



**DEPARTMENT OF THE ARMY  
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-1  
300 PENTAGON  
WASHINGTON DC 20310-0300**

**AUG 29 2013**

**DAPE-CPZ**

**MEMORANDUM FOR ARMY NAF HUMAN RESOURCES OFFICES**

**SUBJECT: Clarification on Implementation of Army Directive 2011-08 for Common Access Card (CAC) Background Vetting for Nonappropriated Fund (NAF) Employees**

**1. References: See Enclosure 1.**

**2. This memorandum provides clarification on Homeland Security Presidential Directive-12 (HSPD-12) and suitability determinations for NAF employees. This memorandum does not apply to NAF employees in child care services positions covered by DoDI 1402.5 who will be addressed in separate policy. NAF employees must be vetted as stated below and the supporting documentation retained.**

**3. CAC Issuance:**

**a. Reference (c) provides the four criteria for CAC issuance: (a) eligibility for a CAC; (b) verification of Department of Defense (DoD) affiliation from an authoritative data source; (c) completion of background vetting requirements; and (d) verification of a claimed identity.**

**b. In accordance with (IAW) References (c) and (d), NAF employees who require a CAC for physical access to a DoD facility or logical access to DoD networks are subject to HSPD-12 credentialing standards.**

**c. No later than 1 October 2013, favorable CAC determinations will be rendered at the DoD Consolidated Adjudications Facility (CAF) IAW Reference (I).**

**d. NAF employees currently holding a CAC must receive a favorably adjudicated NACI or equivalent investigation in order to retain a CAC. Employees who already have a favorably adjudicated NACI (or equivalent) or higher level investigations on record will not require an additional investigation.**

**e. The issuance of a CAC on an interim basis requires, at a minimum, the completion of an FBI fingerprint check with favorable results and successful submission of a National Agency Check with Inquires (NACI) or equivalent to the Office of Personnel Management (OPM).**

**DAPE-CPZ**

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**f. Current and Newly Hired NAF Employees who are non-United States (U.S.) Citizens:**

**(1) Those who have resided in the U.S. for at least 3 of the last 5 years will be processed for a NACI as listed in paragraphs 3.d. and 3.e. alone.**

**(2) Those who have not resided in the U.S for 3 of the last 5 years will be processed for a FBI fingerprint Special Agreement Check (SAC) through OPM, unless otherwise prohibited by the terms of the applicable host nation agreement. Procedures for processing a SAC are enclosed.**

**4. Suitability:**

**a. NAF employees will not be on-boarded without the required initial favorable suitability determination.**

**b. Suitability determinations will be administered as follows:**

**(1) No later than 1 October 2013, favorable suitability determinations will be made at the DoD CAF. Additional guidance will be provided regarding the DoD CAF's roles and responsibilities with respect to suitability determinations at a later date. Until 1 October 2013, NAF Human Resource Officers will work with management and/or security offices.**

**(2) References (g) and (h) will be used as guidelines in making suitability determinations. In cases where derogatory information is identified, a final suitability decision from the Garrison Commander or equivalent will be required. When a final determination has been made, the NAF HRO will complete the Report of Agency Adjudicative Action on OPM Personnel Investigations (INV Form 79A), and return the form to OPM.**

**(3) Cases where there is an unfavorable suitability determinations will be processed IAW Chapter 2 of Reference (f). NAF employees may grieve unfavorable suitability determinations IAW Chapter 8 of Reference (f).**

**(4) Applicants must be notified that their appointments are subject to the completion of a favorable suitability determination.**

**5. Activities are reminded to meet any applicable labor relations obligations prior to implementing this policy.**

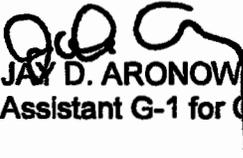
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6. This memorandum supplements previous guidance regarding background vetting for NAF employees. To the extent inconsistent with prior guidance from my office, this memorandum controls. The point of contact is Ms. Rena Gwyn, NAF Human Resources Policy and Program Division, (703) 806-3575 or DSN 656-3575.

Encls

1. References
2. Fingerprint SAC Instructions
3. OFI Form 86C

  
JAY D. ARONOWITZ  
Assistant G-1 for Civilian Personnel

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**ADMINISTRATIVE ASSISTANT TO THE SECRETARY OF THE ARMY  
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**SUPERINTENDENT, U.S. MILITARY ACADEMY  
DIRECTOR, U.S. ARMY ACQUISITION SUPPORT CENTER  
DIRECTOR, CIVILIAN HUMAN RESOURCES AGENCY  
DEPUTY CHIEF OF STAFF FOR INTELLIGENCE, ATTN: DAMI-CP  
OFFICE, ASSISTANT SECRETARY OF THE ARMY (MANPOWER AND RESERVE  
AFFAIRS), ATTN: SAMR-CQ  
OFFICE OF THE GENERAL COUNSEL, ATTN: SAGC (MS. JOHNSON)  
OFFICE OF THE JUDGE ADVOCATE GENERAL, ATTN: DAJA-LE (MS. NUGENT)**

**ENCLOSURE 1**

**REFERENCES**

- (a) Memorandum, DAPE-CPZ, 27 September 2012, Implementation of Army Directive 2011-08 for Common Access Card (CAC) Background Vetting for Nonappropriated Fund (NAF) Employees**
- (b) Memorandum, Secretary of the Army, 26 May 2011, subject: Army Directive 2011-08 (Army Implementation of Homeland Security Presidential Directive-12)**
- (c) Memorandum, Under Secretary of Defense Personnel and Readiness, 1 December 2008, Incorporating Change 4, 4 October 2012, subject: Directive-Type Memorandum (DTM) 08-003, Next Generation Common Access Card (CAC) Implementation Guidance**
- (d) Memorandum, Office of Personnel Management (OPM), 31 July 08, subject: Final Credentialing Standards for Issuing Personal Identity Verification Cards under HSPD-12**
- (e) Memorandum, DAMI-CDS, 5 October 2010, subject: Interim Policy Guidance for Common Access Card (CAC) Background Vetting for Foreign Nationals**
- (f) Army Regulation (AR) 215-3, Nonappropriated Funds Personnel Policy, 29 August 2003**
- (g) Department of Defense Instruction 1400.25, Volume 731, 24 August 2012, subject: DoD Civilian Personnel Management System: Suitability and Fitness Adjudication for Civilian Employees**
- (h) Part 731 of title 5, Code of Federal Regulations (C.F.R.)**
- (i) Memorandum, Deputy Secretary of Defense, 3 May 2012, subject: DoD Central Adjudications Facilities (CAF) Consolidation**
- (j) Homeland Security Presidential Directive—12, Policy for a Common Identification Standard for Federal Employees and Contractors, 27 August 2004**
- (k) Department of Defense Instruction 1402.5, 19 January 1993, subject: Criminal History Background Checks on Individuals In Child Care Services**

## **Finger Print (FP) Special Agreement Check (SAC) Instructions**

### **1. Manual FP Submission:**

- a. Submit a FBI FP SAC on an OFI 86C form. Complete all blocks.
- b. In section 4, block "Social Security Number", since foreign nationals do not possess a social security number, do not complete.
- c. In section 5, block "Special Agreement Codes", place the letter "B" to signify a FP SAC is being requested.
- d. A cover letter/memo must be attached to the OFI 86C stating that subject is a foreign national without a social security number and request OPM assign a pseudo social security number.
- e. Submit the completed OFI 86C form along with the hard card fingerprints to OPM at:

OPM-FIS  
PO Box 618  
1137 Branchton Road  
Boyers, PA 16018-0618  
Attn: Fingerprint SAC Department

### **2. Electronic FP Submission:**

- a. OFI 86C is not required for FP SAC submission.
- b. When submitting electronically, place all "9"s in the social security number field. This will signify to OPM staff that the subject is a foreign national without a social security number.
- c. Do not submit a memo requesting a pseudo social.

## SPECIAL AGREEMENT CHECKS (SAC)

OFI FORM 86C  
November 1990

U.S. OFFICE OF PERSONNEL MANAGEMENT  
OFFICE OF FEDERAL INVESTIGATIONS

|   |                          |  |  |                                  |
|---|--------------------------|--|--|----------------------------------|
| Agency Agreement Number   |                          | OPM USE ONLY                               | OPM Codes                                      | Case Number                      |
|   |                          |  |  |                                  |
| <b>1. SUBJECT-S FULL NAME</b>   |                          |  |  | <b>2. DATE OF BIRTH</b>          |
| Last Name   | First Name               | Middle Name                                | Abbrev.  | Month Day Year                   |
| <b>3. PLACE OF BIRTH Use the two letter code for the State</b>              |                          |  |  | <b>4. SOCIAL SECURITY NUMBER</b> |
| City  | County                   | State                                      | Country ( <i>If not in the United States</i> ) |                                  |
| <b>5. OTHER NAMES USED AND DATES WHEN USED</b>                              |                          |  |  |                                  |
| Name  | Month/year to Month/year | Name                                       | Month/year to Month/year                       |                                  |
| Name  | Month/year to Month/year | Name                                       | Month/year to Month/year                       |                                  |
| <b>SEX</b><br><input type="checkbox"/> Female <input type="checkbox"/> Male |                          | <b>SPECIAL AGREEMENT CODES</b><br><b>B</b> | <b>8. POSITION TITLE</b>                       |                                  |
| <b>9. SON</b>   | <b>10. SOI</b>           | <b>OPAC/ALC NUMBER</b>                     | <b>12. ACCOUNTING DATA</b>                     |                                  |
| <b>13. OTHER INFORMATION REQUIRED BY AGREEMENT</b>                          |                          |  |  |                                  |
| Requesting Official Name and Title<br><br>Regional Security Officer         |                          |  | Signature                                      | Telephone Number    Date         |