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MEMORANDUM FOR DEPARTMENTS AND AGENCIES
CHIEF INFORMATION OFFICERS;
CHIEF SECURITY OFFICERS;
CHIEF BUILDING MANAGEMENT OFFICERS;
AGENCY CHILD CARE LIASIONS; AND
COMMISSIONER, PUBLIC BUILDING SERVICE

FROM:

GARY KLEIN
ASSOCIATE ADMINISTRATOR

SUBJECT: Federal Child Care Center Workers Facility Access Credentialing

In order to ensure continuing physical access for child care workers in Federal work places, agencies shall issue them Facility Access Cards (FAC) that are compatible with, but physically and electronically distinct from, the Personal Identity Verification (PIV) card. These facility access cards will allow them access to local facilities through either visual inspection and/or electronic processing via a physical access control system. The following points pertain to these FACs for child care workers:

- Child care workers shall have limited physical access to Federal facilities (access shall be limited to specific buildings) and shall have no logical access to Federal IT systems;
- The agency Child Care Program Office will sponsor FAC issuance and specific building access to all child care workers under its purview;
- Each child care worker will be enrolled for access to the specific building(s) that house the child care center(s) at which he/she provides services;
- The General Service Administration (GSA), Office of Identity Solutions, will issue the FACs to child care workers on behalf of the agency Child Care Program Office for those agencies getting access cards through the GSA Managed Services Offering (MSO);
- Upon termination of employment, the agency Child Care Program Office will ensure that the departing employee's FAC is returned to the appropriate office for revocation and destruction.

These are minimum requirements for issuing access credentials to child care workers in all Federal facilities and they will be utilized in GSA-controlled and multi-tenant buildings. In other Federal buildings, these requirements apply and specific agency hosts may require additional background investigations based on local policy and building security profiles.

Homeland Security Presidential Directive 12 (HSPD-12), "Policy for a Common Identification Standard for Federal Employees and Contractors," requires that Federal employees and contractors with routine access to Federal facilities acquire personal identity credentials in accordance with a defined standard. The standard for these identity credentials was developed by the National Institutes of Standards and Technology as Federal Information Processing Standard 201 (FIPS 201), "Personal Identity Verification of Federal Employees and Contractors." Tenants of Federal facilities who are neither Federal employees nor contractor personnel will not be issued PIV cards unless they undergo the background investigation defined in FIPS 201 section 2. The minimum requirement for a PIV card is the Office of Personnel Management National Agency Check with Written Inquiries (NACI).

GSA was designated Executive Agent by the Office of Management and Budget for HSPD-12 in memorandum M05-24 dated August 5, 2005, augmented later by a letter dated June 30, 2006. GSA has been congressionally charged with the regulation and oversight of child care centers by the Tribble Amendment, 40 U.S.C. 590. In order to fulfill this responsibility, GSA issues a license agreement that allows a child care provider to utilize Federal space subject to the child care provider's compliance with certain regulatory conditions. One of these conditions is the requirement to complete the criminal history background checks for child care workers mandated in the Crime Control Act of 1990, Pub. L. 101-647, dated November 29, 1990, as amended by Pub. L. 102-190, dated December 5, 1991. These statutes require that each employee of a child care center located in a Federal building or in leased space must undergo a background check that is: 1) based on fingerprints taken by a law enforcement officer and on other identifying information; 2) conducted through the FBI's Identification Division and through the State criminal history repositories in each state in which the child care employee has been a resident or has listed in an employment application, and 3) initiated through the personnel program of the applicable employing agency.

The GSA Child Care Operations Division has worked with the Office of Homeland Security to ensure that all child care workers in Federal work places have gone through the security check process mandated by the Crime Control Act. However, this criminal history check is not the equivalent of the FIPS 201-mandated minimum NACI, because it lacks the written inquiries component. Therefore, child care workers are not eligible for PIV credentials under HSPD-12 and will therefore be issued Facility Access Cards as specified above.

For additional information, please contact Eileen Z. Stern, Director, Child Care Operations Division, (212) 264-8321, eileen.stern@gsa.gov; or Judith Spencer, Office of Governmentwide Policy, Office of Technology Strategy, (202) 208-6576, judith.spencer@gsa.gov.

