.g. closure of offices that take fingerprints) and wish to proceed with onboarding at this time, consistent with the agency head’s determination of risk4, must follow established guidelines to proceed with vetting, except that the collection and

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1 E.O. 13467, as amended; Federal Investigative Standards issued by the Director of National Intelligence and Director of Office of Personnel Management, in their capacity as the Security Executive Agent and the Suitability and Credentialing Executive Agent, respectively.
2 E.O. 8781, as amended.
3 Office of Personnel Management (OPM), Final Credentialing Standards for Issuing Personal Identity Verification Cards under HSPD-12.
4 The agency head may make the determination on a case-by-case basis, for specific positions, or for the agency as a whole.
submission of fingerprints may be delayed until fingerprint processing is feasible, and no later than the date of termination of this temporary guidance.\textsuperscript{5}

- Agencies will delay reporting the final adjudication of the background investigation until a fingerprint check has been completed and considered in the adjudication. Existing mechanisms for measuring the timeliness of adjudication compliance will continue; however, agencies will not be held accountable for adjudication reporting timeliness during the period this guidance is in effect.

- For agencies that utilize the Defense Counterintelligence and Security Agency (DCSA), the primary background investigative service provider for the Government, but are unable to collect and process fingerprints at this time, DCSA is instituting a procedure for the processing of background investigations that allows for deferral of the fingerprint submission requirement. Once an agency is able to collect fingerprints for an individual whose investigation was submitted without them, the agency must submit the fingerprints to DCSA as described in DCSA’s procedure.

- DCSA will issue separate technical guidance directly to its customer agencies via each agency’s DCSA liaison following the issuance of this policy.

Challenges collecting fingerprints also are inhibiting agencies’ ability to issue PIV credentials. Although this guidance permits agencies to proceed with determining eligibility for issuance of a PIV credential, the issuance of the credential itself may not be possible due to the agency’s inability to capture fingerprints and other challenges associated with COVID-19 measures. Agencies should consult Office of Management and Budget (OMB) Memorandum M-20-19, Harnessing Technology to Support Mission Continuity (March 22, 2020) about issuing alternate credentials to PIV-eligible users.

Procedures Involving In-Person Proof of Identity for Employment Authorization and Determining Eligibility for Issuance of a Credential

Due to precautions being implemented by employers and employees related to physical proximity associated with COVID-19, the Department of Homeland Security (DHS) announced on March 20, 2020, that it will exercise its discretion to temporarily defer the physical presence

\textsuperscript{5} Although E.O. 8781, as amended, does not permit the waiver or deferral of the pre-appointment fingerprint requirement for non-temporary employees, in some circumstances it will be impracticable for agencies to comply with this requirement during the national emergency. In this regard, Office of Management and Budget (OMB) M-20-19, Harnessing Technology to Support Mission Continuity (March 22, 2020) states: “Security protocols, requirements regarding the appropriate use of federal resources, and legal requirements are always applicable. However, agencies are encouraged to make risk-based decisions as appropriate to meet mission needs as outlined in M-20-16, Federal Agency Operational Alignment to Slow the Spread of Coronavirus.” Consistent with M-20-19, if an agency head makes a risk-based decision that it cannot comply with the requirement in E.O. 8781 for pre-appointment fingerprinting of non-temporary employees, and that the agency must defer fingerprinting these employees until a later date, the agency head or his or her designee must document the reasons for his or her risk-based decision.
requirements associated with Employment Eligibility Verification (Form I-9). Information regarding the I-9 process for onboarding using remote verification during this temporary period can be found at:


Issuance of a credential also requires in-person identity-proofing. Effective immediately and until agencies are otherwise notified in writing, when agencies are unable to perform the identity proofing processes for determining eligibility and for issuance of a credential consistent with the agency head’s determination of risk, they may elect instead to perform the identity proofing via remote inspection (e.g., over video link, fax or e-mail, etc.) Remote inspections will be an interim process, and any individuals that undergo the remote identity-proofing process are required to undergo in-person identity-proofing when agencies return to full, in-person capabilities. Agencies must be able to demonstrate, for audit purposes, that they have complied with identity-proofing requirements.

This Memorandum has received my authorization as the Suitability and Credentialing Executive Agent, in addition to that of the Director for National Intelligence as the Security Executive Agent, in coordination with the Department of Homeland Security, the Office of the Under Secretary of Defense for Intelligence and Security, and OMB.

This Memorandum is fully consistent with requirements of the Federal Acquisition Regulation and the National Industrial Security Program Operating Manual (NISPOM).

This Memorandum is consistent with OMB Memorandum M-20-16, Federal Agency Operational Alignment to Slow the Spread of Coronavirus and the President's declaration of a national emergency pursuant to section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5191(b)) concerning the COVID-19 outbreak.

6 The virtual I-9 process is sufficient to initiate verification of employment eligibility using the e-Verify system, as required for Federal agencies by OMB Memorandum M-07-21 and as required for Federal contractors by E.O. 12989, as amended.
MEMORANDUM FOR CHIEF MANAGEMENT OFFICER OF THE DEPARTMENT OF
DEFENSE
SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
UNDER SECRETARIES OF DEFENSE
CHIEF OF THE NATIONAL GUARD BUREAU
COMMANDERS OF THE COMBATANT COMMANDS
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE
ASSISTANT SECRETARY OF DEFENSE FOR LEGISLATIVE
AFFAIRS
ASSISTANT TO THE SECRETARY OF DEFENSE FOR PUBLIC
AFFAIRS
DIRECTORS OF DEFENSE AGENCIES
DIRECTORS OF DOD FIELD ACTIVITIES

SUBJECT: Temporary Procedures for Personnel Vetting due to Coronavirus COVID-19

As a result of the COVID-19 pandemic, the Office of Personnel Management provided guidance which allows Departments and Agencies in the Federal government that are unable to collect and process fingerprints to postpone fingerprint collection for the purposes of Security, Suitability, and Credentialing hiring actions. I have assessed that the Department of Defense (DoD) has the resources and capabilities to continue collecting fingerprints, albeit under difficult circumstances.

In accordance with the Acting Director, Office of Personnel Management Memorandum, “Temporary Procedures for Personnel Vetting and Appointment of New Employees during Maximum Telework Period due to Coronavirus COVID-19,” dated March 25, 2020 (TAB A), DoD components shall develop methods of fingerprint collection that mitigate potential spread of the COVID-19 virus. DoD components will continue, to the maximum extent possible, to collect and process fingerprints and follow established guidance for vetting new hires and determining eligibility for issuance of Personal Identity Verification credentials. This includes, to the maximum extent possible, continuing to collect and process fingerprints and following established guidance for vetting contractors under DoD cognizance for the National Industrial Security Program. DoD components shall provide the OUSD(I&S) point of contact listed in this memorandum with an assessment of their ability to execute this guidance, and highlight any concerns or requests for variances, as needed.

In accordance with the OPM guidance, the Defense Counterintelligence and Security Agency (DCSA) will institute procedures for the processing of background investigations that allow for deferral of the submission requirement for those customer agencies that are unable to collect and process fingerprints. The DCSA has issued separate technical guidance directly to
those customer agencies that are unable to collect and process fingerprints, through each agency’s DCSA liaison.

We will continually monitor the situation and will update this guidance as appropriate. My point of contact is Mr. Roger A. Smith, Chief, Personnel Security, at (703) 697-8065 or roger.a.smith127.civ@mail.mil.

Joseph D. Kernan

Attachment:
As stated
MEMORANDUM FOR: HEADS OF DEPARTMENTS AND AGENCIES

FROM: MICHAEL J. RIGAS, ACTING DIRECTOR

SUBJECT: Temporary Procedures for Personnel Vetting and Appointment of New Employees during Maximum Telework Period due to Coronavirus COVID-19

Vetting and Appointment Procedures Involving Fingerprinting

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submission of fingerprints may be delayed until fingerprint processing is feasible, and no later than the date of termination of this temporary guidance.5

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- DCSA will issue separate technical guidance directly to its customer agencies via each agency’s DCSA liaison following the issuance of this policy.

Challenges collecting fingerprints also are inhibiting agencies’ ability to issue PIV credentials. Although this guidance permits agencies to proceed with determining eligibility for issuance of a PIV credential, the issuance of the credential itself may not be possible due to the agency’s inability to capture fingerprints and other challenges associated with COVID-19 measures. Agencies should consult Office of Management and Budget (OMB) Memorandum M-20-19, Harnessing Technology to Support Mission Continuity (March 22, 2020) about issuing alternate credentials to PIV-eligible users.

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requirements associated with Employment Eligibility Verification (Form I-9). Information regarding the I-9 process for onboarding using remote verification during this temporary period can be found at:

https://www.ice.gov/news/releases/dhs-announces-flexibility-requirements-related-form-i-9-compliance

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Footnote:

The virtual I-9 process is sufficient to initiate verification of employment eligibility using the e-Verify system, as required for Federal agencies by OMB Memorandum M-07-21 and as required for Federal contractors by E.O. 12989, as amended.
e-Fingerprint Service Providers

DISCLAIMER: The following businesses and organizations have been approved by the SWFT Program Manager for the enrollment or online submission of electronic fingerprints to SWFT. These entities have had their equipment registered and tested with SWFT, and have given their express permission or have asked to be listed here. This list should not be interpreted to suggest or imply any endorsement or preference by the DMD or the Department of Defense with regard to the qualifications or any other aspect of the entities listed. Any business or entity approved by the SWFT Program Manager for enrollment or online submission of electronic fingerprints may be listed here upon request to be so listed.

Please contact the Service Providers for information about supported geographic areas.

<table>
<thead>
<tr>
<th>Personnel Security Management</th>
<th>Identification International Inc I3</th>
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<tbody>
<tr>
<td>ADDRESS 9441 Water Fern Circle</td>
<td>ADDRESS 3120 Commerce Street, Clermont, FL 34711</td>
</tr>
<tr>
<td>ADDRESS 3120 Commerce Street,</td>
<td>BLACKSBURG, VA 24060</td>
</tr>
<tr>
<td>Joe Jessop</td>
<td>Matthew A. Valet</td>
</tr>
<tr>
<td>PHONE 352-394-7432</td>
<td>PHONE 540-953-1365</td>
</tr>
<tr>
<td>EMAIL <a href="mailto:Joe@psmnet.net">Joe@psmnet.net</a></td>
<td>EMAIL <a href="mailto:Valet@idintl.com">Valet@idintl.com</a></td>
</tr>
<tr>
<td>WEBSITE <a href="http://www.psmnet.net">www.psmnet.net</a></td>
<td>WEBSITE <a href="http://www.idintl.com">www.idintl.com</a></td>
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<tr>
<th>Accurate Biometrics</th>
<th>Industrial Security Integrators, LLC</th>
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<tbody>
<tr>
<td>ADDRESS 900 Park Blvd, Suite 1260 Itasca, IL 60143</td>
<td>ADDRESS 250 Exchange Place Suite E Herndon VA 20170</td>
</tr>
<tr>
<td>POC Julie Meister</td>
<td>POC Paul Capella</td>
</tr>
<tr>
<td>PHONE 773-665-5692</td>
<td>PHONE 703-376-3766</td>
</tr>
<tr>
<td>EMAIL <a href="mailto:info@accuratebiometrics.com">info@accuratebiometrics.com</a></td>
<td>EMAIL <a href="mailto:fingertips@idsecurity.com">fingertips@idsecurity.com</a></td>
</tr>
<tr>
<td>WEBSITE <a href="http://www.accuratebiometrics.com">www.accuratebiometrics.com</a></td>
<td>WEBSITE <a href="http://www.idsecurity.com">www.idsecurity.com</a></td>
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<tr>
<th>Advanced Livescan Technologies</th>
<th>Inquiries</th>
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<tbody>
<tr>
<td>ADDRESS 13763 Kathleen Drive Brook Park, OH 44121</td>
<td>ADDRESS 129 N. West St. Easton, MD 21601</td>
</tr>
<tr>
<td>POC Kevin J. Burke</td>
<td>POC Jennifer Clark</td>
</tr>
<tr>
<td>PHONE 440-759-7028</td>
<td>PHONE 866-987-3767</td>
</tr>
<tr>
<td>EMAIL <a href="mailto:kb@advancedlivescantech.com">kb@advancedlivescantech.com</a></td>
<td>EMAIL <a href="mailto:swftprints@inquiriesinc.com">swftprints@inquiriesinc.com</a></td>
</tr>
<tr>
<td>WEBSITE <a href="http://www.advancedlivescantech.com">www.advancedlivescantech.com</a></td>
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<tr>
<th>Advanced Onion, Inc.</th>
<th>Kinsey Consulting LLC</th>
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<tbody>
<tr>
<td>ADDRESS 2460 Garden Road, Suite E Monterey, CA 93940</td>
<td>ADDRESS 5257 Buckeyslown, Pike, # 212 Frederick MD 21704</td>
</tr>
<tr>
<td>POC Laura Harrasta</td>
<td>POC Ed Kinsey</td>
</tr>
<tr>
<td>PHONE 831-221-5600</td>
<td>PHONE 240-367-9200</td>
</tr>
<tr>
<td>EMAIL <a href="mailto:laura@advancedonion.com">laura@advancedonion.com</a></td>
<td>EMAIL <a href="mailto:info@kinsey-consulting.com">info@kinsey-consulting.com</a></td>
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<tr>
<th>Fieldprint</th>
<th>National Credit Reporting</th>
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<tbody>
<tr>
<td>ADDRESS 400 Upham Road, Suite 115 Marlton, NJ 08053</td>
<td>ADDRESS 5300 Via Del Oro Suite 105 San Jose, CA 95119</td>
</tr>
<tr>
<td>POC Thomas Harrison</td>
<td>POC Cynthia Clark</td>
</tr>
<tr>
<td>PHONE 888-472-4918</td>
<td>PHONE 800-441-1661 Ext.109</td>
</tr>
<tr>
<td>EMAIL <a href="mailto:harrison@fieldprint.com">harrison@fieldprint.com</a></td>
<td>EMAIL myFBIreport.com</td>
</tr>
<tr>
<td>WEBSITE <a href="http://www.fieldprintswft.com">www.fieldprintswft.com</a></td>
<td>WEBSITE <a href="http://www.iinccredit.com">www.iinccredit.com</a></td>
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<td>SERVICES PROVIDED Fingerprinting</td>
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<thead>
<tr>
<th>Personnel Security Professionals LLC</th>
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<tbody>
<tr>
<td>ADDRESS 8533 Shepherdsdown Pike Suite 102 Shepherdsdown, WV 25443</td>
<td>ADDRESS 5300 Via Del Oro Suite 105 San Jose, CA 95119</td>
</tr>
<tr>
<td>POC Cory Klein</td>
<td>POC Cynthia Clark</td>
</tr>
<tr>
<td>PHONE 703-291-0030</td>
<td>PHONE 800-441-1661 Ext.109</td>
</tr>
<tr>
<td>EMAIL <a href="mailto:cklein@persecpros.com">cklein@persecpros.com</a></td>
<td>EMAIL myFBIreport.com</td>
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<tr>
<td>WEBSITE <a href="http://www.persecpros.com">www.persecpros.com</a></td>
<td>WEBSITE <a href="http://www.iinccredit.com">www.iinccredit.com</a></td>
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Reference (c)
Federal Investigations Notice

Notice No. 20-03 Date: March 30, 2020

Subject: Temporary Deferral of Fingerprinting due to COVID-19 Impacts

Pursuant to the Office of Personnel Management (OPM) memorandum, Temporary Procedures for Personnel Vetting and Appointment of New Employees During Maximum Telework Period Due to Coronavirus COVID-19, dated March 25, 2020, the guidance below outlines the process by which Defense Counterintelligence and Security Agency (DCSA) customer agencies can temporarily submit investigative requests to DCSA without an associated fingerprint (FP) submission to support mission-critical onboarding.

Beginning April 6, 2020, if a customer agency has opted to use this alternative process, where the collection of FPs to support a background investigation request is not possible due to impacts of COVID-19:

1) Agencies will notate FIPC Code C9 in the Agency Use Block (AUB) of whichever Standard Form is being used to request the investigation.

2) In the Attachments section within e-QIP on the Fingerprint Submission Data Screen “Not Required” should be entered into the “Submission Type” field, and the “Method of Transmission” field left on “Select an option”. The request can then be released.

3) When DCSA receives a case submitted in this manner, it will conduct a name-based check of Federal Bureau of Investigation’s (FBI’s) criminal history records. Note the name-based check does not include files at the FBI that can only be searched using biometrics.

4) When completed, the investigation will be delivered to the requesting agency in the normal fashion. Per OPM guidance the agency may review or adjudicate the case but should delay reporting the adjudication until the fingerprints have been submitted, received and considered (see number 5).

5) At such time as the customer agency is able to collect FPs for an individual whose case was previously processed without a FP check, the customer agency must submit the FP to DCSA, requesting a Fingerprint Special Agreement Check (SAC) product. Consistent with the OPM memorandum, when the results of the SAC are received and considered in the adjudication, the adjudicative determination on the higher-level investigation may then be reported to the applicable national-level database.

6) Customer agencies are responsible for maintaining a record of the investigations requested under the policy to ensure a FP SAC is conducted as soon as fingerprint capture is possible and the adjudication is ultimately reported to the appropriate repository.

DCSA will continue to charge agencies the published pricing for the applicable case types and will not charge for the associated FP SAC. DCSA will continue to evaluate the situation and notify customer agencies if a change is required to this procedure.

Note that current eAdjudication business rules render any cases delivered without a FP check ineligible for that process. If the FP SAC is submitted and completed before the investigation closes, the case will be eligible for eAdjudication consistent with eAdjudication business rules.
If you have any questions or concerns regarding the guidance above, please contact your DCSA Agency Liaison.

Christy K. Wilder
Deputy Director
Personnel Vetting

Inquiries: DCSA, Customer and Stakeholder Engagements: 724-794-5612
Distribution: All agency SOI and SON Offices
Expiration: When superseded