

DOE HSPD-12 FAQ (V12)

SCOPE AND DEFINITIONS**1. What is HSPD-12?**

HSPD-12 is a Presidential Policy signed August 27, 2004. It:

- Requires background investigations (BI) to support the identity proofing and badging process. See FAQ #14 for additional details.
- Requires a new security badge to be a smart card which will be used to access Federally-owned or -leased facilities and to access federal computer systems.
- Directed Department of Commerce (via National Institute of Standard and Technology) to issue the technical requirements.
- Directed OMB to issue clarifying guidance.

2. What is FIPS 201?

Federal Information Processing Standard 201 (FIPS 201) is the Standard created by NIST on HSPD-12. As of March 2006, FIPS 201 has been updated and is now, officially, 201-1.

3. What is DOE Notice 206.3?

This is the directive that identifies implementation requirements of PIV-I within the Department of Energy. This Notice requires personnel identification to be based upon sound criteria for verifying an individual's identity prior to being issued a DOE badge.

4. I've seen reference to DOE Notice 206.3, is this a typographical error? Should it be DOE Notice 206.2?

No, DOE Notice 206.2 was approved and issued by the Department. Based on the Deputy Secretary memorandum dated October 13, 2005, Notice 206.2 had to be updated and a new number of 206.3 was assigned. DOE Notice 206.3 cancelled DOE Notice 206.2.

5. Where can I get a copy of all of these documents?

Many of these public documents are available on the CIO web site, <http://cio.doe.gov/HSPD-12/index.html>.

6. Can a waiver (exclusion) be requested for FIPS 201?

No, FIPS 201 is mandatory. Section 11 of FIPS 201 states, "As per the Federal Information Security Management Act of 2002, waivers to Federal Information Processing Standards are not allowed."

According to the NIST website for HSPD-12 nist.gov/public_affairs/releases/piv_faqs.htm there is no provision for an exclusion.

7. Does DOE Notice 206.3 pertain to both physical and logical access?

No, this identity proofing Notice addresses only the identity proofing process associated with issuing a badge.

8. What are the HSPD-12 timelines?

- After October 27, 2005, DOE will only issue a security badge to a new Federal or designated contractor employee (see FAQ #14 below) after a BI and begin BIs on existing staff. The security badge issued will be the current DOE security badge.
- By October 27, 2006, agencies are to begin issuing smart card badges. Those agencies following the Shared Service Provider (SSP) model will begin issuing these badges as the SSP is set up in their area. The PMO is tracking the progress of the SSP effort and will advise when the overall schedule is available from GSA.
- Beyond 2006, as cards and services become available, Federal and designated contractor employees must have and use their smart card.

9. Since HSPD-12 contains new requirements for subcontractors (submission of SF-85 forms and fingerprint cards for uncleared personnel), all existing subcontracts will have to be revised. Has this been factored into the timeline for implementation?

The timeline was set by HSPD-12 and OMB.

10. What is PIV?

PIV stands for Personal Identity Verification.

11. What is PIV-I and PIV-II?

FIPS 201 has 2 parts: PIV-I and PIV-II. PIV-I deals with performing background checks for employees and contractors. PIV-II deals with issuing smart cards.

12. What is a PIV-I badge/credential?

For PIV-I, it is the credential issued for access to Federal resources after identity proofing has been completed.

13. The term credential is used in HSPD-12 and FIPS 201. Is a credential different from a DOE badge?

For this purpose the term credential means a DOE Security Badge.

14. Who requires a PIV credential (badge)?

Currently, the Deputy Secretary has determined that all DOE Federal employees, all cleared contractor employees, all uncleared contractor employees assigned to the DOE Headquarters complex, and other uncleared contractors as determined by their program office are covered by HSPD-12.

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15. **What are the Department's badging requirements to meet PIV-I?**
- PIV-I badges can only be issued to new employees and contractors (as specified in FAQ #14 above) after the identity proofing process has occurred.
16. **What if my activity does not currently issue badges?**
- The requirement still exists for conducting background checks on new employees and contractors as specified in FAQ #14 above.
17. **What is the applicability of HSPD-12 to construction projects?**
- Refer to FAQ #14 above for applicability.
18. **What is the applicability of HSPD-12 to public access?**
- HSPD-12 does not apply to the general public. See FAQ #14 above for applicability.
19. **Does the HSPD-12 requirement apply to personnel at facilities DOE has "deeded" to other organizations?**
- HSPD-12 only applies to Federal and contractor personnel (as defined in FAQ #14 above) in those facilities that are owned or leased by DOE.
20. **Does HSPD-12 apply to Management and Integrating (M&I) contractors?**
- Yes, as defined in FAQ #14 above.
21. **We have uncleared subcontractors who never come onsite and never need a DOE badge. These subcontractors are essentially working on Federal projects although they are not working at a Federal site. Are they required to go through the PIV-I process??**
- No, unless so designated by their Departmental Element or they meet the guidelines of FAQ #14 above.
22. **How does DOE N 206.3 apply to an uncleared contractor who is waiting on a security clearance (i.e. the contractor is moving from uncleared to cleared)?**
- If the contractor's entry on duty date was on or prior to 10/27/05, the contractor continues to be treated as a current employee and the process in DOE N 206.3 is not required to be applied immediately. However, all current badged contractor employees are required to undergo the PIV process before October 27, 2007. [NOTE: This deadline may be effectively extended based on the initiation of SSP services in your area.]
23. **If a local site's policy is to issue uncleared workers a DOE standard uncleared (gray) badge, can this badge continue to be issued per DOE Notice 206.3 to uncleared contractors after October 27, 2005?**
- Since October 27, 2005, the current standard (gray) badge is a PIV badge. Therefore, the new uncleared contractor may only be issued this badge if they have undergone the PIV identity proofing process. If an individual will not undergo a NACI and the identity proofing process, then a local, non-PIV badge will need to be issued.
24. **Since uncleared contractors at many sites will now be issued LSSO badges, how long will/should non-PIV, DOE standard (gray) badges for uncleared personnel be honored between DOE sites, and how will sites be able to tell the difference between a new PIV and non-PIV DOE standard badge?**
- The completion of this transition will be based on the SSP schedule. The PIV-II badge roll-out could take the better part of 2 years. Once this effort is complete:
- today's DOE standard badge should no longer provide common access
 - all non-PIV personnel should have site-specific (LSSO) badges, and
 - all individuals requiring a PIV badge should have a new smart card (PIV-II) badge
25. **How will uncleared contractors requiring frequent access to DOE Headquarters facilities be handled if they are not specifically assigned to or working at one of the DOE facilities within the Headquarters complex?**
- Depending upon the circumstances, an uncleared contractor requiring frequent access to DOE Headquarters facilities may be given a temporary, non-PIV badge. However, if an uncleared contractor is on a specific contract to DOE and requires frequent access to DOE Headquarters facilities for an extended period of time, the individual should be processed under PIV and issued a PIV badge.
26. **Can a current Science or other approved DOE badge be issued?**
- For PIV-I, the badge that currently exists will be used, but the identity proofing requirement must be met before issuance. Under PIV-II, the DOE badge will be a smart card with a new design.
27. **Can a site issue a temporary badge while the PIV badge is pending?**
- Yes.
28. **Can a site use the identity proofing process for a non PIV badge?**
- Yes, at the discretion of the site and/or program office and based on a risk analysis, a site may use the same process.

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29. **Is it acceptable to have 2 types of short-term badges?**
Yes.
30. **Will a field-issued (non-PIV) badge presented by an individual at Headquarters be accepted or will the individual be given a temporary badge while at Headquarters?**
An individual from the field who does not have a PIV badge will be required to go through the normal visitor process when visiting Headquarters.
31. **Once PIV-II is implemented, how will uncleared contractors that are not part of the PIV process access logical systems?**
While PIV-II card holders will eventually use their smart-card to access logical systems, logical access is still a few years away. The details of logical access policy are still being formulated and will depend on when the SSP can provide electronic interfaces for logical and physical access.
32. **Will sites be issuing PIV-II badges starting October 27, 2006?**
Under the SSP concept, DOE sites will not produce the PIV-II badge. The facilities established by the SSP will perform the physical enrollment and production of badges. The site sponsors and registrars will still play an active role in initiating the process, performing registrar and adjudication functions and activating the badges in the local physical access control system. The Federal PIV-II rollout schedule will establish the timeline and locations for site participation. As the SSP becomes operational in specific areas, sites in those areas will use the SSP to enroll and obtain badges for their personnel. We anticipate that a few designated cities will begin issuing new badges in October 2006. The list of cities will grow over the next 12-24 months.
33. **If DOE will not be issuing PIV badges in the future, where do personnel go to get their fingerprints and photograph taken?**
Under the SSP concept, Federal Enrollment Service Providers (ESP) will be established at over 400 cities across the country to review I-9 documents and take fingerprints and photos. The Federal task force working HSPD-12 completed a detailed analysis of all locations and determined that 90% of the covered Federal population is within 25 miles of one of these ~400 cities. The remainder of the population, primarily in remote areas, will be serviced by mobile ESPs.
Using an electronic workflow system provided by the SSP, sponsors and adjudicators will initiate requests to have personnel scheduled to be serviced at the ESP.
- The SSP and ESP are only providing the mechanics of card production and delivery; DOE is still responsible for the designation of who receives the PIV-II badge and the adjudication processes surrounding the issuance of the PIV-II badge.
34. **What does “immediately revoked and confiscated” mean?**
Deactivating the security badge from the local access control systems within one (1) hour and recover the badge from the individual as soon as practicable.
35. **Is there a policy shift towards requiring escorts for all visitors?**
No, there is not a policy shift requiring escorts for all visitors. Sites should continue using DOE- and site-specific escort policy.
36. **How will sites that have no previous experience working with OPM to conduct background checks ensure such checks are conducted?**
Sites with no current experience will have to affiliate themselves with DOE Federal sites and Registrars that currently perform this function.
37. **Is the registrar function required to be performed by a Federal employee or a contractor?**
The Registrar must be a Federal employee. However, the Registrar may have a staff consisting of either Federal and/or contractor personnel.
38. **What if there are no Federal employees on site to be the Registrar?**
Certain Registrar duties must be performed by a Federal employee. A site without a Registrar should seek the use of a central Federal facility with a Registrar or Registrar Proxy in conjunction with the Program Office implementation of DOE Notice 206.3.
39. **What Registrar responsibilities can be delegated to non-Federal employees?**
A PDF file table has been developed to specify which Registrar duties may be delegated. The link to this table is as follows:
<http://cio.doe.gov/HSPD-12/DelegationofRegistrarResponsibilities.pdf>
40. **The current SF-85 and SF-86 forms require Agency Use Only information. Who completes these blocks?**
The Registrar completes this information for the SF-85 and Personnel Security completes this information for the SF-86.

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41. **OMB guidance requires Privacy Impact Assessments to protect personal information. How is this requirement going to be implemented within DOE?**
- DOE will adhere to all required privacy legislation and regulations. Headquarters has conducted the PIA for the Department.
42. **What is the criterion to be used to adjudicate the background investigations for contractor or federal employees who require an HSPD-12 badge but who will not receive an access authorization?**
- The initial disqualification criteria are: (1) is, or is suspected of being, a terrorist; (2) is the subject of an outstanding warrant; (3) has deliberately omitted, concealed, or falsified relevant and material facts from any Questionnaire for National Security Positions (SF-86), Questionnaire for Non-Sensitive Positions (SF-85), or similar form; (4) has presented false or forged identity source documents; (5) has been barred from Federal employment; or (6) is currently awaiting a hearing or trial or has been convicted of a crime punishable by imprisonment of six (6) months or longer; or (7) is awaiting or serving a form of pre-prosecution probation, suspended or deferred sentencing, probation or parole in conjunction with an arrest or criminal charges against the individual for a crime that is punishable by imprisonment of six (6) months or longer.
43. **Additional funds are needed to support processing and fingerprinting. Currently, we have the following manpower and projections to process...?**
- The resources to support PIV-I functions are the responsibility of the program office.
44. **Our facility uses Barcodes, Prox and Weigand cards to access many buildings on site after hours and weekends. Are these areas going to require Smart Card identification and National Controls?**
- Access into the buildings must comply with HSPD-12. Access to interior rooms or areas is a local decision, based on DOE and local policy.
45. **DOE Notice 206.3, Paragraph 4.a (1),(a) and (b) contains a general requirement that, prior to security badge issuance, a source documents review and a background investigation (BI) must be done. The CRD does not address the requirement for a BI. Please clarify.**
- BI request and adjudication is a Federal function and not applicable to the CRD.
46. **The CRD reads: Provide short-term individuals with clear documentation on the rules of behavior and consequences for violation before granting access to facilities and/or systems. Will standard documentation be provided or is each site expected to formulate this documentation on rules of behavior/consequences?**
- Current DOE and local policy should be used. HQ does not plan to develop additional guidance.
47. **What is the definition of "uncleared"?**
- "Uncleared," as applied to Federal or contractor employees, refers to those personnel without an "L" or "Q" access authorization (i.e., without a security clearance).
48. **Does the definition of uncleared contractors servicing Headquarters pertain solely to uncleared contractors working in the greater Washington, D.C. metropolitan area or does it pertain to uncleared contractors working for Headquarters Elements in other parts of the country?**
- Uncleared contractors servicing Headquarters are those assigned to and working at the DOE Headquarters facilities in the Washington, D.C. metropolitan area.
49. **With the changes that are being made, do we still have to wait 5 days for the full NAC results or fingerprint check before we can issue a Local Site Specific (uncleared) badge after October 27, 2005, for applicants applying for an "L" or "Q" badge?**
- No. The LSSO badge is non-PIV and does not require a waiting period. Please refer to "Identity Proofing" FAQ #2 for the PIV badge requirements. For a PIV badge, once you have satisfactory finger print check results, there is no 5 day wait requirement.
50. **If the FBI fingerprint does not come back in 5 days, can the badge be issued?**
- No. However, the individual could be considered for a temporary badge.
51. **Many labs have classified areas that do not allow wireless devices of any kind. We are required to wear our badges while in these areas. How do we address the need to have a wireless chip in the PIV-II card with the requirement to not allow wireless devices in these limited areas?**
- The policy was written to address those wireless devices where voice and data are captured and transmitted. This same policy, however, allows government owned wireless devices to be brought into security areas, under the provision that it is government owned, it is mission essential, and a vulnerability analysis has been conducted. The contactless smartcard meets the first two conditions, and the Department will be

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conducting a vulnerability assessment to satisfy the last requirement.

IDENTITY PROOFING PROCESS

1. What is the difference between a NAC and a NACI?

The following describes the details of a National Agency Check (NAC) and a National Agency Check with Inquiries (NACI).

The NAC is part of every NACI. Standard NACs are Security/Suitability Investigations Index (SII), Defense Clearance and Investigation Index (DCII), FBI Name Check, and FBI National Criminal History Fingerprint Check.

NACI. The investigation consists of a NAC with written inquiries and searches of records covering specific areas of an individual's background during the past five years (inquiries sent to current and past employers, schools attended, references, and local law enforcement authorities). Coverage includes:

- Employment, 5 years
- Education, 5 years and highest degree verified
- Residence, 3 years
- References
- Law Enforcement, 5 years

2. Processing a NACI can take a long time, what do we do in the meantime?

The NACI is initiated for the background investigation. A PIV credential is to be issued based on the results of the NAC (National Agency Check). However, the credential may be issued based on satisfactory results from the FBI National Criminal History Check (fingerprint check).

3. Can the BI for access authorization (security clearance) be used to satisfy the PIV identity proofing process?

Yes.

4. How can a prior NACI be verified?

The Registrar can verify whether a NACI was completed through appropriate channels (OPM, former agency, or security office).

5. What if the NACI is several years old, from a different agency, or is from a clearance at a previous agency?

As long as the completed NACI can be verified, the credential can be issued.

6. If the NACI is "several years old," will we be given guidance on how to get the proper certification/verbiage when an applicant comes back in for rebadging?

Federal guidance for HSPD-12 sets no time limit for a background investigation. GSA's Federal Identity Management Handbook states:

With regard to identity proofing of government employees in service for more than 15 years, a successfully adjudicated NACI may be on file at the Office of Policy and (sic) Management (OPM). In the case where no NACI is on file at OPM for that employee, agencies shall refer to that employee's Official Personnel File (OPF), and forms SF86 and/or SF171 before requesting a new NACI. If either of these forms contains an official stamp that reads "EO10450", this indicates that a NACI was successfully adjudicated and a new NACI is not required.

While this handbook is not binding, in the absence of any other Federally issued guidance, it is the only document that is likely to be referenced in the event of an audit.

A background investigation for a security clearance may be sufficient on which to base PIV approval provided you ensure that the clearance was not terminated for cause and there is no evidence that derogatory information surfaced without being adjudicated (e.g., if the clearance request was withdrawn or the clearance was cancelled before the case could be fully adjudicated).

If the background investigation was conducted for another agency, a variation of the reciprocity form attached to Clay Johnson's December 12, 2005, memorandum completed by the applicant's former agency is sufficient documentation to authorize PIV approval. Again, the date of the investigation has no limitations.

7. If a contract changes, but the person/people remain doing the DOE work, does the background check have to be done?

If the same person/people were previously employed on a DOE contract, and the contract changes, then they are not required to complete the PIV process immediately as a new employee. If new people join the contract they are immediately subject to the PIV/NACI process. All employees in the covered population, including current employees, will have to have a NACI on file by October 27, 2007, except those current Federal employees with 15 or more years federal service. They are required to have their NACI on file by October 27, 2008. [NOTE: These deadlines may be effectively extended based on the initiation of SSP services in your area.]

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8. **Personnel with a security clearance require a periodic reinvestigation. Under the new HSPD-12 requirements, will uncleared Federal and contractor employees now require a periodic “renewal” of their NACI or background check?**
- No, at this time there is no requirement for the NACI or background check to be redone periodically for uncleared personnel.
9. **Can NACI processing be outsourced or does it have to be processed through OPM?**
- It must be processed through OPM.
10. **Will there be new forms we use when we hire new contractor employees?**
- Yes, uncleared contractors as designated in Scope and Definitions FAQ #14 will need to complete the SF-85, Questionnaire for Non-Sensitive Positions, portions of the OF-306 and optionally the PIV request form. **NOTE:** Wherever possible e-QIP should be used to complete the SF-85.
11. **Is there a standardized form supporting the PIV process?**
- DOE Headquarters has developed a PIV request form for use in the PIV process. Headquarters is using this form. Its use is optional for the field. The form is available on the DOE directives website:
<http://www.directives.doe.gov/pdfs/forms/206-3.pdf>
12. **Since DOE is going to track the timeliness of the NACI and fingerprint process from submission to completion, how will this data be collected and reported?**
- The HQ Office of Personnel Security is collecting and reporting this information for HQ. Field locations are encouraged (but not required) to track the timeliness of their case processing and report that information to the PMO. The PMO will collect and report this case data to OPM and/or OMB as appropriate.
13. **When an individual has been issued a permanent badge based on a favorable NAC or fingerprint and derogatory information is identified when the rest of the NACI has been completed, the Notice states that the permanent badge is to be immediately confiscated. Can a temporary badge be issued to the individual while the issues are being resolved?**
- This may be acceptable in some cases, but will have to be decided on a case-by-case basis.
14. **Does Section 4(a)(5) (identity proofing for foreign nationals) apply to contractors as well as Federal employees?**
- Section 4(a)(5) applies to anyone who is a foreign national and within the scope of the Notice.
15. **DOE N 206.3 Requirement Paragraph 4a(5) concerning Foreign National employees refers to DOE O 142.1 and DOE O 142.3. Does this mean foreign national employees are not subject to the NAC and NACI background check?**
- OMB circulated draft policy on “Requirements for Background Investigations of Foreign Nationals Requiring Identity Credentials in Accordance with Homeland Security Presidential Directive (HSPD) 12” in April 2006 but has not yet issued any final policy. Current DOE foreign national employee policy should be used until such time as further guidance is provided.
16. **Is the CPCI printout an adequate means of determining the conduct of a NACI?**
- CPCI online access may be used as proof of a background investigation for active clearances. The registrar/adjudicator should sign and date a screen print documenting the active clearance. Terminated or incomplete clearance investigations must be researched; adjudicated, if necessary; and documented to reflect favorable results.
17. **What are examples of the types of derogatory information that can show up in the NACI that may not be found in the FBI fingerprint check?**
- The FBI fingerprint check documents criminal behavior for which someone has been arrested whereas the NACI may reveal anecdotal evidence such as (but not limited to): negative employment actions, illicit drug use, falsification of data provided on forms, etc., that is not captured by the FBI fingerprint check.
18. **How does PIV relate to the access authorization (security clearance) process?**
- They are two separate processes.
19. **PIV-I applies to new employees and contractors, how is identity proofing done for current employees and contractors?**
- At this time the DOE plan is to follow the SSP model promoted by OMB and the Executive Steering Committee (ESC) for current employees. In keeping with this model and the planned roll out of services, sites should do the following:
- Verify and/or complete a NACI or equivalent background investigation for each current employee in the covered population. This includes successful adjudication of relevant derogatory.

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- Have each affected employee verify they have two I-9 documents available for capture and validation by the SSP. Note: one of the I-9 documents must be a government issued picture ID (e.g., driver's license, passport, etc.).

Since Federal personnel records are usually kept for only 15 years, a NACI may not have remained on record for some Federal employees. Federal employees with over 15 years federal service have until October 27, 2008 to complete the PIV process. All other current employees in the covered population are required to complete the process by October 27, 2007. [NOTE: These deadlines may be effectively extended based on the initiation of SSP services in your area.]

20. Will identity proofing documents be required to be submitted to the Registrar as part of the SF-85 or SF-86 package?

The Registrar is required to keep a record copy of each identity proofing document (e.g., document number, title, issuing authority, expiration date, etc.) for SF-85 and SF-86 packages. Therefore, this information should be submitted to the Registrar as part of the SF-85 or SF-86 package. The Registrar will then submit the SF-85 package to OPM or the SF-86 package to the processing Personnel Security office. Local recordkeeping requirements are not intended to be affected by this Registrar requirement.

21. What are the records keeping requirements for documents associated with identity proofing process?

The records keeping requirements are those as specified in FIPS 201-1.

22. OMB M 05-24 sets October 2008 as the deadline for identity proofing people who have been "Federal department or agency employees for over 15 years." Does this mean 15 years in that department or anywhere in the Federal Government?

This deadline applies to Federal employees employed for over 15 years anywhere in the Federal Government, including military service.

23. Can contractors who have been employed by the Department for over 15 years be included during the "grace period"?

No provision is made for this.

24. Can replacement badges be issued to current employees and contractors without the identity proofing process?

Yes, in keeping with local badging policy.

25. If a Badge expires prior to site implementation of SSP processing of employees, does a NACI have to be initiated before a badge is re-issued?

No, existing Federal and contractor employee badges can be re-issued without a initiating a NACI. (See Question #19 above and Scope and Definitions Question #8).

26. Is it a problem if the I.D.(s) photocopied and on file to support the badge issuance process expire(s)?

No, at this time, there is no requirement to update identity source documentation once the identity has been verified.

27. Will there be further guidance on the adjudication process?

No, after further review of the notice, it has been determined that the adjudication criteria as stated is appropriate.

28. What happens if the Federal Registrar does not notify the Sponsor in writing within two (2) business days of an unfavorable adjudication? Does the applicant receive a badge by default or based upon an administrative technicality?

No, regardless of whether the Sponsor is notified within two business days, the applicant would not receive a badge. The Registrar notification is the only acceptable means of determining whether the applicant may be issued a badge.

29. If an applicant has been denied a credential and chooses to appeal the denial, can a temporary badge be issued during the appeals process?

This may be acceptable in some cases but will have to be decided on a case-by-case basis.

30. Do the members of the appeals panel have to be Q cleared personnel? The Q standard seems unnecessary if a facility does not deal with classified information and the panel is only used to adjudicate NACI results for non-sensitive contractor positions.

As the Notice states, Q cleared personnel are required for the appeals panel. The appeals panel is not convened to adjudicate derogatory information. The appeals panel is convened to address appeals of unfavorable adjudications. The Office of General Counsel advised this requirement.

31. Can the Registrar serve as a member of the appeals panel? What is the recommended course of action when the lone security person is serving as the organization's Registrar?

No, the Registrar is not an appropriate member of the appeals panel since the Registrar performs the initial adjudication. The Registrar identifies

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the members of the appeals panel. If no qualified site representative is available, the Departmental or Field Element should determine who will serve as the final panel member. The Field or Operations Office, Service Center, and/or Headquarters personnel may also serve as appeals panel members. However, the Registrar should not be considered as a potential member of the appeals panel.

32. Does the appeals process in 4(b)(13) apply to contractors, subcontractors, etc?

The appeals process for contractors, subcontractors is under development.

33. Who is notified by the Registrar if the BI reveals significant derogatory information that precludes PIV badge issuance or justifies badge revocation?

The Registrar notifies the Sponsoring office only that a badge cannot be issued due to derogatory information. For previously issued badges, additional notifications may be made as necessary to effect badge revocation and/or recovery. No specifics may be discussed. The Registrar notifies the individual applicant of the specific derogatory findings.

34. The information on everyone's last Questionnaire for Sensitive Positions (QSP, SF-86) will most likely have multiple changes, therefore, they will not want to simply re-date and initial the forms. Do they complete a new set of forms, ONLY the QSP Part 2, or what? Will only specific questions need to be updated?

Employees with an existing clearance will not be required to submit new forms. Their most recent successfully adjudicated investigation or re-investigation will be used to satisfy PIV requirements.

35. The Notice states that we can submit SF-86 forms if requesting clearances. Will we be able to use e-QIP (which replaced AUI) for both requests (BI and clearance)? Will we be required to submit 2 hard copies (instead of 1) for the BI plus the clearance requests?

HSPD-12 requires a background investigation at the NACI level or higher. There is no need to submit multiple applications to meet the requirements for PIV and a clearance. OPM will not conduct multiple background investigations simultaneously for one individual. For HSPD-12 to work effectively, Human Resources, Personnel Security, and HSPD-12 Registrars must work in tandem, sharing the results of OPM background investigations for the purposes of personal identity verification, employee suitability, and access authorization (security clearances). Applicants and employees are encouraged to use OPM's Electronic Questionnaires for Investigations Processing (e-QIP) system, which supports both the SF-85

and the SF-86. Applicants for a security clearance must file the SF-86; applicants for building access only can meet suitability and PIV requirements by filing the simpler SF-85, although nothing precludes them from filing the SF-86 for that purpose, particularly if they expect to request a security clearance in the near future.

36. Some personnel have both an Office of Science site-specific badge and a DOE badge, until the badges are required to be one-in-the-same, how does the process ensure that there isn't duplication/conflicts when issuing multiple badges that will require a BI/fingerprinting?

The identity proofing requirement for either badge is the same. The process would not need to be repeated for a subsequent badge. However, verification of the initial process would be required.

37. Our M&O contractor issues and maintains the badging system/records and the physical access systems. DOE directives require that the Issuer be at the same level as the highest access authorization they process. Will the contractors having access to or maintaining these systems be required to undergo the PIV process?

Individuals that have access to or maintain these systems at sites which issue PIV-compliant badges will be required to undergo the PIV process. At this time, individuals accessing or maintaining these systems at sites which ONLY issue non-PIV badges would not be required to undergo the PIV process (unless directed to do so by the program office). We will continue to review this issue and existing policy further as we move into PIV-II and begin interconnecting systems.

FINGERPRINTING REQUIREMENTS

1. What are the fingerprinting requirements?

For PIV-I, the fingerprinting requirement is a full set of rolled fingerprints checked against the FBI National Criminal History database via OPM. For PIV-II, an additional requirement will be the capture of a biometric for use with a smart card.

2. Is there more information on the FBI's technical requirements?

Information on the FBI system, Integrated Automated Fingerprint Identification System (IAFIS) is available at <http://www.fbi.gov/hq/cjisd/iafis.htm>.

3. Can the fingerprints be taken electronically?

OPM has been encouraging agencies to submit fingerprints electronically since March 2000. Reference Federal Investigations Notice (FIN)

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04-02, May 18, 2004, Questions and Answers Concerning the Submission of Electronic Fingerprints (<http://www.opm.gov/extra/investigate/Fin-2004/fn04-02.asp>). Since this notice was issued, the point of contact at OPM has changed. As of June 28, 2006, the point of contact was Deborah Hoffman, 724-794-5612 ext. 7536.

ACQUISITION

1. Is there Federal procurement policy for HSPD-12?

Yes, OMB M-05-24 requires the use of federally approved products and services through GSA. In addition, OMB M-06-18 provides further guidance on the "Acquisition of Products and Services for Implementation of HSPD-12."

2. Is there Department procurement policy for HSPD-12?

Yes, the Acquisition Letter of July 6, 2005 requires all procurements for HSPD-12 components must be approved through the HSPD-12 program management office.

3. How will PIV components be procured?

DOE will use the Shared Service Providers (SSPs) when they are made known to procure the components required for HSPD-12. If additional components are required, the components must either be centrally procured or centrally approved to ensure that PIV interoperability requirements are met.

4. Can you give examples of components that should be procured through a SSP?

Smart cards, middleware, and the Identity Management System will be procured through a SSP.

5. What is the plan for components required to meet the PIV-II deadline?

DOE will use the SSPs, when they are made known, to provide the components for PIV-II.

6. What about Physical Access Control systems?

If an existing system can be modified or upgraded in a cost effective way, then it will be.

7. How does the current Acquisition Letter (AL-2005-10) apply to access control systems for current construction?

Access control systems for current and planned construction projects need to be reviewed in accordance with the Acquisition Letter. Sites should provide the Office of Security and Safety Performance Assurance and the HSPD- 12 PMO with the technical specifications and timelines (procurement, installation, testing, and when the facility will become operational) for review and approval.

8. Is fingerprinting equipment covered by the Acquisition Letter of July 2005 (AL-2005-10)?

Electronic-based systems are covered by the July Acquisition Letter. Non-electronic (i.e. ink and inkless)-based systems are not covered.

9. Is it safe to assume that Products and Services that technically may apply to HSPD-12, but are being purchased for other reasons are exempt?

No. If there is a product or service that may apply to HSPD-12 implementation, please submit the specifications, along with your request, to the HSPD-12 PMO for review.

10. How does the revised scope of the Notice impact the previously issued policy flash regarding acquisition of PIV-I and PIV-II "related" purchases? Do we still need to be in compliance with this acquisition notice?

Both Acquisition Letters remain in effect until superseded or cancelled.

ACCREDITATION

1. Who is the Certifying Official?

The Secretary is required to certify that DOE has implemented PIV-I. This will be done by aggregating the Department and field element Checklists, as prescribed in DOE Notice 206.3.

2. Is the self-certification requirement contained in DOE Notice 206.3 applicable to those sites whose security clearances are held and processed by other offices?

The Heads of Departmental and Field Elements are responsible for assuring that sites under their cognizance have implemented DOE Notice 206.3. The Checklist in 206.3 is a signed affirmation that the requirements have been met.

3. In order to comply with the Accreditation Checklist, must an element ensure that the individual appears in-person, presents two forms of identification and ensure separation of duties, etc.?

Yes, the entire checklist must be completed in the affirmative (yes) in order to be compliant.

4. What action does the term "positively completed" mean in the Notice?

"Positively completed" indicates a "yes" response.

5. If all accreditation checklist items cannot be implemented prior to the October 12, 2005, reporting date, should a site/facility submit the checklist with negative responses or wait until all items can be implemented before submitting the checklist?

Yes, please submit your actual status. However, please note that a checklist with "No" responses is an open action item that jeopardizes the

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Secretary's ability to meet the required October 27, 2005, deadline for the Department and must be resolved as soon as possible.

- 6. For a badging process controlled by a DOE contractor, who signs the accreditation checklist as the certifying official?**

The Head of the Departmental Element will determine who should sign the accreditation checklist for each site.

- 7. If we submitted an Accreditation Checklist in accordance with DOE N 206.2, should we resubmit a new Accreditation Checklist as contained in DOE N 206.3?**

No, it is not necessary to resubmit the Accreditation Checklist.