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

# (Updated Format)

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#### Changes from the previous version of this document are in red font.

## I. Purpose.

This document provides guidance on the process of obtaining and adjudicating background checks for regular and recurring contractor personnel (CONUS-based personnel, and US citizen personnel serving OCONUS) who have regular contact with children under the age of 18 in Army programs. 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 appeal procedures.

# II. Coverage and Applicability.

Instructions in this document apply to regular and recurring contractor personnel (Category 6 on IMCOM matrix). It does not cover Category 7 on the IMCOM matrix (other contractors/short term) or Category 8 (In Home Care Providers, Family Child Care Providers, Respite, Emergency Placement Care). See the Operational Guide for Volunteers and Others for Category 7, and the Operational Guide for In Home Care Providers for Category 8. It provides guidance on all types of initial and reverification actions, to include:

a. Cases requiring only Preliminary Background Checks (PBC) (to include Installation Records Checks (IRC) and FBI Fingerprint Checks (FBI FP), because there is an existing investigation (Tier 1 or above, with State Criminal History Repository (SCHR) checks) (for example, some Camp Adventure personnel).

b. Cases requiring both PBCs and a full National Background Investigation Bureau (NBIB) Tier 1 Investigation with SCHR and/or INTERPOL checks<sup>1</sup>.

c. Cases where there is an existing investigation and only an SCHR Special Agreement Check (SAC) and/or INTERPOL check as well as PBCs are required.

# III. References.

1. Army Directive 2014-23 (Conduct of Screening and Background Checks for Individuals Who Have Regular Contact With Children in Army Programs, 10 September 2014.

2. 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.

3. ASA(M&RA) memorandum, Clarifying Policy in Army Directive 2014-23, 5 February 2018.

4. ASA(M&RA) memorandum, Suitability and Fitness Adjudication at the Child Services Suitability Cell, 12 September 2018.

5. 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 2, page 12, enclosure 3, paragraph 3.b. and reference 3, paragraph 4j. Management will not pursue 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 2, page 13, enclosure 3, paragraph 4.a. and reference 3, paragraph 4k. The CSSC will adjudicate Discretionary/Presumptive Derogatory Information.

3. Preliminary Background Checks (PBC). Checks completed prior to contractor entry on duty, to include FBI Fingerprint Checks, and IRCs (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 in Aberdeen Proving Ground with responsibility for processing

<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 Reimbursable Suitability/Security Investigation (RSI) request is now submitted on a FIPC 554. See https://nbib.opm.gov/hr-security-personnel/rsis-reopens/.

background checks for personnel having regular contact with children. Each serviced activity is assigned to a CSSC Personnel Security Specialist (PSS), who is the primary contact 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 State Criminal History Repository / INTERPOL checks) are 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) requesters and alternate requesters.

b. The requester and alternate requester(s) are able to view case status in PSIP for those cases that were created 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 fill out correctly in accordance with the PSIP Requester Guide and all documentation accompanied the request (if applicable).

(2) Contact NBIB/OPM and/or DoD Consolidated Adjudication Facility (DoD 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 by the CDE government management official 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 by the CDE government management official to the CSSC Director:

• Tony Prestridge, at tony.d.prestridge.civ@mail.mil / (410) 278-2071 / DSN 298-2071.

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

Certain actions require the submitting SON/SOI to be associated with the CSSC SOI so that the requester can request SCHR SACs via the OFI-86C and the CSSC can receive those SCHR SACs. HQ IMCOM CDE will request that NBIB specifically associate the CSSC SOI (Z256) with the submitting

SON/SOI to allow this to occur, by sending an email to ccssonsoi@nbib.gov requesting that the CSSC SOI be added as corresponding to the CDE SON/SOI.

### 3. Fingerprints.

a. Army policy is to use LiveScan for fingerprint capture. When a hardcopy card is required, 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 SON/SOI 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 should use the local CDE SON and/or SOI and CDE 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 results as needed.

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 in a memorandum, 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 along 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 for that state and the case will go into pending status to wait for the SCHRs, 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.

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

#### 4. Movement Between Positions.

a. Requesters should only submit cases for contractors transferring from one organization to another if they meet the requirements in reference 3. If the situation does not warrant a new investigation or a reverification per that reference, the gaining organization will contact the previous organization to obtain required documentation and no action is required by the CSSC.

b. If a new investigation is required in accordance with reference 3, paragraph 4d(1)(a), the requester will submit a request for a new investigation following Section VI, paragraph 4 below. If reverification is required in accordance with reference 3, 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 organization or removed from contact with children, unless serious derogatory information is identified per Section VIII, paragraph 2. Requesters should also verify that all required checks were completed within the applicable timeframe. 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 3). In such cases, requesters should submit the case in PSIP, following guidance in Section VI, paragraph 3 or 4 below depending on whether the individual will need a new investigation (such as when moving from a volunteer to a contractor position) or if only new IRCs and FBI FP SAC are required (such as when moving from a civilian position to a volunteer). 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 requester to their Command HQ.

#### VI. Case Submission Instructions.

#### 1. Multiple Personnel Types.

If an individual is being processed for a contractor assignment and in addition, a position of another type, such as a civilian employee 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 individual is identified to perform duties for the Army involving regular contact with children, the functional manager (FM) coordinates with the BCA to have fingerprints taken (fingerprints must have been taken within the 120 days prior to submission) and submits a work order ticket and preliminary documents to the BCA. (See paragraph 3a below for a list of required documents.)

b. Upon receipt of the work order ticket, BCA reviews preliminary documents to ensure no mandatory disqualifying information is identified; if so, the BCA notifies the FM. If a local decision is made to terminate the request, due process procedures must be followed IAW reference 3.

c. BCA looks up subject information in CVS to confirm status of investigation. If there is an investigation then the BCA contacts NBIB to confirm investigation type and that it includes SCHRs (and credit check, if applicable for positions with fiduciary responsibilities). If it is an investigation requested by Army, and it did not include these checks, and the existing investigation is still open, the BCA requests that NBIB add SCHR checks (and credit checks, if applicable) to the investigation. If the investigation was submitted by another agency, the case should be handled as an OFI-86C case.

d. The BCA submits the request for the background checks and investigation in Personnel Security Investigations Portal (PSIP), following paragraph 3 below.

#### 3. PSIP Submission.

a. The BCA inputs information into PSIP, selecting "Initial" in the Type Tab; "Contractor" in the Role Tab, "none" in the Clearance Tab, "T1" in the Investigation Tab; and "CSSC" entry for "Reason for Request". The BCA uses the SOI "DODS" and the submitting UIC.<sup>3</sup> The BCA will follow other PSI-CoE instructions on submission. However, in addition to uploading the OF-306 in that section of PSIP, the BCA will combine the following documents into a single PDF file and upload it into the Childcare Suitability Documents area of PSIP using the naming convention: LASTNAME\_LAST4SSN\_PE.

(1) Release/Consent Statement<sup>4</sup>. Signature date must be no more than 120 days prior to PSIP submission date.

(2) Application and/or resume.

(3) References – but **only** if the references disclose information that is considered derogatory as defined in reference 3 (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.

(Note that the BCA also follows the PSIP Requester Guide and CDE Standing Operating Procedures (SOP) for all other documents and requirements (for instance, proof of citizenship and listing of states the applicant lived in for the past five years).)

b. Comments should be added in PSIP to indicate if the following apply:

- 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>3</sup> Fingerprint submissions should use the local CDE SON and/or SOI and DPTMS UIC in the Attention Indicator 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.

<sup>&</sup>lt;sup>4</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. 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.

d. PSI-CoE determines whether selectee has an existing investigation with no break in service of 24 months or more based on comments provided by the BCA in the PSIP request and checking applicable systems. If a Tier 1 or equivalent has been completed, go to paragraph 4a below. If no existing investigation, go to paragraph 4b below.

#### 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 requester advising him/her to determine if an OFI-86C is required for SCHR checks. Note that the original PSIP submission creates a case for the CSSC so no further PSIP action is required.

(2) If the contractor 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 CDE SON in block number 9 and CSSC SOI "Z256" in block number 10.

(b) The BCA 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 BCA will also submit a request for INTERPOL checks in accordance with reference 4.

(4) If the contractor has resided overseas longer than five years and has no States to list the BCA need ONLY complete an RSI for INTERPOL Checks using the NP2 Portal.

(5) 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 BCA contacts the CSSC so that the CSSC can send a request for a new investigation (see Section VIII, paragraph 1b below).

#### b. No Existing Investigation.

(1) PSI-CoE contacts selectee and provides information regarding requirement for investigation as well as link to complete eQIP, and reviews and monitors the completion of the SF-85 or 85P in eQIP.

(2) BCA forwards hard copy fingerprint cards, if required, and required releases (as applicable) for SCHRs 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 Checks and INTERPOL, if applicable, are completed.

#### 5. Special Situations.

a. Incorrectly Processed Prior Actions. If it is determined there was derogatory information from the previous background checks that was not obtained and/or adjudicated in accordance with existing guidance at the time, the gaining BCA will submit a case in PSIP, selecting the "CSSC PBCs Only" at the initiation page and adding a note in the comments regarding the situation. The BCA will submit all available documents regarding the previous adjudication (using the guide in paragraph 6c(1)(a) 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(2) above.

*b. Due Process.* If management decides not to proceed at any time based on derogatory information, due process procedures must be followed as appropriate IAW reference 3.

*c. Camp Adventure.* If the request is for Camp Adventure personnel who already have a Tier 1/equivalent or higher investigation with SCHR checks but who need Army PBCs: Select "CSSC PBCs Only" at the Initiation page and add note in Comments that this is a Camp Adventure case and the date of the completed NBIB investigation and SCHR checks. Upload the documents listed in paragraph 3a above.

#### 6. Reverifications.

a. Reverification Requests. Requests for reverification should be submitted no earlier than 75 days prior to the anniversary date of the oldest previous background check or investigation. The BCA will submit all requests for reverification in PSIP, following the detailed instructions below. If the position requires a Tier 2 or Tier 4 reinvestigation at the same time as the reverification, the BCA submits a request for a T2R or T4R in PSIP. Credit checks will only be requested for reverifications if the position requires a Tier 2 or Tier 4 NBIB investigation. If the reverification is for an individual in a Tier 1 position, the requester submits a request in PSIP; PBCs and OFI-86C for SCHR checks will be completed. The submitter will follow the process below.

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

(1) On the OFI-86C form, the office completing the form enters the CDE SON in block 9, and enters CSSC SOI "Z256" in block number 10.

(2) The BCA mails the OFI-86C and applicable state documents (forms and/or hardcopy fingerprint cards) to NBIB.

(3) The results of the completed SCHR checks 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 BCA will also submit a request for INTERPOL checks in accordance with reference 4.

# (5) If the individual has resided overseas longer than 5 years and has no States to list the BCA ONLY completes an RSI for INTERPOL Checks using the NP2 Portal.

#### c. PSIP Submission.

(1) BCA submits the case in PSIP (selecting "CSSC Reverification" at the Initiation page) along with the following forms/documents (uploaded in Childcare Suitability Documents) 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>5</sup>.
- Original OF-306. If no OF-306 was required at the time the individual began work for the Army (prior to 1 January 2013), a memorandum for record should be in the file and may be submitted in lieu of the OF-306.
- Original resume or application.
- Original references, but **only** if the references disclose information that is considered derogatory as defined in reference 3.
- All previous applicable PRB documents: CRESR printout showing full case details and suitability determination, Tab A, Tab C, Tab I, IMCOM 26 and 26A, IMCOM 26B, any other PRB documents adjudicated by the Garrison/equivalent<sup>6</sup> commander (from Tab K in CRESR).
- (b) Position description.

(c) New DA Form 5018-R, ADAPCP Client's Consent Statement For Release Of Treatment Information. Use CSSC template at Appendix M.

(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) 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

<sup>&</sup>lt;sup>5</sup> See Appendix A.

<sup>&</sup>lt;sup>6</sup> The term "garrison/equivalent" is used since commands other than IMCOM will be submitting cases. The responsibilities and authorities of the garrison are exercised in equivalent organizations within those commands.

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 IRC process (DCII/ALERTS, ACR, and ASAP) and the FBI FP SAC. The CSSC:

a. Initiates and receives results of IRCs based on submission of case in PSIP by BCA.

b. Checks CVS for results of recently completed fingerprint SAC; if no findings, obtains screen print for record. If findings, receives, or if necessary, obtains copy of FBI FP SAC results from NBIB.

c. Reviews pre-employment documents, IRC, and FBI FP SAC results for derogatory information and adjudicates it in accordance with Section VIII below.

# VIII. Adjudication.

#### 1. Adjudicative Decision.

a. Based on the results of the PBCs, the CSSC will make all interim and reverification adjudications. The CSSC will determine whether the DoD CAF made a final adjudicative decision and if not, the CSSC will adjudicate each final case. For each adjudication, the CSSC will notify the BCA of the results with the first page of the Appendix B checklist. The checklist will indicate whether it is an interim, reverification or final 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. 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 contractor as necessary. If the CSSC requires additional information to adjudicate the case, the CSSC will forward the appropriate memo (Appendix K, N, or O) to the BCA. The BCA forwards the memo to the FM to provide the memo to the contractor. The FM enters his/her contact information in the space provided and issues the memo to the contractor, who has ten calendar days to respond. The FM obtains the individual's signature on the memo, or if the contractor refuses to

sign to acknowledge the receipt of the memo, the FM annotates the memo accordingly, signs and dates the memo. The FM returns the memo to the BCA and if/when the contractor responds, returns the response to the BCA. The BCA returns a copy of the contractor-signed or FM annotated memo to the CSSC and any additional information provided by the contractor. The contractor may request, in writing, a ten calendar day extension of the initial response period. In this case, the BCA will forward the request to the CSSC for decision and notify the FM, who will notify the contractor of the decision regarding the extension. If the individual does not respond within the 10 days, the BCA will notify the CSSC with a copy of the memo, annotated accordingly.

b. If the PSI-CoE rejects a request for a new investigation because there is an existing investigation, and the previous one has been archived, the BCA contacts the CSSC, and the CSSC sends 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 the CSSC identifies serious derogatory information during a reverification process, the CSSC will contact the BCA to advise them of same so that a local decision may be made as to whether to place the individual back under LOSS or remove the individual 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 BCA to request documentation as to any disciplinary action that might have been considered/taken as a result of the incident. The BCA 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.

If the CSSC makes an unfavorable determination, the CSSC will provide the memo at Appendix P to the BCA and the BCA will forward to FM to provide the individual with notification and information about appeal rights. The FM enters his/her contact information in the space provided and issues the memo to the contractor, who has ten calendar days to respond. If the contractor refuses to sign to acknowledge the receipt of the memo, the FM annotates the memo accordingly, signs and dates the memo and returns it to the BCA. If the contractor requests an extension (up to one additional 10 calendar day period) to submit the appeal, the FM will forward the request to the BCA who will forward it to the CSSC and notify the FM of the CSSC decision. The BCA will return a copy of the subject-signed (or FM annotated) Appendix P memo to the CSSC. If the individual appeals, the BCA forwards the appeal to the CSSC. Once the appeal is acted upon, the CSSC notifies the BCA of the final determination. If no appeal is filed within the time frame allowed, the CSSC notifies the BCA that the determination is final. The CSSC records the determination and maintains the case record. If the appeal is denied, the BCA notifies PSI-CoE to terminate any associated NBIB request.

Appendix A. CSSC Consent/Release Statement.

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