

# *High-Level Overview of Centralized Background Check **and Adjudication** Process for Contractor Personnel Having Regular Contact with Children*

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

## 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. Assistant Secretary of the Army (Manpower and Reserve Affairs) memorandum, Additional Guidance on Army Directive 2014-23, 6 January 2016. (superseded by reference 4)
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.

## Coverage.

This document provides a high level review of the process for background checks for regular and recurring contractor personnel who have regular contact with children under the age of 18 (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, Homes Off Post, Respite, Foster Care). See the High Level Overview (HLO) for Volunteers and Others for Category 7, and the HLO for In

Home Care Providers for Category 8. This document provides guidance on actions where 1) Preliminary Background Checks (Installation Records Checks (IRC) and FBI Fingerprint Checks (FBI FP) – see paragraph 6 under Definitions) and 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 2) where there is an existing investigation and only an SCHR Special Agreement Check (SAC) and/or INTERPOL check as well as PBCs are required (to include re-verifications). Note that throughout this document, when referring to processing SCHR checks, as applicable, INTERPOL checks will also be processed.

**This document implements the centralization of all adjudication (interim, final and reverification) at the Child Services Suitability Cell (CSSC) for all child services suitability cases (reference 5). It also applies PSIP changes that allow direct entry of cases not requiring NBIB investigations; and provide access to requestors and alternate requestors to view case status.**

**Note: 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 Program Coordinator (PC) before submitting a request so that the CSSC PC can ensure that all the checks are coordinated.**

**Note: The Army has made a determination that we 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.**

## 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. Minor Criminal Derogatory Information (previously referred to as “Serious Minor”): Refers to that derogatory information listed in paragraph 1.c.(6) of reference 1 and supplemented by reference 4, enclosure, paragraph 7a and 7c). **The CSSC will adjudicate Minor Criminal Derogatory Information.**

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<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.

4. Minor Derogatory Information: Defined in reference 1, enclosure 6, paragraph 1.c. and supplemented by reference 4, paragraph 4s and paragraph 7b of the enclosure to that memorandum. **The CSSC will make adjudicative determinations on Minor Derogatory Information.**

5. Pending and Undeliverable Items. The NBIB investigation will sometimes be returned with inquiries “pending” or “undeliverable”. **If pending items include no responses from the State(s) on SCHR within 60 days, determinations based upon the Tier 1 report may be made.** Note that should NBIB subsequently receive SCHR or other responses and provide those reports, **the CSSC will adjudicate** any information contained therein in accordance with references.

6. Preliminary Background Checks (PBC). Checks completed prior to selectee’s entry on duty, to include 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). Results of checks may be returned in unredacted listing form.

7. Child Services Suitability Cell (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.

(Note that at any time during the process, the functional manager may decide not to proceed based on derogatory information received.) Individual must be provided due process and appeal rights as described in reference 4 if such a decision is based on derogatory information disclosed during the background check process.

#### Pre-Transition Action Required:

**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](mailto: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.**

#### Communication Protocol.

The CSSC will communicate primarily with the Personnel Security Investigation System (PSIP) requestor. If the primary requestor wishes to have communication from the CSSC also be sent to others, email addresses for those individuals should be added in the comments section of the PSIP submission with the annotation “CSSC: please copy the following individuals on email traffic pertaining to this case”.

**The requestor and alternate requestor 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 Requestor Guide, Appendix N. CSSC will no longer provide bi-weekly spreadsheets outlining case status. A final bi-weekly spreadsheet will be issued the week of 1 October for requestor and alternate requestor use in tracking cases that were submitted via Appendix H.**

Before contacting the CSSC regarding a specific case please do the following:

- a. 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).
- b. Contact NBIB/OPM and/or CAF for any information regarding your case.
- c. Check Defense Information System for Security (DISS) for any information and status.

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 PC. If additional assistance is required, the matter should be elevated to one of the team chiefs 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 Wiecech, at [eric.l.wiecech.civ@mail.mil](mailto:eric.l.wiecech.civ@mail.mil) / (410) 306-0119 / DSN 458-0119

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

- Aaron Pelzer, at [aaron.g.pelzer.civ@mail.mil](mailto:aaron.g.pelzer.civ@mail.mil) / (703) 695-7924 / DSN 225-7924.

## Defense Information System for Security (DISS)

To ensure proper accountability for cases in DISS, a **HQ IMCOM** representative will establish an owning relationship with subjects in DISS. **This individual will forward documents in DISS to the CSSC PC via encrypted email or AMRDEC SAFE. Once the CSSC conducts the final adjudication, the CSSC PC will notify the requestor, who will notify HQ IMCOM to record the suitability determination in DISS.**

## Important Information Regarding Fingerprints.

**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 – do not use the SF-87.**

If fingerprints are unclassifiable, the FPs must be recaptured and resubmitted. However, 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. The original case number must be provided when the reprint is submitted. Failure to provide the original case number may result in an additional charge for the reprint.

- a. For electronic submission, enter the original case number in Originating Agency Case (OCA) No. field.
- b. 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. If those results are unclassifiable, the investigation request should proceed in accordance with NBIB instructions (a name-based search of FBI-CJIS criminal history information).<sup>2</sup>

## Section I. Pre-Employment Phase.<sup>3</sup>

1. Individual is identified to perform duties for the Army involving regular contact with children.<sup>4</sup> The functional manager coordinates with the Background Check Administrator (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 4 below for a list of required documents.)
2. 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 functional manager (see Section II).
3. The BCA will call NBIB to confirm if a **Tier 1 with SCHR checks or CNACI** is on file and was completed in the last 5 years. If not, when taking fingerprints, state fingerprint cards and releases will be completed in order to accompany either the CNACI or the OFI-86 C for the SCHR SAC (as applicable). The BCA will take and submit all appropriate fingerprints to PSI-CoE if a Tier 1 is required, or to NBIB along with the OFI-86C if an investigation is already on file but requires state checks, or is older than 5 years and thus requires re-verification/update.
4. The BCA inputs information into Personnel Security Investigations Portal (PSIP), selecting “CSSC” entry for “reason for access” and “contractor” under “role”, and uses the SOI “DODS” and the submitting UIC.<sup>5</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. **The requestor should note in the comments section: if INTERPOL checks are required; if there is nexus for driving or fiduciary responsibility; and if there was a previous PRB or adjudication.**

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

<sup>3</sup> Note that at any time during the process, the functional manager may decide not to proceed. Individual must be provided due process and appeal rights as described in reference 5 if such a decision is based on derogatory information disclosed during the background check process. If a decision is made that the contractor will not perform duties requiring regular contact with children, the BCA will notify the PSI-CoE to cancel the investigation request and notify the CSSC to discontinue the background check processing.

<sup>4</sup> IAW Reference 4, if an employee is moving from another Army position and has a break in service of more than 24 months, new PBCs and NBIB investigation (minimum of Tier 1 with SCHR checks) are required. Also, if the individual who is moving from one child services position to another has not had a reverification within the previous 24 months, a full reverification is required. 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.

<sup>5</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.

- a. Release/Consent Statement<sup>6</sup>. Signature date must be no more than 120 days prior to PSIP submission date.
- b. Application and/or resume.
- c. References – but **only** if the references disclose information that is considered derogatory as defined in reference 3 (no required format; may use Appendix G).
- d. Position description.
- e. DA Form 5018-R, ADAPCP Client’s Consent Statement For Release Of Treatment Information. Use CSSC template at Appendix M.
- f. Additional documentation and information required by PSI-COE per note below.

(Note that the BCA also follows the PSIP user guide and Commander Designated Entity (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).)

If the request is for Camp Adventure personnel who already have a Tier 1/equivalent or higher investigation: 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 as described above.

5. If management decides not to proceed, due process procedures must be followed as appropriate IAW reference 4.

6. 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 JPAS. If an investigation exists, the PSI-CoE cancels the investigation request (go to Section IA) and email advises that if child services checks are needed that the requestor should submit an OFI-86C. If no existing investigation, go to Section IB.

Simultaneously, CSSC manages installation records check (IRC) process (DCII/ALERTS, ACR, and ASAP) and the FBI FP SAC (go to Section IC, Pre-Employment Phase – Preliminary Background Checks).

#### Section IA. Pre-Employment Phase – Existing Investigation.

1. If there is an existing investigation, PSI-CoE sends email to requestor 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. BCA contacts NBIB to confirm investigation type and that it includes SCHR (and credit check, if applicable for positions with fiduciary responsibilities). If it did not, 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 existing completed investigation does include SCHR checks (and credit, if applicable), and is less

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<sup>6</sup> See Appendix A.

than five years old, no action is needed. If it did not include SCHRS and/or is beyond 5 years old the BCA processes an OFI-86C and sends to NBIB.

a. If a "please call" is annotated on the investigation, the CSSC will contact NBIB or the agency that made the "please call" annotation, and obtain as many details as are available. The CSSC will summarize the information received. If the information is derogatory, CSSC will follow its normal protocol to advise the BCA to contact the submitting POC on whether management wishes to proceed with hiring the selectee. The CSSC will include the information in the interim adjudication process.

b. If the contractor already has a Tier 1 or higher investigation, and SCHRs are required:

1) 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.

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

3) BCA codes FBI FP LiveScan to reflect the CDE SON, SOI and CDE UIC in the Attention Indicator cell and indicates DA ARMY in IPAC cell.

4) The CSSC PC orders the previous investigation to be reviewed for child services suitability from NBIB as needed (see Appendix L).

5) When the BCA receives the FBI FP SAC results from NBIB it requires no action as results will be compiled by CSSC. The BCA can destroy it (shred or place in designated receptacles for PII to be later destroyed).

6) The CSSC obtains 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 Case Closing Transmittal (CCT) and Report of Investigation (ROI) from NBIB.

7) The results of the OFI-86C with SCHR will be sent directly from NBIB to the CSSC.

c. 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 more than five years old and is needed for suitability purposes, 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. The process in Section IB will then apply.

#### Section IB. Pre-Employment Phase – 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 SCHR to PSI-CoE by certified mail.

3. When the SF-85, SF-85P or SF-86 is returned to the CDE from the PSI-CoE, if it contains new derogatory information that has not previously been identified, the CDE contacts the CSSC PC to discuss and determine whether a new **adjudication** is needed or other action needs to be taken.

### Section IC. Pre-Employment Phase – Preliminary Background Checks (PBC).

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

1. Initiates IRCs.
2. 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.
3. Reviews pre-employment documents, IRC, and FBI FP SAC results for derogatory information.
  - If no derogatory present, CSSC notifies BCA using the first page of the checklist at Appendix B. BCA works with functional manager to set start date under Line of Sight Supervision (LOSS). Go to Section VI, Receipt of NBIB Investigation.
  - If mandatory disqualifiers are present, CSSC coordinates with BCA to give the individual the opportunity to respond (Section II, para 2 below) and CSSC makes adjudicative determination and notifies BCA. BCA notifies applicable PRB POC and/or functional manager. Go to Section II, Adjudicating Mandatory Derogatory Information Found – CSSC.
  - **If non-mandatory disqualifying derogatory information is present, go to Section III, Adjudicating Non-Mandatory Derogatory Information found in Pre-Employment Documents and Preliminary Background Checks (PBCs). – CSSC.**

### Section II. Adjudicating Mandatory Derogatory Information Found – CSSC.

1. If mandatory disqualifiers (Mandatory Derogatory Information or MDI) are present at either the interim or final stage of the process, CSSC notifies BCA.
2. CSSC sends Appendix K **to BCA for forwarding to** garrison/equivalent<sup>7</sup> to use in offering selectee the opportunity to respond.<sup>8</sup> The memo provides a 10 calendar day period in which to reply.

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<sup>7</sup> The term “garrison/equivalent” is used throughout this document to indicate that other Army commands will be submitting cases. The responsibilities and authorities of the garrison are exercised in equivalent organizations within those commands.

<sup>8</sup> Per reference 4, individuals must be given an opportunity to provide a response to derogatory information, even if it was self-disclosed.

3. The BCA forwards the memo to the PRB POC/functional manager to provide the memo to the subject. The BCA returns a copy of the selectee-signed Appendix K memo to the CSSC. The selectee may request, in writing, a 10 calendar day extension of the initial response period. The BCA will forward the request to the CSSC for decision and notify the selectee of the decision regarding the extension. Once the subject responds, the BCA then returns response from selectee to CSSC.
4. If the response mitigates the derogatory information, the CSSC notifies the BCA and proceeds to take actions in Section III, Adjudicating Non-Mandatory Derogatory Information – CSSC.
5. If the response does not mitigate the derogatory information, the CSSC makes a final unsuitable determination. The CSSC forwards the first page of the checklist at Appendix B to the BCA to document the decision along with Appendix P to be used to provide the subject the decision and notification of appeal rights.
  - a. BCA notifies PRB POC or applicable functional manager who provides the individual the Appendix P memo, notification of the determination and appeal rights. The BCA forwards a copy of the subject-signed Appendix P memo to the CSSC.
  - b. If the individual appeals, the BCA sends 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.
  - c. CSSC records the determination and maintains case record.
  - d. BCA notifies PSI-CoE to terminate the request, and PSI-CoE completes the case termination.
6. If there is not enough information in official records to make a determination as to whether the derogatory information is mandatorily disqualifying, the CSSC sends the BCA the document at Appendix N which provides a 10 calendar day response timeframe. The BCA forwards the Appendix N memo to the PRB POC/functional manager, sends a copy of the subject-signed memo to the CSSC, and returns any additional information to the CSSC. The BCA returns a copy of the selectee-signed Appendix K memo to the CSSC. The selectee may request, in writing, a 10 calendar day extension of the initial response period. The BCA will forward the request to the CSSC for decision and notify the selectee of the decision regarding the extension. The CSSC will review and either adjudicate the mandatorily disqualifying information (see above) or **adjudicate any non-mandatorily disqualifying** information (go to Section III).

### Section III. Adjudicating Non-Mandatory Derogatory Information found in Pre-Employment Documents and Preliminary Background Checks (PBCs) – CSSC.

CSSC reviews non-mandatory disqualifying derogatory information and performs an interim adjudication.

1. If CSSC favorably adjudicates derogatory information, the adjudicator forwards the first page of the checklist at Appendix B to the BCA. BCA provides information to the PRB POC and/or the functional manager.

2. After receipt of the favorable adjudication and the applicable notice of e-QIP submission from the PSI-CoE, the BCA works with management to set the entry on duty date.
3. 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 PRB POC/functional manager to provide the individual with notification and information about appeal rights, and return a copy of the subject-signed 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.
4. If CSSC needs additional information in order to mitigate the derogatory information, the adjudicator will contact the BCA with the memorandum at Appendix O, which provides a 10 calendar day response timeframe. The BCA forwards the memo to the PRB POC/functional manager, sends a copy of the subject-signed memo to the CSSC, and provides any additional information to the CSSC. The BCA returns a copy of the selectee-signed Appendix O memo to the CSSC. The selectee may request, in writing, a 10 calendar day extension of the initial response period. The BCA will forward the request to the CSSC for decision and notify the selectee of the decision regarding the extension. The CSSC adjudicates the case, and forwards the first page of the checklist at Appendix B to the BCA. If favorable, follow step 2 above. If unfavorable, follow step 3 above.

#### Section IV. Receipt of NBIB Investigation and Final Adjudication.

1. If a Tier 1 investigation was requested, the **HQ IMCOM representative** monitors DISS and forwards the investigation to the CSSC **via encrypted email or AMRDEC SAFE** if the case was transferred from the CAF; or the record of the CAF favorable decision from DISS. If there was an existing investigation, the CSSC will have already obtained a copy of the existing investigation per paragraph IA above. If an OFI-86C was ordered the results will be mailed using CSSC's SOI from NBIB upon completion of the SCHR SAC.
2. **The CSSC follows Appendix L to determine whether to close the case as favorable or to adjudicate the case.**
  - a. If the determination by the CAF can be considered final, the CSSC notifies the BCA with a copy of the updated master CSSC checklist and documents the decision **with the first page of the checklist at Appendix B.**
  - b. **If the determination by the CAF cannot be considered final, the CSSC adjudicates the case and forwards the first page of the checklist at Appendix B to the BCA.**

#### Section V. Reverifications.

If the position requires a Tier 2 or Tier 4 reinvestigation at the same time, **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 requestor submits a request in PSIP.** PBCs and OFI86C will be completed. **The submitter will follow the process below.**

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. **BCA submits the case in PSIP (selecting "CSSC Reverification" at the Initiation page) along with the following forms/documents (uploaded in Childcare Suitability Documents). Comments should be added in PSIP to indicate if INTERPOL checks were submitted; whether there is driving or financial nexus; and whether there was a previous PRB or adjudication.**
  - a. Copies of following documents, unless the CSSC processed the initial background checks or a previous reverification (if so, these documents are not required).
    - 1) Original Release/Consent Statement<sup>9</sup>.
    - 2) 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.
    - 3) Original resume or application.
    - 4) Original references, but **only** if the references disclose information that is considered derogatory as defined in reference 3.
    - 5) 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 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.
4. Local BCA/Security offices code FBI FP LiveScan to reflect the CDE SOI and CDE UIC<sup>10</sup>.
5. When the BCA receives the FBI FP SAC results from NBIB they can destroy it (shred or place in designated receptacles for PII to be later destroyed). The OFI-86C with SCHR will be sent directly from NBIB to the CSSC.
6. The CSSC obtains FBI FP SAC results from CVS/PIPS. When results of the FBI FP SAC indicate a "Record", the CSSC obtains the FBI SAC CCT and ROI from NBIB.

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<sup>9</sup> See Appendix A.

<sup>10</sup>If FBI FP are captured electronically, the BCA will receive the hardcopy FP SAC with the results. BCAs are not required to keep the results. CSSC will pull the FBI FP SAC from CVS/PIPS.

7. Simultaneously CSSC manages PBC process as noted in Section IC, Pre-Employment Phase – Preliminary Background Checks. 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.

8. The CSSC will adjudicate the case based on the results of the reverification checks and notify the garrison with the first page of the Appendix B checklist. **If there is serious derogatory information identified during the reverification process, the CSSC PC will contact the CDE to advise them of same so that a local decision may be made as to whether to place the individual back under LOSS.**

**9. If it is determined there was derogatory information from the previous background checks that was not vetted in accordance with existing guidance at the time, the gaining BCA will email the information to their respective CSSC PC for review to make an adjudication.**

## Section VI. Movement Between Positions.

Garrisons should only submit cases for contractors transferring from one garrison to another if they meet the requirements in reference 4. If a new investigation is required in accordance with reference 4, paragraph 4d(1)(a), the garrison will submit a request for a new investigation following Section I above. If reverification is required in accordance with reference 4, paragraph 4(d)(1)(b), follow Section V above. **Note that the reverification in these cases need not be submitted prior to the transfer and the individual need not be placed under LOSS at the gaining garrison, unless serious derogatory information is identified per Section V, paragraph 8 above.**

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 Contractors)

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

Appendix L. Decision Matrix: Requirements For Ordering Investigations And Managing Adjudication.

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.