

Volunteer Background Investigation Procedures Update

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MEMORANDUM FOR COMMANDERS, MAJOR SUBORDINATE COMMANDS AND
DISTRICT COMMANDS, CHIEFS, SECURITY AND LAW ENFORCEMENT, CHIEFS,
OPERATIONS DIVISIONS

SUBJECT: Volunteer Program Background Investigation Procedures

1. References.

a. Water Resources and Reform Development Act of 2014, Section 1047(d),
Public Law 113-121.

b. Public Law 98-63, Section 101 (33 U.S.C. § 569c), Chapter IV of Title I, Services
of Volunteers, 1983.

c. Homeland Security Presidential Directive 12, Policy for a Common Identification
Standard for Federal Employees and Contractors.

d. Army Directive 2014-23, Conduct of Screening and Background Checks for
Individuals Who Have Regular Contact with Children in Army Programs.

2. Purpose. The purpose of this memorandum is to clarify guidance and procedures in
the "Implementation Guidance for Section 1047(d) Services of Volunteers, of the Water
Resources and Reform Development Act of 2014, Public Law 113-121" for volunteer
background investigations.

3. The following clarifications are provided to meet the most current security standards
for processing background investigations and to provide consistency in procedures
across all Major Subordinate Commands of the U.S. Army Corps of Engineers
(USACE). These procedural updates are effective immediately and will also be
incorporated in the appropriate Engineering Regulation and Engineering Pamphlet
when they are revised:

a. Persons who have ever been convicted of a violent crime, sexual crime, arson,
crime with a weapon, sale or intent to distribute illegal drugs, or are an organized crime
figure will not be utilized as volunteers, regardless of when the crime took place.

b. With the exception of the crimes listed in 3.a. above, the existence of a criminal
conviction does not automatically disqualify an applicant from being a volunteer.
Volunteers with criminal convictions not listed in 3.a. may be considered for service at

Volunteer Background Investigations Procedures

- Memo from HQUSACE Chief Security Branch sent to MSC and District Security and Law Enforcement Chiefs and Operations Division Chiefs, 09 March 2020
- Email sent from HQUSACE Chief, NRM program, 10 March 2020 to OPMs, NRM MSC, NRM Districts, RLAT, SAT
- PURPOSE: Clarifies background investigation guidance and procedures established in the Aug 12 2016 Implementation Guidance for Section 1047(d) Services of Volunteers, of WRRDA 2014



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Why is USACE Updating the Policy/Procedures?

- The WRRDA 2014 Implementation Guidance only included policy on WHEN to conduct a background investigation for volunteers, but not HOW or WHAT LEVEL of background investigation needs to be conducted for the various types of volunteers.
- This has resulted in inconsistent interpretation of Security standards and processing of background investigations throughout USACE, as well as increasing requests from Districts for HQUSACE to provide national standardized guidance.
- Security standards have changed since 2016 when the guidance came out. This memo provides the most current Security standards for processing background investigations and will provide consistency in procedures across all MSCs.
- Bottom line: Our first priority is the safety of the public, USACE staff, and other volunteers. By following standard procedures provided by HQUSACE Security Office, our goal is to reduce risks to all involved.



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What Changed from WRRDA 2014 Guidance?

- Added clarification on timeframe for consideration if potential volunteer has committed a crime in the restricted list (violent crime, sexual crime, arson, crime with a weapon, sale or intent to distribute illegal drugs, or are an organized crime figure) => People who have been convicted of any of these will not be utilized as volunteers, **regardless of when the crime took place.**
- Added clarification on potential volunteers with criminal convictions that do not fall in one of the above categories => **May be considered** for service at the discretion of the District Volunteer Coordinator and the District Security Office by joint decision.
- Added clarification for volunteers with military CAC, transferring from another Department or agency who possess a VOLAC or Personal Identity Verification (PIV) Credential, or have undergone the required Tier 1 (NACI) or higher background investigation at their current or former agency => **Do not need a new background investigation** unless there has been a 2 year break in service.



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What Changed from WRRDA 2014 Guidance?

- Background investigations for volunteer positions that involve regular contact with children under 18 years of age without a parent or guardian present, or where the volunteer does not work under constant line of sight supervision (LOSS) by USACE personnel who have been screened in accordance with Army Directive 2014-23, **require re-verification every 5 years.**
- All other **background investigations will be effective indefinitely** (no expiration date), unless there is a 2 year break in service or if the command learns of any adverse information about the individual that was not previously adjudicated in a background investigation.
- Specified procedures for three levels of volunteers and developed a Decision Matrix to assist in determining what level of background investigation is necessary
- Changed wording for Tier 1 Investigation requirement from 'volunteering more than 180 days in a year' to '6 months consecutively, regardless of number of hours served each day'
- Changed wording about wearing the volunteer uniform to focus more on unescorted access into government facilities and buildings.



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What Changed from WRRDA 2014 Guidance?

- **Required** for any volunteer in one or more of the following scenarios:
 - Individuals who volunteer for ~~more than 180 calendar days in a year~~ *(6 months consecutively)*
 - Positions that work independently of USACE personnel that are regularly in contact with children under 18 without a parent or guardian present. (*Ref: Army Directive AD 2014-23)
 - Positions that require access to a Corps networked computer
 - Positions that require access to government files and records
 - Positions that require the collection or handling of fees
 - ~~Positions that require wearing the Corps volunteer clothing/name tag who work independently of Corps personnel~~ *(Work independently of USACE personnel with unescorted access to controlled/locked government buildings)*



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Volunteer Background Investigation Procedures and Requirements Decision Matrix

	Volunteer Type	Level of Background Investigation (BI) Required	Security Office Involvement/ Processes BI	Background Investigation Expiration	Notes
Level 1	One-time event	None required, but may choose to use local contractor at project level or District Security Office to run FBI fingerprints	No (Unless running an FBI fingerprint check)	N/A	
	Only work under LOSS by USACE personnel with infrequent contact with minors				
	Less than 6 consecutive months and do not meet any of the scenarios below				
Level 2	Work independently of USACE personnel with unescorted access into controlled space/non-public areas	Special Agreement Check (SAC) FBI fingerprint check	Yes	SAC valid for lifetime as long as there is not a 2 year break in service.	Fingerprints may be done at military base, District Office, law enforcement office, etc.
	Require access to government files/records				
	Collection/handling of fees				
Level 3	Volunteering more than 6 consecutive months	Tier 1: FBI fingerprints, SF 85, and OF 306 using PSIP and EQIP	Yes	BI valid for lifetime as long as there is not a 2 year break in service.	Volunteer may begin their service once their SAC results (FBI fingerprint check), SF85 and OF 306 forms have been favorably reviewed by the District Security Office for no adverse information, and the SF 85 and OF 306 forms have been submitted to OPM through the PSIP to process the full investigation.
	Involving regular contact with children under 18 years without a parent or guardian present and without constant LOSS by USACE personnel			BI valid for 5 years	
	Requiring USACE networked computer access/VOLAC card			BI valid for lifetime as long as there is not a 2 year break in service. VOLAC valid for 5 years.	



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How Does this Impact Existing Programs?

- Returning volunteers from previous seasons will not need a new background investigation unless there has been a break in service, or their previous background investigation did not meet the new Security standards.
- Level 2 and 3 volunteers require background investigation processing through District Security Office. Locations that have been previously using outside contractors/vendors to run background investigations will need to coordinate with Security Office.
- Fingerprinting may be conducted at military bases, District or Division Offices, Project offices, military recruiting centers, universities, other Federal agencies, or law enforcement offices.
 - HQ Security Office has funding to provide to locations that need to purchase fingerprinting machines (~\$3k each) and can provide training. Any USACE employee can take volunteer fingerprints and submit them through the web-based system to their District Security Office.
 - A Special Agreement Check (SAC)/FBI fingerprint check is the terminology used for the standard fingerprinting process.
 - Digital fingerprints are the preferred collection method. In locations where digital collection is not available, fingerprints may be obtained on the SF 87 or FD 285 fingerprint card and submitted to the District Security Office for transmission to the Personal Security Investigation Center of Excellence- (PSI-CoE). All fingerprint cards require a valid Security Officer identifier, Submitting Office Number, and an Intra-Governmental Payment and Collection code to be processed.



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How Does this Impact Existing Programs?

- District Volunteer Coordinators will need to work closely with their Security Office and serve as liaisons with field sites to process background investigations. In locations where the Security Offices have not been involved in the past, there may be increased workload impacts.
- NOTE: Districts may have additional volunteer background investigation guidelines/policies in place that impose stronger restrictions beyond the national policy. These are not impacted by the updated guidance.
 - Ex: Some districts require background investigations for adult non-volunteer spouse/partner residing with a volunteer USACE fee lands. This is not impacted by the updated HQ guidance.



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Tier 1 Investigations

- Required for volunteers who:
 - Volunteer more than 6 months consecutively, regardless of number of hours served each day.
 - Have access to USACE networked computer
 - Have regular contact with children under 18 years of age without a parent or guardian present, or where the volunteer does not work with constant Line of Sight Supervision (LOSS) by USACE personnel who have been screened in accordance to Army Directive 2014-23.
- Tier 1 volunteers may begin their service once their fingerprint results, Standard Form SF 85 Questionnaire for Non-Sensitive Positions and Optional Form OF 306 Declaration for Federal Employment have been favorably reviewed by the District Security Office for no adverse information, and the SF 85 and OF 306 forms have been submitted to the Office of Personnel Management (OPM) through the Personnel Security Investigation Portal (PSIP).
- Bottom line: You do not need to wait for the Office of Personnel Management to process the full investigation (which can take months) to bring the volunteer on board.



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Resources: NRM Gateway

<https://corpslakes.erdcdren.mil/employees/volunteer/volunteer.cfm>



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Natural Resources Management Gateway

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News/Events People Forums Learning GETS Tools New Postings Submit Index/Search ?

Volunteer Program

[Headquarters POC](#)

Corps projects offer many volunteer opportunities in recreation and natural resources management. Volunteers can serve as park and campground hosts, staff visitor centers, conduct programs, clean shorelines, restore fish and wildlife habitat, maintain park trails and facilities, and more. Corps personnel can recruit their own volunteers or post opportunities on www.volunteer.gov, an interagency volunteer portal that is used by the Department of Interior, Department of Agriculture, Department of Defense, and Department of Commerce to recruit volunteers for natural and cultural resources programs. Volunteers may find opportunities on www.volunteer.gov and may also call 800-VOL-TEER for more information.

- [Policy & Procedures](#)
- [Volunteer Forms](#)
- [Program History](#)
- [Training](#)
- [Volunteer.gov](#)
- [Related Sites](#)
- [National Public Lands Day](#)
- [Division & District POCs](#) 
- [Volunteer Awards](#)
- [Volunteer Program Annual Reports](#)
- [News / Current Issues](#)
- [FAQs](#)
- [Good Enough to Share](#)
- [Volunteer Clothing and Brochures](#)
- [Volunteer Plans and Handbooks](#)
- [Job/Activity Hazard Analyses](#)
- [Background Checks/Volunteer Computer Access](#)
- [Corps Photo Album for Volunteers](#)
- [Volunteer Pass Program](#)

 Item is restricted to U.S. Army Corps of Engineers and will open in a new window.



Volunteer

Partnership Advisory Committee (PAC) 2020

- Tennille Hammonds – At-Large
(SWF - RPEC)
- Francis Ferrell – SAD
(SAW - Falls Lake)
- Allison Walker - LRD
(Nashville District Office)
- Stacy Sigman - MVD
(MVK - Lake Ouachita)
- Heath Kruger – NWD
(Omaha District)
- Scott Sunderland – NAD
(NAP - Blue Marsh Lake)
- Taylor Saia - SPD
(SPK - Northern Operations Branch)



Not pictured:

- Rob Jordan - SWD
(SWF – Lewisville/Ray Roberts)
- Heather Burke - HQUSACE



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Questions?



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