

Operational Guidance for Centralized Background Check Process and Adjudication: In-Home Care Providers

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Note that the red font in this document indicates there were changes made from the previous version.

I. Purpose.

This document provides a high level overview of the process for background checks for In-Home Care Providers (IHCP). IHCP in this document has the same meaning as in reference 1. **This document is reformatted for simplicity. It also clarifies Personnel Security Investigation Portal (PSIP) changes for child services cases; clarifies actions required at reverification; provides for placing incomplete cases on hold or terminating cases; and outlines appeal procedures.**

II. Coverage and Applicability.

1. This guidance document covers Family Child Care (FCC), Emergency Placement Care (EPC), Army-sanctioned Respite Care, and FCC Backup Providers. Family members or other individuals age 12 and

over residing in the home for more than 30 days are also included for all except Respite Care and FCC Backup providers who provide care only in the homes of approved FCC providers. Backup FCC providers who provide care in their own homes must be submitted as FCC providers, not Backup providers.

2. This document outlines processes for new providers requiring a full National Background Investigation Bureau (NBIB) Tier 1 Investigation with State Criminal History Repository Checks (SCHR) and/or INTERPOL¹ checks as well as Preliminary Background Checks (PBC); those who have an existing investigation and only need a SCHR Special Agreement Check (SAC) and/or INTERPOL checks as well as PBCs; and reverifications (annual for providers, every five years for others residing in the home) which require new Installation Records Checks and FBI Fingerprint SACs.

3. With issuance of references 5 and 6, Line of Sight Supervision (LOSS) is now applicable for FCC providers, but no other category of IHCP. The CSSC will make interim fitness determinations for FCC providers and others residing in the home, so that their homes may be opened under LOSS.

4. Table 1 lists the required checks for each population.

Category	Requirement	All IHCPs ²	Individuals 12 to 17 years residing in the home ³	Individuals 18 years and older residing in the home ⁴
Preliminary Background Checks (PBC)	<ul style="list-style-type: none"> • FBI Fingerprint (FP) Special Agreement Check (SAC) 	X		X
	<ul style="list-style-type: none"> • Installation Records Checks <ul style="list-style-type: none"> ○ Military Law Enforcement Records (Defense Central Index of Investigations (DCII)/Army Law Enforcement Reporting and Tracking System (ALERTS)) ○ Army Substance Abuse Program (ASAP) ○ Army Central Registry (ACR) 	X	X	X
Once the CSSC makes an interim suitability determination regarding an FCC provider and others residing in the home, the garrison may elect to open the home under LOSS, following the guidance in references 5 and 6.				

¹ INTERPOL checks are required when an IHCP 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 3 – however, please note that the Reimbursable Suitability/Security Investigation (RSI) request is now submitted on a FIPC 554. See <https://nbib.opm.gov/hr-security-personnel/rsis-reopens/>.

² For EPC, both parents are screened and adjudicated as providers.

³ Not applicable for Respite Care, or FCC Backup Providers.

⁴ Not applicable for Respite Care, or FCC Backup Providers.

NBIB Investigation	<ul style="list-style-type: none"> • NBIB Tier 1 Investigation • State Criminal History Repository Check SAC 	X		
Except for FCC providers, no care can begin until all above checks are returned and favorably adjudicated.				
Reverification (Annual for Providers, every 5 years for others residing in the home)	<ul style="list-style-type: none"> • FBI FP SAC • Installation Records Checks <ul style="list-style-type: none"> ○ Military Law Enforcement Records (DCII/ALERTS) ○ Drug and Alcohol ○ Army Central Registry 	X	X	X

Table 1: Investigative Requirements

III. References.

1. Army Directive 2014-23 (Conduct of Screening and Background Checks for Individuals Who Have Regular Contact With Children in Army Programs, 10 September 2014.
2. Department of Defense Instruction 1402.05, Background Checks on Individuals in DoD Child Care Services Programs, 11 September 2015, Incorporating Change 1, Effective July 14, 2016.
3. ASA(M&RA) memorandum, Clarifying Policy in Army Directive 2014-23, 5 February 2018.
4. ASA(M&RA) memorandum, Suitability and Fitness Adjudication at the Child Services Suitability Cell, 12 September 2018.
5. Assistant Secretary of Defense Memorandum, Policy Clarification for Line of Sight Supervision (LOSS), 28 September 2018.
6. ASA(M&RA) memorandum, Policy Clarification for Line of Sight Supervision (LOSS), 22 October 2018.

IV. Definitions.

1. Mandatory/Automatic Derogatory Information: Defined as “Criteria for Automatic Disqualification” in reference 2, page 12, enclosure 3, paragraph 3b 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 2a and reference 3, paragraph 4k. The CSSC will adjudicate Discretionary/Presumptive Derogatory Information.
3. Preliminary Background Checks (PBC). Initial checks, to include FBI FP SAC, 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).
4. **Consolidated Suitability Service Center** (CSSC). In this document, CSSC refers to the 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 2 below).

5. Reverification. In accordance with references 2 and 3, reverification of background checks (IRCs, FBI Fingerprint results, and State Criminal History Repository / INTERPOL checks) are completed every year for providers and every 5 years for others residing in the home (except for others living with respite care and FCC backup providers, who are not screened).

V. General Instructions.

1. Communication With the CSSC.

a. The CSSC will communicate primarily with the **primary and alternate** Personnel Security Investigation Portal (PSIP) requesters.

b. 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 the PSIP Requestor Guide, Appendix N.

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

(1) Check to ensure that PSIP request was filled out correctly in accordance with the PSIP Requester Guide and all documentation accompanied the request (if applicable).

(2) Contact NBIB/OPM and/or CAF for any information regarding **the background investigation, as applicable.**

(3) Check Defense Information System for Security (DISS) for any information and status, **as applicable.**

(4) **Check PSIP for current case status.**

d. Should concerns or issues arise during the course of a case or regarding any matters concerning the CSSC, the initial contact should be with the assigned CSSC PSS. If additional assistance is required, the matter should be elevated **by the CDE government management official** to one of the **technical leads** at the CSSC:

- Robert Snyder, at robert.c.snyder7.civ@mail.mil / (410) 278-1412 / DSN 298-1412; or
- Eric Wiecech, at eric.l.wiecech.civ@mail.mil / (410) 306-0119 / DSN 458-0119

If additional assistance is required, matters may be elevated **by the CDE government management official** to the CSSC Director:

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

2. Connecting SOI/SON with CSSC.

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

(Z256) with the submitting SON/SOI to allow this to occur, **by sending** an email to ccssonsoi@nbib.gov requesting that the CSSC SOI be added as corresponding to **the CDE SON/SOI**.

3. Fingerprints.

a. Army policy is to use LiveScan for fingerprint capture. When a hardcopy card is required to accompany an OFI-86C, only use the FD-258 (**version 5-15-17**) – do not use the SF-87. **This is especially important when submitting an OFI-86C case as NBIB will not know where to send the results if a SF 87 is used due to the inclusion of the SON/SOI fields. When submitting a Hard copy FD-258 fingerprint card to obtain a FBIF FP SAC, in the section labeled “Reason for Fingerprinted” make sure to list the SON, SOI and IPAC information.** Local Background Check Administrator (BCA)/Security offices code FBI FP LiveScan to reflect the CDE SOI and CDE UIC. CSSC will pull the FBI FP SAC from CVS/PIPS **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.

(3) 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).⁵

c. **If fingerprints that are submitted for a SCHR along with an NBIB background investigation are unclassifiable, the case will be transferred to the Army by the DoD CAF with the notice that the prints were unclassifiable. The requester will need to submit a second set of cards, labelled “reprint” to the child care eQIP team at NBIB. They will initiate a new SCHR for that state and the case will go into pending status to wait for the SCHR, which are then recorded on a new Case Closing Transmittal and transferred to the Army.**

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.**

4. Movement Between Positions.

a. Garrisons should only submit cases for IHCPs transferring from one **organization** to another if they meet the requirements in reference 3. **If the situation does not warrant a new investigation or a**

⁵ See <https://nbib.opm.gov/hr-security-personnel/requesting-opm-personnel-investigations/#url=6.3>.

reverification per that reference, the gaining organization will contact the previous organization to obtain required documentation and no action is required by the CSSC.

b. If a new investigation is required in accordance with reference 3, paragraph 4d(1)(a), the garrison will submit a request for a new investigation following Section VI paragraph 4 below. If reverification of an individual residing in an IHCP home is required in accordance with reference 3, paragraph 4(d)(1)(b), follow Section VI paragraph 5. Note that the reverification in these cases need not be submitted prior to the transfer and the individual need not be restricted from providing service at the gaining garrison, unless serious derogatory information is identified per Section V, paragraph 5.

b. If the individual was previously cleared for child services work in a different personnel category, he/she may be subject to additional background checks or investigative requirements, and the case must be adjudicated accordingly (see reference 3). In such cases, requesters should submit the case in PSIP, following guidance below depending on whether the individual will need a new investigation (such as when moving from a volunteer to an IHCP) or if only new IRCs and FBI FP SAC are required (such as when moving from an IHCP to a volunteer).

5. Requests for Installation Records Checks from Other Components.

The Army has made a determination that Army activities will not complete courtesy installation records checks for other components on individuals who previously were or currently are serving the Army in positions having regular contact with children. The recipient of any such requests should decline and if necessary, refer the requestor to their Command HQ.

VI. Case Submission Instructions.

1. Multiple Personnel Types.

If an individual is being processed for an IHCP and in addition, a position of another type, such as a civilian employee or a volunteer, please call or email the CSSC PSS before submitting a request so that the CSSC PSS can ensure that all the checks are coordinated.

2. Preparation for Submission of Request.

Providers	Other Individuals Residing in the Home (N/A for Respite Care Providers and FCC Backup Providers Only Providing Care in Primary FCC Home)
<p>a. When an individual desiring to become IHCP submits application and is selected, the functional manager (FM) coordinates with the BCA and submits a work order ticket and preliminary documents to the BCA (see paragraph 3 below for a list of required documents). The applicant coordinates with the CDE office to have fingerprints taken (fingerprints must have been taken within 120 days prior to submission).</p>	<p>a. When an individual desiring to become IHCP submits application and is selected, the FM coordinates with the BCA and submits a work order ticket and preliminary documents to the BCA (see paragraph 3 below for a list of required documents). The applicant coordinates with the CDE office to have fingerprints taken for family members age 18 and over (fingerprints must have been taken within 120 days prior to submission).</p>

<p>b. Upon receipt of the work order ticket, BCA reviews preliminary documents and FBI Fingerprint check results to ensure no mandatory disqualifying information is identified; if so, the BCA notifies the FM. If a local decision is made to terminate the fitness request, due process procedures must be followed IAW reference 3.</p>	<p>b. Upon receipt of the work order ticket, BCA reviews preliminary documents and FBI Fingerprint check results to ensure no mandatory disqualifying information is identified; if so, the BCA notifies the functional manager. If a local decision is made to terminate the fitness request, due process procedures must be followed IAW reference 3.</p>
<p>c. The BCA calls NBIB to confirm if a CNACI or Tier 1/equivalent with SCHR checks is on file for the provider; and follows instructions in paragraph 3 below.</p>	<p>c. No CNACI or Tier 1/equivalent with SCHR checks is required for others in the household unless it is an EPC home in which case both parents are screened as providers.</p>

3. PSIP Submission.

<p>a. Even if the BCA is aware of an existing investigation, the BCA inputs information into PSIP, selecting “initial” in the Type Tab; “In-Home Care Provider” in the Role Tab, “none” in the Clearance Tab, “T1” in the Investigation Tab, and “CSSC” in Reason for Request. The BCA uses the SOI “DODS” and the garrison UIC. The BCA uploads the OF-306 into that area of PSIP and combines the following documents for the provider into a single PDF file. The requestor uploads these documents into the Childcare Suitability Documents area of PSIP using the naming convention: LASTNAME_LAST4SSN_PE.</p> <p>(1) Release/Consent Statement⁶. Signature date must be no more than 120 days prior to PSIP submission date.</p> <p>(2) Application (DA Form 5219-R for FCC and FCC Backup; any format for all others).</p> <p>(3) References – but only if the references disclose information that is considered derogatory as defined in reference 2.</p> <p style="padding-left: 40px;">FCC: Should be on DA Form 5220-R; All other providers – No standard form – may use form at Appendix G or local form.</p> <p>(4) Position description. The position description should indicate whether or not the provider will be transporting children so that driving nexus may be evaluated if applicable.</p>	<p>a. The BCA combines the following documents for each family member or individual residing in the home into a single PDF file for each and uploads into PSIP, in the Childcare Suitability Documents area using the naming convention: LASTNAME_LAST4SSN_FM_PE.</p> <p>(1) Release/Consent Statement⁷. Signature date must be no more than 120 days prior to PSIP submission date.</p> <p>(2) References – but only if the references disclose information that is considered derogatory as defined in reference 2 (no required format; may use Appendix G). If providing a unit commander reference, should be on DA Form 5220-R or IMCOM equivalent.</p> <p>(3) DA Form 5018-R, ADAPCP Client’s Consent Statement For Release Of Treatment Information. Use CSSC template at Appendix M.</p>
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⁶ See Appendix A.

⁷ See Appendix A.

<p>(5) DA Form 5018-R, ADAPCP Client`s Consent Statement For Release Of Treatment Information. Use CSSC template at Appendix M.</p> <p>(6) Appendix J, Notification of Submission (only for FCC providers and EPC).</p>	
<p>b. Comments should be added in PSIP to indicate the following:</p> <ul style="list-style-type: none"> • Type of Provider • INTERPOL checks submitted and date • Driving nexus • Financial nexus • Previous PRB or adjudication • States lived in for past five years • Break in service over 24 months • Date OFI-86C submitted, if any • 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 	<p>N/A for other individuals residing in the home.</p>
<p>c. BCA follows the Personnel Security Investigations Portal (PSIP) user guide and CDE Standing Operating Procedures (SOP) for all other documents and requirements (for instance, proof of citizenship and listing of states the applicant lived in for the past five years).</p>	<p>N/A for other individuals residing in the home.</p>
<p>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 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.</p>	<p>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 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.</p>

<p>e. PSI-CoE determines whether provider 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 Joint Personnel Adjudication System (JPAS) and/or Central Verification System (CVS). If a Tier 1 or equivalent (or higher) has been completed in the last 5 years, go to paragraph 4a. If no investigation exists, go to paragraph 4b.</p>	<p>N/A for other individuals residing in the home.</p>
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4. Full National Background Investigation Required.

a. Existing Investigation.

Provider	Other Individuals Residing in the Home (N/A for Respite Care Providers and FCC Backup Providers Only Providing Care in Primary FCC Home)
<p>(1) If an investigation exists, the PSI-CoE cancels the investigation request and email advises that if child services checks are needed, and the requestor should submit an OFI-86C. No additional PSIP action is required, as the original submission created the CSSC case.</p> <p>(a) The BCA will take and submit all appropriate fingerprints to NBIB along with the OFI-86C if an investigation is already on file but requires state checks.</p> <p>(b) If the existing investigation is pending and was requested by Army, the BCA requests that NBIB add SCHR checks to the investigation. If the pending investigation was requested by another agency, the BCA will process a stand alone OFI-86C for SCHR checks.</p> <p>(c) If the existing completed investigation does not include SCHR checks the BCA processes an OFI-86C and sends to NBIB.</p> <p>(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.</p> <p>(2) The BCA mails the OFI-86C and applicable state documents (forms and/or hardcopy fingerprint cards) to NBIB.</p> <p>(3) If the individual has resided OCONUS for more than six months in the past five years, the BCA will also submit a request for INTERPOL checks in accordance with reference 3.</p>	<p>(1) BCA takes and submits fingerprints for a FBI FP SAC for any family members 18 and older residing in the home for 30 days or more.</p>

<p>(4) If the individual has resided overseas longer than five years and has no States to list the BCA need ONLY complete an RSI for INTERPOL Checks using the NP2 Portal.</p>	
<p>(2) 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, the BCA contacts the CSSC so that the CSSC can send a request for a new investigation (see Section VIII paragraph 1b).</p>	<p>N/A for other individuals residing in the home.</p>
<p>(3) If the investigation documents identify the presence of, a “please call” annotation 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. The CSSC will include the information in the adjudicative process.</p> <p>(a) CSSC obtains all previous investigations to be reviewed for child services suitability from NBIB as needed.</p> <p>(b) 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.</p> <p>(c) The results of the OFI-86C with SCHR will be sent directly from NBIB to the CSSC. Once SCHR checks and previous investigation are received, go to Section II - Processing and Adjudication of Results of PBCs and NBIB Investigation.</p>	<p>N/A for other individuals residing in the home.</p>

b. No Existing Investigation.

Provider	Other Individuals Residing in the Home (N/A for Respite Care Providers and FCC/HOPS Backup Providers Only Providing Care in Primary FCC Home)
<p>(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 in eQIP.</p> <p>(2) BCA forwards hard copy fingerprint cards and required releases (as applicable) for SCHR checks</p>	<p>N/A for other individuals residing in the home.</p>

<p>to PSI-CoE by certified mail or other mailing system with tracking number.</p> <p>(3) Requester does not submit a separate OFI-86C or request for INTERPOL checks to NBIB for these cases. The Tier 1 investigation, coded correctly, will ensure that SCHR and INTERPOL checks, if applicable, are completed.</p>	
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5. Special Situations.

a. *Incorrectly Processed Prior Actions.*

If it is determined there was derogatory information from the previous background checks that was not obtained and/or adjudicated in accordance with existing guidance at the time, the gaining BCA will submit a case in PSIP, selecting the “CSSC PBCs Only” at the initiation page and adding a note in the comments regarding the situation. The BCA will submit all available documents regarding the previous adjudication (using the guide in paragraph 5a(2) below) in the Childcare Suitability Documents area of PSIP. If SCHR checks were not previously completed, the requestor will complete the OFI-86C as described in 4a(2) above.

b. *Due Process.*

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

c. *Emergency Placement Care.*

Both parents, if present in the home, will need to be screened as providers for EPC. Provider information must be submitted for both. Submitters should identify one parent as “Provider #1” and all family members attached to that record. The other parent should be considered “Provider #2” and also be attached to Provider #1.

d. *Family Member Checks.*

In some situations, an individual residing in the home will require checks separately from the provider. In situations where a child turns 12 or 18 during the year, the applicable checks will be applied at the provider’s next reverification. When an individual plans to move into an FCC home during the year, or when a deployed military member redeploys, checks for that individual will be processed at that time; reverification checks for that individual will be processed with the other members of the family. The BCA will align the reverification date for the newly added household member to the date for reverification of other family members.

6. Reverifications.

a. When a reverification is required, the FBI FP SAC and IRCs will be completed on an annual basis for IHCPs and every five years for others residing in the household. If a child turned 12 or 18 during the previous year, checks applicable to the child’s age must be completed with the provider’s next reverification. If reverification for an individual residing in the household is required in accordance with transfer guidance (see Section V below), the BCA contacts the CSSC PSS to coordinate submission of the other individual’s reverification documentation. Reverifications should be submitted following the instructions below no more than 75 days in advance of the due date.

(1) Local BCA/Security offices code FBI FP LiveScan to reflect the CDE SOI and CDE UIC⁸.

(2) BCA requestor submits a request in PSIP, selecting “CSSC Reverification” at the Initiation page, and uploads Appendix J, All In Home Care Providers Notification of Submission (**only for FCC providers and EPC**) and the following documents in a single PDF file in the Childcare Suitability Documents area of PSIP, using the naming convention of LASTNAME_LAST4SSN_PE.

a. New DA Form 5018-R, ADAPCP Client’s Consent Statement For Release Of Treatment Information for each individual. Use CSSC template at Appendix M.

b. 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 Statement⁹.

2) 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 commander (from Tab K in CRESR).

c. Originals of the following forms, unless the CSSC processed the initial package:

o For provider:

- Application (DA Form 5219-R for FCC and Backup; any format for all others).
- Original references, but **only** if the references disclose information that is considered derogatory as defined in reference 2:
 - FCC: References will be on DA Form 5220-R;
 - All other providers: No standard form – may use form at Appendix G or local form.
- Position description.

o For others in the household:

- Three references, **if** the references disclose information that is considered derogatory as defined in reference 2 (no required format; may use Appendix G). (For youth, one of the three references must be from school counselor and for sponsor, an additional (fourth) reference must be a unit commander reference (on DA Form 5220-R or IMCOM equivalent).)

(3) Comments should be added in PSIP to indicate if the following apply:

- Previous PRB or adjudication
- **Break in service over 24 months**
- **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**

⁸If 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.

⁹ See Appendix A.

b. 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.

VII. CSSC Preliminary Background Check Processing.

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

- a. Initiates and receives results of IRCS based on submission of case in PSIP by BCA.
- b. Checks CVS for results of recently completed fingerprint SAC; if no findings, obtains screen print for record. If findings, receives, or if necessary, obtains copy of FBI FP SAC results from NBIB.
- c. Reviews pre-employment documents, IRC, and FBI FP SAC results for derogatory information and adjudicates it in accordance with Section VIII below.

VIII. Adjudication.

1. Adjudicative Decision.

a. Based on the PBCs, the CSSC will make all interim and reverification adjudications. Interim determinations are only required for FCC providers and others residing in the home, so that the home may be open under LOSS. Interim adjudications will be made on or after the date that the SF-85 or OFI-86C is forwarded to NBIB. If the DoD Consolidated Adjudication Facility (CAF) decision does not make a final adjudicative decision, the CSSC will adjudicate each final case. For each adjudication, the CSSC will notify the BCA of the results with the first page of the Appendix B checklist. The checklist will indicate whether it is an interim, final or reverification adjudication. The documents the adjudicator will use are, as applicable:

- (1) Results of IRCS from IRC agencies.
- (2) Results of SCHR checks and INTERPOL checks from NBIB.
- (3) FBI FP SAC results from CVS/Personnel Investigation Processing System (PIPS). When results of the FBI FP SAC indicate a "Record", the CSSC obtains the FBI SAC results from NBIB.
- (4) New investigation received in DISS, or a previous investigation from NBIB as needed (see Appendix L).
- (5) Information about "please call" alerts.
- (6) SF-85 for provider.

(7) Information from the 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 contractor-signed or FM annotated memo to the CSSC and any additional information provided by the contractor. 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 or extension, the BCA will notify the CSSC with a copy of the memo, annotated accordingly.

b. If the PSI-CoE rejects a request for a new investigation because there is an existing investigation, and the previous one has been archived, the BCA contacts the CSSC, and the CSSC sends a request for a new investigation to the Initiations Inbox. The request will include the CLR # and an explanation similar to those cited in the Definition of Suitability CC Pilot reason for access, e.g. current existing investigation unavailable for review or the age of the investigation does not meet the needs of the program.

2. Reverifications.

a. If the CSSC identifies serious derogatory information during a reverification process, the CSSC will contact the BCA to advise them of same so that a local decision may be made as to whether to place the individual back under LOSS or remove the individual from contact with children.

b. If the CSSC identifies derogatory information in any of the checks pertaining to an incident that appears to have occurred on the job, the CSSC will contact the BCA to request documentation as to any disciplinary action that might have been considered/taken as a result of the incident. The BCA will coordinate with management as necessary to obtain that documentation and provide it to the CSSC so that incident is not considered in the reverification process.

IX. Appeals.

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

Appendix A. CSSC Consent/Release Statement.

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.

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

Appendix L. Decision Matrix: Requirements For Ordering Investigations.

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. (N/A for IHCP)

Appendix P. Memorandum Notifying Subject of Unsuitable Determination and Appeal Rights.