Subject: To remind agencies of the standards that should be used for identity credentialing of persons requiring long-term access to Federally controlled facilities and information systems.

Date Issued: June 9, 2010

Effective Date: June 9, 2010

Scope and Effect: This is an internal advisory document for use by USDA personnel involved in implementing USDA’s personnel security program.

Supersession: None.

Background: Homeland Security Presidential Directive (HSPD) 12 directed the Department of Commerce to develop a standard for secure and reliable forms of identification used to access Federally controlled facilities and information systems, and directed executive departments and agencies to have a program in place to ensure that their issuance of identity credentials to employees and contractors meets the standard. The President charged the Office of Management and Budget (OMB) with ensuring compliance with that standard. OMB delegated to the U.S. Office of Personnel Management (OPM) the authority to develop standards for use in determining when persons should be granted or denied identity credentials.

New Procedure: OPM has released a new Federal Investigations Notice (FIN) 10-05 to reiterate the guidelines to follow under HSPD-12. The full version is attached.

On July 31, 2008, OPM issued a memorandum to Heads of Departments and Agencies, titled Final Credentialing Standards for Issuing Personal Identity Verification Cards under HSPD-12. The Final Credentialing Standards memorandum sets out a set of minimum standards (the "HSPD-12 credentialing standards") that must be used to determine initial eligibility for an identity credential under HSPD-12. The standards list six instances in which identity credentials may not be issued, which are related to the counter-terrorism, information security, and identity verification concerns to which HSPD-12 is directed.

The memorandum also provides a set of "supplemental credentialing standards" that agencies may use when a candidate for an identity credential is not subject to a security clearance determination or a determination of suitability or fitness for Federal employment or to work on a Federal contract. In such cases,
supplemental credentialing standards may be used because the final decision to grant or deny the credential is not simply derivative of a suitability, fitness, or security clearance determination. The seven supplemental credentialing standards address whether issuance of the identity credential to the candidate poses an unacceptable risk to the life, safety, or health of employees, contractors, vendors, or visitors; to the Government's physical assets or information systems; to personal property; to records, including classified, privileged, proprietary, financial, or medical records; or to the privacy of data subjects.

Under E.O. 13467, individual agencies do not have the authority to prescribe their own credentialing standards for access to Federally controlled facilities and information systems. Accordingly, the Final Credentialing Standards are exclusive.

To further assist agencies in making credentialing determinations, on January 14, 2008, OPM issued a Memorandum to Heads of Departments and Agencies, Chief Human Capital Officers, and Security Officers, titled Introduction of Credentialing, Suitability, and Security Clearance Decision-Making Guide. This guide further explains the identity credentialing process, and it reminds agencies of the nondiscrimination principles that apply in credentialing determinations.

Agencies are reminded that OPM's credentialing standards issued pursuant to E.O. 13467 remain in force. In all cases, agencies must apply the minimum HSPD-12 credentialing standards. When persons requiring credentials are not subject to security clearance determinations, or determinations of their suitability or fitness for Federal employment or to work on a Federal contract, agencies may also apply the supplemental HSPD-12 credentialing standards. Agencies may not, however, waive, modify, replace, or add to OPM's credentialing standards.


Further Information: For further information, please contact the Personnel and Document Security Division at (202) 720-7373.