Security and Hazardous Materials Safety (ASH)

Office of Personnel Security-Contractors Division (AXP)

Contractors Division: Vendor Training



Training Overview

- **→** Policy
- Roles and Responsibilities
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 - Contractor Applicant
- Vendor Applicant Portal(VAP)
 - Functions (Add, Remove, Reports)
 - Requesting a VAP POC account
 - Vendor responsibilities
- Contractor Applicant Requirements
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- Investigation Results
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- Obtaining an FAA PIV Card



Why are contractor background investigations required?

Investigations are completed to determine the contractors suitability to work on a federal contract in order to authorize access to our facilities, systems, or to Sensitive Unclassified Information (SUI). To accomplish our mission the following Directive and Orders have been implemented:

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

FAA Order 1600.1F: establishes the Contractor and Industrial Security Program for the FAA and prescribes related policy, standards, criteria, and guidelines for security screening of contractor employees

FAA Order 1600.78: Federal Aviation Administration delegated responsibility for issuing specific ID cards used FAA-wide to Implement Homeland Security Presidential Directive -12, dated May 10, 2010.



Roles and Responsibilities

CONTRACT COMPANY POINT OF CONTACT

- As the designated point of contact for the FAA's Vendor Applicant Portal (VAP), responsibility includes submitting contract employees for investigations and removing contractors when applicable and timely.
- Assisting contractor applicants through background investigation process.
- Remaining in communication with the FAA Security Office via the Vendor Application Program (VAP) to maintain contractor's work status for the duration of contract/task order.
- Notifying FAA CO/COR (within 24 hours) when a contractor completes work obligations or leaves the contract and return FAA PIV cards within 5 business days.

CONTRACTOR APPLICANT

- Complete the required investigation forms. Forms that may be required include DOT 1631 Credit release, e-App, and work history/resume.
- Comply with Requests to obtain (2) sets of fingerprint cards.
- Responding to all email/phone calls for data clarification in a timely manner.



Investigation Processing

Consistent with FAA Order 1600.1F, AXP must approve designated risk levels for the positions under the contract, to be determined by the FAA Operating Office (the organization with the requirement) in coordination with the COR, using the OPM Position Designation Automated Tool (PD Tool).

AMS Security Clause- 3.14-2 Contractor Personnel Suitability Requirements



Contractor Applicant On-Boarding Process Roadmap



VAP POC submits Contractor Applicant in VAP

- The contract company's Vendor Applicant Portal (VAP) POC submits a request in VAP to begin on-boarding process for a new contract award/task order.
- The FAA Contract POC reviews and authorizes the VAP contractor applicant request



- Personnel Security Specialist (PSS) checks Central Verification System (CVS) to determine if applicant has favorably adjudicated investigation completed that meets requirements for the FAA contractor position.
- If so, the FAA Contract POC and VAP POC are notified of approved suitability and process is complete. If not, a new background investigation is necessary.



PSS initiates Background Investigation Process

- PSS contacts contract applicant via email with fingerprinting instructions/locations.
- Applicant given 15 days to complete fingerprintingapplicant controls this step of the timeline.

1-5 business days

1-XX davs

PSS Reviews Paperwork

PSS reviews completed security paperwork and fingerprint results, if acceptable makes an interim suitability determination.

When rejected, contractor applicant may need to resubmit or be requested to provide clarifying information (this delays investigation processing)



PSS Contacts Contractor Applicant

1-15 Days

- Once PSS receives fingerprints, a second email is sent to contractor applicant with instructions to complete investigation forms/e-APP.
- Applicant given up to 15 days to complete investigation forms/e-APP- applicant controls this step of the timeline.



DCSA Processes Investigation

- DCSA conducts the background investigation. DCSA, an outside agency, controls this step of the timeline.
- Contractor Applicant must respond to any inquiries throughout the investigation.

15-90 Davs



PSS Adjudication of Background **Investigation and Final Suitability Determination**

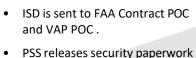
 Adjudication timeliness goal is 60 days, FAA Personnel Security average adjudication time is 10 days.



1-5 Business

Days





Card.

PSS Notifies POCs of Interim

Suitability Determination (ISD)

Favorable ISD allows applicant

to onboard and can obtain a PIV

to Defense Counterintelligence and Security Agency (DCSA).





Vendor Applicant Portal (VAP)



Vendor Applicant Portal (VAP)

- The VAP system is for ADDING NEW contractors, REMOVING contractors and REQUESTING REPORTS. The VAP system is NOT to be used for PIV card renewal requests.
- It is very important that you use the VAP, as it is a secure website that will help protect the Personally Identifiable Information (PII) of everyone involved. <u>You should never send</u> us PII via email.
- You will need to ensure that the contract/task order number your employee will be working under is entered into the VAP. An investigation will not be conducted otherwise.
- The Contract Vendor (Prime) should be identified as the company. If the contractor applicant is working for a sub-contracted company the awarded Vendor (Prime) must be identified.
- It is your responsibility to ensure that your employees complete this process in the time frame assigned to them. <u>They will not be authorized unescorted access to any FAA</u> <u>facilities without FAA Security approval</u>.

The FAA requires a background investigation for contractors when *access* is needed to FAA facilities, systems, or to Sensitive Unclassified Information (SUI).



VAP -Add (requesting an investigation)

Adding a Contractor:

- The Add Contractor has several fields to fill in on the ADD option screen. Most fields are mandatory. It is critical that all data, especially the Social Security Number (SSN), is entered correctly.
- It is important for the vendor to get the contractor applicant's email address correct because an email will be sent to the contractor by a Personnel Security Specialist (PSS).
- Even when a contractor currently holds an FAA PIV card they must still be entered into the VAP for each contract/task order award; each contractor employee's individual security record should reflect all FAA requirements that they support.

DATA VALIDATION is imperative: Ensure contractor information that is entered into the VAP is correct. Information provided (legal "full" names, DOB, SSN, etc.) should be verified prior to entry. This information then should be consistent with all of the contractor applicant's investigation forms.

Incorrect information delays the contractors ability to start work, hinders their ability to complete investigative requirements and to receive a PIV card.



VAP -Add continued...

Adding a Contractor:

- Contractor applicants must respond to the investigation invitation and instructions within the designated time frame. Contractor applicants will be made "inactive" for non-compliance and could be restricted from being authorized a new VAP add for a designated period after non-compliance.
- The <u>VAP remarks section</u> should be used to provide any additional information that may be important (ex. contractor transferring from another contract, identify SPONSOR if different from the CO/COR).
- Once all the data is entered, click the submit button to prepare data to be sent to our Investigative Tracking System (ITS).
- No investigative actions will be taken on behalf of a contractor applicant until a VAP submission has been received.
- Position Titles entered into the VAP add must be consistent with the approved labor categories in the established Personnel Security Contract Profile.

Labor Category/Position Title	Risk Level	Investigation
Position 1	Low	T1
Position 2	Moderate	T2

VAP –Removal

Removing a Contractor:

- The Remove Contractor module allows the vendor POC to inform the PSS of those contractors no longer working on a specific FAA contract/task order. The removal request form is easy to fill in, again with most fields being mandatory. It is crucial that the contract number and SSN fields are entered correctly.
- A VAP removal action should be submitted on any contractor no longer support the FAA contract/task order.

Note: It is important to use the "remarks" section especially if the contractor has been terminated under derogatory circumstances.

- Provide employee <u>Date of Separation (DOS)</u>
- Identify if employee is eligible for rehire
- Identify if employee left under favorable or unfavorable conditions
- ✓ A VAP removal is required within twenty-four (24) hours after any contractor employee resigns, is terminated, transferred, or otherwise removed from the contract.
- ✓ If the FAA issued the contract employee a PIV card, or other ID card, the contractor must collect the card within twenty-four hours, and return it to AXP no later than five (5) businessdays of the employee's termination or transfer as identified in AMS security clause 3.14-2 Contractor Personnel Suitability Requirements



VAP-Reports

Requesting a Report:

The vendor POC enters the contract/task order number, and a report will be emailed to the vendor. The purpose is to allow the vendor to reconcile their list of employees with the report.

This report is the *roster** and should identify the contractor employee status in as close to real time as possible (as applicable to FAA access needs).

- Pending-identifies that the contractor applicant is still in the investigation processing and is not yet authorized to work.
- Current- the contractor is actively working with a <u>current</u> need for FAA access.
- **Inactive** identifies that the contractor requires FAA *access* but did not complete the investigation requirements within the designated time and therefore are no longer in processing.
- Former- no longer needing FAA access but does not mean they are not working for the
 Vendor but working in a capacity in which there is not a current FAA access requirement.
- ✓ You may need to sort the roster by contractor name as the system may indicate a contractor more than once, i.e. *pending* with a second line item identifying *former* (as a *former* status will be recorded for an individual and populate on the report, if there is a 2nd status identified other than *former*, <u>defer to that as the most recent status</u>).



^{*} A <u>roster is required to be generated by the Vendor quarterly</u> and reviewed for accuracy as identified in AMS security clause 3.14-2 Contractor Personnel Suitability Requirements.

VAP-POC account set-up

VAP Requirement:

- Companies are required to provide one to three (1-3) contacts to be a VAP user. Larger companies may designate up to five (5) contacts.
- VAP POC responsible for data integrity. Contract information entered into the VAP must be accurate and include contract number, contract expiration date, FAA contract point of contact.
- The identified VAP POC(s) do not require an investigation, therefore should not be entered into the VAP unless they are supporting a requirement with identified FAA access.

*Incorrect and or incomplete information may delay contractor investigations being initiated by the FAA Security POC.

Making a VAP account request for the VENDOR VAP POC:

Requests to add a Vendor VAP POC must be sent to the Contracting Officer Representatives (COR)designee/Contracting Officer (CO) and/or for coordination with our Contract Management Team to 9-ASH-Security-Contract-Customer-Service@faa.gov.

A request must include:

- 1. Name (Full Legal Name)
- 2. Telephone Number
- 3. Email address
- 4. Company Name



VAP application-system upgrade coming soon

Personnel Security is currently working hard to upgrade the **Vendor Applicant Portal** (VAP). We are excited to announce several new features and improvements to assist the VAP POC with more efficient contractor management entry, oversite and reporting capabilities.



Improved Functions include:

- Personnel Security Contract Profile- imported into the portal that identifies contract/task order award number, the approved labor categories/position titles for the contract/task order award, and associated FAA Points of Contact (POC).
- VAP add- when requesting FAA access for the contractor employee the add application will be submitted to the Contracting Officer Representative (COR) for approval. This action will authorize Personnel Security to proceed with the investigation processing for the applicant.
- VAP removals- more efficient capabilities to remove contractors from the contract/task order award when contractors complete their work obligations.
- **VAP reports-** improved reporting ability to ensure that the Vendor's roster for contractor employees is in real time status that includes with improved identification of sub-contractor personnel.



Contract Company/Vendor/VAP POC Responsibilities

Vendor POC responsibilities

Best practice is for the Contract Company/Vendor to identify **1-3 Vendor POCs** as well as an established POC for any of the **sub-contract company(ies)**, when applicable.

Contract Award

- Request access to the Vendor Applicant Portal (VAP).
- To maintain the Vendor VAP POC account in VAP active status, log-in is required every 30 days.
- Submit contract employees to the FAA by entering them into the VAP (approximately 30 days before their work obligations begin on the contract); required for any contractor that needs physical (unescorted access to FAA facilities/controlled space), logical (computer/network), and/or access to Sensitive Unclassified Information (SUI).
- Contractors <u>must</u> be submitted into the VAP for each award obligation in which they support. FAA's contractor employee oversite is at the **task order level**; therefore, the contractor employee may have multiple contracts/task orders that they support simultaneously.

Contract Close-Out

- Complete VAP contractor removal process for all contractors related to the FAA contract.
- Collection of FAA PIV Card & return to FAA CO/COR or ID Media Office (PIV credential may be returned by mailing to the address identified on the back of the card).
- Verification of continued contract obligations for contractors to maintain FAA issued PIV card.

Vendor POC responsibilities continued...

Throughout the contract life

- Submit contract employees, update contractor's work status as needed and remove contractors when they are no longer working on the FAA contract via the VAP.
- Assist contractor applicants with completion of the investigative forms as needed.
- Assist contractor with identifying and scheduling a fingerprint enrollment session.
 Fingerprint sessions may have a nominal fee which are the responsibility of the contractor.
- Ensure that contractor applicants are completing the investigation form requirements and meeting the <u>15-calendar day</u> processing time frame.
- Confirm that contractors have received the appropriate favorable interim suitability determination prior to starting work.
- Update contractor information via a new VAP entry as information changes (ex. contractor working a new contract number, contractor name and/or duty location changes).
- Provide current contract employee roster as requested. A roster report completed through VAP is required on a quarterly basis to ensure the roster is accurate. Any discrepancies must be corrected immediately.
- The prime contractor is responsible for the accuracy of their subcontractors' rosters as well.

The Contractor Applicant

Contractor Applicant

From the date that FAA initiates the investigation invite, contractors have <u>15 calendar days</u> to complete all packet requirements.

You should be aware of these items during this investigation phase:

- Contractor investigation and FAA PIV card needs are specific to the contractor applicants FAA work obligation.
- Applicants will complete the online standard forms (eApp), provide two (2) fingerprint cards, an Authorization to Obtain Credit Report (DOT1631 when required), and work history/resume (when required).
- Contractors must respond promptly to all FAA inquiries for clarification on application.
- When an investigation determination is made, the Vendor POC(s) and FAA CO/COR will be notified by email.
- Contractor applicants must respond to the investigation invitation and instructions within the designated time frame. Contractor applicants will be made "inactive" for non-compliance and could be restricted from being authorized a new VAP add for a designated period after non-compliance.
- After a favorable investigation decision, contractors must comply with requirements to be issued the FAA PIV card. The FAA PIV card will take 7-10 days to receive from initial requirements and must be activated immediately.

Contractor Applicant Responsibilities

When a Background Investigation is initiated the Contractor Applicant will be notified via the email and will be requested to complete the following:

 Contractor applicant is sent an email notification to obtain two (2) sets of fingerprint cards, to review the Privacy Statement and, when applicable, the DOT 1631 form.

Note: The Vendor POC and the FAA Official are copied on this initial correspondence.

- This email identifies the FAA Security Point of Contact (POC) for the contractor's investigation.
- Contractor must return forms and fingerprints to the Security Point of Contact at address identified in the investigation requirements email notification.
- Depending on the investigation requirement the contractor applicant may also be required to complete the eApp standard forms via the eApp portal. A registration code and instructions for the eApp standard form will be included in an email notification when this is required.



Investigative Form Requirements

Fingerprint Cards

Obtaining the Fingerprint Card:

- Respond to any request for fingerprint Submission. When requested, two (2) sets of fingerprint cards are required. The acceptable Fingerprint Card forms are the SF- 87 or FD-258.
- Fingerprints may be completed by a local police department, a professional fingerprinting service (these options may have a nominal fee that are the responsibility of the contractor) or at an FAA ID Media Office if available.

*FAA ID Media fingerprint services are available in limited areas. For a list of locations go to: https://www.faa.gov/about/office_org/headquarters_offices/ash/ash_programs/piv/fingerprint_locations/

- It is recommended to schedule a fingerprint appointment as soon as the investigative need is identified for the contractor applicant. For some locations it may take a couple weeks to schedule a time.
- All identifying information must be completed. PRINT LEGIBLY and ENSURE ACCURACY. Failure to complete all required information may result in the fingerprint card being rejected.
- Person taking the fingerprints must be trained and authorized to officially take fingerprints. Official taking fingerprints must date, sign and identify their title and address.
- Applicant may not take own fingerprints.

Fingerprint Cards continued...

Fingerprint transmissions should be sent to our SOI/SON – TD04

Send fingerprint cards to our centralized mailing address via FEDEX or UPS only:

Federal Aviation Administration ATTN: PSS Name, AXP-Branch Number (330 or 340) Security Command Center, Bldg. 230, Rm 110 6500 S. MacArthur Blvd Oklahoma City, OK 73169



eApp standard forms

To access the eApp standard forms go to NBIS eApp & NBIS Agency (dcsa.mil)

NBIS eApp (electronic application) and NBIS Agency are the new entry points for background investigation applications and are replacing eQIP as the system for initiating investigations. eApp contains the investigative Standard Forms (SF) federal applicants and employees use to input information required process their personnel background investigation.

As a single-page solution, based on modern, simple design elements, eApp makes the application process more intuitive and easier to use for applicants initiating a background investigation.

Introduction to NBIS eApp: <u>DVIDS - Video - eAPP (dvidshub.net)</u>



Investigative Results Interim or Final Suitability Determinations

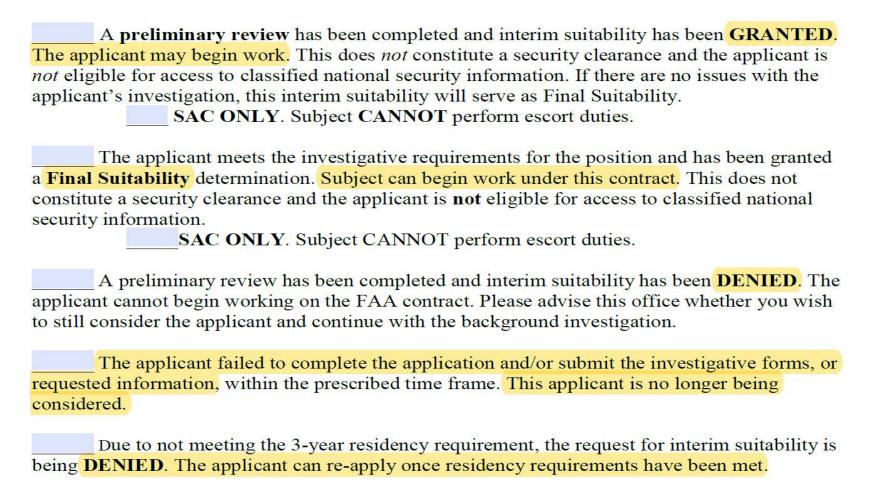
When may the contractor start work?

The Interim or Final Suitability Determination

- When the contractor has completed all investigation requirements to an accepted standard and a determination has been made, the FAA Security POC will email the notification. This notification is identified as an Interim Suitability Determination (ISD).
- If the contractor applicant has previously completed a background investigation with the federal government, then reciprocity may be granted and a Final Suitability Notification letter is sent. Reciprocity is the acceptance of another agency's security assessment of the contractor applicant.
- ISD notice is emailed to the FAA Official(s) with a copy to the VAP POC(s).
- When an Interim notification is provided, the contractor applicant's investigation may be identified as still in process until a final determination is made. The contractor is required to respond timely to any additional inquiries during this time. Failure to respond will result in a reversal of the initial ISD finding and the contractor will be denied the ability to continue work on the FAA contract.
- If a contractor is denied after "due process" then the VAP POC should complete a VAP removal action.
- Failure to complete the security process in a timely manner may result in an Interim Suitability being denied and the contractor applicant's removal from the process
- When the interim suitability is denied, the FAA Contracting Officer Representative (COR) may request that the Contractor Applicant still be considered by requesting that the background investigation be completed.



ISD notification types



Obtaining a FAA PIV Card

FAA PIV Card

Before obtaining an FAA PIV card a favorable Initial Suitability Determination must be received:

- Upon favorable investigative determination notification, the Contract Company POC should complete the identification Card Application (DOT 1681) using the automated system located at https://idms.faa.gov/1681. The application must be completed by the contractor applicant within the FAA firewall and approved by their Sponsor (ex. CO, COR, Facility Mgr).
 - ☐ The Contract Company POC will be notified via email when the identification card application has been approved. An appointment should be made at this time for PIV card enrollment.
 - □ The contractor applicant must attend appointment and have a photo taken. Two (2) pieces of valid government issued identification are require at time of appointment (Acceptable identification attachment is available).
 - □ The contractor will receive instructions when the FAA PIV card is ready for pick-up. An appointment needs to be made to complete the card activation.

FAA Card Types	Access Need	
Orange	Only issued to individuals restricted to a specific area within a FAA Facility; Expiration date cannot exceed one year from date of issue.	
Yellow	Individuals that are not required to be entered into a physical access system and that do not need logical access (snow removal, landscaping, vendors, etc.); may be issued to other agency employees who are working at an FAA facility (e.g. GSA, NOAA, Military Liaison, etc.); may be issued to FAA employees and contractors waiting for their PIV Card.	
PIV Card	Individuals that require routine facility access, access to systems, or to Sensitive Unclassified Information (SUI).	

FAA PIV Card

- FAA PIV Card National Support Desk. For PIV Card related issues, you may contact the FAA National PIV Support Desk at 1-888-584-8334 or submit your question via email at <u>9-NATL-PIV@faa.gov.</u>
- Cards lost, stolen, damaged or compromised cards should be reported within three (3) days.
 To report, contact the FAA National PIV Support Desk at 1-888-584-8334 or submit notification to 9-NATL-PIV@faa.gov.
- PIV Card Service Locations. An accredited PIV Card Issuer (PCI) can only issue PIV cards.
 FAA accredited PCI enrollment issuance locations and ASH security service centers can be found at the following site: https://piv.faa.gov/ServiceCenterHours.htm.
- Acceptable Applicant Identification. All applicants shall present two (2) forms of unexpired identity source documents in their original form. Acceptable identity source documents may be requested by contacting your FAA Security POC.
- Identification Card Renewal. Cardholders are responsible for ensuring their identification card
 does not expire. The cardholder must initiate the renewal process at least 15 business days
 prior to expiration by completing the online Form 1681 located at https://idms.faa.gov/1681/.



Best Practices

Common Reasons for Determination Delays:

- Incorrect names and transposed SSN submitted
- Contractor Applicant not completing fingerprint card requirement
- Contractor Applicants fail to complete online e-App standard form
- Contractor Applicant not addressing eApp rejections

Recommendations:

- Contract Company should identify responsible POC to track progress and assist applicants through the FAA investigative process.
 - POC can reach out to the FAA Personnel Security to ensure they understand the process to assist their employees and sub-contractors
- Contract Company should submit contractor applicant into the Vendor Application Program (VAP) approximately 30 days prior to contractor applicant needing to start work.
- Contract Company should request applicant status if contractor is stating that they
 have completed all packet requirements and more than (5) business days have
 passed without an investigation determination notice.
- Upon favorable investigative determination, Contract Company should contact the FAA CO/COR to request the FAA PIV card request.



Personnel Security-Contractors Division

→ All Vendor Applicant Portal (VAP) and Contractor related inquiries should be sent to:

9-ASH-Security-Contract-Customer-Service@faa.gov



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