



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



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Memorandum

To: Service Directorate
Attn: Volunteer Coordinators

From: Deputy Director *Mark A. P. Jones*

Subject: Interim Guidance on the Implementation of HSPD-12 for Volunteers

Homeland Security Presidential Directive 12 (HSPD-12), "Policy for a Common Identification Standard for Federal Employees and Contractors," directs the implementation of a new standardized process to enhance security, reduce identity fraud, and protect personal privacy by establishing a mandatory, Government-wide standard for identification issued to Federal employees, contractors, and "other" individuals. The Department of the Interior began implementing the HSPD-12 program Department-wide on October 27, 2005.

Many Fish and Wildlife Service (Service) volunteers may also be affected by this new process and be required to have a "Smart Card" under certain criteria. As is the case with employees, affected volunteers must undergo security checks and be issued identification by October 2007.

Attached is interim Service guidance that explains the process for obtaining a background check and issuing a "Smart Card," how to determine when a volunteer needs a "Smart Card," associated costs, and the length of time necessary to complete a background investigation.

Background information about HSPD-12 can be found at www.doi.gov/hspd12. Questions on the Service's general implementation of HSPD-12 should be directed to your servicing Human Resources Office. Questions on the Service's volunteer program should be directed to Deborah Moore, Division of Visitor Services and Communications, at (703) 358-2386, or by e-mail at deborah_moore@fws.gov.

Attachment

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Implementation of Homeland Security Presidential Directive-12 (HSPD-12) for Volunteers

What does Homeland Security Presidential Directive 12 (HSPD-12) require?

On August 27, 2004, the President signed Homeland Security Presidential Directive 12 (HSPD-12). "Policy for a Common Identification Standard for Federal Employees and Contractors." HSPD-12 directs the implementation of a new standardized badging process to enhance security, reduce identity fraud, and protect personal privacy by establishing a mandatory, Government-wide standard for secure and reliable forms of identification issued to Federal employees, contractors, and "other" individuals. The Department of the Interior began implementing the HSPD-12 program Department-wide on October 27, 2005.

In addition to employees and contractors, the Department has determined that HSPD-12 applies to our volunteers as well, if certain criteria are met. Service volunteers subject to HSPD-12 must undergo background checks (a National Agency Check with Inquiries or NACI) and be fingerprinted. A NACI is the minimum background check required under HSPD-12 and is the same one that most Service employees undergo.

HSPD-12 mandates the creation of a common ID system for use by all government agencies; requires that the ID system be integrated; and, that the integrated ID system be used by all Federal employees who have computer access and non-Federal employees working with the Service who have access to a Federally-controlled information system or a controlled area not open to the public.

What is a Smart Card?

The common ID system is referred to as the "Smart Card." It is one part of a security system for protecting Federal buildings, computers, equipment, applications and data. The "Smart Card" is used to securely and reliably maintain information on employees', contractors' or volunteers' verified identities. "Smart cards" are issued to minimize identity fraud, protect privacy, and improve security through a standardized clearance process. A "Smart Card" is good for 5 years, but its expiration date for a foreign national working as a volunteer cannot exceed the expiration date of documents required by the Immigration and Naturalization Service (e.g. green card, work permit, etc.)

Under what circumstances does a volunteer need a Smart Card?

A "Smart Card" is required for volunteers who:

- Have un-supervised access to a Federally-controlled information system.
- Have access to Federally-controlled facilities or Federally-controlled space within a facility for more than 180 days.

A Federally-controlled facility is defined as a Federally-owned or leased space, whether for single or multi-tenant occupancy, all or any portion of which is under the jurisdiction, custody, or control of the Department, its Bureaus or Offices. A volunteer would not normally need to undergo a NACI and be fingerprinted if he/she worked at a visitor information desk in a Federally-controlled facility (such as a visitor center) and did not have access to a Federally-controlled information system.

A Federally-controlled information system is generally any records system or data base that has been created by the Federal government, managed by the government and/or for which the government has administrative control. A Federally-controlled information system is defined by the Federal Information Security Management Act of 2002 (44 USC 3502 (8) which is the primary legislation governing Federal information security. (Information security means protecting information and information systems from unauthorized access, use, disclosure, disruption, modification or disruption.)

How is the 180-day period for volunteers calculated?

The 180-day period begins the first day the volunteer is officially affiliated with the Service and ends exactly 180 calendar days later, regardless of the frequency or duration of the work activity. As an example, a volunteer begins work over a weekend in January. One month later, the volunteer works over another weekend. Under this scenario, the volunteer is already 60 days into his/her 180-day period.

Who does not need a Smart Card?

Supervised access to Federally-controlled facilities or information systems will be granted to certain volunteers without issuing a HSPD-12 compliant identification under the following conditions:

- The volunteer works less than 180 days for the Service.
- The volunteer undergoes a screening system, displays a temporary/visitor badge at all times, and/or be escorted at all times.
- The volunteer does not access Federally-controlled information systems but, as part of their duties, requires sporadic physical access to part of the facility that has access to such systems. Under this scenario, the volunteer must undergo a screening system, display a temporary/visitor badge at all times, and/or be escorted at all times.

Examples of when volunteers would not need a "Smart Card" include:

- A volunteer uses a computer that only has access to software programs on its hard drive, but does not use a computer that has access to Federally-controlled information systems.
- A volunteer works in a visitor center's bookstore where they manage the bookstore's inventory on a computer's hard drive.

- A volunteer works in a visitor center but does not have access to part of a Federally-controlled facility such as staff offices.
- A volunteer working in a maintenance facility or a fee booth. These are generally considered not to be restricted buildings under HSPD-12.
- A volunteer who only works outside leading an interpretive event and does not use facilities that are restricted from public entry.

How does a volunteer obtain a Smart Card?

As is the case with Service employees and contractors, a volunteer will be asked to undergo a NACI in order to be issued a “Smart Card.” To complete the process, the volunteer must:

- Complete a Personal Identity Verification (PIV) Credential Request Form (<http://www.test.myinterior.doi.net/HSPD12/Documents/PIV%20Credential%20Request%20Form.pdf>)
- Complete a Background Investigation Form SF-85 (OMB Questionnaire for Non-Sensitive Positions) (http://www.opm.gov/forms/pdf_fill/SF85.pdf)
- Be fingerprinted (SF 87 – fingerprint card)
- Be photographed as part of the PIV Credential Request

How long does it take to complete a NACI?

After submitting the above information, a background check for employees, contractors, and volunteers can take approximately 180 days (6 months) to complete. The NACI must be initiated before a volunteer is issued a “Smart Card.” However, once the fingerprint check has been completed (approximately 5-7 days), the volunteer may begin work under a provisional credential issued by the Service.

What does a provisional credential allow?

A provisional credential will allow the volunteer limited access to Federally-controlled buildings and Federally-controlled information systems. Note that the Department requires that the provisional credential be revoked if the volunteer’s NACI has not been completed within 6 months. A credential may also be revoked at any time for just cause during the investigation or thereafter.

Temporary credentials with limited access may also be issued to temporary volunteers (less than 180 days) or if a volunteer forgets to bring their “Smart Card” to work. A temporary credential may be issued after their identity is confirmed.

How long a period of time does a NACI cover and can it be used for working with other agencies?

A NACI is approved for a 15 year period, as long as the volunteer is not separated from the government for more than two years or moves into a position that requires a higher security review level, such as a secret or top secret security clearance.

A NACI is reciprocal among Federal agencies. For example, if a volunteer obtains a background check to work with the National Park Service and then decides later to volunteer with the Service, no additional security clearance is necessary.

What happens to the volunteer's personal information collected as part of the NACI?

HSPD-12 explicitly states that protecting personal privacy is a requirement. Information received as part of the NACI is protected by the Service in accordance with 5 U.S.C. 552a (Privacy Act of 1974). For the Service, this means that private information must be stored in locked rooms and file cabinets for paper records and protected with secure passwords for electronic records. Offices responsible for managing volunteer security records should also take other precautionary steps, such as positioning computer screens to avoid sight in high traffic areas.

What is the cost for a Smart Card?

We estimate that the cost to run a background investigation will be approximately \$100.00 for a volunteer and \$50.00 to issue the Smart Card. Additionally, it costs about \$50.00 per computer to install a "Smart Card" reading device. At present, all costs for background checks, issuance of the "Smart Cards" and the reading devices are expected to be covered by the offices in which volunteers work.

Where can I get more information on HSPD-12?

As a first step, you should contact your servicing Human Resources office for more details about security checks and the "Smart Card." General information on HSPD-12 is also available at www.doi.gov/hspd12.