



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Washington, D.C. 20240



In Reply Refer To:  
FWS/ANRS-VSC/033675

NOV 23 2007

## Memorandum

To: Service Directorate

From: **Acting Director** *Kenneth Stansell*

Subject: Guidance on the Implementation of Homeland Security Presidential Directive 12 for Volunteers

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." The Department of the Interior began implementing the HSPD-12 program Department-wide on October 27, 2005, and the Fish and Wildlife Service (Service) is required to be in compliance by October 2008.

HSPD-12 directs the implementation of a new standardized credentialing 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: 1) Federal employees, 2) contractors, and 3) "other" individuals. Volunteers fall into the third ("other") category.

HSPD-12 mandates the creation of a common ID for use by all Government agencies and requires that the ID system be integrated and used by all Federal employees, contractors and volunteers who have access to Federally-controlled space not open to the public, or have access to Federally-controlled information systems. We believe that HSPD-12 will not apply to most Service volunteers since they do not have or need access to Federally-controlled space or information systems (as defined in the attachment) to perform their duties. In many instances, managers can address the requirements by initiating simple physical and administrative measures to minimize such access.

Interim Service guidance on HSPD-12 and how it affects volunteers was approved in June 2006. The attached guidance provides updated information and procedures for conducting background investigations for affected volunteers and issuing identification cards. This guidance should assist field stations or offices with volunteers in determining whether or not a volunteer requires a Federally-issued a HSPD-12 Personal Identity Verification Compliant Card (PIV II) or a Temporary Access Badge (TAB). This guidance applies to all volunteers, whether they are part-time or full-time.



If you have any questions regarding HSPD-12 or the guidance that is being issued, please contact Deborah Moore, National Volunteer Coordinator, at (703) 358-2386 or [deborah\\_moore@fws.gov](mailto:deborah_moore@fws.gov).

Attachment

## U.S. Fish and Wildlife Service Final Guidance Homeland Security Presidential Directive 12 (HSPD 12) Compliance for Volunteers

This guidance provides procedures for conducting background investigations for volunteers and issuing identification cards.

**Background.** 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." The Department of the Interior began implementing the HSPD-12 program Department-wide on October 27, 2005. HSPD-12 requires this credential process to enhance security, reduce identity fraud, and protect personal privacy by protecting Federal records. This guidance applies to all Service volunteers, whether they are part-time or full-time. It includes people volunteering on their own and through groups such as Friends Organizations and Scout troops.

**What is a HSPD-12 PIV II Compliant Card?** The HSPD-12 Personal Identity Verification Compliant Card (PIV II) is an identification card used to securely and reliably verify information on the identity of employees, contractors and volunteers. It is part of a security system for granting access into Federal buildings and computers. The PIV II is issued to minimize identity fraud, protect privacy, and improve security through a standardized clearance process. The PIV II is good for up to 5 years but needs recertification updates every 3 years.

The PIV II applies to volunteers who will have **unsupervised** access to Federally-controlled facilities, Federally-controlled information systems or sensitive information for **180 days or longer**.

**What is a Temporary Access Badge?** A Temporary Access Badge (TAB) is an identification badge we issue to volunteers who will work with the Service for **fewer than 180 days**. The TAB applies to volunteers who will have **unsupervised** access to Federally-controlled facilities, Federally-controlled information systems or sensitive information.

The TAB requires a less rigorous background check than the PIV II.

**How is the 180-day period for volunteers calculated?** For volunteers accessing Federally-controlled facilities or Federally-controlled information systems or sensitive information, the 180-day period begins the first day the volunteer is officially affiliated with the Service and it ends exactly 180 calendar days later, regardless of the frequency or duration of the work activity. For example, a volunteer starts the first weekend in January and works just 2 days every month on the first weekend of the month. Although the volunteer works only 12 days by the end of 6 months, the volunteer meets the 180-day time period in early June.

**Does every volunteer need a PIV II or TAB?** No. A volunteer does not need a PIV II or TAB if they only work outside or in public areas of buildings, or will not have unsupervised access to Federally-controlled information systems, Federally-controlled buildings or sensitive information.

### **What are some examples of volunteers who do not need a PIV II or TAB?**

- O Volunteer who works in the visitor center and does not have access to staff offices, the network, and/or sensitive information.
- O Volunteer who works outside and does not have access to staff offices, the network, and/or sensitive information.
- O Volunteer who works in a Friend's bookstore that is part of the visitor center and does not have access to staff offices, the network, and/or sensitive information.
- O Volunteer who has access to a stand alone computer that does not contain sensitive information in the visitor center or a Friend's bookstore and does not have access to staff offices, the network, and/or sensitive information.
- O Volunteer who works at a fee booth or maintenance building that does not have access to a network computer and/or sensitive information.
- O Volunteers who are supervised. Supervision means a staff person in the presence of a volunteer **at all times**. For example, a volunteer who is attending a meeting with staff would need to be escorted to/from the meeting.

**What is a Federally-controlled Facility?** Federally-controlled facilities are the buildings, grounds, and approaches that we own or lease and that are under our jurisdiction, custody, or control.

If a Federally-controlled facility does not contain a Federally-controlled information system or sensitive information, then you may not need, or be required to use, a PIV II for entrance. For example, a maintenance building, fee booth, or visitor center that does not contain a Federally-controlled information system or sensitive information would not meet the definition of a Federally-controlled facility as it pertains to HSPD-12.

**What is a Federally-controlled Information System?** A Federally-controlled information system is any record system or data base that we create, manage, or control. Hard copies of sensitive documents or files are Federally-controlled information systems. Sensitive information is any information where the loss, misuse, or unauthorized access to, or modification of, could adversely affect the national interest or the conduct of Federal programs, or the privacy of individuals.

Networked computers are Federally-controlled information systems because they may access sensitive information.

The following are not Federally-controlled information systems: copies of non-sensitive documents or files and stand-alone computers that are not connected to a Service network. Volunteers may access stand alone systems or systems connected through a public Internet Service Provider (ISP) to the internet. The system must be located in either a fully supervised or public area and cannot traverse the DOI network to gain access to the internet. An example would be a computer in a visitor center or Friend's bookstore that has access to the internet only.

**How to obtain a PIV II or a TAB.** For both cards, the staff person responsible for overseeing the volunteer program at the field station level should explain why the identification cards are necessary and ensure that volunteers complete the required forms.

## **PIV II:**

Just as with Service employees and contractors, a volunteer has to pass a background investigation to get a PIV II. While volunteers can complete some steps on the Internet, volunteers have to appear in person at a credentialing center to enroll and activate the PIV II. The Service's Regional Human Resources Offices are credentialing centers. The Department is working toward opening credentialing centers strategically throughout the United States to meet the geographic and capacity needs of the Service. The General Services Administration (GSA) is identifying sites that field station staff, contractors, and volunteers can easily reach. We will share centers with other Interior bureaus and Federal agencies.

To obtain the PIV II, the staff person overseeing the volunteer program at the field station must ensure volunteers:

- Complete a Personal Identity Verification (PIV) Credential Request Form (DI 2005).
- Complete a Background Investigation Form SF-85, OMB Questionnaire for Non-Sensitive Positions ([www.opm.gov/forms/pdf\\_fill/SF85.pdf](http://www.opm.gov/forms/pdf_fill/SF85.pdf)).
- Complete OF 612 (Optional Application for Federal Employment) or submit a resume, and OF 306 (Declaration of Federal Employment).
- Complete FD 258, fingerprint card ([www.fbi.gov/hq/cjisd/pdf/fpcardb.pdf](http://www.fbi.gov/hq/cjisd/pdf/fpcardb.pdf)).
- Be photographed as part of the PIV Credential Request.
- Send completed forms and card to the Regional Volunteer Coordinator for review.

If the package is complete, the Regional Volunteer Coordinator then gives the information to the Regional Human Resources Office to begin required background investigations through the Office of Personnel Management.

## **TAB:**

To obtain a TAB, the staff person overseeing the volunteer program at the field station must ensure volunteers:

- Complete a PIV Request Form (DI 2005) and makes a notation on the form that it is for a "Temporary Affiliate-Not to Exceed 180 days".
- Complete FD 258, fingerprint card.
- Send completed form and card to the Regional Volunteer Coordinator for review.

If the package is complete, the Regional Volunteer Coordinator then gives the information to the Regional Human Resources Office to begin required background investigations through the Office of Personnel Management. The volunteer must pass the FBI criminal history fingerprint check before they may receive a TAB.

If the volunteer work schedule extends past the 180-day period that volunteer must adhere to the "Smart Card" process, including a complete background investigation.

If the volunteer's work schedule extends beyond the 180-day period, the person responsible for overseeing the volunteer program at the field station must begin the process for obtaining a PIV II.

**How long does it take to complete a Background Investigation?** The fingerprint check for both PIV II and TAB may take 5 to 7 days after the Office of Personnel Management (OPM) receives the package. A background investigation for the PIV II may take OPM up to 180 days to complete.

For volunteers who need the PIV II, once they pass the fingerprint check portion of the background investigation, they may begin work. If the outcome of the investigation is not favorable, we will terminate our relationship.

**For how long is a Background Investigation valid?** A background investigation is good for a lifetime, as long as it can be verified and as long as the volunteer is not separated from the government for more than 2 years, or moves into a position that has been designated at a higher sensitivity level.

The background investigation is reciprocal among Federal agencies. For example, if a volunteer obtains a background investigation to work with the National Park Service and then decides later to volunteer with the U.S. Fish and Wildlife Service, another background investigation is not necessary. If the volunteer is issued a PIV II and leaves a site for another, that site will retrieve the PIV II from the volunteer and mail it to the next duty station prior to that volunteer's arrival.

**What happens to the personal information collected as part of the Background Investigation?** HSPD-12 explicitly states that protecting personal privacy is a requirement. We protect the volunteer information we receive as part of the background investigation according to the Privacy Act of 1974 (5 U.S.C. 552a). This means we store paper records containing private information in locked rooms and file cabinets. We protect electronic records containing private information with secure passwords. Offices responsible for managing volunteer security records take other precautionary steps, such as positioning computer screens to avoid sight in high traffic areas.

Your servicing Regional Human Resources Office maintain the background investigation forms, fingerprint forms and the results of the background investigations, any appeals, and any litigation files in a locked file cabinet or password-protected environment.

**What is the estimated cost to the Service for a PIV II or TAB?** The cost of a PIV II is approximately \$220.00 per volunteer. The cost for a TAB is approximately \$25.00. The office in which the volunteer works must cover the cost of the PIV II and TAB.

**Are there special considerations for volunteers who are not U.S. citizens?** Yes. All volunteers who are not U.S. citizens must present their Visa for review and verification. The expiration date of the PIV II for a foreign national working as a volunteer cannot exceed the expiration date of documents required by the Immigration and Naturalization Service (i.e., green card, work permit, etc.)

For a foreign national volunteering for more than 3 years the staff person overseeing the volunteer program at the field station must review and copy the volunteer's Visa and take steps to begin a background investigation. The volunteer must have a complete, favorably adjudicated background investigation. If the volunteer needs a PIV II, the volunteer may get one after the successful adjudication of a FBI criminal history fingerprint check and pending the completion of the background investigation.

For a foreign national volunteering for fewer than 3 years the staff person overseeing the volunteer program at the field station must review and copy the volunteer's Visa. The volunteer must complete a favorably adjudicated FBI criminal history fingerprint check before they can begin volunteering.

**Contacts for Additional Questions.** Contact your Regional Volunteer Coordinator for more details about the background investigation, the PIV II and TAB. General information on HSPD-12 is also available at [www.doi.gov/hspd12](http://www.doi.gov/hspd12).

# Steps to Determining if Volunteers Need PIV II or Temporary Access Badge

