

Army Regulation 600–78

Personnel–General

Army Suitability, Fitness, and Credentialing Program

**Headquarters
Department of the Army
Washington, DC
8 March 2024**

SUMMARY of CHANGE

AR 600–78

Army Suitability, Fitness, and Credentialing Program

This major revision, dated 8 March 2024—

- o Changes title of the regulation from Army Suitability Program to Army Suitability, Fitness, and Credentialing Program (cover).
- o Updates the Army’s policies for the implementation of Homeland Security Presidential Directive-12 (throughout).
- o Updates responsibilities and assigns organizations as members of the Army Suitability Working Group (chap 2).
- o Incorporates Army Directive 2018–16 (Suitability Criteria for Military Personnel in Specified Positions), dated 8 November 2018 (chap 3).
- o Requires that a memorandum for record for local screening include the date, name of the individual screened, names of the agencies screened, and name of the reviewing individual (para 3–4a).
- o Consolidates Army requirements for suitability and fitness vetting and adjudications for non-uniformed Army personnel, to include Federal Civilian employees, contractors, and volunteers (chap 4).
- o Incorporates Army Directive 2014–23 (Conduct of Screening and Background Checks for Individuals Who Have Regular Contact with Children in Army Programs), dated 10 September 2014 (chap 5).
- o Establishes Army policy for vetting and credential requirements for the Trusted Associate Sponsorship System and the Volunteer Logical Access Credential (chap 6).
- o Requires the Trusted Agent to enter the contracting officer representative’s name, email address, phone number, and required physical and logical access into the Trusted Associate Sponsorship System from the remarks section of the DD Form 1172–2 (Application for Identification Card/DEERS Enrollment) (para 6–10a).


Series Title

Army Suitability, Fitness, and Credentialing Program

By Order of the Secretary of the Army:

RANDY A. GEORGE
General, United States Army
Chief of Staff

Official:


MARK F. AVERILL
Administrative Assistant to the
Secretary of the Army

residents of in-home childcare providers' homes must meet screening requirements.

Proponent and exception authority.

The proponent of this regulation is the Deputy Chief of Staff, G–1. Except as established in Army Directive 2014–23 (Conduct of Screening and Background Checks for Individuals Who Have Regular Contact with Children in Army Programs), the proponent has the authority to approve exceptions or waivers to this regulation that are consistent with controlling law and regulations. The proponent may delegate this approval authority, in writing, to a division chief within the proponent agency or its direct reporting unit or field operating agency, in the grade of colonel or the civilian equivalent. Activities may request a waiver to this regulation by providing justification that includes a full analysis of the expected benefits and must include formal review by the activity's senior legal officer. All waiver requests will be endorsed by the commander or senior leader of the requesting activity and forwarded through their higher headquarters to the policy

proponent. Refer to AR 25–30 for specific requirements.

Army internal control process.

This regulation contains internal control provisions in accordance with AR 11–2 and identifies key internal controls that must be evaluated (see app C).

Supplementation. Supplementation of this regulation and establishment of command and local forms are prohibited without prior approval from the Deputy Chief of Staff, G–1 (DAPE–MPS), 300 Army Pentagon, Washington, DC 20310–0300.

Suggested improvements. Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) via email to usarmy.pentagon.hqda-dcs-g-1.mbx.suitability-division@army.mil.

Distribution. This regulation is available in electronic media only and is intended for the Regular Army, the Army National Guard/Army National Guard of the United States, and the U.S. Army Reserve.

History. This publication is a major revision.

Summary. This regulation provides Army guidance and assigns responsibilities for suitability, fitness, and credentialing.

Applicability. This regulation applies to the Regular Army, the Army National Guard/Army National Guard of the United States, and the U.S. Army Reserve, unless otherwise stated. It also applies to civilians, contractors (HSPD–12), and volunteers working for or on behalf of Army organizations. Additionally, adult

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Glossary

Chapter 1 Introduction

1–1. Purpose

This regulation sets forth responsibilities concerning suitability, fitness, and credentialing for uniformed military personnel, civilians, volunteers, and contractors of the U.S. Army, as well as granting uniformed military personnel, civilians, contractors, volunteers, and other affiliated persons assignment to trusted positions.

1–2. References and forms

See appendix A.

1–3. Explanation of abbreviations and terms

See the glossary.

1–4. Responsibilities

See chapter 2.

1–5. Records management (recordkeeping) requirements

The records management requirement for all record numbers, associated forms, and reports required by this publication are addressed in the Records Retention Schedule–Army (RRS–A). Detailed information for all related record numbers, forms, and reports are located in Army Records Information Management System (ARIMS)/RRS–A at <https://www.arims.army.mil>. If any record numbers, forms, and reports are not current, addressed, and/or published correctly in ARIMS/RRS–A, see DA Pam 25–403 for guidance.

1–6. Program applicability

a. This regulation implements the Department of the Army (DA) Suitability, Fitness, and Credentialing Program and takes precedence over all other departmental issuances affecting the suitability, fitness, and credentialing program.

b. This regulation establishes suitability, fitness, and credentialing policies for—

(1) Military positions of trust, to include drill sergeants, recruiters, training cadre, and other positions screened for suitability found in chapter 3 of this regulation.

(2) Federal Civilians, contractors, and volunteers who work for or on behalf of the Army or who require physical or logical access to Army installations, facilities, and networks.

(3) Personnel who provide services to individuals under the age of 18 in Army programs, such as Army Child, Youth, and School Services employees, medical and health care personnel, and Junior Reserve Officers' Training Corps (JROTC) instructors.

c. Suitability for Personnel Reliability Program (PRP) positions for nuclear, chemical, and biological personnel is governed by separate regulations. Suitability standards are identified in AR 50–5, AR 50–6, and AR 190–17.

d. To the extent the requirements of this regulation impact bargaining unit employees' conditions of employment, activities must meet all statutory labor relations obligations in its implementation.

Chapter 2 Responsibilities

2–1. Assistant Secretary of the Army (Acquisition, Logistics and Technology)

The ASA (ALT) will—

a. Issue, in coordination with the Assistant Secretary of the Army (Manpower and Reserve Affairs) (ASA (M&RA)); Deputy Chief of Staff (DCS), G–1; DCS, G–2; and DCS, G–3/5/7, regulatory guidance for fitness and credentialing implementations within Army contracts.

b. Ensure that all Army contracts, through the performance work statement or statement of work, require contractors to adhere to fitness and credentialing policies.

c. Communicate suitability, fitness, and credentialing requirements to the Army acquisition community.

d. Provide subject matter expertise to the Army Suitability Working Group (ASWG) implementation working groups and Council of Colonels.

e. Serve as a member of the ASWG.

2-2. Assistant Secretary of the Army (Financial Management and Comptroller)

The ASA (FM&C) will—

- a.* Manage the planning, programming, budgeting, and execution process and supporting groups and boards that assist in the process as the principal advisor to the Secretary of the Army for financial management.
- b.* Ensure that the Director, Program Analysis and Evaluation addresses all ASWG recommendations to allocate resources to management decision packages.
- c.* Serve as a member of the ASWG.

2-3. Assistant Secretary of the Army (Manpower and Reserve Affairs)

The ASA (M&RA) will—

- a.* Serve as the principal advisor to the Secretary of the Army for the Army Suitability, Fitness, and Credentialing Program and ensure that Army policies, plans, and programs for Army suitability, fitness, and credentialing are executed consistent with law, regulation, and policy.
- b.* Oversee the implementation of the Army Suitability, Fitness, and Credentialing Program and prescribe policy.
- c.* Assign a member of the ASA (M&RA) staff to co-chair the ASWG with the DCS, G-1 as part of the Army Protection Program.
- d.* Set policy and provide oversight for Army suitability, fitness, and credentialing programs across all Army components.
- e.* Provide guidance to and coordinate with the ASA (ALT); DCS, G-1; Office of the Chief Information Officer (OCIO); DCS, G-6; DCS, G-2; DCS G-3/5/7; DCS, G-9; and the Provost Marshal General (PMG) as they develop supplemental guidance and procedures to ensure Army compliance with relevant regulations.
- f.* Provide guidance to and coordinate with the ASA (ALT) and DCS, G-3/5/7, for suitability policy, ensuring that suitability and fitness requirements are included in the security requirements section of all Army contracts.
- g.* Ensure, in coordination with the DCS, G-3/5/7, that the Army Suitability, Fitness, and Credentialing Program is nested with the operations security requirements.
- h.* Publish, in conjunction with the Chief, Public Affairs, a strategic communication plan that disseminates the policy, procedures, and rationale for the implementation of suitability and fitness requirements.
- i.* Establish suitability, fitness, and credentialing implementation working groups and Council of Colonels, as needed.

2-4. Chief Information Officer

The CIO will—

- a.* Exercise overall supervision for information management.
- b.* Execute the following functions of information technology (IT) policy: Cloud and IT governance; and Information Resource Management, including Enterprise IT for worldwide Army operations, the Enterprise IT architecture, and Cyber Security policy, which includes cyber policy for networks.
- c.* Provide subject matter expertise for credentialing, suitability, and fitness implementation working groups and Council of Colonels.
- d.* Serve as a member of the ASWG.
- e.* Implement the Army's Privacy Program that complies with the Privacy Act of 1974 (Section 552a, Title 5, United States Code (5 USC 552a)), as amended; DoDD 5400.11; and other Federal regulations.

2-5. Deputy Chief of Staff, G-6

The DCS, G-6 will—

- a.* Execute planning, strategy, network architecture, and implementation of command, control, communications, cyber operations and networks for worldwide Army operations.
- b.* Provide subject matter expertise for credentialing, suitability, and fitness implementation working groups and Council of Colonels.
- c.* Serve as a member of the ASWG.

2-6. The Director, U.S. Army Criminal Investigation Division

The Director, USACID will ensure the Director, U.S. Army Crime Records Center (CRC)—

- a.* Provides crime records screening to enable suitability and fitness functions.
- b.* Conducts military criminal records checks for military personnel assigned to or nominated for positions screened for suitability, upon the request of DCS, G-1, U.S. Army Human Resources Command (HRC), or Chief, National Guard Bureau (CNGB).

c. Releases to DCS, G-1 or HRC the results of military criminal records checks for Regular Army (RA)/U.S. Army Reserve (USAR) Soldiers currently in or nominated for positions screened for suitability. DCS, G-1 or HRC may release the results to the appropriate appointing or approval authority.

d. Releases results of military criminal records checks for Army National Guard (ARNG)/Army National Guard of the United States (ARNGUS) personnel to the Director, Army National Guard (DARNG).

2-7. The Inspector General

TIG will—

a. Ensure commanders incorporate suitability, fitness, and credentialing screening into their organizational inspection programs (OIPs) (see app B).

b. Conduct screening for personnel nominated for or currently serving in positions screened for suitability, upon the request of HRC or the National Guard Bureau (NGB).

c. Release to HRC summaries of substantiated allegations against personnel nominated for or currently serving in positions screened for suitability.

d. Release summaries of substantiated allegations against ARNG/ARNGUS personnel to NGB J-1.

e. Limit distribution of information related to substantiated Inspector General (IG) allegations.

f. Direct all questions and screening action requests to TIG Records Screening and Oversight Office. Field and local IGs are not authorized to conduct any local suitability screenings or to release adverse information.

2-8. Chief, National Guard Bureau

The CNGB will—

a. Ensure command procedures and processes conform to and support the Army suitability, fitness, and credentialing program.

b. Conduct and ensure the completion of local and centralized screening of all ARNG/ARNGUS personnel serving in or nominated for those positions. Ensure that the Soldier has a current periodic health assessment and that all medical records are reviewed to ensure the Soldier is medically fit for assignment to the position.

c. NGB J-1 may release IG summaries to State Adjutants General or Commanding General (CG) for the District of Columbia through the ARNG G-1 for the purpose of determining suitability for a specific position. Summaries will not be used to support other adverse actions or for any other purpose.

d. Provide a quarterly consolidated roster of approved suitability appeals to DCS, G-1, Suitability Division.

e. Ensure the suitability screening process is included in the OIP (see app B).

f. Ensure summaries of screening results are released to the appropriate approval or removal authority, who may use it only to determine suitability for the designated position. Disqualification from a designated position is not an independent basis for disciplinary action.

g. Ensure commanders and staff in their commands or agencies who are involved with screening individuals for appointment, enlistment, or induction will secure audit-capable authorization to screen such private information. Heads of agencies conducting screening for civilian, or contractor employment will also ensure audit-capable authorization for their screening personnel. Commanders and heads of agencies will ensure processes are in place to—

(1) Validate the identity of applicants.

(2) Capture and retain authoritative identification documents in the appropriate human resource record.

2-9. Deputy Chief of Staff, G-1

The DCS, G-1 will—

a. Assign overarching responsibility for coordination of policies and activities related to suitability, fitness, and credentialing activities.

b. Assign a member of the DCS, G-1 staff as the co-chair, with the ASA (M&RA), for the ASWG.

c. Establish and maintain an effective Army suitability, fitness, and credentialing program using automated and consolidated adjudicative processes to the maximum extent practicable. In this capacity, the DCS, G-1, in coordination with ASA (M&RA), ensures policies and procedures relating to suitability, fitness, and credentialing for Army personnel will use consistent standards to the extent possible; provide for reciprocal recognition of existing investigations and adjudications; be cost-effective and timely; and provide effective protection of the national interest.

d. Review the Army suitability, fitness, and credentialing mission, identify all populations covered and requirements for each, and recommend courses of action for program improvement at the policy and operational levels.

e. Act as the primary office of responsibility for oversight of studies of suitability, fitness, and credentialing activities.

f. Develop and prescribe suitability and fitness standards to include quality control audits and inspections of organizations that conduct suitability, fitness, and credentialing processing.

g. Develop and implement policies that prescribe Army suitability, fitness, and credentialing standards for all Army personnel, to include all positions related to vulnerable populations, board security screening in support of HRC, and any current or subsequently identified Army suitability, fitness, and credentialing requirements.

h. Publish, in conjunction with the Chief, Public Affairs, a strategic communication plan that disseminates the policy, procedures, and rationale for the implementation of Army suitability, fitness, and credentialing program requirements.

i. Set the strategic direction and provide the overall supervision for Army suitability, fitness, and credentialing across all Army components by providing policy, programming, and oversight.

j. Establish a centralized suitability, fitness, and credentialing adjudication capability for Army civilians, volunteers, and contractors.

k. Ensure that civilian employment policies are adjusted to incorporate Federal, Department of Defense (DoD), and emerging credentialing requirements.

l. Develop input to the Army Campaign Plan and track and report compliance through the Army Protection Program.

m. Ensure Homeland Security Presidential Directive–12 (HSPD–12) processes are coordinated with appropriate agency for adjudication.

n. Centralize and consolidate all HSPD–12 military service, contractor, volunteer, and Federal employment investigations at the Defense Counterintelligence and Security Agency (DCSA) Consolidated Adjudication Services (CAS), in accordance with DoDM 5200.02.

o. Validate resource requirements for the centralized submission, investigation, and centralized adjudication of suitability, fitness, and credentialing background investigations. Assign them to the appropriate management decision package.

p. Ensure that guidance includes provisions for collection of common access cards (CACs) upon separation, retirement, termination, contract termination or expiration, or CAC revocation.

q. Coordinate with DCS, G–3/5/7 to integrate Army suitability screening into the Army Insider Threat (InT) Program to ensure suitability information is submitted to InT Hub.

r. DCS, G–1 will ensure that the CG, HRC—

(1) Conducts centralized background and broadened screening for all nominated RA and USAR military recruiters, drill sergeants, Reserve Officers' Training Corps (ROTC) cadre, and other positions screened for suitability identified in chapter 3 of this regulation. Ensures behavioral health evaluations completed during the local screening process meet the requirements of AR 601–1. Any distribution of this information must comply with the requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

(2) Conducts centralized screening for all nominated RA and USAR training and recruiting cadre. Ensures medical records reviews are completed during the local screening process of training and recruiting cadre.

(3) Releases summaries of screening results to the appropriate approval or removal authority, who may use it only to determine suitability for the designated position. Disqualification from a designated position is not an independent basis for disciplinary action.

(4) Executes and administers the Army Trusted Associate Sponsorship System (TASS) under the direction of the Army Defense Enrollment Eligibility Reporting System (DEERS) Project Office.

(5) Audits the Army's contractor population to ensure HSPD–12 compliance.

(6) Ensures commanders and staff in their commands or agencies who are involved with screening individuals for appointment, enlistment, or induction will secure audit-capable authorization to screen such private information. Heads of agencies conducting screening for civilian, or contractor employment will also ensure audit-capable authorization or their screening personnel. Commanders and heads of agencies will ensure processes are in place to—

(a) Validate the identity of applicants.

(b) Capture and retain authoritative identification documents in the appropriate human resource record.

2–10. Deputy Chief of Staff, G–2

The DCS, G–2 will—

a. Provide subject matter expertise and support to DCS, G–1 on background investigation programs.

b. Serve as a member of the ASWG.

2–11. Deputy Chief of Staff, G–3/5/7

The DCS, G–3/5/7 will—

- a. Ensure that the Army's operations security program supports credentialing, suitability, and fitness implementation.
- b. Integrate credentialing, suitability, and fitness implementation into the Army Campaign Plan and emerging force protection policies and programs to ensure the widest dissemination of requirements.
- c. Coordinate with DCS, G-1; CIO/G-6; DCS, G-2; and PMG to develop supplemental guidance and procedures for leveraging biometrics in support of credentialing, suitability, and fitness implementation.
- d. Serve as a member of the ASWG.

2-12. Deputy Chief of Staff, G-9

The DCS, G-9 will—

- a. Provide support in the execution of the suitability and fitness policy that involves personnel working in Army-sanctioned child services programs, in coordination with the DCS, G-1 and ASA (M&RA).
- b. Serve as a member of the ASWG.

2-13. Chief, Army Reserve and Commanding General, U.S. Army Reserve Command

The CAR will—

- a. Ensure command procedures and processes conform to and support the Army suitability, fitness, and credentialing program.
- b. Ensure that the Soldier has a current periodic health assessment and that all medical records are reviewed to make sure the Soldier is medically fit for assignment to the position.
- c. Complete local screening and request centralized screening of all USAR personnel serving in or nominated for designated positions requiring a suitability review.
- d. Provide a quarterly consolidated roster of approved suitability appeals to DCS, G-1, Suitability Division.
- e. Ensure the suitability screening process is included in the OIP (see app B).
- f. Release summaries of screening results to the appropriate approval or removal authority, who may use it only to determine suitability for the designated position. Disqualification from a designated position is not an independent basis for disciplinary action.
- g. Serve as a member of the ASWG.

2-14. The Surgeon General

TSG will—

- a. Provide support in the execution of suitability and fitness policy that involves health care, in coordination with the DCS, G-1.
- b. Serve as a member of the ASWG.

2-15. Chief of Chaplains

The CCH will—

- a. Provide support in the execution of suitability and fitness policy pertaining to positions of assigned duties in chaplain-led and religious support programs, in coordination with DCS, G-1.
- b. Serve as a member of the ASWG.

2-16. Provost Marshal General

The PMG will—

- a. Establish uniform Armywide guidance for verifying the authenticity and validity of Federal credentials for physical access.
- b. Establish guidance for visual and electronic authentication of credentials within the physical security community.
- c. Establish guidance and process for cross-acceptance of FIPS 201-2 compliant credentials of other Federal agencies whose personnel request to visit Army installations or controlled spaces.
- d. Provide policy on physical security equipment standards for FIPS 201-2 credentialing and badge requirements necessary to support the acquisition community.
- e. Provide subject matter expertise to credentialing, suitability, and fitness implementation working groups and Council of Colonels.
- f. Serve as a member of the ASWG.

2-17. Commanding General, U.S. Army Training and Doctrine Command

The CG, TRADOC will—

a. Conduct local screening and request centralized screening for all recruiting cadre (including USAR recruiting cadre) and all instructor cadre (company level and below).

b. Ensure commanders and staff in their commands or agencies who are involved with screening individuals for appointment, enlistment, or induction will secure audit-capable authorization to screen such private information. Heads of agencies conducting screening for civilian, or contractor employment will also ensure audit-capable authorization of their screening personnel. Commanders and heads of agencies will ensure processes are in place to—

(1) Validate the identity of applicants.

(2) Capture and retain authoritative identification documents in the appropriate human resource record.

2–18. Commanding General, U.S. Army Materiel Command and U.S. Army Installation Management Command

The CG, AMC will—

a. Conduct Army Substance Abuse Program (ASAP) reviews for military personnel serving in or nominated for positions screened for suitability who are assigned to the installation or in the installation’s area of responsibility, upon the request from organizations (to include NGB).

b. Ensure suitability case processing is conducted for all units, tenant units, and DoD-affiliated organizations which includes fingerprint services and Standard Form (SF) 85 (Questionnaire for Non-Sensitive Positions) submissions. See chapter 4 (Suitability—civilian) and (Fitness—government contractor) employees.

c. Ensure access to required suitability systems is granted at the appropriate level in accordance with DoD and Army policy.

d. Ensure quality control of complete packet submission of installation records checks (IRCs) and other supporting documentation into the appropriate systems.

e. Ensure prompt notification of case cancellation.

2–19. Commanding General, U.S. Army Medical Command

The CG, MEDCOM will—

a. Complete local screening (see app C) of MEDCOM drill sergeants.

b. Ensure the Soldier has a current periodic health assessment and that all medical records are reviewed to make sure the Soldier is medically fit for assignment to the position.

c. Ensure medical records reviews are conducted by independently credentialed health providers for Soldiers serving in or nominated for designated positions.

2–20. Army commands, Army service component commands, and direct reporting units

Commanders of ACOMs, ASCCs, and DRUs will—

a. Appoint a Suitability Program Manager to ensure command procedures and processes conform to and support the Army suitability, fitness, and credentialing program.

b. Identify the host nation equivalent checks required to be in compliance.

c. Provide a quarterly consolidated roster of approved suitability appeals to DCS, G–1, Suitability Division.

d. Ensure the suitability screening process is included in the OIP (see app B).

e. Complete local screening and request centralized screening of all personnel serving in or nominated for designated positions requiring a suitability review.

f. Release summaries of screening results to the appropriate approval or removal authority, who may use it only to determine suitability for the designated position. Disqualification from a designated position is not an independent basis for disciplinary action.

2–21. Army Contracting Agency

The Director, Army Contracting Agency will—

a. Ensure verbiage for suitability, fitness, and credentialing screening are included in contracts.

b. Ensure compliance by the contractor with suitability and fitness screening requirements.

2–22. U.S. Army Civilian Human Resources Agency

The Director, CHRA will—

a. Conduct suitability prescreening for new hires by reviewing U.S. Office of Personnel Management (OPM) and DoD suitability and vetting systems.

b. Ensure access to required suitability systems is granted at the appropriate level in accordance with DoD and Army policy.

- c. Ensure quality control of complete packet submission of Optional Form (OF) 306 (Declaration for Federal Employment), resumes, position descriptions, and other supporting documentation into the appropriate systems.
- d. Ensure prompt notification of case cancellation.

2–23. Personnel Security Investigations Center of Excellence

The Director, PSI–CoE will—

- a. Receive and review requests for suitability and fitness background investigations received through Personnel Security Investigation Portal (PSIP).
- b. Screen applicant resume, OF 306, and SF 85 submissions for quality and accuracy. Submit background investigation request to DCSA when all documentation requirements (for example, completed SF 85, resume, OF 306, and fingerprints) for the investigation are met.
- c. Code suitability and fitness investigation requests to be returned to the DCSA CAS for appropriate suitability and fitness determination adjudication.

2–24. Program responsibilities

See program responsibilities for Service points of contact; Trusted Agent Security Managers (TASMs); Trusted Agents (TAs); and Government sponsors in paragraph 6–7 through paragraph 6–11.

Chapter 3

Suitability for Uniformed Military Personnel

3–1. Army Personnel Suitability Screening Program

a. This chapter describes the Army Personnel Suitability Screening Program (PSSP) for uniformed military personnel. The policy is designed to ensure the Army selects and assigns suitable Soldiers to the following positions:

(1) Training cadre, which is described as those positions that instruct or train new personnel entering the military to include all drill sergeants and cadre, at the company level and below.

(2) For the purpose of this regulation, recruiters include all Soldiers performing a direct recruiting function that supports the accomplishment of the recruiting mission. These positions include Soldiers holding the primary military occupational specialties (MOSs) of 79R (Recruiter) and 79T (ARNG Recruiter and Retention noncommissioned officer (NCO)), DA-select recruiters, recruiting officers, recruiting warrant officers, recruiting company/battalion/brigade (BDE) commanders, and MOS-immaterial recruiting battalion and BDE command sergeants major. Recruiting battalion and BDE staff who do not perform recruiting duties, recruiting command headquarters staff, and recruiters serving on Headquarters, Department of the Army (HQDA) staff who do not perform a direct recruiting function are exempt from the screening requirements, unless nominated for another position screened for suitability. Soldiers assisting a recruiting battalion no more than 30 days, such as hometown recruiters, do not require suitability screening.

(3) ARNG recruit sustainment cadre.

(4) ROTC cadre.

(5) Officer Candidate School cadre. The Superintendent, United States Military Academy; Commander, U.S. Army Cadet Command; and Commander, 3–11 Infantry (Officer Candidate School) are authorized to request from HRC similar background checks on Soldiers with unaccompanied access to cadets, cadet candidates, and other vulnerable populations as the command deems necessary.

(6) Warrior Transition Unit cadre.

(7) United States Military Academy cadre.

(8) Military entrance processing station (MEPS) positions.

(9) Sexual Harassment/Assault Response and Prevention (SHARP) professionals. SHARP professionals are individuals holding authorized SHARP positions. Authorized SHARP positions are program managers (PMs), sexual assault response coordinators (SARCs), and SHARP Victim Advocates (VAs).

b. Certain other positions under the Army PSSP require a special nominating or boarding process governed by different Army regulations or DoD guidance. Additional instructions for a specific position may be found in a separate regulation, directive, or memorandum of instruction governing that specific process. Any new positions requiring or needing suitability screening may be added by submitting a request through the first general officer in the chain of command to Headquarters, Department of the Army (DAPE–MPS), 300 Army Pentagon, Washington, DC 20310–0300.

c. The DCS, G-1's Army Resilience Directorate will maintain and update policy for selection criteria in accordance with chapter 7 of AR 600–20 for background screenings requirements for the Army SHARP program under the supervision of the ASA (M&RA).

d. Suitability screening policy for military health care personnel providing care or performing services for children in medical treatment facilities or chaplains, religious affairs specialists, and other personnel performing child and youth services (CYS) duties for children is located in chapter 5 of this regulation.

e. Suitability for PRP positions for nuclear, chemical, and biological personnel is governed by separate regulations. Suitability standards are identified in AR 50–5, AR 50–6, and AR 190–17.

3–2. Scope and method of suitability screening

a. The purpose of suitability screening is not to discover the existence of derogatory information that may disqualify a Soldier, but to provide information used in developing an overall opinion of the character and conduct of an individual and whether that person is suitable for appointment to these important positions. Personnel chosen to serve in positions listed in paragraph 3–1 should have the following positive characteristics:

- (1) Possess a high degree of maturity, leadership, judgement, self-discipline, and professionalism.
- (2) Display moral attributes, ethical qualities, and personal traits that thoroughly embrace the Warrior Ethos and Army Values.
- (3) Be fully committed to the program for which they are being considered, as well as the population who they would serve.

b. All screening requirements for military personnel must be met prior to assignment to a position screened for suitability or upon reassignment to another position screened for suitability.

c. The screening process consists of “centralized screenings” and “local screenings” and are conducted by the organizations (“screening agencies”). All screening agencies will report disqualifying information to HRC for RA and USAR Soldiers, or to the CNGB for ARNG/ARNGUS Soldiers. HRC or NGB will then forward the disqualifying information to the appropriate appointing, suspension, or approval or removal authority or to the appropriate requesting board. ARNG/ARNGUS Soldier screening will be initiated through the State Adjutant General, who will report applicable information to the appropriate authority.

d. Initial screenings will be comprehensive and will search all approved records identified in this regulation. Soldiers nominated to serve in a position screened for suitability will be screened prior to their selection to that position. If an initial screening occurred more than 12 months prior to reporting for assignment, a Soldier must be re-screened prior to assuming duties of the new position.

e. Soldiers serving in positions screened for suitability will be rescreened every 3 years from the date of their initial assignment to the position if they remain in that position for more than 3 years. Commands must submit requests for rescreening to the applicable screening agencies listed in appendix C at least 120 days before the expiration of a Soldier's prior screening.

f. Re-screenings will search all applicable records for the preceding 5 years to ensure there is no gap in information between screenings. Misconduct resulting in disqualifying information between screenings may result in suspension or potential disqualification from a designated position.

g. If a Soldier is reassigned within 3 years to a different designated position, the Soldier will not undergo a new screening.

h. Commands will maintain their screening requirements documentation while the Soldier is serving in the command. If a Soldier is going to a new designated position requiring screening, the command will forward the screening documentation to the Soldier's gaining command.

3–3. Centralized screenings

a. HRC supports the ARNG in the suitability screening for ARNG/ARNGUS Soldiers, consistent with applicable law, regulation, and policy. HRC (for RA and USAR Soldiers) or NGB (for ARNG/ARNGUS Soldiers) will initiate and coordinate centralized screenings. The following screening agencies will screen the records, upon request, and provide the results to HRC or NGB:

- (1) *The Inspector General*. IG records.
- (2) *U.S. Army Human Resources Command*. Defense Information System for Security (DISS), Joint Personnel Adjudication System (JPAS), and Defense Central Investigations Index (DCII).
- (3) *U.S. Army Criminal Investigation Division, U.S. Army Crime Records Center*. Military police reports and USACID reports of investigation.

b. For RA/USAR Soldiers, HRC will conduct or request the following screens:

- (1) Complete Army Military Human Resource Record (AMHRR) including restricted files.

- (2) IG records.
- (3) USACID/CRC records, military police reports and USACID reports of investigation.
- (4) DISS, JPAS, and DCII.

c. For ARNG, States will submit their requests through NGB, which will coordinate for centralized screens with USACID/CRC, TIG, and, for IRCs, U.S. Army Installation Management Command. NGB will conduct ASAP checks for ARNG Soldiers only.

d. For ARNG personnel, responses to ASAP inquiries will be one of the following: no positive tests, one positive test more than 5 years ago, one positive test in the past 5 years, or multiple positive tests. The confidentiality of ASAP information will be maintained in accordance with AR 600–85 and provided only to individuals within the Army who have an official need to know.

e. HRC will manage the selection and screening process for recruiters (RA/USAR), drill sergeants, and ROTC cadre.

f. All screening requirements for personnel outlined in this regulation must be met prior to assignment to a position. Units must allow at least 120 days to complete centralized screening prior to appointment and training. RA/USAR units in short-tour locations may establish expedited screening by coordinating with HRC at usarmy.knox.hrc.mbx.epmd-ebss@mail.mil. See table 3–1 and table 3–2.

**Table 3–1
Screening requirements for boarded and special nominated positions**

Special Nominative Positions	Regulation, Policy, or Directive	HRC	IG	MP/CID
White House (Officer and Enlisted)	White House; DoDD 5210.55; DoDI 5210.87; AR 614–100, AR 614–200	X	X	X
Office of State Department (Officer and Enlisted)	Office of the Secretary of Defense; AR 614–100, AR 614–200	X	X	X
Command sergeant major appointment (Initial, BDE, Nominative)	AR 614–200	X	X	X
Sergeant Major (SGM) assignments (Nominative SGM, Key Billet Centralized Selection List (CSL) SGM, U.S. Army Sergeants Major Academy Sergeants Major Course selectees)	AR 614–200	X	X	X
Sergeant Major of the Army Candidates	AR 614–200	X	X	X
Battalion/BDE command (including initial entry training)/Key Billet (CSL selectees)	AR 600–8–104	X	X	X
Equal Opportunity Advisor (EOA) nominees (Division Level and Higher)	AR 600–8–104; AR 600–20	X	X	X
IG nominations	AR 20–1; AR 614–100; AR 614–200	X	X	X
Enlisted Aide	AR 600–8–104; AR 614–200	X	X	X
Officer centralized promotions (O–6 and below)	AR 600–8–29	X	X	X
Serving Soldiers applying for officer/warrant officer accessions	AR 135–100; AR 601–100	X	X	X
Attaché Services	AR 614–100; AR 614–200	X	X	X
Personnel Exchange Program	AR 614–10	X	X	X
Award Recipients being presented by the President of the United States, the Secretary of the Army, or Army Chief of Staff	AR 600–8–22	X	X	X
DA NCO and Soldier of the Year Candidates	HQDA Execution Order	X	X	X

**Table 3–2
Military personnel screening matrix**

Screening Criteria	Screening Agency
Minimum rank	N/A
Deployable	N/A
Recommendation letter	N/A
National Agency Check with Local Agency Checks and Credit Check (NACLCL)/Tier 3 investigation	HRC ARNG: Unit
ASAP	RA/USAR: Unit ARNG: NGB
National Sex Offender Public website (NSOPW)	Unit
Medical record review	Unit
AMHRR, including restricted files	RA/USAR: HRC ARNG: ARNG
Inspector General files	RA/USAR: HRC ARNG: ARNG
USACID/CRC databases	RA/USAR: N/A ² ARNG: ARNG
DCSA CAS	RA/USAR: HRC ARNG: N/A

1. Positions screened for suitability include drill sergeant; recruiter (79R); recruiting and retention NCO (79T); recruit sustainment cadre, detailed recruiter, and recruiting commander/1SG; ROTC cadre; State Officer Candidate School cadre; Warrior Transition Unit cadre; United States Military Academy cadre; MEPS nominees.

2. Checks performed at DCSA CAS.

Note. Civilian local law enforcement records checks will be conducted for all ARNG and USAR personnel only.

3–4. Local screenings

a. BDE-level commanders will initiate and coordinate local screenings and may delegate this responsibility to subordinate battalion-level commanders, as appropriate, for geographically dispersed units. A memorandum for record (MFR) will be prepared with the date, individual screened, agencies screened, and reviewing individual. The following screening agencies will screen or facilitate the screening of the following records and provide the results to the requesting commander:

- (1) Army Substance Use Disorder Clinical Care. Army substance abuse training records.
- (2) Medical treatment facility (MTF). Medical records.
- (3) Installation Security Office. Installation security records.
- (4) Installation directorate of emergency services. Local files check, DISS, DCII.
- (5) Local law enforcement agency: local civilian law enforcement records (ARNG/USAR personnel only).

b. Responses to ASAP inquiries will be one of the following: no positive tests, one positive test more than 5 years ago, one positive test in the past 5 years, or multiple positive tests. The confidentiality of ASAP information will be maintained in accordance with AR 600–85 and provided only to individuals within the Army who have an official need to know.

c. Units will verify with local security managers that all personnel nominated to these positions have a favorable NACLCL investigation or Tier 3 or higher investigation. Units will also complete all local screening requirements before submitting names for centralized screening.

d. Units will check the U.S. Department of Justice NSOPW at <https://www.nsopw.gov>. In the event of a name or photo match, commanders are required to conduct further investigation. If a name search indicates a potential match with a person serving in or nominated for a designated position, the commander must communicate with the responsible jurisdiction or the local law enforcement agency where the offender resides, works, or attends school (as appropriate) to confirm the identity and information. No adverse action or suitability determination will be made based solely on information listed in the NSOPW.

e. If a name search indicates a potential match with a person serving in or nominated for a position screened for suitability, the commander must communicate with the responsible jurisdiction or the local law enforcement agency where the offender resides, works, or attends school to confirm the identity and information. No adverse action or suitability adjudication will be made solely based on information listed on the NSOPW.

f. Common names may provide a large number of results. A good faith effort will be made to review the list provided by the NSOPW, but reviewers are not expected to spend an unreasonable amount of time if the results are too numerous. If commands are unable to conduct an exhaustive review of the NSOPW, they will note the reason in a MFR.

g. Disqualification from a designated position covered by this regulation is not an independent basis for disciplinary action. However, a commander is not prohibited from taking appropriate action based on the underlying misconduct that led to the disqualification. Commanders should consult with their servicing Judge Advocate regarding the underlying misconduct. See table 3–3 and table 3–4.

Table 3–3
Local screening requirements

	Security Office	TRADOC, U.S. Army Reserve Command, U.S. Army Recruiting Command	Provost Marshal Of- fice/Director of Emer- gency Ser- vices	ASAP	MTF	HRC
White House (Officer and Enlisted)	X	X	X	X	X	X
Office of State Department (Officer and Enlisted)	X	X	X	X	X	X
EOA Nominees	X	X	X	X	X	X
IG Nominations	X	X	X	X	X	X
HQDA NCO/Soldier of the Year Candidates						X
Enlisted Aide	X	X	X	X	X	X
Attaché Services	X		X	X	X	X
Personnel Exchange Program	X	X	X	X	X	X
Award Recipients being presented by the President of the United States, the Secretary of the Army, or Army Chief of Staff	X	X	X	X	X	X
DA NCO and Soldier of the Year Candidates	X	X	X	X	X	X

Table 3–4
U.S. Army Human Resources Command centralized screening requirements for Soldiers

HRC	Submitted by the ACOM, ASCC, or DRU to HRC Centralized Screening for Soldiers serving in or nominated for designated positions
HRC	Army Human Resource Record Fiche Review
HRC	Inspector General Files
HRC	Army Law Enforcement Reporting and Tracking System (ALERTS) USACID/CRC Databases

3–5. Disqualifying offenses

a. Adverse information is defined as any substantiated adverse finding or conclusion from an officially documented investigation or inquiry or any other credible information of an adverse nature. To be credible, the information must be resolved and supported by a preponderance of the evidence. To be adverse, the information must be derogatory, unfavorable, or of a nature that reflects clearly unacceptable conduct, integrity, or judgment on the part of the Soldier.

(1) Type I offenses that result in a civilian or military criminal conviction or a finding of guilty in a field grade Article 15, UCMJ proceeding are automatic disqualifiers for appointment to, or retention in, a designated position. Type I offenses have no expiration, and the disqualification may not be appealed. For a Type I offense, commanders

will coordinate with their command legal counsel to initiate elimination proceedings in accordance with applicable law, regulation, and policy. Information in the Soldier's record suggestive of a Type I offense that does not result in a criminal conviction or a finding of guilty in a field grade Article 15 proceeding will be treated as a Type II offense and reviewed by the approval authority. Type I offenses (over the Soldier's lifetime)—

(a) Possessing, receiving, or viewing child pornography (Article 134 UCMJ).

(b) Rape or sexual assault (Article 120 or 134 UCMJ).

(c) Any offense punishable under UCMJ Articles 80, 120, 120b, 128, 134, and 130; similar civilian offenses (rape, sexual assault, aggravated sexual contact, abusive sexual contact, stalking, sexual abuse of a child); or any attempt to commit such acts (Article 80, UCMJ).

(d) Inappropriate relationships and prohibited activities between recruits and recruiters and between trainers providing entry-level training and trainees (DoDI 1304.33/Article 93a, UCMJ).

(e) Domestic violence or child abuse as described by DoDI 6400.06 (Article 128 UCMJ), child abuse, or any violent crime under the UCMJ.

(f) A requirement to be registered as a sex offender.

(g) Previous separation from any Service for any Type I offense listed above.

(2) Type II offenses meeting the definition of adverse information will also result in automatic disqualification for appointment to, or retention in, a designated position and are limited to those that occurred during the Soldier's military career. A disqualification determination based on a Type II offense may be appealed. Type II offenses are (over a Soldier's military career, including Sister Services)—

(a) Sexual harassment to include influencing, threatening a person's career, pay, or job (Article 93, or 132 UCMJ).

(b) Prostitution or pandering (Article 134 UCMJ).

(c) Fraternalization (Article 134 UCMJ).

(d) Participation in extremist organizations and activities by Army personnel inconsistent with the responsibilities of military service (as defined in AR 600–20).

(e) Special, general court-martial conviction that results in any civilian criminal felony convictions.

(f) Criminal offense involving a child.

(g) Extramarital sexual conduct or inappropriate relationship (Article 134).

(h) Wrongful broadcast or distribution of intimate visual images (Article 117a UCMJ).

(i) Wrongful use possession, distribution, importation, or exportation of a controlled substance (Article 112a UCMJ).

(j) Initial enlistment waivers for derogatory information related to any Type I offense.

(k) Type I offenses for which a Soldier was not convicted in a court of law or did not receive an Article 15 or higher UCMJ action.

(l) Alcohol abuse (as defined in 5 CFR 731.202(b)(5)).

(3) Type III offenses meeting the definition of adverse information and committed within 5 years of the date of a Soldier's nomination, unless otherwise stated, may be disqualifying for appointment to, or retention in, a designated position. An approval authority may favorably adjudicate a Type III offense. A disqualification determination based on a Type III offense may be appealed. The Type III offenses are (within the last 5 years unless otherwise stated):

(a) Relief for cause noncommissioned officer evaluation report or officer evaluation reports in current grade.

(b) Previous separation from any service for any Type III offense.

(c) Initial enlistment waivers for derogatory information (not related to an offense listed in Type II).

(d) Assault (other than categories listed in Type I).

(e) Larceny, fraud, or robbery (Articles 121, 124, or 122, UCMJ).

(f) Burglary (Article 129).

(g) Prohibited activities related to recruiting efforts, future Soldiers, or initial entry trainees that fall under DoDI 1304.33. Prohibited activities with military recruits or trainees that fall under DoDI 1304.33 (Article 93a UCMJ).

b. Conduct may be considered regardless if issues resulted in formal charges or administrative or legal action. Conduct that may have resulted in dismissal, expungement, or a finding of not guilty by a court or other entities in the civilian or military justice system may still be considered for suitability and fitness adjudications using the preponderance of the evidence standard, but will be adjudicated as a Type II or Type III offense.

c. Favorable adjudications granted prior to this issuance based on policy in previous issuances will remain in effect. Offenses committed after a previous adjudication but prior to this issuance will be adjudicated based on the requirements of this regulation. See table 3–5 and table 3–6.

Table 3–5
Authority matrix for Type II offenses—Continued

	Appointing Authority	Removal Authority	Appeal Authority
Recruiting cadre (RA/USAR)	BDE commander or O–6 equivalent	Initial ¹ : N/A Current ² : BDE commander or O–6 equivalent	Initial ¹ : CG, HRC ³ Current ² : Deputy Commanding General (DCG), TRADOC or CG, MEDCOM
Recruiting cadre (ARNG)	State Adjutant General	BDE commander or O–6 equivalent	CNGB ⁴
Training cadre (RA/USAR) Training cadre (TRADOC and MEDCOM)	BDE commander or O–6 equivalent	Initial ¹ : N/A Current ² : BDE commander or O–6 equivalent	Initial ¹ : CG, HRC ³ Current ² : DCG, TRADOC, or CG, MEDCOM
Training cadre (ARNG)	State Adjutant General	BDE commander or O–6 equivalent	CNGB ⁴

Note. Type II offenses are automatically disqualifying and require an appeal to the appropriate appeal authority listed above.

¹Initial pre-assignment screening conducted at HRC.

²Currently serving in position when offense happens.

³Authorities for initial assignment of RA/USAR training and recruiting cadre.

⁴CNGB may delegate to the DARNG if the CNGB is of another Service.

Table 3–6
Authority matrix for Type III offenses

	Appointing Authority	Removal Authority	Approval Authority	Appeal Authority
Recruiting cadre (RA/USAR)	Recruiting BDE commander or O–6 equivalent	Initial ¹ : N/A Current ² : BDE commander or O–6 equivalent	Initial ¹ : Chief, Distribution Div., HRC ³ Current ¹ : BDE commander or O–6 equivalent	Initial ¹ : CG, HRC ³ Current ² : DCG, TRADOC; or CG, MEDCOM
Recruiting cadre (ARNG)	BDE commander or O–6 equivalent	BDE commander or O–6 equivalent	First One-Star general officer in chain of command	State Adjutant General
Training cadre (RA/USAR) Training cadre (TRADOC and MEDCOM)	Training BDE commander or O–6 equivalent	Initial ¹ : N/A Current ² : BDE commander or O–6 equivalent	Initial ¹ : Chief, Distribution Div., HRC ³ Current ¹ : BDE commander or O–6 equivalent	Initial ¹ : CG, HRC ³ Current ² : DCG, TRADOC, or CG, MEDCOM
Training cadre (ARNG)	BDE commander or O–6 equivalent	BDE commander or O–6 equivalent	First One-Star general officer in chain of command	State Adjutant General

Note.

¹Initial pre-assignment screening conducted at HRC.

²Currently serving in position when offense happens.

³Authorities for initial assignment of RA/USAR training and recruiting cadre.

3–6. Administrative reports

While not Type I or Type II offenses, the following preclude initial appointment to a position of trust:

a. Soldiers who are flagged, barred from reenlistment, or coded with any administrative information indicating legal investigation is underway are prohibited from initial appointment or service in a position or appointment screened for suitability and position of significant trust and authority until the flag, bar, or code is removed.

b. Soldiers pending determination by a Medical Evaluation Board, Physical Evaluation Board, or Military Occupational Specialty Administrative Retention Review process are not eligible for appointment as training or recruiting cadre or SHARP professionals unless found fit for continued duty.

c. Soldiers with a currently revoked, denied, or suspended security clearance, or who failed to obtain or maintain a favorable NACLIC or Tier 3 or higher investigation are not eligible for appointment to these positions. Conduct may be considered regardless if issues resulted in formal charges or administrative or legal action. Conduct that may have resulted in dismissal, expungement, or a finding of not guilty by a court or other entities in the civilian or military justice system may still be considered for suitability and fitness adjudications using the preponderance of evidence standard, but will be adjudicated as a Type II or Type III offense.

d. Favorable adjudications granted prior to this issuance based on policy in previous issuances will remain in effect. Offenses committed after a previous adjudication but prior to this issuance will be adjudicated based on the requirements of this regulation.

3-7. Authorities

a. Appointing, suspension, removal, approval, and appeals authorities for positions covered in this chapter can be found in this regulation.

b. Authorities listed in this regulation may not be delegated.

c. For recruiters, drill sergeants, and ROTC cadre, authorities are different for Soldiers during the nominating process than after they reach their place of duty. Authorities during the initial screening process remain at HRC. Authorities for Soldiers who are currently serving in these positions reside within their respective commands as detailed in this regulation.

3-8. Appointing authority responsibilities concerning disqualifying information

The appointing authority must notify by memorandum Soldiers who are disqualified from serving in a position due to adverse information of a Type I, Type II, or Type III offense. The memorandum will include the basis of disqualification; the Soldier's right to military counsel or civilian counsel, at the Soldier's expense; the process for submitting rebuttal matters to dispute incorrect information; and the process for submitting an appeal, if authorized. The appointing authority must provide the Soldier with a copy of the disqualifying information or the name and address of the agency that reported the disqualifying information.

3-9. Suspension process

a. For Soldiers serving in positions screened for suitability, the removal authority must immediately suspend and temporarily reassign a Soldier upon notification that the Soldier is under investigation for an offense or upon notification there is adverse information that the Soldier has committed an offense listed in this regulation.

b. The command must flag Soldiers under investigation in accordance with AR 600-8-2 and monitor the investigation until complete.

c. The removal authority must comply with the requirements of AR 601-1 when suspending enlisted recruiters and with the requirements of AR 614-200 when suspending enlisted training cadre.

d. The removal authority must notify the Soldier of the suspension from the position in writing to include the basis of the suspension.

e. If the investigation result is unsubstantiated, the command must notify the removal authority in order to lift the suspension and reinstate the Soldier to the position.

f. If the investigation is substantiated or if the command receives adverse information of an offense, the command must provide the disqualifying information to the removal and approval authority listed in this regulation.

g. Credible derogatory information must be reported in accordance with AR 380-67 and subsequent guidance from DCS, G-2.

h. For offenses that call into question a Soldier's suitability for continued service in the military, follow the appropriate separation process found in AR 600-8-24, AR 635-200, AR 135-175, or AR 135-178.

3-10. Removal process

a. The removal authority will provide a disqualified Soldier with a memorandum explaining the basis for the removal; the Soldier's right to consult with military counsel or civilian counsel (at the Soldier's own expense); the Soldier's right to request an adjudication or appeal an unfavorable adjudication, if authorized; to submit a rebuttal; and to submit matters in defense, extenuation, or mitigation. The removal authority must also provide the Soldier with a copy of the disqualifying information (or the name and address of the agency that reported the disqualifying information) and removal notice of his or her additional skill identifier.

b. Soldiers will have 14 calendar days from notification to submit a memorandum requesting a reconsideration for approval or appeal or notifying their command of the intent to rebut incorrect information. Soldiers will submit their request or notification through their chain of command to the approval or appeal authority. Reserve Component

commanders may grant an extension of up to 30 total days or through the next scheduled battle assembly. A memorandum from the commander granting the extension must accompany the reconsideration request when submit to the approval or appeal authority.

c. Soldiers will have 45 calendar days from notification to submit documents in defense, extenuation, mitigation, or rebuttal. Such documents will be submitted through their chain of command to the approval or appeal authority.

d. Commanders may grant extensions in cases where Soldiers are attempting to provide documentation but are unable to meet the timeline due to factors outside of their control. If granted, extensions and the reasons for extension will be documented in a memorandum and submitted to the approval or appeal authority.

e. If the Soldier requests an approval or appeal or submits a rebuttal, the removal authority must provide their recommendation to the approval authority.

f. Before removing enlisted training cadre from their positions, commanders must comply with the requirements of AR 614–200.

g. Before removing enlisted recruiters from their positions, commanders must comply with the requirements of AR 601–1.

h. Removal authority will document their rationale for removing an individual from a position in a MFR.

i. Soldiers who have been removed from a position screened for suitability for a Type I or II offense are ineligible for future appointments to other positions screened for suitability.

j. Removal authority must forward a copy of the memorandum for recruiters, drill sergeants, and ROTC cadre to HRC at usarmy.knox.hrc.mbx.epmd-ebss@mail.mil. HRC will file a copy of the memorandum in the performance folder of the AMHRR. For ARNG recruiting cadre, the removal authority must forward a copy of the memorandum to the CNGB.

3–11. Approval or appeal process

a. Soldiers who are disqualified because of adverse information of a Type I offense may not appeal the disqualification. A Type I offense that does not result in a criminal conviction or a finding of guilty in a field grade Article 15 UCMJ proceeding will be treated as a Type II offense.

b. Soldiers who are disqualified because of adverse information of a Type II offense may submit an appeal to the appeal authority.

c. Soldiers who are disqualified because of adverse information of a Type III offense may request an adjudication from the approval authority to serve in the position. If the approval authority denies the request, the individual may submit an appeal to the appeal authority.

d. Soldiers will have 14 calendar days from notification to submit a memorandum requesting a reconsideration for approval or appeal. Soldiers will submit their request through their chain of command to the approval or appeal authority. Reserve Component commanders may grant an extension of up to 30 total days or through the next scheduled battle assembly. A memorandum from the commander granting the extension must accompany the reconsideration request when submitted to the approval or appeal authority.

e. Soldiers will have 45 calendar days from notification to submit documents in defense, extenuation, or mitigation. Such documents will be submitted through their chain of command to the approval or appeal authority.

f. Commanders may grant extensions in cases where Soldiers are attempting to provide documentation but are unable to meet the timeline due to factors beyond their control. If granted, extensions and the reasons for extension will be documented in a memorandum and submitted to the approval or appeal authority.

g. The approval or appeal authority must make a recommendation regarding an adjudication request within 45 calendar days after receiving the Soldier's information in defense, extenuation, or mitigation.

h. If an approval or appeal is granted for a currently serving member of the training and recruiting cadre, the approval or appeal authority, as appropriate, will sign a memorandum stating the rationale for the approval and why the individual is still suited to serve in that position. The unit will submit a copy of the memorandum to the appropriate higher command and then to HRC at usarmy.knox.hrc.mbx.epmd-ebss@mail.mil. HRC will file a copy of the memorandum in the performance folder of the AMHRR. For ARNG recruiting cadre, the unit must submit a copy of the memorandum to the CNGB. The signed approval or appeal memorandum must be retained by the unit for the duration of the Soldier's assignment to that position.

i. Approvals and appeals should only be granted in extenuating circumstances, when the approval or appeal authority determines that, despite the disqualifying information, the Soldier requesting the adjudication or submitting the appeal is best qualified to serve in the position. Approvals or appeals should not be granted if the disqualifying information calls into question the character, conduct, or personal integrity of the Soldier requesting the adjudication.

j. The appeal authority must document by memorandum the decision to remove a Soldier from a position and provide the documentation to HRC or the CNGB, which in return must apply the appropriate personnel management

codes to the Soldier's file. If the Soldier does not request an appeal, the approval authority must provide the documentation to HRC or the CNGB, which will apply the appropriate personnel management codes to the Soldier's file.

k. All decisions made by the appeal authority are final.

3-12. Rebuttal process

a. Soldiers who believe the disqualifying information is erroneous must notify the appointing or removal authority within 14 calendar days from receipt of the disqualification notification. The notification must be a memorandum explaining their intent to submit rebuttal matters in order to refute the accuracy of the disqualifying information. Reserve Component commanders may grant an extension of up to 30 total days or through the next scheduled battle assembly. A memorandum from the commander granting the extension must accompany the reconsideration request when submitted to the approval or appeal authority.

b. Soldiers must submit their rebuttal matters within 45 calendar days of the date they received the disqualification notification. Unless a Soldier requests and receives an extension, failure to comply with the suspense will constitute a waiver of the right to submit rebuttal matters.

c. Commanders may grant extensions in cases where Soldiers are attempting to provide documentation but are unable to meet the timeline due to factors outside of their control. If granted, extensions and the reasons for extension will be documented in a memorandum and submitted to the appointing or removal authority.

3-13. Reassignment or reclassification

For those RA and USAR cases where suspension or removal requires reassignment (training and recruiting cadre), the unit must coordinate with HRC for reassignment, reclassification, or other personnel action in accordance with AR 614-200 for enlisted Soldiers, AR 601-1 for enlisted recruiters, or AR 614-100 for officers and warrant officers. For those ARNG/ARNGUS cases where suspension or removal requires reassignment (training and recruiting cadre), the commander must coordinate with the ARNG for reassignment, reclassification, or other personnel action in accordance with AR 614-200, AR 601-1, or AR 614-100.

3-14. Command reporting requirements

a. No later than the 5th working day of the beginning of each quarter, all ACOMs, ASCCs, DRUs, ARNG, and the USAR, will provide a consolidated quarterly report of suitability actions, pertaining to uniformed military personnel, to the HQDA, Chief, Suitability Division, Directorate of Military Personnel Management, DCS, G-1.

b. Commands will capture reporting requirements in a command reporting memorandum (see fig 3-1). Commands will forward the quarterly reports in accordance with this regulation.

c. Commands will retain all records pertaining to removal and appeals, regardless of disposition, for a minimum of 2 years after a Soldier has terminated a specified position or upon completion of the 5 year periodic review.



DEPARTMENT OF THE ARMY
ORGANIZATION
STREET ADDRESS
CITY STATE ZIP

OFFICE SYMBOL

MEMORANDUM FOR Chief, Suitability Division (DAPE-MPS), Directorate of Military Personnel Management, DCS, G-1

SUBJECT: FY19, 2nd Quarter Suitability Report

1. Reference. Army Regulation 600-78 (Army Suitability, Fitness, and Credentialing Program), Chapter 3, 18 February 2020.
2. State your command and reporting criteria, for example:
Enclosed is the TRADOC quarterly report, depicting one approved appeal for Type II offense and one disapproved appeal for Type II/Type III offense.
3. Provide synopsis of all removals and appeals, regardless of disposition.
4. POC is

Encls

SIGNATURE BLOCK

Figure 3-1. Command reporting memorandum

Chapter 4 Suitability and Fitness for Army-Affiliated Civilians

4–1. General

The appointment or retention of each covered individual will be subject to suitability or fitness investigations. The objective of the suitability or fitness investigation is to provide a measure of assurance that persons are of good character and reputation, trustworthy, and suitable or fit to promote the efficiency and protect the integrity of the Federal service. The final step in the suitability or fitness process is the adjudication. The adjudicator reviews information discovered during a background investigation and makes a determination as to whether the individual is suitable or fit to work for or on behalf of the Federal Government. Suitability and fitness adjudications are distinct from a person's ability to fulfill the qualifications of a job, as measured by experience, education, knowledge, and skills. The requirements and processes described in this chapter for Army civilian personnel are identical for suitability and fitness unless otherwise noted.

a. Positions involving regular contact with children have suitability or fitness requirements in addition to the basic requirements for civilian and contract positions. Additional guidance for these positions is located in chapter 5 of this regulation.

b. Positions in the SHARP program have specific DoD requirements and will continue to be governed by SHARP policy until superseded by the publication of a SHARP regulation or future issuances.

c. Positions that fall within the PRP are covered in paragraph 4–11.

d. This chapter does not cover positions limited to credentialing and issuance. Those positions are covered in chapter 6 of this regulation. However, those with a favorable suitability or fitness adjudication are not required to have a separate HSPD–12 adjudication.

e. Some positions may have position-specific requirements for additional screening procedures or background checks beyond those required for basic suitability or fitness for Federal employment. These positions will be covered under "Special Populations" in paragraph 4–11.

4–2. Applicability of suitability and fitness

a. Definition. The terms *suitability* and *fitness* are often used interchangeably within the context of background screening or adjudication, with the applicability of the term dependent upon the organization or population under discussion. For the purposes of this regulation, the distinction lies not in the definition, but the populations covered. Suitability and fitness adjudications are conducted using identical criteria, which are found in 5 CFR 731.202.

b. Suitability. Individuals are suitable for Federal employment if their identifiable character traits and conduct are sufficient to protect the integrity or promote the efficiency of the Federal service. For civilian positions, the term *suitability* is used in reference to the positions covered by 5 CFR 731. Suitability coverage includes—

(1) Competitive service positions which consist of civil service positions within the executive branch of the Federal Government, with some exceptions defined in 5 USC 2102.

(2) Excepted service positions where the incumbent can be noncompetitively converted to the competitive service.

(3) Summer hires and temporary or seasonal employees (between the ages of 14 and 18 years old).

(4) Career appointments to the senior executive service. This regulation does not apply to positions in the senior executive service. The Army Civilian Senior Leader Management Office, assigned to the Office of the Secretary of the Army and administered by the Deputy Under Secretary of the Army, is responsible for policies regarding senior executive service positions.

c. Fitness. A reference to a person's level of character and conduct determined necessary for an individual to perform work for or on behalf of a Federal agency. Within the Army, fitness applies to—

(1) Non-appropriated funds (NAF) positions.

(2) Excepted service positions (other than those positions subject to suitability).

(3) Contractors in positions that are the same or similar to civilian personnel positions or who work on behalf of the Federal Government performing duties which the requiring activity determines should be performed by contractor personnel who meet the character and conduct standards specified under suitability criteria (for example, ROTC contractor instructor performing the same cadre duties as uniformed military instructors).

(4) Volunteers that are in the same or similar positions to civilian personnel positions.

(5) Summer hires and temporary or seasonal employees (between the ages of 14 and 18 years old).

(6) Other personnel, such as JROTC instructors, in-home care providers (IHCPs), or individuals employed by other Federal agencies who have contact with children in Army programs. Fitness for these personnel is covered in chapter 5 of this regulation.

4–3. Suitability and fitness requirements

- a.* Suitability for Federal employment must be processed in accordance with 5 CFR 731; DoDI 1400.25; and the OPM Suitability Processing Handbook.
- b.* OPM has delegated limited authority to DoD for the adjudication of suitability determinations for appointment to covered positions under 5 CFR 731. DoD further delegates this authority to the heads of DoD Components, such as the Secretary of the Army who has delegated this authority to the Headquarters, Department of the Army (DAPE–MPS), 300 Army Pentagon, Washington, DC 20310–0300 and the Centralized Suitability Service Center, Aberdeen Proving Ground, Maryland 21005.
- c.* In accordance with DoDI 1400.25, the DCSA CAS is delegated the authority to make favorable suitability and fitness determinations.
- d.* For preliminary background checks for NAF employees, see AR 215–3.
- e.* Additional regulations and policies addressing suitability and fitness can be found in appendix A.

4–4. Adjudicator requirements

- a.* Suitability and fitness adjudication is an inherently governmental function and cannot be performed by a contractor.
- b.* Adjudicators must have a minimum of an interim Tier 5 in order to access suitability or security information systems per OPM, DoD, and Defense Manpower Data Center (DMDC) guidance.
- c.* All Centralized Suitability Service Center (CSSC) adjudicators are required to successfully complete the Center for Development Security Excellence Introduction to Suitability Adjudications for the DoD, Introduction to DoD HSPD–12 CAC Credentialing, and the OPM Fundamentals of Suitability for Suitability and Fitness Adjudicators training.

4–5. Suitability and fitness pre-screening and adjudications

- a.* All personnel referenced in paragraph 4–2 of this regulation must have a favorable suitability or fitness determination rendered by the CAS or the CSSC. All determinations made by the CAS or the CSSC are final.
- b.* The pre-screening process occurs after the OF 306 has been obtained and will be performed by the Civilian Personnel Advisory Center (CPAC)/Human Resources (HR) personnel. The pre-screening process will require CPACs to review resumes or applications, OFs 306, fingerprint records, information in Central Verification System (CVS), and any other application-related information received or developed to identify potentially disqualifying suitability or fitness issues. CPACs must have appropriate access to CVS to perform the pre-screening. Individuals with no derogatory information identified during pre-screening can be considered favorably pre-screened and a tentative job offer may be made while awaiting interim adjudication by the CSSC. Individuals who are not favorably pre-screened will be referred to the CSSC for interim adjudication before any further action is taken.
- c.* An interim suitability or fitness adjudication will be conducted by the CSSC with all information and when the eQIP submission is available.
- d.* Position designation, position sensitivity, and position risk level will determine the background investigation required of the position. The position designation tool (PDT) will be used on all civilian personnel, contractor, and volunteer positions. The PDT will be applied before recruiting for a vacant or newly established position or when the duties or circumstances of the position change.
- e.* Investigations should be initiated before appointment (entrance on duty), but no later than 14 calendar days after placement in position.
- f.* All requests for suitability and fitness background investigations will be submitted to the PSI-CoE through the PSIP using the CSSC’s submitting office identifier (SOI). The PSI-CoE will initiate the background investigation request. Once the background investigation is complete, the results are provided to the DCSA CAS for a suitability or fitness adjudication. When the DCSA CAS cannot render a favorable adjudication, it transfers jurisdiction to the CSSC. When this occurs, the CSSC will make the final determination.
- g.* If a Federal Civilian appointee (appropriated funds (APF) and NAF), fails to obtain a final favorable suitability or fitness determination, it may result in termination or removal from the position and Federal service.
- h.* Selectees, contractors, volunteers, and others covered by this regulation will not enter on duty, or provide a service without a minimum favorable interim determination by the CSSC.
- i.* In accordance with 5 CFR 731, until a hiring agency makes a conditional offer of employment, it is prohibited from making specific inquiries concerning a Federal Civilian applicant’s criminal history or adverse credit background of any kind or similar to those asked on the OF 306 or in other investigative forms used to determine suitability or fitness, or forms used to conduct background investigations for Federal employment. Exception may be granted by OPM for certain positions, grade levels, and job series.

4–6. Reciprocity and reinvestigations for suitability and fitness

a. Reciprocal recognition of favorable suitability or fitness adjudications will be applied for all Civilian personnel positions requiring a suitability or fitness investigation without a break in Federal service longer than 24 months. A new suitability or fitness investigation and adjudication will be conducted if a break in service or employment is greater than 24 months. A new suitability or fitness investigation will be required in accordance with 5 CFR 731. The CPAC/HR personnel will check for and apply reciprocity to all suitability and fitness cases that meet reciprocal requirements and share documentation with other HR professionals.

b. In accordance with 5 CFR 731, reinvestigations and new determinations are required at least once every 5 years for continued employment of individuals occupying public trust positions. Public trust reinvestigations are not required for an individual who, prior to the fifth year, receives a separate investigation that meets or exceeds the requirements for a public trust reinvestigation. Employees must be notified of reinvestigation requirements. Reinvestigations for Tier 1 are not authorized.

c. Reciprocal recognition of contractor fitness adjudications should be applied to a position with suitability or fitness requirements in accordance with 5 CFR 731.104(a)(4) and 5 CFR 731.104(a)(5).

d. For position changes within the Army, the CPAC/HR personnel will query OPM/DCSA CVS and DISS Joint Verification System (JVS) for investigative and adjudicative history as well as to verify the absence of significant security or suitability issues which require further evaluation. The CPAC/HR personnel may also need to communicate and coordinate with other Army entities to gain awareness of any existing agency debarments currently in effect or active referrals to OPM for jurisdiction over matters involving material, intentionally false statements; deception or fraud in examinations or appointment; or refusal to furnish testimony. If there is investigative history which meets or exceeds the selectee's position investigative requirement, but no adjudication history has been recorded, the CPAC/HR personnel will submit a customer service request (CSR) through DISS JVS to the DCSA CAS requesting adjudication of the investigation.

e. For transfers within DoD, the CPAC/HR personnel will query OPM/DCSA CVS and DISS JVS for investigative and adjudicative history as well as the apparent absence of significant security or suitability issues which require further evaluation. If there is investigative history which meets the selectee's position investigative requirement, but no adjudication history has been recorded, the CPAC/HR personnel will submit a CSR to the DCSA CAS using DISS JVS.

f. For transfers from non-DoD agencies, the CPAC/HR personnel will query OPM/DCSA CVS for investigative and adjudication history and to ensure the absence of existing Federal debarment or "please call" alerts, which indicate potential derogatory information available from another agency and require further evaluation. If there is investigative history which meets the selectee's position investigative requirements, but no adjudication history has been recorded, then the CPAC/HR personnel will refer it to the CSSC, which will then obtain the completed investigation without an adjudicative determination from the investigation service provider. The CSSC will make the adjudicative determination and record it in the appropriate system.

4–7. Suitability actions for positions covered under 5 CFR 731

a. Suitability actions that can be taken by OPM or an agency are referenced in 5 CFR 731.203.

b. Neither OPM nor an agency acting under delegated authority may take a suitability action in connection with any application for or appointment to a position that is not subject to investigation under 5 CFR 731.104.

c. OPM takes suitability actions against an employee, applicant, or appointee for the reasons cited in 5 CFR 731.203 specifically, when there is material falsification or failure to provide testimony. Other suitability actions may be taken against an employee as outlined in 5 CFR 731 and 5 CFR 752.

d. In accordance with 5 CFR 731, OPM or agencies (such as the Army) exercising delegated authority can bar an applicant or appointee for reasons cited in 5 CFR 731.202(1), (2), and (5) through (7). All debarments must be processed in accordance with 5 CFR 731.

e. OPM debarments—

(1) OPM has the sole authority and discretion to bar an individual from positions across the entire Federal Government for not more than 3 years by denying an individual examination for and appointment to covered positions.

(2) OPM will consider imposing a government-wide debarment based on the criteria in 5 CFR 731.202.

(3) OPM may take jurisdiction of cases if OPM determines a government-wide debarment is appropriate.

(4) OPM debarments are recorded in CVS.

f. Army debarments—

(1) The Army can bar an individual Armywide for up to 3 years by denying an individual examination for an appointment to either all or specific positions within the Army covered under 5 CFR 731.

(2) Army debarments will be in accordance with 5 CFR 731.205.

- (3) All Army debarments must be reported to OPM.
- (4) Debarments from all positions within the Army covered under 5 CFR 731 will be based on the nature of the position and the OPM suitability factors per 5 CFR 731.202.
- (5) Decisions regarding the length of and positions included in a debarment must be made on an individual basis and in accordance with 5 CFR 731.
- (6) CPAC or HR representative responsibilities—
 - (a) CPAC or HR representatives will request a debarment review, only if an issue is discovered and may warrant a debarment, from the CSSC.
 - (b) CPAC or HR representatives will prepare and issue the debarment notification letter to the applicant or appointee upon CSSC's final determination.
 - (c) CPAC or HR representatives will send a copy of the notification of Army debarment to the CSSC for filing and updating the database.
 - (d) The CPAC or HR representative will check CVS and the Army debarment system for debarments prior to appointment.
- (7) CSSC responsibilities—
 - (a) CSSC will review a debarment request, or an issue that may warrant debarment, based on the OPM suitability factors in 5 CFR 731.202.
 - (b) CSSC will forward the debarment jurisdiction determination to OPM. Upon OPM final determination, the CSSC will also make an Army debarment determination.
 - (c) CSSC sends negative recommendations to the CPAC or HR representatives for preparing and issuing of the debarment notification letter to the applicant or appointee.
 - (d) CSSC will record debarment in database and retain the debarment notification letter for the duration of the debarment period.
 - (e) CSSC will establish and maintain a database system for Army debarments.
 - (f) CSSC will review the database for debarred applicants upon request and notify CPAC or HR representatives.

4–8. Due process for Federal Civilian employees

- a. An applicant or appointee to a covered position may appeal a suitability action as defined in 5 CFR 731 to the Merit Systems Protection Board (MSPB). Non-selection for a position is not a suitability action.
- b. NAF employees or applicants may appeal unfavorable suitability or fitness adjudications in accordance with NAF administrative or negotiated grievance process. NAF employees do not have MSPB appeal rights.

4–9. Records maintenance

- a. Records must be retained for an OPM review to determine the degree of compliance in accordance with 5 CFR 731, the OPM Suitability Processing Handbook, and other OPM issuances.
- b. The CSSC will maintain paper or electronic records of the results of initial and recurring background checks for civilian positions as part of the suitability files, covered by System of Records Notices OPM/CENTRAL–9 and OPM/GOVT–1. The supporting documentation used to render the adjudication will be retained for three years for no issue cases or five years for actionable or issue cases. Paper files will be stored in a locked filing cabinet. Electronic files will be maintained in a DoD-approved system of record. All employees are required to have an appropriate background investigation before they are allowed access to the records.
- c. Adjudicative records or information used to make a determination will not be maintained outside the CSSC or DoD-approved system of record without prior written approval from Headquarters, Department of the Army (DAPE–MPS), 300 Army Pentagon, Washington, DC 20310–0300.
- d. Records maintenance requirements apply to all positions, including those detailed in other chapters.

4–10. Specifics regarding fitness requirements for contractors

- a. The Army has retained the OPM's use of the term *fitness* in reference to contractors, and fitness screening and adjudication will be conducted with the same standards and guidelines as suitability adjudication for Federal Civilian employees per paragraph 4–2c(3) and paragraph 4–3d.
- b. When the requiring activity determines that its requirement for contract will include the use of personnel requiring favorable fitness determinations, such need is identified in the statement of work or performance work statement submission to the supporting contracting office as applicable. The solicitation of a contract will in this case identify to contractor entities the standards for fitness which are the same as suitability referenced in 5 CFR 731.202. As part of the contractor's offer of service to the government in response to any solicitation including this criteria, the contractor is responsible for employing only personnel in designated positions who may receive a favorable determination.

- c. For contracts requiring fitness adjudications, favorable interim determinations will be executed in accordance with paragraphs 4–5a through 4–5d and paragraph 4–6(c).
- d. Contractors with physical access to sensitive or classified material or logical access to sensitive or classified information or systems may require a security clearance in accordance with AR 380–67.
- e. Contractors who do not require a security clearance but do require CAC-credentialing may be subject to a fitness adjudication depending on the risk category of the contract position.
- f. Contractors who do not require CAC-credentialing, fitness adjudications, or security clearances but do require access to Army installations will be vetted in accordance with AR 190–13. Examples include one-time or short-term contractor services, such as facility repairs or delivery of supplies.
- g. Contractors who work alongside or perform duties identical or similar to those of Federal Civilian employees will be subject to the same fitness or suitability requirements per paragraph 4–2c(3), in accordance with the terms of their contracts.
- h. Contractors with access to vulnerable populations must receive favorable fitness adjudication, just as military or Federal Civilian employees who work with vulnerable populations must receive a favorable suitability or fitness adjudication.
- i. Contractors in positions providing services to individuals under the age of 18 will be subject to the screening criteria described in chapter 5 of this regulation, to include reverification requirements found in paragraph 5–11.
- j. Procedures for findings of derogatory information require that all information of record both favorable and unfavorable will be assessed in terms of its relevance, recency, and seriousness. Likewise, positive mitigating factors should be considered. Final suitability decisions will be made by the CSSC.
- k. A disqualifying event by an individual contractor employed on a contract must be reported to the contracting officer for resolution with the contractor company (may include and is not limited to replacing the employee on the contract up to contract termination under appropriate circumstances).
- l. If the agency makes an unfavorable fitness adjudication, the adjudicating body making such a determination will provide the individual, contracting company and contracting officer with a written decision.

4–11. Suitability or fitness adjudications for special populations

- a. Personnel performing certain duties with access to arms, ammunition and explosives, unaccompanied access to controlled medical substances, or assignment as a DA police officer or DA security guard are subject to personnel security investigations and adjudication by the DCSA CAS at either the Tier 3 or Tier 5 level. Activity certifying and reviewing officials are responsible to ensure that personnel meet high standards of reliability in accordance with guidance and instructions in AR 190–13 for subject populations outlined in AR 190–11, AR 190–51, and AR 190–56.
- b. Suitability for PRP positions for nuclear, chemical, and biological personnel is governed by separate regulations. Suitability standards for such personnel are identified in AR 50–5, AR 50–6; and AR 190–17.
- c. Civilian IG suitability is governed by AR 20–1.

Chapter 5

Individuals Who Have Regular Contact With Children or Provide Childcare Services

Section I

Introduction and Scope

5–1. Purpose

This chapter establishes Army policies and procedures for vetting individuals who provide services to individuals under the age of 18 in Army programs and adjudication of the results, as required by DoDI 1402.05. Everyone who regularly interacts with children in the execution and support of Army programs, services, and activities must be of good character, law abiding, and fit to have responsibility for children. The Army must ensure the health, safety, and well-being of children and reduce the risk for child abuse and neglect in all Army programs and activities.

5–2. Individuals subject to child and youth services suitability standards

- a. The following individuals are subject to the screening and background checks required in this chapter:
 - (1) All personnel employed or performing duties in Army CYS facilities (for example, Army Child Development Centers, Youth Services Centers, and so forth) or other Army-sanctioned child and services programs on Army installations, to include Army Reserve and National Guard. This includes administrative, culinary, custodial, medical, or other personnel routinely working in a CYS facility when children are present.

(2) Emergency placement and respite childcare providers, individuals providing in-home Family childcare (FCC), and any person 18 years of age or older residing in an IHCP home.

(3) Individuals employed or performing duties in recreational and athletic programs providing services to individuals under the age of 18.

(4) Chaplains, religious affairs specialists, and other individuals employed or performing CYS duties for children.

(5) Health care personnel providing care or performing services for children on an Army installation or as part of an Army program or an Army-sanctioned activity.

(6) Individuals employed or performing CYS duties in social services (for example, Family Advocacy Program (FAP)), residential care, rehabilitation programs, detention, and correctional services on an Army installation or as part of an Army-sanctioned program.

(7) JROTC instructors.

(8) Any other individuals reasonably expected to have regular contact with children on an Army installation or as part of an Army-sanctioned program, including specified volunteers (examples: lifeguards, coaches, bible studies, and so forth).

b. A third party administrator (TPA) is a person or organization that processes claims and performs other administrative services in accordance with a service contract. The State in which the TPA provides the childcare services is responsible for establishing the requirements for State licensure and designating the state-approved entity with responsibility for conducting and adjudicating the background checks.

(1) TPAs must validate and maintain supporting documentation that the childcare services and organization is currently licensed and regulated by the State to provide childcare services.

(2) Community-based childcare providers, as defined in DoDI 6060.02, must meet State licensing standards or school district requirements and policies for background checks. TPAs will verify that these requirements are met.

5–3. Disciplinary actions and suitability

An individual's poor performance or misconduct while in a position requiring regular contact with children will be handled in accordance with applicable HR personnel policies and regulatory or statutory guidance, after consultation with local labor counselors. Derogatory information previously adjudicated through normal processes will not be considered by the CSSC at reverification unless it is required to determine a pattern of behavior. Any new derogatory information discovered through the reverification process must be referred to the CSSC. The CSSC will determine if the individual in question can continue serving in a CYS position. Administrative action must be taken in accordance with HR personnel policy to remove said employee if found unfavorable by the CSSC.

Section II

Screening and Investigative Requirements

5–4. Preselection assessment

The hiring/selecting official is responsible for ensuring that an individual has the necessary skill sets for the position; through personal interview and reference checks. The hiring or selecting official will also assess the applicant's temperament and qualifications to work with children before requesting a background check.

5–5. Reciprocity

a. Reciprocal recognition of favorable CYS suitability or fitness adjudications will be applied for all positions requiring a CYS suitability or fitness investigation if—

(1) The previous favorable adjudication is inside the reverification window described in paragraph 5–12.

(2) There was no break in Federal employment or service greater than 24 months.

b. A new, higher-level investigation and childcare services adjudication may be required when the new position has additional requirements that were not in the original position.

5–6. Criminal history screening

All personnel seeking CYS positions or other positions identified in paragraph 5–2 must complete DD Form 2981 (Basic Criminal History and Statement of Admission (Department of Defense Child Care Services Programs)). The original signed DD Form 2981 will be submitted as part of the background check process. For CYS employees, a copy of the completed DD Form 2981 will be given to the hiring/selecting official, placed in the individual's local personnel file, and recertified annually. Any new derogatory information must be submitted to the CSSC to determine if the employee may continue servicing in a CYS position.

5–7. Installation records checks

- a.* All personnel seeking childcare services positions or other positions identified in paragraph 5–2 must complete DA Form 7215 (Release/Consent Statement).
- b.* The following installation records or systems will be checked for each applicant regardless of whether or not they have previous military affiliation, the results of which will be recorded in the suitability file:
 - (1) ALERTS.
 - (2) DCII.
 - (3) ASAP Drug and Alcohol Management Information System.
 - (4) Family Advocacy Program - Army Central Registry.
- c.* IRCs must be completed and adjudicated prior to the individual performing CYS under line of sight supervision (LOSS).
- d.* IRCs are also required for all personnel as part of the reverification process.

5–8. Federal Bureau of Investigations criminal history check

- a.* The Federal Bureau of Investigations (FBI) criminal history check is required for all personnel seeking childcare services positions and other positions identified in paragraph 5–2.
- b.* The FBI criminal history check must be fingerprint-based, and fingerprints must be captured using an FBI-approved system. Electronic fingerprints should be captured to the extent possible. A fingerprint result of “unclassified” by the FBI will result in another fingerprint submission. A name-based search of the individual’s FBI Criminal Justice Information System criminal history information may be used after two failed attempts using fingerprints.
- c.* SOIs must be linked to the Centralized Suitability Service Center System of Identification (CSSC SOIS) (Z256) for FBI fingerprint submission. To do so, the submitter must send an email to ccssonsoi@dcsa.gov requesting that the CSSC SOI (Z256) be added corresponding to their own submitting office number or security office identifier.
- d.* The FBI criminal history check must be completed and adjudicated prior to the individual performing CYS under LOSS.
- e.* The FBI criminal history check is also required for all personnel as part of the reverification process.

5–9. National Background Investigation Bureau investigations

- a.* A minimum of a Tier 1 Federal Investigation is required for the following categories of personnel providing CYS or serving in other positions identified in paragraph 5–2:
 - (1) Civilian employees (APF and NAF).
 - (2) Contractors.
 - (3) FCC and other in-home childcare service providers.
 - (4) Military personnel.
 - (5) Foreign National applicants (see para 5–9*d* below).

Note. DCSA will usually not conduct a Tier 1 investigation for personnel that already have a current adjudicated Tier 1 or higher-level investigation. Exceptions include scenarios where the results of a previous investigation or adjudication are called into question or if the results of an adjudicated investigation have been purged.

- b.* Those personnel subject to a Tier 1 investigation in paragraph 5–9*a* are also required to have a State Criminal History Repository (SCHR) check conducted for all States that an individual has lived within five years of the date the investigation is requested.
 - (1) SCHR checks may require hard copy fingerprint submissions and State-specific forms.
 - (2) SCHR checks will include State child abuse and neglect repository and the State sex offender registry, where available.
- c.* Personnel in Tier 1 positions identified by management as also having significant financial responsibilities (using the DCSA Position Designation Tool) will have a credit check added to the initial Tier 1 request. Individuals with existing Tier 1 investigations moving to positions with significant financial responsibility will have a credit special agreement check initiated. No credit check is required at reverification.
- d.* To the extent permissible by the laws of the host government, investigations of non-U.S. national personnel at foreign locations must be consistent with or equivalent to a Tier 1 investigation and SCHR check. ASCCs are responsible for identifying the host nation equivalent checks required to be in compliance. Component commands will make suitability determinations on non-U.S. national personnel serving abroad. Where the host nation's agreement prevents a background check comparable to a criminal history check, foreign nationals will not be eligible for employment overseas where regular contact with children is required.

e. Anyone subject to an DCSA investigation that resided in a country other than their current location for any consecutive period of six months or more in the previous five years is required to undergo a standalone International Criminal Police Organization (INTERPOL) check via DCSA.

5–10. Volunteers

a. Specified volunteers are individuals whose volunteer duties with Army programs or services could put them in extensive and frequent contact with children over an extended period of time. Specified volunteer positions may involve extensive interactions alone with children or youth or involve overnight travel or activities with children or youth. Specified volunteers require IRC and FBI criminal history checks (or equivalent local host nation criminal checks) but are not subject to DCSA investigations. Where the host nation's agreement prevents a background check comparable to a criminal history check, foreign nationals will not be eligible to volunteer overseas where regular contact with children is required.

b. Non-specified volunteers are individuals with infrequent contact with minors, or interacting in a controlled and limited duration activity, such as participating in one-time activities or events, are considered non-specified volunteers. For example, individuals designated as a field trip chaperone with monitored access and limited duration (for example, 3 to 5 hours) would fall into this category. Background checks are not required for non-specified volunteers whose services will be of shorter duration than is required to perform the background checks, and who work under LOSS by an individual who has successfully completed a criminal history background check.

c. For additional screening requirement information for specified volunteers, see table 5–1 of this regulation.

5–11. Persons 18 years of age or older residing in an in-home care provider home

a. Adult persons 18 years of age or older residing in IHCP homes that are not affiliated with the DoD are not subject to DCSA investigations. For such persons, only an FBI criminal history check is to be completed.

b. If DoD affiliated, adult persons 18 years or older must complete an FBI criminal history check; IRC to include the installation law enforcement check, drug and alcohol records check, and a FAP records check for a minimum of two years before the date of the application per 34 USC 20351 and DoDI 1402.05.

c. Adult visitors to IHCP homes will be screened as if they are residents if they are to be in the home for more than 30 days.

d. For additional screening requirement information for adults living in IHCP homes, see table 5–1 of this regulation.

5–12. Reverifications

a. *Annual reverifications.* FCC and other in-home childcare service providers are subject to the following annual reverifications, which must be initiated prior to one year from the date of the oldest check:

- (1) IRCs.
- (2) FBI criminal history (fingerprint) check.

Note. Annual reverifications of non-U.S. national personnel at foreign locations must be consistent with or equivalent to those listed above.

b. *Five-year reverifications.*

(1) All others covered in this chapter are subject to the following reverifications which must be initiated prior to five years from the date of the oldest check:

- (a) IRCs.
- (b) FBI criminal history (fingerprint) check.

(c) SCHR checks for all States where an individual has lived since the date the last investigation or reverification was completed.

(d) An INTERPOL check is also required if an individual has resided in a foreign country for any consecutive period of six months or more in the previous five years.

(2) All specified volunteers and any person 18 years of age or older residing in an IHCP home (FCC or emergency placement) are subject to the following reverifications, which must be initiated prior to five years from the date of the last oldest check:

- (a) IRCs.
- (b) FBI fingerprint check.

Note. Five-year reverifications of non-U.S. national personnel at foreign locations must be consistent with or equivalent to those listed above.

c. Derogatory information. Derogatory information previously adjudicated through normal processes will not be considered by the CSSC at reverification unless it is required to determine a pattern of behavior. Any new derogatory information discovered through the reverification process must be referred to the CSSC. The CSSC will determine whether the individual in question can continue serving in a CYS position. Administrative action must be taken in accordance with HR personnel policy to remove said employee if found unfavorable by the CSSC.

d. Awaiting verification. Individuals awaiting reverification may continue to work independently provided there is no newly reported derogatory information. If there is newly reported derogatory information, the individual must be placed under LOSS awaiting reverification from CSSC.

**Table 5–1
Screening and investigation requirements**

	IHCPs	Civilian Employees, Contractors, and JROTC	Military Per- sonnel	Specified Volunteers and Adults Living in IHCP Homes
Initial Investigation				
DD Form 2981	◆	◆	◆	◆
DA Form 7215	◆	◆	◆	◆
IRCs	◆ ▲	◆	◆	◆
FBI Criminal History FP Check	◆ ▲ ●	◆	◆	◆
Tier 1 Investigation	◆ ❖	◆ ❖		
SCHR Check	◆ ❖	◆ ❖	◆	
INTERPOL Check (if needed)	◆ ❖	◆ ❖	◆	
Annual Reverification				
DD Form 2981	◆			
DA Form 7215	◆			
IRCs	◆			
FBI Criminal History FP Check	◆			
Five-Year Reverification				
DD Form 2981		◆	◆	◆
DA Form 7215	◆	◆	◆	◆
IRCs		◆	◆	◆
FBI Criminal History FP Check		◆	◆	◆
SCHR Check		◆ ❖	◆ ❖	
INTERPOL Check (if needed)		◆ ❖	◆	

◆ Mandatory requirement.

❖ Foreign National Equivalent as reviewed by the component commander

▲ Adults 18 years of age or older and affiliated with the DoD.

● Adults 18 years of age or older not affiliated with the DoD.

5–13. Self-reporting requirement

Individuals who have a completed background check are required to immediately report to their supervisor or chain of command with a completed DD Form 2981 if: they have been arrested, apprehended, charged, or convicted of any offenses listed under paragraph 5–14; they have met the family advocacy criteria for domestic violence or child maltreatment; or they have an open FAP incident where they have been identified as an alleged offender, in which case the supervisor or chain of command must submit the completed DD Form 2981 to the CSSC for determination. When newly reported derogatory information is reported, the individual must be placed under LOSS awaiting reverification

from CSSC. Administrative action may be taken as appropriate in accordance with HR personnel policy if the employee is found unsuitable by the CSSC.

5–14. Criteria for automatic disqualification

No person, regardless of circumstances, will be allowed to provide childcare services if the background check discloses—

a. Except as noted below, that the individual has been convicted in either a civilian or military court (to include a general, special, or summary court-martial) or received non-judicial punishment under Article 15, UCMJ for any of the following:

- (1) A sexual offense (to include child pornography, bestiality, and aggravated sexual abuse).
- (2) A criminal offense involving a child victim.
- (3) A felony drug offense (felony conviction in civilian court, or conviction at a special or general court-martial under the UCMJ).

b. That the individual has been held to be negligent in a civil adjudication or administrative proceeding concerning the death or serious injury to a child or dependent person entrusted to the individual's care.

Section III

Process for Interim and Final Adjudications

5–15. Adjudication of derogatory information

The ultimate decision to determine how to use information obtained from the criminal history background checks in selection for positions involving the care, treatment, supervision, or education of children must be made by the CAS or the CSSC adjudicator based upon all known facts.

a. Evaluation authority. Adverse information will be evaluated by a designated adjudicator qualified in interpreting the results of background checks.

(1) All information of record (both favorable and unfavorable) will be assessed in terms of its relevance, recentness, and seriousness for interim and final suitability decisions made by the DCSA CAS or CSSC.

(2) A disqualifying event may be the basis for a non-selection, withdrawal of a tentative offer of employment, ineligibility for facility access, or removal from a contract. A suitability action under 5 CFR 731 may be taken resulting in a probationary termination, an adverse action, or other appropriate action.

(3) The servicing legal advisor will be consulted prior to taking adverse action against a current employee based on the presence of derogatory information.

(4) Notice and opportunity to respond must be provided whenever derogatory information constitutes a potential basis for either automatic or presumptive disqualification from service and forms the basis of a decision to either forward the file for further consideration or terminate the process.

b. Due process.

(1) Applicants will be afforded the opportunity to challenge the accuracy and completeness of derogatory information received from all sources. Applicants have 10 working days from time of notice of disqualification to provide supporting documentation to their supporting HR or security office.

(2) If the management official forwards the file for further consideration, the entire derogatory information packet along with the individual's response should be forwarded to the CSSC for suitability consideration and determination.

5–16. Centralized adjudication

a. General. In accordance with DoDM 5200.02 and DoDM 1402.05, the CAS is primarily responsible for adjudicating suitability cases for the DoD and making favorable suitability determinations.

b. Interim adjudication and line-of-sight supervision. The CSSC will conduct the interim adjudication of any derogatory information that arises from IRCs and FBI fingerprint checks. The CSSC will make a determination and notify the requesting organization that an individual has—

- (1) A favorable determination and may begin work under LOSS.
- (2) An unfavorable determination and therefore, the individual may not be hired or must be removed from their position.

c. Final adjudication. When the DCSA CAS transfers jurisdiction for adjudication to the Army, the CSSC adjudicates the case and enters the decision into the appropriate system(s) of record.

d. Reverification. The CSSC will conduct the adjudication of all new derogatory information that arises from a reverification of suitability background checks.

e. Final results. HR personnel/CPACs must utilize the DoD-approved system of record to verify the final adjudicative results.

f. Progress. CYS administrators/Hiring officials/Supervisors must use the DoD-approved systems to track progress of their cases.

5–17. Appeals

Appeals regarding suitability determinations or suitability actions for civilian employees will follow the requirements of chapter 4 of this regulation. For other categories of personnel, individuals have appeal rights regarding an unfavorable suitability determination. The individual will receive written notice from the servicing HR or security office of the unfavorable determination and a 10 working day opportunity will be afforded to respond. The applicant's response must contain any relevant mitigating information and will be forwarded to the CSSC. Any additional information submitted by the individual will be considered in the review process. The CSSC's decision is final.

Chapter 6

Common Access Card Credentialing, Trusted Associate Sponsorship System, and the Volunteer Logical Access Credential

6–1. Homeland Security Presidential Directive 12

a. HSPD–12 mandates a government-wide standard for secure and reliable forms of identification issued by the Federal Government for physical access to Federally-controlled facilities or logical access to Federally-controlled information systems. The CAC is the Federal Government personal identity verification (PIV) credential adopted by the DoD.

b. Army military, civilian, and contractor personnel are subject to the HSPD–12 credentialing requirements. Special consideration for foreign nationals is located in DoDM 1000.13, Volume 1 and in DoDI 5200.46.

c. If at any time during employment or service, an Army Soldier, civilian or contractor is found to not meet HSPD–12 credentialing standards or adjudication is made that the individual's possession of a CAC poses an unacceptable risk as defined in DoDI 5200.46, the individual's CAC will be revoked.

6–2. Common access card screening and investigative requirements

a. U.S. citizens. All CAC applicants must meet background vetting requirements in accordance with DoDI 5200.46 before the issuance of a CAC can be approved. In the absence of a complete and favorable adjudicated Tier 1 or DoD-determined equivalent or higher investigation, submit the FBI fingerprint check and Tier 1 to DCSA. The Tier 1 submission and a favorable FBI criminal history check are sufficient to issue a CAC pending a final adjudication (see para 6–3).

b. Non-U.S. citizens at foreign locations. Except for uniformed Servicemembers, non-U.S. person CAC applicants who have not resided in the U.S. or U.S. territories for at least 3 years are ineligible to complete a National Agency Check and Inquiries (NACI) and instead must meet one of the following criteria prior to CAC issuance:

(1) Possess (as foreign military, employee, or contractor support personnel) a visitor status and security assurance that has been confirmed, documented, and processed in accordance with international agreements (DoDM 1000.13, Volume 1 and DoDI 5200.46).

(2) Meet (as direct or indirect DoD-hired personnel overseas) the investigative requirements for DoD employment as recognized through international agreements (see DoDI 5200.46). In addition to these investigative requirements, CAC issuance requires a fingerprint check against the FBI criminal history database, a name check against FBI investigations files, and a name check against the Terrorist Screening Database. The background investigation must be completed and favorably adjudicated before a CAC can be issued to a non-U.S. foreign national at a foreign location. A non-U.S. citizen is not eligible for a Volunteer Logical Access Credential (VoLAC).

c. Other non-U.S. citizens. Non-U.S. citizens at locations in the U.S. or U.S. territories who have resided in the U.S. or U.S. territories for less than three years do not satisfy the investigative requirements to be issued a CAC but may be issued an alternative facility access identity credential by the sponsoring command, after an appropriate risk assessment, consistent with the installation physical security program.

d. Contractors. All contractor personnel must have a completed DD Form 1172–2 (Application for Identification Card/DEERS Enrollment).

6–3. Interim adjudications

a. A CAC may be issued to U.S. citizens following a favorable FBI criminal history fingerprint check and the submission of a Tier 1 or higher investigation.

b. For non-U.S. nationals in the U.S. or U.S. territories, a CAC may be issued following a favorable FBI criminal history fingerprint check and the submission of a Tier 1 or higher investigation if an individual has resided in the U.S. or U.S. territories for at least 3 years. Non-U.S. nationals who have resided in the U.S. or U.S. territories for less than 3 years must have a complete investigation and favorable adjudication.

c. Non-U.S. nationals at foreign locations are not authorized the issuance of a CAC without a complete investigation and favorable adjudication.

(1) The type of background investigation may vary based on standing reciprocity treaties concerning identity assurance and information exchanges that exist between the U.S. and its allies or agency agreements with the host country.

(2) The investigation of a non-U.S. national at a foreign location must be consistent with a NACI, to the extent possible, and include a fingerprint check against the FBI criminal history database, an FBI investigations files (name check) search, and a name check against the terrorist screening database.

d. If a CAC is issued based upon the initiation of a NACI (Tier 1) or higher-level investigation and the background check is returned adjudicated as favorable, the individual may keep their CAC. If the background check is adjudicated and returned with unfavorable information found, the sponsoring activity must notify the TA for immediate revocation and collection of the CAC.

6–4. Reciprocity and reinvestigations

a. Reciprocity.

(1) The Army will not re-adjudicate CAC determinations for individuals transferring from another Federal department or agency provided that—

(a) The individual’s former department or agency verifies possession of a valid PIV.

(b) The individual has undergone the required NACI or other equivalent (or greater) suitability or national security investigation and received favorable adjudication from the former department or agency.

(c) There is no break in service of 24 months or more and the individual has no actionable information since the date of the last completed investigation.

(2) Interim CAC adjudications are not eligible to be transferred or reciprocally accepted. Reciprocity must be based on final favorable adjudication only.

b. Reinvestigations.

(1) Individuals identified as having a favorably adjudicated investigation on record, equivalent to or greater than the NACI (Tier 1), do not require an additional investigation for CAC issuance.

(2) There is no requirement to reinvestigate CAC holders unless they are subject to reinvestigation for national security or suitability reasons as specified in applicable DoD issuances.

6–5. Specific populations requiring sponsorship for common access card issuance

Specific populations, listed in paragraph 6–6 of this regulation, who are eligible to submit for the “U.S. DoD/Uniformed Service Identification (ID) Card” may only be sponsored if they meet additional criteria. Examples of these population categories include DoD contractors, non-DoD Federal Civilians, State employees, and other non-DoD personnel that have an affiliation with the DoD other than through employment or contract. Eligibility for these approved population categories is based on the DoD Government Sponsor’s determination of the type and frequency of access required to DoD facilities or networks. For the populations described in this paragraph, the applicant’s sponsor must confirm that the applicant meets one of the requirements below, per DoDM 1000.13, Volume 1:

a. Both physical access to a DoD facility and access, via logon, to DoD networks on- site or remotely. Access to the DoD network must require the use of a computer with government-controlled configuration or use of a DoD-approved remote access procedure in accordance with the Defense Information Systems Agency Security Technical Implementation Guide.

b. Remote access, via logon, to a DoD network using DoD-approved remote access procedures.

c. Physical access to multiple DoD facilities or multiple non-DoD Federally-controlled facilities on behalf of the DoD (applicable to DoD contractors only) on a recurring basis for a period of 6 months or more.

(1) The frequency of “recurring basis” for access will be determined by the DoD component concerned in coordination with installation security policies.

(2) CAC eligibility for applicants requiring physical access to multiple DoD facilities on a recurring basis for less than 6 months are risk-based decisions that will be made by the DoD component concerned in coordination with

installation security policies. These applicants may instead be eligible for local or regional base passes in accordance with the Under Secretary of Defense for Intelligence (USD(I)) and local installation security policies and procedures.

6-6. Trusted Associate Sponsorship System

a. Paragraphs 6-6 through 6-14 establish procedures for the implementation, management, and oversight of the TASS and the issuance of CACs and VoLACs to eligible TASS applicants.

b. Information from the DD Form 1172-2 will be entered into TASS for CAC application for the following populations:

- (1) Affiliated volunteers (requiring DoD network access).
- (2) DoD and uniformed service contractors.
- (3) Foreign affiliates.
- (4) Non-DoD civil service employees.
- (5) Non-DoD presidential appointees.
- (6) Non-Federal agency civilian associates.
- (7) Non-U.S. NAF employees.
- (8) Outside the continental United States hires.
- (9) Other Federal agency contractors.

c. The policies and requirements for individuals serving as TASS service points of contact (SPOCs), TASMs, TAs, and Government sponsors are identified in paragraphs 6-7 through 6-11.

6-7. Requirements for service points of contact, Trusted Agent Security Managers, and Trusted Agents

Individuals filling the positions of SPOC, TASM, and TA must meet all of the following requirements:

- a.* Be a U.S. citizen.
- b.* Be a uniformed Servicemember or DoD Civilian working for the service or agency. (Cannot be a contractor.)
- c.* Be a CAC holder.
- d.* Have not been convicted of a felony offense.
- e.* Have not been denied a security clearance or had a previous security clearance revoked.
- f.* Be trustworthy.
- g.* Have completed annual TASS certification training.
- h.* Be capable of sending and receiving digitally signed and encrypted email.
- i.* Have a working knowledge of the structure of the site under his or her control, including populations and mission.
- j.* Be retainable for a minimum of 12 month.

6-8. Service points of contact responsibilities

SPOCs are responsible for the following:

- a.* The management and oversight of the TASS program within the Army.
- b.* For second level technical issues, coordinate Tier 2 support with DMDC. TASMs and TAs will not contact Tier 2 support without expressed permission from the SPOC.
- c.* Establish sites with TASS capability, provision or revoke TASM registrations through Enterprise Monitoring and Management Accounts (EMMA) and ensure other field support is maintained.
- d.* Remove sites or combine sites in order to streamline operations.
- e.* Track and enforce all TASM and TA training requirements.
- f.* Provide documented policies and guidelines for TASMs to provide training to TAs on how to complete and maintain the sponsorship process and responsibilities.

6-9. Trusted Agent Security Managers' responsibilities

Each site can have up to 10 TASMs, but will maintain a minimum of two assigned TASMs. TASMs will be appointed by the sponsoring agency in writing with an official memorandum and by submitting a DD Form 2875 (System Authorization Access Request (SAAR)) to the SPOC. TASMs are responsible for the following:

- a.* User management and administration for their specific site.
- b.* Act as a TA when TA is not available.
- c.* Troubleshoot TASS questions and issues for their site.
- d.* Provision or revoke TA users for their site through EMMA. TASM should maintain a DD Form 2875 on file for each TA's tour of duty.
- e.* Assist and track TA training status for their site.

- f.* Submit requests to SPOC for new or additional TASM capabilities.
- g.* Ensure positive identification of all site TAs.
- h.* Ensure annual certification requirements for TASS are completed.
- i.* Notify SPOC when resigning position by requesting a TASM revocation and appointing a new TASM. Current TASMs will not be removed until a replacement has been appointed by the losing organization.
- j.* Notify the SPOC when there will be extended absences so appropriate measures can be implemented to maintain oversight of their site.
- k.* Notify SPOC of any TASS outages and any suspected or known TASS system compromise.
- l.* Will ensure TAs manage no more than 100 active records without the expressed permission from the SPOC via an exception to policy memo.
- m.* Audit TAs to ensure enrollment eligibility and vetting for applicants meets the requirements. TASM or assigned security manager will conduct a quarterly 25 percent audit and submit results to the SPOC by the 7th of the following month.
- n.* Transfer applicants between TAs within the site or coordinate with SPOC to transfer applicants between sites under the Army purview.

6–10. Trusted Agent responsibilities

TAs are responsible for the following:

- a.* Ensure sponsors submit a completed DD Form 1172–2, to include the remarks section data containing the contracting officer representative’s name, email address, phone number, and required access of physical or logical access to the DoD Network, and enter the information into TASS. The TA will re-verify their eligibility every 180 days. TAs will manage no more than 100 applicants without an approved DD Form 2875 requesting an exception to policy for batch processing.
- b.* Ensure annual certification requirements for TASS are completed.
- c.* Establish sponsorship of the applicant.
- d.* Ensure applicant meets the eligibility criteria to receive a CAC.
- e.* Ensure positive identification of the applicant.
- f.* Ensure background vetting is complete and in accordance with paragraphs 6–13 and 6–14.
- g.* Revoke credentials when it is determined applicant is no longer eligible.
- h.* Ensure retrieval of CAC from applicants who are no longer eligible, either by government sponsor, contract employer, or TA. Deliver retrieved cards to ID card issuing facility for proper disposal within one week. Maintain the HRC documentation for delivery to the ID card issuing facility for 12 months.
- i.* Ensure sponsors submit a completed TASS registration request DD Form 1172–2 when entering initial application or re-verifying the applicant. Maintain documentation for 12 months after contract end date. When re-verifying an applicant, the TA should have the sponsor provide answers to the following questions:
 - (1) Does the person still work for the organization?
 - (2) Does the person still need a CAC? Do they require access to a DoD network, a DoD facility, or a CAC-enabled government website?
 - (3) Does the person still possess a valid background investigation? If so, provide the investigation and the closing date of the investigation.
- j.* Notify TASM (only contact SPOC when TASM is unavailable)—
 - (1) When resigning as a TA.
 - (2) When experiencing site outages.
 - (3) Of any suspected or known TASS compromise.

6–11. Government sponsors’ responsibilities

Government sponsors have the following responsibilities:

- a.* Ensure the applicant has met the requirements to be issued a credential.
- b.* Ensure the applicant has met the background vetting requirement to be issued a credential, which includes for CAC issuance a valid NACI or DoD-equivalent investigation and the completion of an FBI fingerprint check with the return of favorable results and submission of a NACI to OPM. For VoLAC issuance, ensure the applicant has a valid NACI or DoD-equivalent investigation and the completion of an FBI fingerprint check with the return of favorable results and submission of a NACI to OPM.
- c.* Ensure the applicant meets contractual requirements or has another valid relationship with the DoD.
- d.* Submit a completed TASS registration DD Form 1172–2 to the TA for processing when initially submitting an applicant for credential issuance.

- e.* Approve the reverification of an applicant to retain their issued credential by submitting a completed TASS registration or email to the assigned TA validating continued employment and security status.
- f.* Notifying the TA when the applicant is no longer eligible to retain their credential.
- g.* Retrieve or confiscate the credential from the applicant when they are no longer eligible to retain it. Turn the credential over to the TA for proper disposal.
- h.* Notify TA when no longer going to be filling the role of Government Sponsor (for example, transferring, job or position change, retirement).

6–12. Common access card issuance and eligibility requirements under Trusted Associate Sponsorship System

- a.* Contractors will be issued CACs for a period not to exceed 3 years from the date of issuance regardless of the contract end date. The only exception is if the contract with the government will end and not be renewed or rebid.
- b.* Unfunded contracted options should be considered in the determination of the length of CAC eligibility. For example, a contractor hired under a DoD contract with a base year plus 2 option years would be issued a CAC good for 3 years. The issuance of a CAC is based on four criteria: eligibility, completion of background vetting, verification of DoD affiliation from an authoritative data source, and verification of claimed identity. Of the four criteria, TASS TAs are required to validate eligibility and background vetting before entering individuals into TASS.
- c.* If the contractor or employee is retained for continued employment executing the same tasks and duties, the TA will change the contract number in the TASS for the specific employee.
- d.* CAC eligibility of populations that are not automatically eligible for a CAC based on their personnel category within DoD is based on the DoD Government Sponsor's determination as to the type and frequency of access required to DoD facilities, DoD websites that require CAC access, or networks that support the mission. Government Sponsors determine criteria for eligibility by considering the access controls employed by the DoD facility and the individual's personnel category.
- e.* DoD contractors, non-contractors, non-DoD Federal employees, and foreign affiliates who are eligible to be entered into TASS for CAC issuance are required to meet one of the following criteria:
 - (1) A requirement for logical access to a DoD network or website that requires CAC login.
 - (2) A requirement for both physical access to a DoD facility and access, via logon, to a DoD network, either onsite or remotely. Access to a DoD network must require the use of a computer with a government-controlled configuration or use of a DoD-approved remote access procedure in accordance with the Defense Information Systems Agency.
 - (3) A requirement for physical access to multiple DoD facilities or multiple non-DoD Federally-controlled facilities on behalf of DoD on a recurring basis for a period of 6 months or more.
- f.* Background vetting under TASS will adhere to the same CAC screening and investigative requirements found in paragraph 6–2.

6–13. Higher-level vetting requirements for contractors

- a.* Some contractor positions may require a higher level of vetting beyond the minimum NACI background investigation necessary for the issuance of a CAC, for example, the requirement for a Top Secret (Tier 5) clearance. All specific regulatory guidance and agency procedures must be strictly followed with regard to higher-level vetting requirements.
- b.* The TASS, TA, or TASM will receive formal notice from the contractor or contracting company ensuring contractors who require higher-level clearances have been vetted or are in the process of being vetted.
- c.* Army TASS, TAs, or TASMs must actively work with personnel security managers throughout the additional vetting process to ensure favorable adjudication for the contractor to maintain possession of a CAC.
- d.* If an interim clearance is granted and a CAC is issued based upon the ongoing investigation, security managers must immediately notify the sponsoring TA/TASM if the clearance adjudication is returned as unfavorable so that the CAC may be immediately revoked and collected.
- e.* Additionally, security managers must immediately report non-favorable adjudication or loss of favorable adjudication of higher-level vetting to the appropriate TA/TASM for immediate revocation of issued CAC.

6–14. Volunteer Logical Access Credential

- a.* The VoLAC is for individuals who donate their services to DoD components. The card is a plastic smartcard containing DoD public key infrastructure certificates, which is intended for the sole purpose of gaining access to a DoD computer and network in order for the volunteer to fulfill their designated mission. It is not a DoD CAC. It does not include a photo. It does not convey benefits, entitlements, or other privileges, nor can it be used for physical access purposes.

- b.* The VoLAC will expire at the end of volunteer service or 3 years from the date of issuance, whichever is shorter.
- c.* The eligibility requirements for issuance of a VoLAC are—
- (1) Be a student intern (5 USC 3111) or an authorized DoD volunteer (10 USC 1588).
 - (2) Require frequent access to a DoD network to perform volunteer duties.
 - (3) Be sponsored by DoD as part of an official volunteer assignment. The sponsor must be a government employee or active duty military member.
 - (4) Be a U.S. citizen.
 - (5) Be registered in DEERS through TASS.
 - (6) Have, at a minimum, a favorable NACI as required by DoD 5200.46 for individuals requiring network access to DoD systems. A credential may be issued upon the return of favorable results from an FBI National Criminal History fingerprint check.
 - (7) Be eligible for a DoD-sponsored unclassified network account.
 - (8) Agree to be photographed and have fingerprints taken and stored.
- d.* Any derogatory incident discovered after a VoLAC has been issued, the VoLAC will be immediately revoked and collected.

Appendix A

References

Unless otherwise indicated, all Army publications are available on the Army Publishing Directorate (APD) website at <https://armypubs.army.mil>. DoD publications are available on the Executive Services Directorate website at <https://www.esd.whs.mil>. USCs are available on the USC website at <https://uscode.house.gov>.

Section I

Required Publications

AR 135–175

Separation of Officers (Cited in para 3–9*h*.)

AR 135–178

Enlisted Administrative Separations (Cited in para 3–9*h*.)

AR 215–3

Nonappropriated Funds Instrumentalities Personnel Policy (Cited in para 4–3*d*.)

AR 380–67

Personnel Security Program (Cited in para 3–9*g*.)

AR 600–8–2

Suspension of Favorable Personnel Actions (Flag) (Cited in para 3–9*b*.)

AR 600–8–22

Military Awards (Cited in table 3–1.)

AR 600–8–24

Officer Transfers and Discharges (Cited in para 3–9*h*.)

AR 600–85

The Army Substance Abuse Program (Cited in para 3–3*d*.)

AR 601–1

Assignment of Personnel to Army Recruiting Activities (Cited in para 2–9*r*(1).)

AR 614–100

Officer Assignment Policies, Details, and Transfers (Cited in table 3–1.)

AR 614–200

Enlisted Assignments and Utilization Management (Cited in table 3–1.)

AR 635–200

Active Duty Enlisted Administrative Separations (Cited in para 3–9*h*.)

DoDI 1304.33

Protecting Against Inappropriate Relations During Recruiting and Entry Level Training (Cited in para 3–5*a*(1)(*d*).)

DoDI 1400.25

DoD Civilian Personnel Management System (Cited in para 4–3*a*.)

DoDI 1402.05

Background Checks on Individuals in DoD Child Care Services Programs (Cited in para 5–1.)

DoDM 1000.13, Volume 1

DoD Identification (ID) Cards: ID Card Life-Cycle (Cited in para 6–1*b*.)

OPM Suitability Processing Handbook

Introduction of Credentialing, Suitability, and Security Clearance Decision-Making Guide (Available at <https://www.opm.gov>.) (Cited in para 4–3*a*.)

5 CFR 731

Suitability (Available at <https://www.ecfr.gov>.) (Cited in para 4–2*b*.)

Section II

Related Publications

A related publication is a source of additional information. The user does not have to read it to understand this publication. Unless otherwise indicated, all Army publications are available on the APD website at <https://armypubs.army.mil>. DoD publications are available on the ESD website at <https://www.esd.whs.mil>. CFRs are available at <https://www.ecfr.gov>. USCs are available on the USC website at <https://uscode.house.gov>.

AR 11–2

Managers' Internal Control Program

AR 20–1

Inspector General Activities and Procedures

AR 25–30

Army Publishing Program

AR 50–5

Nuclear Surety

AR 50–6

Chemical Surety

AR 135–100

Appointment of Commissioned and Warrant Officers of the Army

AR 190–11

Physical Security of Arms, Ammunition, and Explosives

AR 190–13

The Army Physical Security Program

AR 190–17

Biological Select Agents and Toxins Security Program

AR 190–51

Security of Unclassified Army Resources (Sensitive and Nonsensitive)

AR 190–56

The Army Civilian Police and Security Guard Program

AR 600–8–29

Officer Promotions

AR 600–8–104

Army Military Human Resource Records Management

AR 600–20

Army Command Policy

AR 601–100

Appointment of Commissioned and Warrant Officers in the Regular Army

AR 608–18

The Army Family Advocacy Program

AR 614–10

Army Military Personnel Exchange Program with Military Services of Other Nations

The Army Plan

2011 Strategic Planning Guidance, Army Planning Priorities Guidance 13–17, Army Program Guidance Memorandum, and Army Campaign Plan (Available at <https://api.army.mil>.)

DA Pam 25–403

Army Guide to Recordkeeping

DoDD 6495.01

Sexual Assault Prevention and Response (SAPR) Program

DoDI 5200.46

DoD Investigative and Adjudicative Guidance for Issuing the Common Access Card (CAC)

DoDI 6495.03

Defense Sexual Assault Advocate Certification Program (D-SAACP)

DoDM 1000.13, Volume 2

DoD Identification (ID) Cards: Benefits For Members Of The Uniformed Services, Their Dependents, And Other Eligible Individuals

DoDM 5200.02

Procedures for the DoD Personnel Security Program (PSP)

DoDM 6400.01, Volume 1

Family Advocacy Program (FAP): FAP Standards

Federal Information Processing Standards Publication 201-3

Personal Identity Verification (PIV) of Federal Employees and Contractors (Available at <https://csrc.nist.gov>.)

Homeland Security Presidential Directive 12

Policy for a Common Identification Standard for Federal Employees and Contractors (Available at <https://www.dhs.gov>.)

Memorandum, Deputy Secretary of Defense, 20 Oct 2010

Consolidation of DoD Component Central Adjudication Facilities (CAFs) (Available at <https://ousdi.defense.gov>.)

Memorandum, Deputy Secretary of Defense, 3 May 2012

DoD Central Adjudications Facility (CAF) Consolidation (Available at <https://ousdi.defense.gov>.)

Memorandum, Office of Personnel Management, Oct 08

Position Designation of National Security and Public Trust Positions (Available at <https://www.opm.gov>.)

Office of Management and Budget (OMB) Memorandum M-05-24

Implementation of Homeland Security Presidential Directive (HSPD) 12 - Policy for a Common Identification Standard for Federal Employees and Contractors, 5 Aug 2005 (Available at <https://www.whitehouse.gov>.)

TC 3-21.75

The Warrior Ethos and Soldier Combat Skills

2 CFR 180.990

Preponderance of the evidence

5 CFR 731.202

Criteria for making suitability determinations

5 CFR 731.203

Suitability actions by OPM and other agencies

5 CFR 731.205

Debarment by agencies

5 CFR 752

Adverse Actions

5 USC 552a

Records maintained on individuals

5 USC 2102

The competitive service

5 USC 3111

Acceptance of volunteer service

10 USC 1588

Authority to accept certain voluntary services

34 USC 20351

Requirement for background checks

Section III**Prescribed Forms**

This section contains no entries.

Section IV**Referenced Forms**

Unless otherwise indicated, DA forms are available on the APD website (<https://armypubs.army.mil>), and DD forms are available on the Washington Headquarters Services (WHS), Executive Services Directorate (ESD) website (<https://www.esd.whs.mil>).

DA Form 11–2

Internal Control Evaluation Certification

DA Form 2028

Recommended Changes to Publications and Blank Forms

DA Form 7215

Release/Consent Statement

DD Form 1172–2

Application for Identification Card/DEERS Enrollment

DD Form 2875

System Authorization Access Request (SAAR)

DD Form 2981

Basic Criminal History and Statement of Admission (Department of Defense Child Care Services Programs)

OF 306

Declaration for Federal Employment

SF 85

Questionnaire for Non-Sensitive Positions

Appendix B

Tiers

B-1. Other documents

Once the investigation type and form type are determined, other investigative documents may be necessary depending on whether the investigation is an initial or reinvestigation, and whether the individual needing the investigation is a Federal civilian, contractor, or military. See table B-1.

Table B-1

Tier descriptions

Tier	Positions designation/access	New name	Former name
Tier 1	Low risk, non-sensitive, physical or logical access	T1	NACI
Tier 2	Moderate risk, public trust	T2 T2R T2S T2SR	Moderate background investigation
Tier 3	Non-critical Sensitive, L, Confidential and secret information	T3 T3R	Access National Agency Check with Written Inquiries NACLC
Tier 4	High risk Public trust	T4 T4R	Background investigation
Tier 5	Critical Sensitive, Top Secret, Sensitive Compartmented Information, Q	T5 T5R T5C	Single scope background investigation Single scope background investigation periodic reinvestigation Phased periodic reinvestigation

B-2. Position Designation System

The Position Designation System will show the required investigation and form type by determining the sensitivity and risk level. Table B-2 depicts the correlation between position designation, investigation types, reinvestigation types and form types.

Table B-2
Correlation

0BCode	1BDefinition
2BR	3BReinvestigation
4BS	5BEnhanced subject interview
6BC	7BContinuous evaluation

Note. T2S and T2RS identify the application of an enhanced subject interview as a standard component of the investigation at the discretion of the requesting agency.

Appendix C

Internal Control Evaluation

C–1. Function

The function covered by this evaluation is the Army Suitability, Fitness, and Credentialing Program.

C–2. Purpose

The purpose of this evaluation is to assist commanders and organizations in evaluating key internal controls outlined below. It is not intended to address all internal control elements.

C–3. Instructions

Answers must be based upon the actual testing of controls (for example, document analysis, direct observation, sampling, simulation, or others). Answers that indicate deficiencies must be explained and the corrective action indicated in the supporting documentation. These key controls must be evaluated at least once every five years. Certification that this evaluation has been conducted must be accomplished on DA Form 11–2 (Internal Control Evaluation Certification).

C–4. Test questions

- a.* Is personally identifiable information protected?
- b.* Is the DCS, G–1 monitoring, evaluating, and reporting on the administration of the Army Suitability, Fitness, and Credentialing Program?
- c.* Has the commander established a self-inspection program to ensure the command and subordinate organizations are following applicable suitability, fitness, and CAC-credentialing policy?
- d.* Do subordinate leaders, supervisors, and managers advise, update, and communicate with the commander for final decisions on matters related to suitability, fitness, and CAC-credentialing?
- e.* Are personnel submitted for periodic reviews or re-screenings in a timely manner?
- f.* Do organizations adhere to deadlines in providing information related to unfavorable adjudications or disqualifying information?
- g.* Have supervisors ensured that subordinate personnel are trained in, understand, and follow requirements of this regulation relevant to their organizations?
- h.* Has the commander ensured personnel investigations for suitability, fitness, and CAC-credentialing meet the requirements of this regulation?
- i.* Has the commander ensured supervisors are familiar with special responsibilities in matters pertaining to indicators that may signal personnel suitability or fitness concerns?
- j.* Does the commander reinforce the requirements for self, supervisor, and command reporting of incidents that may affect an individual's suitability or fitness determination?

C–5. Supersession

This evaluation replaces the evaluation for the execution of the Army Suitability, Fitness, and Credentialing Program previously published in AR 600–78, dated 25 October 2018.

C–6. Comments

To make this checklist a more useful tool for evaluating management controls, submit comments to usarmy.pentagon.hqda-dcs-g-1.mbx.suitability-division@army.mil.

Glossary

Section I

Abbreviations

AASA

Administrative Assistant to the Secretary of the Army

ACOM

Army command

ALERTS

Army Law Enforcement Reporting and Tracking System

AMC

U.S. Army Materiel Command

AMHRR

Army Military Human Resource Record

APF

appropriated funds

AR

Army regulation

ARIMS

Army Records Information Management System

ARNG

Army National Guard

ARNGUS

Army National Guard of the United States

ASA (ALT)

Assistant Secretary of the Army (Acquisition, Logistics and Technology)

ASA (FM&C)

Assistant Secretary of the Army (Financial Management and Comptroller)

ASA (M&RA)

Assistant Secretary of the Army (Manpower and Reserve Affairs)

ASAP

Army Substance Abuse Program

ASCC

Army service component command

ASWG

Army Suitability Working Group

BDE

brigade

CAC

common access card

CAR

Chief, Army Reserve

CAS

Consolidated Adjudication Services

CCH

Chief of Chaplains

CFR
Code of Federal Regulations

CG
Commanding general

CHRA
U.S. Army Civilian Human Resources Agency

CIO
Chief Information Officer

CNGB
Chief, National Guard Bureau

CPAC
Civilian Personnel Advisory Center

CRC
U.S. Army Crimes Records Center

CSL
Centralized Selection List

CSR
customer service request

CSSC
Centralized Suitability Service Center

CVS
Central Verification System

CYS
Child and Youth Services

DA
Department of the Army

DA Pam
Department of the Army pamphlet

DARNG
Director, Army National Guard

DCG
Deputy commanding general

DCII
Defense Central Investigations Index

DCS
Deputy Chief of Staff

DCSA
Defense Counterintelligence and Security Agency

DEERS
Defense Enrollment Eligibility Reporting System

DISS
Defense Information System for Security

DMDC
Defense Manpower Data Center

DoD
Department of Defense

DoDD

Department of Defense directive

DoDI

Department of Defense instruction

DoDM

Department of Defense manual

DRU

direct reporting unit

EMMA

Enterprise Monitoring and Management Accounts

EOA

Equal Opportunity Advisor

FAP

Family Advocacy Program

FBI

Federal Bureau of Investigations

FCC

Family childcare

FIPS

Federal Information Processing Standards

HQDA

Headquarters, Department of the Army

HR

Human Resources

HRC

U.S. Army Human Resources Command

HSPD-12

Homeland Security Presidential Directive-12

ID

Identification

IG

Inspector General

IHCP

in-home care provider

INTERPOL

International Criminal Police Organization

IRC

installation records check

JPAS

Joint Personnel Adjudication System

JROTC

Junior Reserve Officers' Training Corps

JVS

Joint Verification System

LOSS

Line of sight supervision

MEDCOM
U.S. Army Medical Command

MEPS
military entrance processing station

MFR
memorandum for record

MOS
military occupational specialty

MSPB
Merit Systems Protection Board

MTF
medical treatment facility

NACI
National Agency Check and Inquiries

NACLC
National Agency Check with Local Agency Checks and Credit Check

NAF
non-appropriated funds

NCO
noncommissioned officer

NGB
National Guard Bureau

NSOPW
National Sex Offender Public website

OF
Optional Form

OIP
organizational inspection program

OMB
Office of Management and Budget

OPM
U.S. Office of Personnel Management

PDT
position designation tool

PIV
personal identity verification

PMG
Provost Marshal General

PRP
Personnel Reliability Program

PSI-CoE
Personnel Security Investigations Center of Excellence

PSIP
Personnel Security Investigation Portal

PSSP
Personnel Suitability Screening Program

RA
Regular Army

ROTC
Reserve Officers' Training Corps

SAAR
system authorization access request

SCHR
State Criminal History Repository

SF
Standard Form

SGM
sergeant major

SHARP
Sexual Harassment/Assault Response and Prevention

SOI
submitting office identifier

SPOC
service point of contact

TA
Trusted Agent

TASM
Trusted Agent Security Manager

TASS
Trusted Associate Sponsorship System

TIG
The Inspector General

TPA
third party administrator

TRADOC
U.S. Army Training and Doctrine Command

TSG
The Surgeon General

UCMJ
Uniform Code of Military Justice

USACID
Director, U.S. Army Criminal Investigation Division

USAR
U.S. Army Reserve

USC
United States Code

VoLAC
Volunteer Logical Access Credential

Section II

Terms

Actionable information

Information that potentially justifies an unfavorable credentialing adjudication.

Adjudication

The evaluation of pertinent data in a background investigation, and any other available information (for example, law enforcement, installation records, and so forth) that is relevant and reliable, to determine whether a covered individual is: (i) suitable for Government employment; (ii) eligible for logical and physical access; (iii) eligible for access to classified information; (iv) eligible to hold a sensitive position; or (v) fit to perform work for or on behalf of the Government as a contractor employee.

Adverse information

Any substantiated adverse finding or conclusion from an officially documented investigation or inquiry or any other credible information of an adverse nature. Adverse information must be derogatory, unfavorable, or of a nature that reflects clearly unacceptable conduct, integrity, or judgment on the part of the individual. To be credible, the information must be resolved and supported by a preponderance of the evidence.

Army personnel

Soldiers, Department of the Army civilian employees (non-appropriated funds and APF), volunteers, and interns. ARNG Title 5 State Employees and Contractor employees will be considered “Army personnel” for purposes of this directive to the extent required under the terms of their contract.

Army Suitability

The term “Army Suitability” specifically encompasses all suitability, fitness, and HSPD–12 CAC-credentialing functions, the Personnel Reliability Program, information technology vetting of privileged users, health care personnel, DA Civilian Police and Security Guards, continued reliability of positions having duties and responsibilities associated with law enforcement and security, unescorted access to arms, ammunition and explosives, and other access to credentials or as subsequently defined by the DCS, G–1.

Biometrics

Biometrics is the process of recognizing an individual based on measurable anatomical, physiological, and behavioral characteristics. Biometrics presents the technological means of identifying individuals based on their physical characteristics and enables multiple business and warfighting functions.

Childcare services

Care or services provided to children under the age of 18 in settings including child protective services (including the investigation of child abuse and neglect reports), social services, health and mental health care, childcare (day), education (whether or not directly involved in teaching), emergency placement (foster care), residential care, recreational or rehabilitative programs, and detention, correctional, or treatment services, as defined in DoDI 1402.05.

Covered individual

A person who performs work for or on behalf of the executive branch, or who seeks to perform work for on behalf of the executive branch.

Covered positions

Positions covered under 5 CFR 731, consisting of positions in the competitive service, positions in the excepted service where the incumbent can be noncompetitively converted to the competitive service, and career appointments to positions in the senior executive service.

Credible evidence

Information that is resolved and supported by a preponderance of the evidence.

Debarment

A prohibition from taking a competitive service examination or from being hired (or retained in) a covered position for a specific time period. Debarment can be issued by the Agency or OPM.

Derogatory information

Information that may reasonably justify an unfavorable personnel suitability or fitness determination because of the nexus between the issue or conduct and the core duties of the position.

Fitness

Refers to a person's character and level of conduct determined necessary for an individual to perform work for, or on behalf of, a Federal agency as an employee (other than in a position subject to suitability), as a volunteer, or as a contractor. Fitness is distinguishable from a person's ability to fulfill the qualifications of a job, as measured by experience, education, knowledge, and skills.

Foreign affiliate

A non-U.S. citizen working with the U.S. government that is not paid by the U.S. government.

Health care personnel

Health and mental health care personnel, employed or performing CYS duties on an Army installation, in an Army-sanctioned program, or as part of an Army-sanctioned activity, including but not limited to physicians, dentists, nurse practitioners, clinical social workers, physical therapists, speech-language pathologists, clinical support staff (including residents), registered nurses, licensed practical nurses, nursing assistants, play therapists, and technicians. Health care providers participating in TRICARE are governed by TRICARE policy.

Homeland Security Presidential Directive–12 (HSPD–12)

HSPD–12 mandates a Government-wide standard for secure and reliable forms of identification issued by the Federal Government for physical access to Federally-controlled facilities or logical access to Federally-controlled information systems. The CAC is the DoD Federal PIV credential.

Installation

A base, camp, post, station, center, or other activity under the jurisdiction of the Department of Army, including any leased facility, which is located within any of the States, the District of Columbia, the Commonwealth of Puerto Rico, American Samoa, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, or Guam. Such term does not include any facility used primarily for civil works, rivers and harbors projects, or flood control projects. In the case of an activity in a foreign country, an installation is any property under the operational control of the Secretary of Army, without regard to the duration of operational control.

Local screening

Records reviews or screening performed by the immediate commander. Brigade-level commanders will initiate and coordinate local screenings.

Preponderance of evidence

According to 2 CFR 180.990, "preponderance of the evidence" means proof by information that, compared with information opposing it, leads to the conclusion that the fact at issue is more probably true than not.

Regular contact with children

Recurring and more than incidental contact with or access to children during the performance of duties on an Army installation, related to a program or as part of an Army-sanctioned activity. Recurring contacts may include services performed more than an average of 1 day a week for 3 or more months, or daily for a period of 1 month or longer.

Residents

Adults who reside in the homes of IHCP providers. This includes adults who are or will be staying in IHCP providers' homes for 30 days or more.

Specified volunteers

Individuals who could have extensive or frequent contact with children over a period of time. They include, but are not limited to, positions involving extensive interaction alone, extended travel, or overnight activities with children or youth.

Suitability

Refers to a person's identifiable character traits or conduct that may have an impact on the integrity or efficiency of the service. Suitability is distinguishable from a person's ability to fulfill the qualifications of a job, as measured by experience, education, knowledge, and skills. Suitability and fitness have similar meanings; the distinction in usage relates to the populations of personnel under discussion. Suitability refers primarily to Federal Civilian and military employees, usually not contractors or volunteers.

Suitability actions

Actions taken that affect covered applicants and appointees under 5 CFR 731.203. Suitability actions consist of cancellation of eligibility for employment, removal, cancellation of reinstatement eligibility of employment or debarment after an unfavorable determination of suitability or fitness.

Terrorist screening database

The U.S. Government's consolidated database, managed by the Terrorist Screening Center, containing law enforcement and national security information concerning the identity information of those known to be or reasonably suspected of being involved in terrorist activities.

Vetting

The process by which covered individuals undergo investigation, evaluation, and adjudication of whether they are, and remain over time, suitable or fit for Federal employment, eligible to occupy a sensitive position, eligible for access to classified information, eligible to serve as a non-appropriated fund employee or a contractor, eligible to serve in the military, or authorized to be issued a Federal credential. 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, 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.

Vulnerable populations

Vulnerable populations are groups that, in the aggregate, are especially susceptible to abuse due to a greater potential for powerlessness, emotional vulnerability, trustfulness, and other factors that make one an attractive target for a would-be predator or abusive authority figure.

UNCLASSIFIED

PIN 203423-000