**Security and Suitability Roles and Responsibilities**

(Updates highlighted in yellow)

**Purpose:** A consolidated agency security and suitability requirements guide for Contracting Officers (CO) and Contracting Officer’s Representative’s-Contracting Officer’s Technical Representatives (COR-COTR).

**COR-COTR Roles and Responsibilities:**

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|  | **General:** If contractor personnel will have access to an agency facility, site, system, or information, the acquisition is subject to security or suitability requirements.   * Suitability requirements (i.e. background investigation) apply when contractor personnel will have access to an agency facility, site, system, or information. Contractor personnel must go through the appropriate suitability screening processes when the above conditions apply, no matter the length of the award’s period of performance (POP). The agency does not allow contractor personnel to perform on an award unless they have undergone the appropriate background investigation by the Office of Personnel’s Center for Suitability and Personnel Security (CSPS). * Security requirements (i.e. credentialing) apply when contractor personnel require access to agency information systems or routine, unescorted access to agency facilities or sites;   + These contractor personnel receive credentials to allow them unescorted access to agency facilities or sites, or access to systems. See Post Award - Credentialing section below.   + For questions about infrequent access, please contact [HSPD12.training@ssa.gov](mailto:HSPD12.training@ssa.gov?subject=Contractor%20Infrequent%20Access%20Question). |
|  | **Pre Award – Risk Designation:** If security or suitability requirements apply, select the appropriate Risk Designation level on the SSA’s Streamlined Acquisition System (SSASy) **requisition** under the *General/Description* screen. The SSASy field name is *Security Classification* and is a required field.   * Access the following websites for help in determining appropriate Risk Designations:   + [Information Security Policy (ISP) Section 1.8, Personnel Security and Suitability Program](http://isp.ssahost.ba.ssa.gov/Documents/ISP%20Most%20Recent%20Version.pdf);   + CSPS’s [Position Risk Designation for Contract Positions](http://personnel.ba.ssa.gov/OPE/CSPS/pos_risk_contract.htm);   + Your component’s security officer ([Information Security Officer Listing](http://sharepoint.ba.ssa.gov/DCS/OIS/SIC/Lists/ISO%20Directory/AllItems.aspx)); or   + The [CSPS Team](http://opedirectory.personnel.ba.ssa.gov/Org_Details.aspx?STAFFID=12). * ‘None’ is the appropriate response if security or suitability requirements do not apply. * Select the lowest risk level on the requisition for an award. That will allow contractor personnel to potentially apply for multiple risk designations. Contact CSPS when a higher risk level will be required. |
|  | **Pre Award** – **Exception Requests:** Request exceptions to the normal background investigation process in emergency situations when contractor personnel require access to a facility or site, but DO NOT require access to information systems or programmatic information. Email these requests to [^dchr.ope.suitability](mailto:%5edchr.ope.suitability).   * Label the email subject line as “Quick Check” and include, in the body of the email, the award number, a description of the work the contractor personnel will perform, the duration of access requested, the contractor personnel name, and a thoroughly completed Optional Form (OF) 306, Declaration for Federal Employment. * If CSPS grants an exception, this temporary access will only apply for the period specified by CSPS and only for the specified contractor personnel identified by the COR-COTR. * CSPS expects these types of exceptions will be rare.     **Post Award – Investigation Timeliness/Contractor Personnel Suitability Verification:**   * Work closely with the company point of contact (CPOC) to ensure timely completion of all background investigation requirements.   + Ensure the contractor follows the chronological suitability process, as listed in agency specific (AS) clause 2352.204-1, Security and Suitability Requirements, and they submit thoroughly completed forms and documents.   + Ensure the CPOC is aware of the process and that failure to follow the process or submit thorough and accurately completed forms will result in delays of suitability letters. * Submit the Electronic Questionnaires for Investigations Processing (e-QIP) Applicant Listing, the OF 306, Fair Credit Reporting Act (FCRA), and work authorizations, if applicable, for all contractor personnel listed on the e-QIP Applicant Listing to CSPS. * Work closely with the CPOC when contractor personnel submits incomplete or inaccurate suitability packages to CSPS to minimize delays in suitability letters. * Check a contractor personnel’s suitability status online at [Contractor Suitability System](https://cssverify.personnel.ba.ssa.gov/) or call 1-844-874-9940. You will need this information to check the status: the award number, the contractor personnel’s social security number, the contractor personnel’s last name, and the contractor personnel’s date of birth. * Submit any Contractor Rollover Request Form Listings received from the CPOC to CSPS.   **Post Award** **–Electronic Personal Enrollment Credential System (EPECS):**   * If the award requires *unescorted* physical access or logical access, enter contractor personnel information in EPECS (NOTE: COR-COTRs must have a Homeland Security Presidential Directive-12 credential and personal identification number to access EPECS.). * For EPECS questions access the [Electronic Personal Enrollment Credential System – Contract Manager](https://hspd12.ba.ssa.gov/hspd12/links.htm) website, contact [HSPD12.training@ssa.gov](mailto:HSPD12.training@ssa.gov?subject=EPECS%20Question), or call 877-697-4889 (option 6). |
|  | **Post Award - Credentialing:**   * Schedule appointments for contractor personnel to meet with agency Parking and Credentialing officials (or Regional Security Officials); * Notify the contractor of the date(s) and time(s) of the appointment(s); and * Escort the contractor personnel to the Parking and Credentialing Office (or Regional Security Office) on the day of the appointment. |
|  | **Post Award** **– Adding and Removing Contractor Personnel:**   * Add and remove contractor personnel from EPECS, as appropriate, during the POP of the award. * Discuss removing contractor personnel from the award per the Removal from Duty paragraph of the [AS clause 2352.204-1, Security and Suitability Requirements](http://oag.ba.ad.ssa.gov/files/oag/documents/cotr/2352.204-1%20-%20Security%20and%20Suitability%20Requirements.doc), with the CO. The CO is responsible for taking the necessary actions. |

**COs Roles and Responsibilities:**

**Pre Award – Risk Designation**

* The SSASy *Security Classification* fieldon the **requisition** will indicate if the acquisition is subject to security or suitability requirements. If you think the AS clause 2352.204-1 applies and the COR-COTR selected “None” in the *Security Classification* SSASy field, contact the COR-COTR to discuss the addition of the clause and the COR-COTR’s responsibilities. If the clause applies, remember to update the *Security Classification* field in the SSASy solicitation and awardto indicate the appropriate Risk Determination level (consult with the COR-COTR to determine the appropriate risk level).
* If you think the AS clause 2352.204-1 does not apply and the COR-COTR selected a security classification, contact the COR-COTR to discuss changing the SSASy solicitation and award *Security Classification* field to ‘None.’

**Pre Award – Solicitation**:Include the AS clause 2352.204-1 in all solicitations and awards when the SSASy *Security Classification* fieldon the **requisition** indicates these requirements apply to the procurement.

**Post Award – Removal of Contractor Personnel**: If removing contractor personnel from an award, per the terms of *Removal from Duty* paragraph of the AS clause 2352.204-1:

Discuss this removal with the COR-COTR; and

* Let the COR-COTR know immediately about the removal of contractor personnel who have unescorted physical access or logical access so the COR-COTR can remove them from EPECS.

**FOR REFERENCE: Contractors are responsible for:**

* Including the AS clause 2352.204-1 in subcontracts if subcontractor personnel will have access to agency facilities, sites, systems, or information.
* Submitting the e-QIP Applicant Listing, OF 306, FCRA, and work authorizations, if applicable, for all contractor and subcontractor personnel listed on the e-QIP Applicant Listing to the COR-COTR.
* Indicating previously cleared (by the agency or another Federal agency) contractor personnel on the Applicant Listing.
* Confirming removal of contractor personnel found unsuitable by CSPS.
* Contacting the COR-COTR to arrange for credentialing.
* Reporting contractor personnel status changes (removal from the award, leaves the company, arrested, change in alien status, etc.) to the COR-COTR and CSPS.
* Accounting for and ensuring that all forms of Government-provided identification (credential) issued to the contractor are returned to the agency’s Parking and Credentialing Office (or Regional Security Office) as soon as any of the following occur: no longer needed for award performance; completion of a contractor personnel’s employment; or award completion or termination.

**Useful Links:**

**Credential:**

* Infrequent access questions email [HSPD12.training@ssa.gov](mailto:HSPD12.training@ssa.gov?subject=Contractor%20Infrequent%20Access%20Question)
* Parking and Credentialing email: [Parking.and.Credentialing@ssa.gov](mailto:Parking.and.Credentialing@ssa.gov?subject=Sponsoring%20of%20Contractor%20Appointment%20Request)

Phone numbers:

Baltimore: 410-965-5910

Research Triangle Park: 877-586-6650 x25211

* Regional Credentialing Contacts: Appendix A of AS clause 2352.204-1

**COR-COTR Security Roles and Responsibilities:**

* [ISP – Section 7.2, Appendix B, Roles and Responsibilities](http://isp.ssahost.ba.ssa.gov/Documents/ISP%20Most%20Recent%20Version.pdf) (Scroll down to the Section labeled Contracting Officer’s Technical Representatives)
* [AS clause 2352.204-1, Security and Suitability Requirements](http://oag.ba.ad.ssa.gov/files/oag/documents/cotr/2352.204-1%20-%20Security%20and%20Suitability%20Requirements.doc)

**Risk Designation:**

* [ISP - Section 1.8, Personnel Security and Suitability Program](http://isp.ssahost.ba.ssa.gov/Documents/ISP%20Most%20Recent%20Version.pdf)
* [Position Risk Designation for Contract Positions](http://personnel.ba.ssa.gov/OPE/CSPS/pos_risk_contract.htm)
* Email [^DCHR OPE Suitability](mailto:DCHR.OPE.Suitability@ssa.gov)

**EPECS:**

* [EPECS Contract Manager](https://hspd12.ba.ssa.gov/hspd12/links.htm) website
* [EPECS Contractor Enrollment Training](https://s3e1068/hspd12/epecs/COTR%20Training/COTR%20Training.htm)
* For EPECS questions contact [HSPD12.Training@ssa.gov](mailto:HSPD12.Training@ssa.gov) or 877-697-4889 option 6.

**Suitability:**

[Contractor Suitability System](https://cssverify.personnel.ba.ssa.gov/)

[CSPS COTR SharePoint Site](http://sharepoint.ba.ssa.gov/DCHR/OPE/CSPS/CSPSCOTR/SitePages/Home.aspx) (For COR-COTRs only)

CSPS Suitability Hotline: 1-844-874-9940 from 9:00 am until 3:00 pm EST.

[^DCHR OPE Suitability](mailto:DCHR.OPE.Suitability@ssa.gov)