# Operational Guidance for Centralized Background Check and Adjudication Process: Civilian Personnel Having Regular Contact with Children

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Red font in this document indicates there were changes made from the previous version.

### I. Purpose.

This document provides guidance on the process for background checks for Nonappropriated Fund (NAF) and Appropriated Fund (APF) civilian (CONUS-based personnel, and US citizen personnel serving OCONUS) who have regular contact with children under the age of 18. This document is reformatted for simplicity. It also clarifies Personnel Security Investigation Portal (PSIP) changes for child services cases; clarifies actions required at reverification; provides for placing incomplete cases on hold or terminating cases; and outlines the grievance process for NAF personnel.

# II. Coverage and Applicability.

This document covers actions where a full National Background Investigation Bureau (NBIB) Tier 1 Investigation with State Criminal History Repository Checks (SCHR) and/or INTERPOL checks<sup>1</sup> as well as Preliminary Background Checks (PBC) are required; and where there is an existing investigation and only

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<sup>&</sup>lt;sup>1</sup> INTERPOL checks are required when an individual has resided overseas more than six months in the previous five years. In this document, when SCHR checks are listed, this should include INTERPOL checks as applicable. Instructions regarding submission of requests for INTERPOL checks are in reference 4; however, please note that the request is now submitted on a FIPC 554. See https://nbib.opm.gov/hr-security-personnel/rsis-reopens/.

a SCHR Special Agreement Check (SAC) and/or INTERPOL check as well as credit checks and PBCs are required (to include reverifications). Note that throughout this document, when referring to processing SCHR checks, as applicable, INTERPOL and credit checks will also be processed.

# III. References.

- 1. 5 Code of Federal Regulations 731, Suitability.
- 2. Army Directive 2014-23 (Conduct of Screening and Background Checks for Individuals Who Have Regular Contact With Children in Army Programs, 10 September 2014.
- 3. Department of Defense Instruction 1402.05, Background Checks on Individuals in DoD Child Care Services Programs, 11 September 2015, Incorporating Change 1, Effective July 14, 2016.
- 4. ASA(M&RA) memorandum, Clarifying Policy in Army Directive 2014-23, 5 February 2018.
- 5. ASA(M&RA memorandum, Suitability and Fitness Adjudication at the Child Services Suitability Cell, 12 September 2018.
- 6. ASA(M&RA) memorandum, Guidance on the Provisional Hiring Process for Installation Management Command (IMCOM) Personnel in Child Care Services Positions, 30 August 2018.
- 7. ASA(M&RA) memorandum, Policy Clarification for Line of Sight Supervision (LOSS), 22 October 2018.

### IV. Definitions.

- 1. Mandatory/Automatic Derogatory Information: Defined as "Criteria for Automatic Disqualification" in reference 3, page 12, enclosure 3, paragraph 3.b. and reference 4, paragraph 4j. Management will not pursue hiring action in these cases, or the CSSC will make a determination that the derogatory information presented is disqualifying.
- 2. Discretionary/Presumptive Derogatory Information: Defined in reference 3, page 13, enclosure 3, paragraph 4.a. and reference 4, paragraph 4k. The CSSC will adjudicate Discretionary/Presumptive Derogatory Information.
- 3. Preliminary Background Checks (PBC). Checks completed prior to selectee's placement under LOSS, to include FBI Fingerprint Checks, and Installation Records Checks (IRC) (Defense Central Index of Investigations (DCII), Army Law Enforcement Reporting and Tracking System (ALERTS), Army Central Registry (ACR), and Army Substance Abuse Program (ASAP) data bases).
- 4. Consolidated Suitability Service Center (CSSC). In this document, CSSC refers to the HQDA Deputy Chief of Staff, G-1 organization, located at Aberdeen Proving Ground with responsibility for processing background checks for personnel having regular contact with children. Each serviced activity is assigned to a CSSC Personnel Security Specialist (PSS) who will serve as liaison for that serviced activity (see Section V, paragraph 1 below).
- 5. Reverification. In accordance with references, reverification of background checks (IRCs, FBI Fingerprint results, and SCHR / INTERPOL checks) is completed every five years.

### V. General Instructions.

### 1. Communication with the CSSC.

- a. The CSSC will communicate primarily with the Personnel Security Investigation Portal (PSIP) requester and alternate requesters.
- b. The requester and alternate requester(s) are able to view case status in PSIP. The key to understanding terms associated with Processing Status and Reason in PSIP is in the PSIP Requester Guide, Appendix N.
  - c. Before contacting the CSSC PSS regarding a specific case please do the following:
- (1) Check to ensure that PSIP request was filled out correctly in accordance with the PSIP Requester Guide and all documentation accompanied the request (if applicable).
- (2) Contact NBIB/OPM and/or CAF for any information regarding the background investigation, as applicable.
- (3) Check Defense Information System for Security (DISS) for any information and status, as applicable.
  - (4) Check PSIP for current case status.
- d. Should concerns or issues arise during the course of a case or regarding any matters concerning the CSSC, the initial contact should be with the assigned CSSC PSS. If additional assistance is required, the matter should be elevated to one of the technical leads at the CSSC:
  - Robert Snyder, at robert.c.snyder7.civ@mail.mil / (410) 278-1412 / DSN 298-1412; or
  - Eric Wieciech, at eric.l.wieciech.civ@mail.mil / (410) 306-0119 / DSN 458-0119

If additional assistance is required, matters may be elevated to the CSSC Director:

- Tony Prestridge, at tony.d.prestridge.civ@mail.mil / (410) 278-2071 / DSN 298-2071.
- e. When the CPAC is planning for a job fair or other hiring event where a number of selections are planned, the CPAC should alert the CSSC PSS as far in advance as possible so that the CSSC may plan for the workload surge.

### 2. Connecting SOI/SON with CSSC.

Certain actions require the submitting SON/SOI to be associated with the CSSC SOI so that the requestor can request SCHR SACs via the OFI-86C and the CSSC can receive those SCHR SACs. Prior to transition date, requestors must take action to request that NBIB specifically associate the CSSC SOI (Z256) with the submitting SON/SOI to allow this to occur. To do so, the submitter should send an email to ccssonsoi@nbib.gov requesting that the CSSC SOI be added as corresponding to their own SON/SOI. This should be done as soon as possible.

# 3. Fingerprints.

a. Army policy is to use LiveScan for fingerprint capture. When a hardcopy card is required to accompany an OFI-86C, only use the FD-258 (version 5-15-17) – do not use the SF-87. This is especially

important when submitting an OFI-86C case as NBIB will not know where to send the results if an SF-87 is used due to the inclusion of the SOI/SON fields. When submitting a Hard copy FD-258 fingerprint card to obtain a FBIF FP SAC, in the section labeled "Reason for Fingerprinted" make sure to list the SON, SOI and IPAC information. Fingerprint submissions using LiveScan should use the local CPAC SON and/or SOI and CPAC UIC in the Attention Indicator cell, and indicate DA ARMY in the IPAC cell. The CSSC will obtain the initial FBI Fingerprint (FP) Special Agreement Check (SAC) results from NBIB's Central Verification System and/or NP2 Portal, and order copies of the results as needed. When the CPAC receives the mailed FBI FP SAC results from NBIB they can destroy the document (shred or place in designated receptacles for PII to be later destroyed).

- b. If fingerprints are unclassifiable, the FPs must be recaptured and resubmitted one additional time. The original case number must be provided when the reprint is submitted to avoid another charge by NBIB. Failure to provide the original case number may result in an additional charge for the reprint. There is no requirement to recapture and resubmit if the individual is a double amputee or has another physical condition that precludes capturing of FPs.
- (1) For electronic submission, enter the original case number in Originating Agency Case (OCA) No. field.
- (2) For hardcopy submissions, enter the original case number in the OCA number field on the FD-258. Submit the hardcopy card with "Reprint" written in the top left hand corner, and provide the Unclassifiable Notice indicating the original fingerprint was unclassifiable. The second capture should be electronic if at all possible.
- c. If FPs are still unclassifiable after the second attempt, the reason will be documented, if it can be determined (such as if subject has a physical condition that precludes capturing fingerprints). In such cases, the investigation request should proceed in accordance with NBIB instructions (a name-based search of FBI-CJIS criminal history information).<sup>2</sup>
- d. If fingerprints that are submitted for a SCHR with an NBIB background investigation are unclassifiable, the case will be transferred to the Army by the DoD CAF with the notice that the prints were unclassifiable. The requester will need to submit a second set of cards, labelled "reprint" to the child care eQIP team at NBIB. They will initiate a new SCHR check for that state and the case will go into pending status to wait for the added check(s), which are then recorded on a new Case Closing Transmittal and transferred to the Army.
- e. Fingerprints submitted to NBIB for an initial investigation or a reverification should be taken no more than 120 days prior to the date of PSIP submission. Ideally, they should be taken and submitted no more than 3 to 10 days after the PSIP submission.

### 4. Movement Between Positions.

a. CPACs should only submit cases for civilians with a position change and/or relocation if they meet the requirements in reference 4. If the situation does not warrant a new investigation (break in service of less than 24 months) or a reverification (less than 24 months since previous background checks) the

<sup>&</sup>lt;sup>2</sup> See https://nbib.opm.gov/hr-security-personnel/requesting-opm-personnel-investigations/#url=6.3.

gaining CPAC contacts the prior CPAC to obtain required documentation, and no action is required by the CSSC.

- b. If a new investigation is required in accordance with reference 4, paragraph 4d(1)(a), the CPAC will submit a request for a new investigation following Section VI, paragraph 3 or 4 below. If reverification is required in accordance with reference 4, paragraph 4(d)(1)(b), follow Section VI, paragraph 6 below. Note that the reverification in these cases need not be submitted prior to the transfer and the individual need not be placed under LOSS by the gaining garrison or removed from contact with children, unless serious derogatory information is identified per Section VIII, paragraph 2. If a credit check is required for the new position, and the individual did not previously have a credit check, a stand alone credit check SAC will be requested.
- c. If the individual was previously cleared for child services work in a different personnel category, he/she may be subject to additional background checks or investigative requirements, and the case must be adjudicated accordingly (see reference 4). In such cases, requestors should submit the case in PSIP, following guidance in Section VI as applicable, depending on whether the individual will need a new investigation (such as when moving from a volunteer or military service to a civilian position) or if only new IRCs and FBI FP SAC are required (such as when moving from a contractor to a civilian position). Requesters should also verify that all required checks were completed within the applicable timeframe.

# 5. Requests for Installation Records Checks from Other Components.

The Army has made a determination that Army activities will not complete courtesy installation records checks for other components on individuals who previously were or currently are serving the Army in positions having regular contact with children. The recipient of any such requests should decline and if necessary, refer the requestor to their Command HQ.

# VI. Case Submission Instructions.

### 1. Multiple Personnel Types.

If an individual is being processed for a civilian position and in addition, a position of another type, such as a family child care provider or a volunteer, please call or email the CSSC PSS before submitting a request so that the CSSC PSS can ensure that all the checks are coordinated.

# 2. Preparation for Submission of Request.

- a. When an applicant applies for and is selected for a civilian position,<sup>3</sup> the CPAC contacts selectee to make tentative offer, refer him/her to have fingerprints taken (fingerprints must have been taken within the 120 days prior to submission), and obtains pre-employment documentation (see paragraph 3a below for a list of required documents).
- b. Upon receipt of pre-employment documents from the selectee, CPAC reviews pre-employment documents and results of FBI fingerprint checks for derogatory information. Local component

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<sup>&</sup>lt;sup>3</sup> Follow guidance in Reference 4 and Section V paragraph 4 of this guide if an employee is moving from another Army position.

adjudicator makes initial screening determination for provisional hiring (reference 6 if applicable); or submits the case to the CSSC for an interim suitability determination. <sup>4</sup>

### 3. PSIP Submission.

- a. If initial screening determination is favorable, or if an interim suitability determination is needed, CPAC inputs information into PSIP, selecting "CSSC" entry for "reason for access" and "civilian" under "role", and uses the SOI DODS and the UIC for his/her organization.<sup>5</sup> Additionally, the CPAC will follow other PSI-CoE instructions on submission. The CPAC uploads the OF-306 into the applicable area of PSIP and the following documents, in a single PDF file using the naming convention:

  LASTNAME LAST4SSN PE into the Childcare Suitability Documents area.
- (1) Release/Consent Statement.<sup>6</sup> Signature date must be no more than 120 days prior to PSIP submission date.
- (2) For APF, resume. For NAF, DA Form 3433 (resume should also be included if one was submitted at the time of application).
- (3) References but **only** if the references disclose information that is considered derogatory as defined in reference 3. For NAF positions, if the reference is from CPAC, it will be on a DA Form 3439; if from management, either on the DA Form 3439 or another document. For APF positions, there is no required format; may use Appendix G.
  - (4) Position description.
- (5) DA Form 5018-R, ADAPCP Client's Consent Statement For Release Of Treatment Information. Use CSSC template at Appendix M.
  - b. Comments should be added in PSIP to indicate if the following apply:
    - NAF or APF position
    - INTERPOL checks were submitted
    - Driving nexus
    - Financial nexus
    - Previous PRB or adjudication
    - States lived in for past five years
    - Break in service over 24 months
    - Date OFI-86C submitted, if any
    - Individual has been previously cleared for an Army position and the type of position

<sup>&</sup>lt;sup>4</sup> If the tentative or firm (conditional) job offer has already been extended, and then based on derogatory information a Suitability Adjudicator is unable to make a favorable interim suitability determination, then the job offer may be withdrawn. Management will work with the CPAC to observe necessary procedures, including due process procedures as applicable. If the appointee/employee is already on board, then management must work with the CPAC and the local legal advisor to determine appropriate action. In these cases, and additionally, if the selectee declines or the employee or appointee resigns, the CPAC will notify the PSI-CoE to cancel the investigation request and notify the CSSC to discontinue the background check processing.

<sup>&</sup>lt;sup>5</sup> Fingerprint submissions should use the local SON and/or SOI and UIC so that the servicing CPAC receives the results to perform required interim basic suitability determination. The CSSC will obtain the results from NBIB's Central Verification System and/or NP2 Portal for the initial child care services checks.

<sup>&</sup>lt;sup>6</sup> See Appendix A.

- Transfer case to same position or new position
- Request closed previously by PSI-CoE or CSSC
- Any other information that would assist the CSSC in processing the case
- c. PSI-CoE determines whether selectee has an existing investigation with no break in service of 24 months or more and notifies submitter.

If there is an existing investigation, go to paragraph 4a below.

If there is no existing investigation, go to paragraph 4b below.

- d. All documents must be complete and accurate. In the event of errors or omissions, the CSSC will notify the requester and other POCs on the request by email that the case requires correction and what the needed corrections are; process the case to the extent possible; and then place the case on hold. If, after 10 business days on hold, the corrections are not complete, the case will be terminated. If the CSSC terminates a case for errors or omissions in the submitted documents, the requester may submit the case to be reopened via encrypted email with all case documents attached, to the CSSC PSS. The PSS will obtain approval for the reopen from a CSSC technical lead. If approved, the case will be reopened and be placed in active status for processing.
- 4. Full National Background Investigation Required.
  - a. Existing Investigation.
- (1) If there is an existing investigation, PSI-CoE cancels the PSIP request and sends email to requestor advising him/her to determine if an OFI-86C is required for SCHR checks. The original PSIP submission creates a case for the CSSC so no further PSIP action is required.
- (2) CPAC contacts NBIB to determine the type of the previous investigation and if the previous investigation included SCHR checks. If it did not, and if the investigation is still open, the CPAC adds the SCHR checks, and credit check if required (for positions with fiduciary responsibilities). If the previous investigation included SCHR checks (and credit checks, if applicable), no action is required. If the previous investigation is no longer available, go to paragraph 4a(4) below.
- (3) If the individual already has a Tier 1/equivalent or higher investigation, and SCHR checks are required:
- (a) On the OFI-86C form, the office completing the form enters the "CPAC SON" in block number 9 and enters CSSC SOI "Z256" in block number 10.
- (b) The CPAC mails the OFI-86C and applicable state documents (forms and/or hardcopy fingerprint cards) to NBIB.
- (c) When the CPAC receives the FBI FP SAC results from NBIB, after determining provisional interim suitability as applicable, they can destroy it (shred or place in designated reciprocals for PII to be later destroyed). The OFI-86C with SCHR will be sent directly from NBIB to the CSSC.
- (4) If the individual has resided OCONUS for more than six months in the past five years, the CPAC will also submit an RSI request using the NP2 Portal, for an INTERPOL check.

- (5) If the individual has resided overseas longer than five years and has no States to list the CPAC need ONLY complete an RSI for INTERPOL Checks using the NP2 Portal.
- (6) If the PSI-CoE cancels a request because there is a previous investigation, but the previous investigation has been purged and is no longer available, and the previous investigation is needed for suitability purposes, the CPAC contacts the CSSC so that the CSSC can send a request for a new investigation, IAW Section VIII paragraph 1b.

### b. No Existing Investigation.

- (1) PSI-CoE contacts selectee and provides information regarding requirement for investigation as well as link to complete eQIP; advises that SCHR checks are required for each state where he/she resided for at least the past five years; and works with selectee to complete SF-85, 85P, or 86 in eQIP.
- (2) CPAC forwards hardcopy fingerprint cards for SCHR checks, if required, to PSI-CoE by certified mail, or other mailing system with tracking number.
- (3) Requester does not submit a separate OFI-86C or request for INTERPOL checks to NBIB for these cases. The Tier 1 investigation, coded correctly, will ensure that SCHR and INTERPOL checks, if applicable, are completed.

### 5. Special Situations.

- a. Incorrectly Processed Prior Action. If it is determined that derogatory information from the previous background checks was not vetted in accordance with existing guidance at the time, the gaining CPAC will submit the case in PSIP, selecting the "CSSC PBCs Only" at the Initiations page and adding a note in the comment regarding the situation. The CPAC will submit all available documents regarding the previous adjudication (using the guide in paragraph 6c(3) below) in the Childcare Suitability Documents area of PSIP. If SCHR checks were not previously completed, the requester will complete the OFI-86C as described in 4a above.
- b. Due Process. If management decides not to proceed at any time based on derogatory information, due process procedures must be followed as applicable in accordance with reference 4.

### 6. Reverifications.

# a. Submission Timeline.

Requests for reverification should be submitted no earlier than 75 days prior to the anniversary date of the oldest previous background check or investigation.

### b. SCHR and/or INTERPOL Checks.

- (1) On the OFI86C form, the office completing the form enters the "CPAC SON" in block number 9, and enters CSSC SOI "Z256" in block number 10.
- (2) The CPAC mails the OFI-86C and applicable state documents (forms and/or hardcopy fingerprint cards) to NBIB.
- (3) If the individual has resided OCONUS for more than six months in the past five years, the CPAC will also submit a request an RSI for an INTERPOL check in accordance with reference 4. If the individual

has only resided OCONUS for the past five years, the CPAC will only submit the RSI. Please note that the request is now submitted on a FIPC 554. See https://nbib.opm.gov/hr-security-personnel/rsis-reopens/.

c. PSIP Submission.

For all reverifications (Tier 1, 2 or 4), the requestor submits a request in PSIP, selecting "CSSC reverification" at the Initiation page.

- (1) If the position requires a Tier 2 or Tier 4 reinvestigation at the time of reverification, the CPAC submits a request for a T2R or T4R in PSIP. CPAC will not normally request a credit SAC at reverification (a credit check will only be required if the position requires a Tier 2 or Tier 4 background investigation and it will be automatically conducted for the Tier 2/Tier 4 reinvestigation). IRCs, FBI FP and SCHR background checks will be required (note that if a credit check on a Tier 1 investigation should have been obtained, but was not, at the time of the initial investigation, a credit check will be requested as part of the reverification).
  - (2) Comments should be added in PSIP to indicate if the following apply:
    - INTERPOL checks submitted and the date
    - Driving nexus
    - Financial nexus
    - Previous PRB or adjudication
    - States lived in for past five years
    - Break in service over 24 months
    - Date OFI-86C submitted, if any
    - Transfer case to same position or new position
    - Individual has been previously cleared for an Army position and the type of position
    - Request closed previously by PSI-CoE or CSSC
    - Any other information that would assist the CSSC in processing the case
- (3) CPAC uploads the following forms/documents (as a single PDF file in the Childcare Suitability Documents area, using the naming convention LASTNAME LAST4SSN PE).
- (a) Copies of following documents, unless the CSSC processed the initial background checks or a previous reverification (if so, these documents are not required).
  - Original Release/Consent Statement.<sup>7</sup>
  - Original OF-306. For NAF cases, if no OF-306 was required at the time the individual was hired (prior to 1 October 2011), a memorandum for record should be in the file and may be submitted in lieu of the OF-306.
  - For APF, original resume. For NAF, original DA Form 3433 (resume should also be included if one was submitted at the time of application). If the original NAF application was prior to 16 September 2015, submit the DA Form 3433-1 and 3433-2.
  - Original references, but **only** if the references disclose information that is considered derogatory as defined in reference 3. For NAF positions, if the reference is from CPAC, it will be on a DA

<sup>7</sup> See Appendix A.

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- Form 3439; if from management, either on the DA Form 3439 or another document. For APF positions, there is no required format; may use Appendix G.
- All previous applicable PRB documents: CRESR printout showing full case details and suitability determination, Tab A, Tab C, Tab I, IMCOM 26 or 26A, IMCOM 26B, any other PRB documents adjudicated by the Garrison/equivalent commander (these can be found in Tab K in CRESR).
- (b) Current position description.
- (c) New DA Form 5018-R, ADAPCP Client's Consent Statement For Release Of Treatment Information. Use CSSC template at Appendix M.
- (4) All documents must be complete and accurate. In the event of errors or omissions, the CSSC will notify the requester and other POCs on the request by email that the case requires correction and what the needed corrections are; process the case to the extent possible; and then place the case on hold. If, after 10 business days on hold, the corrections are not complete, the case will be terminated. If the CSSC terminates a case for errors or omissions in the submitted documents, the requester may submit the case to be reopened via encrypted email with all case documents attached, to the CSSC PSS. The PSS will obtain approval for the reopen from a CSSC technical lead. If approved, the case will be reopened and be placed in active status for processing.

# VII. CSSC Preliminary Background Check Processing.

CSSC manages the PBCs to include FBI Fingerprint checks and IRC process (DCII/ALERTS, ACR, and ASAP):

- a. Initiates and receives results of IRCs based on submission of case in PSIP by CPAC.
- b. Checks Central Verification System (CVS) for results of fingerprint check; if no findings, obtains screen print for record. If findings, receives, or if necessary, obtains copy of FBI FP SAC results.
- c. Reviews pre-employment documents, IRC, and fingerprint check results for derogatory information and adjudicates in accordance with Section VIII below.

# VIII. Adjudication.

# 1. Adjudicative Decision.

- a. Determination. Based on the results of the PBCs, the CSSC will make all interim and reverification adjudication decisions. If the DoD Consolidated Adjudication Facility (CAF) did not make a final adjudicative decision, the CSSC will adjudicate each final case. For each adjudication, the CSSC will notify the CPAC of the decision with the first page of the Appendix B checklist. The checklist will indicate whether it is an interim, final or reverification adjudication. Interim adjudications will be made on or after the date that the SF-85, 85P or 86 is forwarded to NBIB via e-QIP.
  - b. Documents to be Used in Adjudication. The documents the adjudicator will use are, as applicable:
    - (1) Results of IRCs from IRC agencies.
    - (2) Results of SCHR checks and INTERPOL checks from NBIB.

- (3) FBI FP SAC results from CVS/Personnel Investigation Processing System (PIPS). When results of the FBI FP SAC indicate a "Record", the CSSC obtains the FBI SAC results from NBIB.
- (4) New investigation received in DISS, or a previous investigation the CSSC orders from NBIB as needed (see Appendix L).
  - (5) Information about "please call" alerts.
  - (6) SF-85, SF-85P, or SF-86.
- (7) Information from the individual as necessary. If the CSSC receives information that could cause an unfavorable suitability or fitness determination, the CSSC will forward the appropriate memo (Appendix K, N, or O) to the CPAC. The CPAC enters his/her contact information in the space provided and issues the memo to the individual, who has ten calendar days to respond. The CPAC obtains the individual's signature on the memo, or if the individual refuses to sign to acknowledge the receipt of the memo, the CPAC annotates the memo accordingly, signs and dates the memo. The CPAC returns a copy of the signed or CPAC annotated memo to the CSSC and any additional information provided by the individual. The individual may request, in writing, a ten calendar day extension of the initial response period. In this case, the CPAC will forward the request to the CSSC for decision and notify the individual of the decision regarding the extension. If the individual does not respond within the 10 days, the CPAC will notify the CSSC with a copy of the memo, annotated accordingly.
- c. Archived Investigation. If the PSI-CoE cancels a request because there is a previous investigation, but the previous investigation has been purged and is no longer available, and the previous investigation is needed for suitability purposes, the CPAC contacts the CSSC so that the CSSC can send a request for a new investigation to the Initiations Inbox. The request will include the CLR # and an explanation similar to those cited in the Definition of Suitability CC Pilot reason for access, e.g. current existing investigation unavailable for review or the age of the investigation does not meet the needs of the program.

### 2. Reverifications.

- a. If there is serious derogatory information identified during the reverification process, the CSSC will contact the CPAC to advise them of same so that a local decision may be made as to whether to place the individual back on LOSS or remove them from contact with children.
- b. If the CSSC identifies derogatory information in any of the checks pertaining to an incident that appears to have occurred on the job, the CSSC will contact the CPAC to request documentation as to any letter of reprimand, disciplinary action, or adverse action that might have been considered/taken or is pending as a result of the incident. The CPAC should also provide any information about a grievance or appeal of the personnel action taken, if any. The CPAC will coordinate with management as necessary to obtain that documentation and provide it to the CSSC so that incident is not considered in the reverification process.

# IX. Appeals and Grievances.

If the CSSC makes an unfavorable determination, the CSSC will provide the memo at Appendix P to the CPAC. The CPAC enters his/her contact information in the space provided and issues the memo to the individual, along with any information about appeal rights, if any, IAW references 3 and 4.

Appendix A. CSSC Consent/Release Statement.

Appendix B. CSSC Master Checklist.

Appendix C. No Longer in Use.

Appendix D. No Longer in Use.

Appendix E. No Longer in Use.

Appendix F. No Longer in Use.

Appendix G. Child Care Services Reference Form.

Appendix H. No Longer in Use.

Appendix I. No Longer in Use.

Appendix J. All In Home Care Providers Notification of Submission. (N/A for Civilian Employees)

Appendix K. Memorandum Notifying Subject of Mandatory Derogatory Information with Opportunity to Challenge.

Appendix L. Decision Matrix: Requirements For Ordering Investigations.

Appendix M. CSSC Template for DA-5018-R.

Appendix N. Memorandum Requesting Subject Provide Additional Information, Possible Mandatory Disqualifier.

Appendix O. Memorandum Requesting Subject Provide Additional Information, Discretionary Derogatory Information.

Appendix P. Memorandum Notifying Subject of Unsuitable Determination and Appeal Rights.