

VOLUNTEER BACKGROUND INVESTIGATIONS – NWP PROCEDURES

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VOLUNTEER BACKGROUND INVESTIGATIONS



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- 09 MARCH 2020 – Updated Policy Memo from HQUSACE Chief Security Branch sent to MSC and District Security and Law Enforcement Chiefs and Operations Division Chief
- 10 MARCH 2020 - Memo was distributed from HQUSACE Chief of NRM program to OPMs, NRM MSCs, NRM Districts
- PURPOSE: Clarifies background investigation guidance and procedures established in the 12 AUG 2016 Implementation Guidance for Section 1047(d) Services of Volunteers, of WRRDA 2014.



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

CECO-I

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

LEVEL 1 VOLUNTEERS



- See criteria to the right (LOSS = Line of Sight Supervision.)
- NWP Security is not requiring anything at this time for Level 1
- Included in this category would be volunteers who work independently (no line of sight supervision) in a PUBLIC area, and do not meet any of the scenarios in Level 2 or 3
- If you want to do a background check, let Security know your intentions, and follow procedures for Level 2 Volunteers

ENCLOSURE 1
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 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 Electronic Questionnaires for Investigations Processing	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), SF 85 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 Management 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.	

LEVEL 2 VOLUNTEERS



ENCLOSURE 1 Volunteer Background Investigation Procedures and Requirements Decision Matrix

1- Volunteer completes a set of Special Agreement Check (SAC) FBI Fingerprints. Fingerprints are mailed to the Project Volunteer Coordinator. (See slide 8 regarding electronic prints.)

2- Volunteer Coordinator mails the fingerprints and the Volunteer Background Investigation Request form to NWP Security Office at the address below.

*US Army Corps of Engineers
CENWP-SL - Volunteer Applications
333 SW 1st Ave
Portland, OR 97204-3440*

3- Once Security Office runs the prints, volunteer coordinator will receive either a "Clear to Proceed" message or a "Not Suitable" for hire designation.

4- Security Office will record the data on the Volunteer Background Investigation Tracker spreadsheet.

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LEVEL 3 VOLUNTEERS



1- Volunteer completes the PSIP Required Info form, OF-306 and a set of SAC FBI Fingerprints. Completed forms are mailed to the Project Volunteer Coordinator.

2- Volunteer Coordinator mails the following to NWP Security Office at the address below.

- i. PSIP form completed by both volunteer and volunteer coordinator as the supervisor,
- ii. OF-306,
- iii. Set of SAC FBI Fingerprints, and
- iv. Volunteer Background Investigation Request form

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LEVEL 3 VOLUNTEERS CONTINUED



3- Security office reviews and enters the information in PSIP and an invitation to complete the electronic SF-85 questionnaire is automatically generated and sent to volunteer. Email will have an "EQUIP link" to access form. They have SEVEN (7) calendar days to complete or it terminates and we have to start over.

4- Volunteer completes the electronic SF-85 questionnaire. The SF-85 is a background check for non-sensitive positions. Applicants will need to provide all residences and employment information for the last 5 years.

*Note a PO Box will not be accepted. They need to have a permanent physical address. This may be challenging for some fulltime RVers. This form is provided for your awareness and/or if they have questions about it.

5- Once Security Office runs the prints, volunteer coordinator will receive an "Interim Clearance" message indicating they are clear to proceed or a "Not Suitable" for hire designation.

6- Security Office will record the data on the Volunteer Background Investigation Tracker spreadsheet.

ENCLOSURE 1 Volunteer Background Investigation Procedures and Requirements Decision Matrix

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FINGERPRINTS



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- Will need to be done locally wherever the volunteer is.
- If they are in our area, we can send them to the NWP District office. NWP has a fingerprint machine and will take fingerprints at no cost to the volunteer.
- We could also send them to the closest District office to them, and this should be at no cost to them as well.
- If traveling to a District office is not feasible, then a local Law Enforcement office, courthouse, or other federal agency can do it for them for a fee.
- These other offices will likely take wet ink prints on the standard fingerprint chart (typically SF-87 or FD-258).
- An email template about fingerprints is being provided for volunteers outside of the Portland area.
- Check with your supervisor and project budget staff if a reimbursement on a local voucher 1164 is permissible after they arrive on site.

ELECTRONIC FINGERPRINTS



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- This is the preferred method.
- Electronic fingerprints taken by NWP or another District office will likely be taken electronically and automatically uploaded to the DCSA (formerly OPM) system.
- Since uploaded automatically, no need for mailing.

COORDINATING WITH OTHER SECURITY OFFICES



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- If the volunteer applicant is close to a different District office, take the following steps:
 1. Call the Security Office and check that they have a fingerprint machine and are willing to do this for us.
 2. Confirm that the volunteer can call the security office directly to schedule an appointment.
 3. Give the volunteer the contact information to set up an appointment.
 4. Instruct the volunteer to provide the following SON, SOI and ALC numbers to the security office at the time the fingerprints are taken.
- **NWP = SON: 2101, SOI: A170, ALC: 00005570**

PAPER FINGERPRINT CHARTS



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- Volunteers need to be sure both they and the person doing the fingerprints SIGNS the chart.
- Volunteers will mail paper fingerprints charts to the project volunteer coordinator.
- Scanning fingerprint charts is not acceptable. There are fine details of a print that may be lost in a scan. (Fingerprint scanners are expensive and not commonly found.)
- Volunteer coordinators will enter the following codes on the fingerprint chart before mailing it to security: **SON 2101, SOI A170, and ALC 00005570**. On form SF-87, add all of these codes in the box labeled “Department, Bureau, and Duty Station”. On FD-258 enter these numbers in the box labeled “Reason Fingerprinted”.
- Due to the PII, it is recommended that volunteers upgrade shipping to 2nd Day when they mail to the volunteer coordinator, and in turn, volunteer coordinator sends it similarly to Security.
- Be sure to use a carrier that has a tracking number and share the information with the receiving party.

PSIP FORMS AND OF-306



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- These forms can be submitted electronically.
- However OF-306 requires a wet ink signature, not electronic signature.
- If they want to send electronically, Volunteer will need to print, sign, scan and send.
- Due to the PII, when sending these forms via email, the encryption option would be best. However encryption is not possible with all email platforms.
- In lieu of the encryption option, forms can be transferred via DoD SAFE file transfer system.
<https://safe.apps.mil/about.php>
- When sending to Security Office, you can use encryption option in Outlook.

LENGTH OF VALIDITY FOR LEVEL 3 / TIER 1



- On the decision matrix, the box denoting "BI Valid for 5 years" is aligned with the middle box that indicates "regular contact with children... without a parent or guardian... without constant LOSS".
- If that is your triggering factor for the Tier 1 BI, it is only good for 5 years.
- If your triggering factor is 6 consecutive months or computer access, then its Lifetime with no 2-year break in service.

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VOLUNTEERS WITH EXISTING BACKGROUND INVESTIGATION



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- If the volunteer reports they have already completed a background investigation, Security can verify this by entering their SSN into the DCSA database.
- If it comes back less than 2 years old, you do not need to complete another one.
- If it is older than 2 years old, you need to verify that there has not been a 2-year break in service.
- “Service” includes active duty, civilian, federal contractor, or volunteer for the federal government.
- Volunteer coordinators will complete an employment verification with one of their employment or volunteering positions from the past 2 years.

CURRENT VOLUNTEERS



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- If you have current volunteers, you need to check to be sure that their current investigation complies with the new policy.
- If their current investigation does not match the new policy requirements, a new one will need to be initiated.

COMMUNICATING THE REQUIREMENT



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Lastly, it should be recognized that this new policy will create work for you and your applicant. However when you are communicating this requirement, you will want to frame it in a careful way. Below are some recommended statements that you could use as talking points:

- This may be a higher level of investigation than you are used to with other volunteering opportunities.
- This volunteer position is a trusted position, serving at one of the critical infrastructure civil works projects under the Department of Defense/ Department of Army.
- The access granted to this position is similar to that of an employee, (often but not always), including unescorted access to a Federal Powerhouse.
- Thorough background checks are required and necessary to ensure the safety and security of the infrastructure, the agency employees, volunteers, contractors and visiting public.

COMMUNICATING THE REQUIREMENT



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- If the applicant has volunteered for the Corps before, or is former military, this process may not be surprising at all.
- For others it may seem like overkill.
- By phrasing the purpose of the background check in a deliberate way, they might have a greater understanding and appreciation for why we are required to do this.

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QUESTIONS



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503-808-4325

Or

NWP Security Office
503-808-4442
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