

# Operational Guidance for Centralized Background Check and Adjudication Process: Specified Volunteers and Others 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 specified volunteers and personnel falling into categories not otherwise covered (**CONUS-based personnel, and US citizen personnel serving OCONUS**). This **version of this guidance document is reformatted for simplicity and includes clarifications throughout. It 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 all specified volunteers and personnel not covered by other guides (such as interns, employees of other agencies, short duration contractors, etc.) who have regular contact with children under the age of 18 **in Army programs**). This document covers actions for initial background checks and re-verifications. All checks must be completed and favorably adjudicated prior to the specified volunteer or other individual offering services. These checks are the FBI Fingerprint Checks and Installation Records Checks (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). The same checks are required every five years for reverification IAW references **2 and 3**.

### 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.

### 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 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 2, page 13, enclosure 3, paragraph 4.a. and reference 4, paragraph 4k. The CSSC will adjudicate Discretionary/Presumptive Derogatory Information.
3. Installation Records Checks (IRC). Checks of Army records in 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 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 2, 3 and 4, reverification of background checks (IRCs and FBI Fingerprint results) is completed every five years.**

### V. General Instructions.

1. **Communication with the CSSC.**
  - a. The CSSC will communicate primarily with the **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 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). **Additionally, please 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](mailto:robert.c.snyder7.civ@mail.mil) / (410) 278-1412 / DSN 298-1412; or
- Eric Wieciech, at [eric.l.wieciech.civ@mail.mil](mailto: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](mailto:tony.d.prestridge.civ@mail.mil) / (410) 278-2071 / DSN 298-2071.

## 2. 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. **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 Commander Designated Entity SON and/or SOI and **CDE** 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 **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, 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>1</sup>

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<sup>1</sup> See <https://nbib.opm.gov/hr-security-personnel/requesting-opm-personnel-investigations/#url=6.3>.

d. 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.

### 3. Movement Between Positions.

a. Requestors should only submit cases for volunteers transferring from one garrison 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 reverification of a volunteer is required in accordance with reference 3, paragraph 4(d)(1)(b), follow Section VI, paragraph 5 below. Note that the reverification in these cases need not be submitted prior to the transfer and the individual need not be removed from contact with children, unless serious derogatory information is identified per Section VI paragraph 5.

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 volunteer case in PSIP, following guidance in Section VI below, as new IRCs and FBI FP SAC will be required. Requesters should also verify that all required checks were completed within the applicable time frame.

### 4. 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 volunteer assignment and in addition, a position of another type, such as a civilian employee or a contractor, 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 Checks.

a. When an individual is identified to be a specified volunteer for the Army, or to provide services to Army families in an opportunity involving regular contact with children, the functional manager (FM) coordinates with the BCA to have fingerprints taken (fingerprints must have been taken in the 120 days prior to submission) and submits a work order ticket and preliminary documents to the BCA. (See paragraph 3 below for a list of required documents.)

b. Upon receipt of the work order ticket, BCA reviews preliminary documents and results of FBI fingerprint checks 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 submits the case in PSIP following instructions in paragraph 3a below.

### 3. PSIP Submission.

a. The BCA submits a request in PSIP, selecting “CSSC PBC Only” on the Initiation page, and uploads the forms listed below in a single file using the naming convention LASTNAME\_LAST4SSN\_PE in the Childcare Suitability Documents area, to notify them of the requirement for IRCs.

(1) Release/Consent Statement<sup>2</sup> Signature date must be no more than 120 days prior to PSIP submission date.

(2) Position description.

(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) Resume or application.

(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:

- Driving nexus
- Financial nexus
- Previous PRB or adjudication
- Short term contractor
- Individual has been previously cleared for an Army position and the type of position
- 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.

### 4. Special Situations.

a. *Incorrectly Processed Prior Actions.* If it is determined that 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” option at the initiation page and adding a note in the comments explaining the situation. The BCA will submit all available documents regarding the previous adjudication (using the guide in paragraph 5c below) in the Childcare Suitability Documents area of PSIP.

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<sup>2</sup> Appendix A.

*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.

## 5. Reverifications.

a. Requests for reverification should be submitted no earlier than 75 days prior to the anniversary date of the oldest previous background check. The FM coordinates with the BCA to have fingerprints taken (fingerprints must have been taken in the 120 days prior to submission) and submits a work order ticket and preliminary documents to the BCA. The BCA will submit all requests for reverification in PSIP, following the instructions below.

b. BCA submits the case in PSIP, selecting “CSSC Reverification” at the Initiation page and submits the documents listed below in a single PDF file, uploaded into the Childcare Suitability Documents area, using the naming convention LASTNAME\_LAST4SSN\_PE.

(1) 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 for each individual.<sup>3</sup>
- 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 or 26A, IMCOM 26B, any other PRB documents adjudicated by the Garrison/equivalent commander (these may be found in Tab K in Child Related Employment Suitability Review system).
- Original resume.

(2) Position description.

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

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

- Driving nexus
- Financial nexus
- Previous PRB or adjudication
- 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

*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

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<sup>3</sup> Appendix A.

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 Records Check Processing.

CSSC manages installation records check (IRC) process (DCII/ALERTS, ACR, and ASAP) and the FBI FP SAC:

- 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 National Background Investigation Bureau (NBIB).
- c. Reviews preliminary documents, IRC, and FBI FP SAC results for derogatory information and adjudicates it in accordance with Section VIII below.

## VIII. Adjudication.

### 1. Adjudicative Decision.

The CSSC will make all initial and reverification adjudications. 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 initial or reverification adjudication. The documents the adjudicator will use are, as applicable:

- (1) Results of IRCs from IRC agencies.
- (2) 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 SAC results from NBIB.
- (3) Information from the volunteer or other individual 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 individual. The FM enters his/her contact information in the space provided and issues the memo to the individual, who has ten calendar days to respond. The FM obtains the individual's signature on the memo, or if the individual 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 individual responds, returns the response to the BCA. The BCA returns a copy of the individual-signed or FM 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 BCA 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 BCA will notify the CSSC with a copy of the memo, annotated accordingly.



## 2. Reverifications.

a. If the CSSC identifies serious 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 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 **while performing child services functions for the Army**, the CSSC will contact the BCA to request documentation as to any 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 volunteer, who has ten calendar days to respond. If the volunteer 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. The BCA will return a copy of the subject-signed (or FM annotated) Appendix P memo to the CSSC. If the individual 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.** If the volunteer 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 **final** determination and maintains the case record.

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 Volunteers)

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

Appendix L. Decision Matrix: Requirements for Ordering Investigations. (N/A for Volunteers)

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.