

Bulletin

January 30, 2012
FSS No. 26

Contractor Computer Access *Policy Guidance*

OVERVIEW

In an effort to clarify the specific requirements necessary to grant contractors and employees access to VA computer systems, this bulletin is issued to reiterate the policy requirements for background **screening** prior to granting access.

The background **screening**, known as a Special Agreement Check (SAC), must be completed prior to access.

There are **no** current requirements that the full background **investigation** (NACI, MBI or BI) must be initiated at Office of Personnel Management (OPM) before starting work or being granted computer access. However, the background **investigation** needs to be initiated within 14 days after appointment.

In addition to the above requirements, contractors and employees must also complete the Privacy and Security Training and sign VA Handbook 6500-Appendix G- Department of Veterans Affairs (VA) National Rules of Behavior before access is granted.

In summary, the contractor can start work once the fingerprint SAC has been favorably adjudicated. It is the responsibility of the CO/COTR to ensure the contractor complies with the investigative requirement and immediately submits the required documentation to the Security and Investigations Center (SIC) to initiate the investigation with OPM.

GUIDANCE

VA Handbook 6500.6 sets the requirement that a background investigation is initiated or verified, but it does not say it must be accomplished **before** contractors can access systems on their contracts. Therefore, you have to look at other references to determine the requirements before access to systems and the timeliness of when a background investigation must be initiated.

VA Handbook 6500 (Sept. 18, 2007) states (in part): VA requires that all personnel be subject to an appropriate “**background screening**” **prior to permitting access to VA information and information**



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systems. This includes VA applicants, appointees, employees, **contractors**, and other individuals who require physical and/or logical access to VA information or information systems to perform their jobs.

VA Directive 0710 clarifies the definition of a “**background screening**”: VA requires that all personnel be subject to an appropriate background screening (**Special Agreement Check (SAC)**) prior to permitting access to VA information and information systems. This includes applicants, appointees, employees, **contractors**, affiliates and other individuals who require physical and/or logical access to VA information or information systems to perform their jobs.

VA Handbook 0710 states: **Investigative Process for Low Risk and Non-sensitive Positions.** Unless exempted under the provisions of VA Directive 0710, appointees and contract personnel appointed to Low Risk/Non-sensitive positions must be the subjects of a National Agency Check with Written Inquiries (NACI) investigation conducted by OPM. See 5 CFR §736.201(c), Investigative Requirements. HRM at VA field facilities and VA Central Office will coordinate the initiation of the NACI investigations within 14 calendar days of an individual’s appointment, and make final suitability determinations for individuals in these positions. **However, the initiation and adjudication of contract personnel will be handled by the Security and Investigations Center.**

There are no current requirements that the full background investigation (NACI, MBI or BI) must be initiated at OPM before starting work or being granted computer access. The **background screening** (SAC) needs to be completed prior to access, and the investigation needs to be initiated within 14 days **after** appointment.

However, the contractor cannot get a PIV card until the full investigation is scheduled at OPM.

The contractor can start work once the fingerprint SAC has been favorably adjudicated. It is the responsibility of the CO/COTR to ensure the contractor complies with the investigative requirement and immediately submits the required documentation to the SIC to initiate the investigation with OPM.

ADDITIONAL INFORMATION

Point of Contact

For questions concerning this guidance:

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