Special Access Program Personnel Security Official (SPO) Training Course

Introduction

Course Welcome

Narrator: Welcome to the Special Access Program Personnel Security Official Training course.

The goal of this course is to explain the Special Access Program, or SAP, nomination process as well as the role and responsibilities of a Special Access Program Personnel Security Official, or SPO, in that process.

Course Topics

Narrator: This course is organized into the topics listed here.

Course Topics:

- Course Introduction
- Nomination Process Roles and Responsibilities
- Nomination Process and Requirements
- Nomination Package Documentation
- Common Issues with Templates
- Administration
- Course Conclusion

Course Objectives

Narrator: Here are the course objectives. Take a moment to review them.

Course Objectives:

- Describe the roles and responsibilities of the individuals involved in the SAP nomination process.
- List the procedures involved in the SAP nomination process.
- Describe the documentation that may be included in a Nomination Package.
- Identify common issues encountered when working with Pre-Screening Questionnaire (PSQ) templates.
- Describe the major administrative actions required in the SAP nomination process.

Course Overview

Narrator: The world has become a place where information is power. Governments, corporations, educational institutions, and private organizations all rely on information to make decisions that may have a global impact. To protect our nation and its warfighters, it is essential to control and limit access to sensitive information and programs. We must be especially vigilant in granting access to Special Access Programs, or SAPs.

As a Special Access Program Personnel Security Official, or SPO, you are a key component of the vehicle used to assess whether a candidate is eligible for SAP access through the SAP Nomination Process. But what are the roles and responsibilities in the process? What guidance, tools, and steps are involved?

This course will answer these questions and explain the SAP nomination process. Let's get started.

Nomination Process Roles and Responsibilities

Department of Defense Manual (DODM) 5205.07 Volume 2

Narrator: DOD Manual 5205.07, Volume 2 assigns responsibilities and provides security procedures for personnel security for DOD Special Access Programs.

This manual applies to the:

- Office of the Secretary of Defense (OSD);
- Military Departments;
- Office of the Chairman of the Joint Chiefs of Staff;
- Combatant Commands;
- Office of the Inspector General of the DOD;
- Defense Agencies;
- DOD Field Activities;
- All other organizational entities within the DOD, and;
- Any DOD Component contractors and consultants that require access to DOD SAPs

There are five roles involved in the SAP Nomination process. They are the Requestor; the SPO; the Program Security Officer, or PSO; the SAP Central Office, or SAPCO; and the Access Approval Authority, or AAA. Let's explore each role individually and look at their responsibilities.

The Requestor

Narrator: The requestor is responsible for initiating the process by completing the Program Access Request, or PAR, and providing the justification to grant access to a SAP.

The justification must address why access is required by establishing need-to-know, or NTK, and the nominated individual's material contribution to the SAP. The requestor must be briefed into the program for which the nominee is requesting access.

The Requestor:

- Initiates the PAR and provides the justification.
- Must be accessed to the SAP for which the nominated individual is being submitted.

The SAP Personnel Security Official (SPO)

Narrator: Before a SPO may engage in the SAP Nomination process, they must be designated in writing by a Cognizant Authority SAPCO, the Oversight Authority SAPCO, or their designee, and complete the requisite training. Once designated in writing, it is the SPO's responsibility to ensure the information contained in the requestor's PAR package is complete and accurate.

Once the SPO is satisfied with the information contained in the PAR package, they will make an initial eligibility determination and/or recommendation in accordance with Enclosure 4 of DODM 5205.07, Volume 2. Keep in mind that the SPO may not disqualify a candidate for SAP access but may recommend additional review to the PSO.

The SPO:

- Must be designated in writing by the Cognizant Authority (CA) SAPCO/Oversight Authority (OA) SAPCO /designee and complete the requisite training.
- Is responsible for the completeness and accuracy of all information submitted in nominated individual's PAR package.
- Makes initial eligibility determination and/or recommendation in accordance with Enclosure 4 of DODM 5205.07, Vol 2.

The Program Security Officer (PSO)

Narrator: The PSO is responsible for the next level of review in the SAP Nomination process. They must be designated by the CA SAPCO. It is the PSO's responsibility to evaluate the SPO's access eligibility recommendation and any additional information the nominated individual provides "yes" answers to on their SAP Pre-Screening Questionnaire, or PSQ, if an additional review is necessary. Following the evaluation of the individual's PAR package and the SPO's recommendation, the PSO will either concur or non-concur to the granting of access to the SAP for the nominated individual.

The PSO:

- Must be designated by the CA SAPCO.
- Evaluates the SPO's access eligibility recommendation and any additional information the nominated individual provides "yes" answers to on their SAP Pre-Screening Questionnaire (PSQ).
- Concurs or non-concurs with granting access to the SAP for the nominated individual.

The SPO and PSO

Narrator: Should there be any previously unreported derogatory information revealed in response to the PSQ, the SPO will refer the person to their cognizant SSO or SM in order to report that information through appropriate channels to the DOD CAF. Once it has been reported the SAP Nomination Process can continue.

The SPO and PSO:

- Refer the nominee to their cognizant Special Security Officer (SSO) or Security Manager (SM) to report previously unreported derogatory information through appropriate channels to the DOD Consolidated Adjudications Facility (CAF).

The SAP Central Office (SAPCO)

Narrator: The SAPCO exercises and delegates Access Approval Authority, or AAA, when necessary, as determined by the DOD Component head consistent with DOD Directive 5205.07. This office will exercise Access Approval Authority for nominated individuals who do not meet the nomination and eligibility criteria described in Enclosure 4 of DODM 5205.07, Volume 2. Furthermore, the SAPCO will evaluate the information contained in a Letter of Compelling Need, or LOCN, if one is required for the nomination package. The SAPCO is also responsible for designating individuals who may contact and provide information to the appropriate DOD Consolidated adjudications facility and formally appoints individuals to serve as SPOs. Learn more about the SAPCO on the Course Resources.

SAPCO:

- Exercises and delegates Access Approval Authority (AAA), when necessary, as determined by the DOD Component head consistent with DODD 5205.07
- Exercises AAA for nominated individuals who do not meet the nomination and eligibility criteria described in Enclosure 4 of DODM 5205.07, Vol 2
- Evaluates information contained in a Letter of Compelling Need (LOCN)
- Designates personnel who may contact and provide information to the appropriate DOD Consolidated adjudications facility
- Formally appoints individuals to serve as SPOs

The Access Approval Authority

Narrator: The Access Approval Authority is responsible for making SAP access approval or disapproval decisions, including evaluating a nominated individual's suitability when unique risk is identified in responses to the SAP PSQ. They also coordinate with the PSO, Government Program Manager, or GPM, and SAPCO as necessary. These individuals understand that SAP access is a separate and distinct action from a national security eligibility determination. In other words, even though a nominee may meet national security eligibility requirements, they may still be denied access to a SAP for other reasons.

Finally, AAA's must be trained in their authorities, standards, and limitations in accordance with CA SAPCO guidance. Now that we have discussed the nomination process roles and responsibilities, let's test your understanding.

AAA:

- Make SAP access approval or disapproval decisions, including evaluating a nominated individual's suitability when unique risk is identified in responses to the SAP PSQ, and coordinate with the PSO, Government Program Manager (GPM), and SAPCO as necessary.

- Understand that SAP access is a separate and distinct action from an eligibility determination.

- Be trained in their authorities, standards, and limitations in accordance with CA SAPCO guidance.

Review Activity 1

Question (Multiple response)

Of the actions listed, which are responsibilities of the SPO?

- o Ensure the completeness and accuracy of all information submitted in a nominated individual's PAR package.
- o Make an initial eligibility determination and/or recommendation.
- o Provide justification that addresses why access is required by establishing need-to-know.
- o Evaluate information contained in a Letter of Compelling Need.

Answer: A SPO is responsible for ensuring the completeness and accuracy of all information submitted in a nominated individual's PAR package as well as making the initial eligibility determination and/or recommendation.

Review Activity 2

Question (Multiple response)

If unreported, potentially derogatory information is uncovered during the SAP Nomination process, where would the SPO refer the nominee?

- o Security Manager
- o Special Security Officer
- o Program Security Officer
- o Program Manager

Answer: The SPO and PSO share the responsibility of referring the nominee to their cognizant SSO or SM in order to report that information through appropriate channels to the DOD CAF. Once it has been reported, the SAP Nomination Process can continue.

Nomination Requirements and Process

Nomination Process Overview

Narrator: Now that we have discussed the roles and responsibilities of those involved in the nomination process, let's take a closer look at the process itself.

The process approved in DODM 5205.07, Volume 2 must be followed for all candidates requesting SAP access.

The process leverages existing DOD resources and consists of three parts: final national security eligibility based on a favorable adjudication of an appropriate investigation; a demonstrated need to know and material contribution; and finally, SAP access eligibility.

The SAP Nomination Review Process is a standardized security management process that applies enhanced security procedures to determine an individual's eligibility for access to a DOD SAP. It provides a timely, standardized, program-level review of the nominated individual's package for access to a DOD SAP. It is not an investigation or adjudication.

The SAP access lifecycle:

- Access Request: Requestor initiates PAR and provides detailed justification. Only an individual currently accessed to the SAP may make a request for a nominated individual's SAP access.
- SPO Review: SPO ensures baseline eligibility standards are met and nomination package is accurate/complete.
- Risk Assessment: PSO/SAPCO review SAP PSQ Templates and LOCN.
- Access Determination: AAA reviews justification and coordinator recommendations and then either approves or disapproves access.
- Indoctrination: Nominee signs SAPIA and PSO, CPSO, or GSSO conducts indoctrination briefing.
- Continued Access: SAP-briefed individual continuously reports, updates PSQ as changes occur/annually, and has ongoing NTK.
- Debrief: No continued NTK, permanent change of station/position change, or access suspended or revoked by CA SAPCO or higher.

Nomination Requirement

Narrator: Before an individual can be nominated for SAP access, there are some prerequisite conditions they must meet. First, the nominee must be a U.S. citizen. This does not preclude non-U.S. citizens from gaining access to a DOD SAP; however, these individuals will be evaluated in accordance with the procedures listed in DODD 5205.07, SAP Policy. Next, they must possess a final TOP SECRET or SECRET clearance that is appropriate to the SAP that is being requested. Along with the clearance, the nominee must have a current investigation that is within six years or be deferred in Continuous Vetting. Finally, if the nominee is a contractor or consultant, they must have a DD Form 254 or consultant agreement authorizing SAP access in accordance with 32 CFR Part 117, National Industrial Security Program Operating Manual or NISPOM.

The requirement must be validated and verified by the requestor in the PAR. Also, if either the DD-254 or consultant agreement is not in the nominee's package, it should be noted as such in the remarks section of the PAR. It must also be readily available upon request. When the requirements above cannot be met, the requestor will submit a Letter of Compelling Need providing facts to support a determination that is in the national interest for the CA or OA SAPCO to approve access.

Prerequisite Conditions:

- Be a U.S. citizen. (Non-US citizens' access to DOD SAPs will be evaluated in accordance with DODD 5205.07, SAP Policy.)
- Possess a final TOP SECRET or SECRET clearance as appropriate to the SAP access requested.
- Have a current investigation within six years or be deferred in Continuous Vetting (CV).
- If a contractor or consultant, the nominee must have a DD Form 254 or consultant agreement authorizing SAP access in accordance with 32 CFR Part 117, National Industrial Security Program Operating Manual (NISPOM).
    o The requirement must be validated/verified by requestor in block 11 of PAR.
    o If either the DD-254 or consultant agreement are not in the nominee's file, it should be noted as such in the remarks section of PAR. It must also be readily available upon request.

NOTE: If the above requirements cannot be met, refer to the "Periodic Re-Investigation Deferment Enrollment in Continuous Evaluation for Special Access Program Nomination Process."

Nomination Packages

Narrator: Once the prerequisite conditions are met, the nominee will complete their nomination package and submit it to the SPO to evaluate and assess the nominee's eligibility for SAP access.

Some of the documents that make up the package are mandatory, while others will be added to the package on an "as required" basis. Learn more about each document below. At any time, you may view samples of the nomination package documents on the Course Resources.

PAR:

Narrator: The PAR is a mandatory part of the nomination package and will be used to nominate an individual for SAP access.

As stated previously, only an individual with current access to the SAP may make a request for a nominated individual's SAP access.

A single PAR may be prepared for access to multiple SAPs under the cognizance of the same Access Approval Authority.

Program Access Request (PAR):

- Mandatory document used to nominate an individual for SAP access
- Nomination must come from an individual currently accessed to the SAP
- One PAR may be prepared for access to multiple SAPs under the cognizance of the same AAA

SAP Pre-Screening Questionnaire (PSQ):

Narrator: The SAP Pre-Screening Questionnaire needs to be included in the nomination package and is used to collect personnel security information and assess associated risk to SAPs. It must be recertified annually or resubmitted whenever there are changes to reportable information, such as foreign travel. All new SAP Pre-Screening Questionnaires will include the necessary templates to support any "yes" answers given on the questionnaire.

SAP Pre-Screening Questionnaire (PSQ)

- Mandatory document used to collect personnel security information and assess associated risk
- Recertify annually or when reportable information changes
- New SAP PSQs will include the necessary templates to support "yes" answers

DD-254:

Narrator: The Contract Security Classification Specification, Form DD-254, or a consultant agreement authorizing SAP access is required for all contractors and consultants submitting a nomination package in accordance with the NISPOM. Entities who do not meet the DOD nomination requirements will not use a DD-254, so they will always require a Letter of Compelling Need in their nomination package.

Contract Security Classification Specification (DD-254)

- DD-254, or a consultant agreement authorizing SAP access, is required for all contractors and consultants
- Entities who do not meet the nomination requirements do not use the DD-254; they require a Letter of Compelling Need (LOCN)

LOCN:

Narrator: A Letter of Compelling Need will accompany the nomination request package for any individuals who do not meet the nomination requirements.

The letter will describe the individual's unique skills and/or knowledge as well as the benefit the SAP will gain by granting the individual access.

The letter must reflect clearly why no other individual can fulfill or is readily available to fulfill that position. The requestor will validate that a detailed justification is included in

the Letter of Compelling Need before including it in the nomination package.

Letter of Compelling Need (LOCN)

- Accompanies nomination requests for individuals who do not meet nomination requirements only
- Describes the unique skills or knowledge and the benefit the SAP will gain by granting the individual access
- Reflects clearly why no other individual can fulfill or is readily available to fulfill that position

Functions of the SPO

Narrator: As we stated previously, it is the SPO's responsibility to ensure the information contained in the requestor's nomination package is complete and accurate. Let's take a closer look at what these responsibilities entail. First, the SPO conducts a review of the PARs and PSQs submitted by requestors to ensure they are complete and accurate. If any information is not complete or not accurate, the SPO will return the PAR and PSQ to the requestor. Next the SPO will verify that the nominee's clearance is in the system of record as required or is in deferred status in Continuous Vetting. Examples of these databases include the Defense Information System for Security, or DISS, and Scattered Castles, or SC. Then the SPO will turn their attention to the information on PARs and PSQs to assess if a further review is needed. If the PSQ contains all "No" responses, the SPO will mark the nominee as "Eligible" in block 29 on the PAR. If the PSQ is beyond the scope of what the SAPCO has determined acceptable for the SPO, the SPO will mark "Needs Further Review" in block 29 on the PAR and will summarize the information in the remarks section, block 37. Lastly, the SPO will forward the nomination package with their recommendations to the PSO for the next level of review. Keep in mind that it is the function of the SPO to make an initial eligibility determination on the PAR. A SPO cannot disqualify a candidate from SAP access under any circumstances.

SPO Functions:

- Reviews submitted PARs and PSQs by the requestor for completeness and accuracy.

  - Returns PAR and PSQ to requestor if not complete

- Verifies nominee's clearance is in the system of record (DISS/SC) as required or deferred status in Continuous Vetting (CV)

- Assesses information on PARs and PSQs to determine if a further review is needed

  - If a PSQ is all "no's," block 29 on the PAR will be marked "Eligible"
  - If the PSQ is beyond the scope of what the SAPCO has determined acceptable, mark "Needs Further Review" in block 29 on the PAR and summarize the information in block 37 "Remarks"

NOTE: The SPO function is to make the initial eligibility determination and cannot disqualify a candidate for SAP access.

PAR Review and Coordination

So, what should a SPO look for while analyzing the PAR? Let's review a few sections on the form for more information. When you have finished reviewing the form, check your knowledge.

> Blocks 1–24:

- Review for accuracy and completeness
- Inquire about missing/incomplete information
- Return to requestor until all required information is collected

> Block 25:

- Verify clearance via DISS/SC and indicate in block 25 if the clearance is acceptable or unacceptable; provide your name and date.

> Block 29:

- Make eligibility determination.
  - Check "eligible" if the SAP PSQ has all "no" answers AND the nominee meets eligibility requirements.
  - Check "needs additional review" if the SAP PSQ has "yes" answers OR if the nominee does not meet eligibility requirements.

> Block 37:

- Summarize PSQ in remarks section.
  - Briefly describe nominee responses, including yes answers on SAP PSQ.
    - EX1: "PSQ dated 191231. All no."
    - EX2: "PSQ dated 191231. Foreign travel Canada (Dec 2016), Taiwan (Mar 2017)"
    - Ex3: "PSQ dated 191231. Foreign associations Mexico (x2), Iran, Poland, Peru (x3)"

NOTE: When referencing SAP PSQ templates 1 or 2 in the "Remarks" section, list how many foreign affections and/or associations have been reported from each country listed.

Review Activity 3

Question (Multiple choice)

What is considered a standardized security management process that applies enhanced security procedures to determine an individual's eligibility for access to a DOD SAP?

- o   SAP Access Lifecycle Review

- o   SAP Nomination Review

- o   SAP Nomination Eligibility Review

- o   SPO Eligibility Review

Answer: The SAP Nomination Review Process is a standardized security management process that applies enhanced security procedures to determine an individual's eligibility for access to a DOD SAP. It provides a timely, standardized, program-level review of the nominated individual's package for access to a DOD SAP. It is not an investigation or adjudication.

Review Activity 4

Question (Multiple answer)

Of the documents that make up a government nomination package, which documents are mandatory?

- o   Program Access Request (PAR)
- o   Contract Security Classification Specification (DD-254)
- o   SAP Pre-Screening Questionnaire (PSQ)
- o   Letter of Compelling Need (LOCN)

Answer: The Program Access Request and the SAP Pre-Screening Questionnaire are mandatory in all government nomination packages. The DD-254 is for contractors and consultants, and Letter of Compelling Need is only for those that do not meet nomination requirements.

Nomination Package Documentation

Pre-Screening Questionnaire (PSQ) and Templates

Narrator: With an understanding of the nomination process in mind, let's take a closer look at the documentation that goes into a Nomination Package along with the PAR, starting with the Pre-Screening Questionnaire. The SPO will review the answers provided by the nominee for Foreign Affections, Foreign Associations, Foreign Travel, Personal Conduct, and Financial Responsibility. If all questions are marked "no" on the PSQ, then the SPO can check "Eligible" in block 29 on the PAR and send the package to the PSO for its next level of review. If any are marked "yes," then the nominee must provide the supplemental PSQ templates that corresponds with the questions that are marked "yes." All applicable templates should have been completed and included as part of the nomination package. If the templates are missing, then the package must be returned to the requestor for completion. For nominees that already have SAP access, their PSQs will be reciprocally accepted by all DOD Components when the PSQ is within 365 days from the date of signature; all SAP PSQ answers are "no"; and the prior security clearance eligibility determination has been made without condition, deviation, or waiver.

The SPO will review the answers provided on the PSQ regarding:

- Foreign Affections

- Foreign Associations

- Foreign Travel

- Personal Conduct

- Financial Responsibility

Reciprocity for Nominees Currently SAP-Accessed

- Within 365 days from the date of signature

- All SAP PSQ answers are "no"

- Prior security clearance eligibility determination without condition, deviation, or waiver

SPO Review of PSQ Templates

Narrator: As we've discussed, if a nominee answers "yes" to any questions on the Pre-Screening Questionnaire, then the corresponding supplemental templates must be submitted with the PSQ to the SPO. But what information should be on each template? What should the SPO look for while reviewing the nominee's PSQ templates? Let's learn more about each PSQ template. The PSQ templates may be viewed on the course resource page.

PSQ Templates:

- Foreign Affections

- Foreign Associations

- Foreign Travel

- Personal Conduct

- Financial Responsibility

Foreign Affections Template 1:

- o A foreign affection is a spouse, parent, sibling, child, cohabitant, stepparent, stepchild(ren), or step- or half-sibling that is NOT a citizen of the U.S.
- o A dual citizen is someone who claims citizenship to one or more countries including the U.S. (Ex. Australia/U.S.)

Foreign Associations Template 2:

- o Foreign associates are non-immediate family members (in-laws, cousins, aunts, uncles, nieces, nephews, etc.), friends, co-workers that you socialize with OUTSIDE of work, social media connections, etc., that you, your spouse, or cohabitant continue to have ongoing communication with that are NOT citizens of the U.S. OR that claim citizenship to one or more countries including the U.S. (dual citizenship).
- o Foreign assets are bank accounts, investments, holdings, businesses, finances, real estate, or any other financial interest or assets associated with or conducted in a country other than the U.S.

Foreign Travel Template 3:

- o Foreign travel, not related to U.S. government business outside the borders of the U.S. and its territories, that was done for personal or company business, volunteer activities, education, tourism, visiting family/friends, trade shows, conferences, or seminars. This includes foreign embassies within the U.S. and abroad.

Personal Conduct Template 4:

- o Personal conduct refers to reporting information which may have an impact on clearance eligibility or suitability. Reporting includes all suspensions, denials, revocations, and arrests regardless of outcome (charged, charges dropped, withdrawn, etc.).

Financial Responsibility Template 5:

- o Financial responsibility refers to the timely payment of financial obligations. Bills referred to collection agencies, garnished wages, tax liens, bankruptcies, lawsuits, judgements, etc., since the nominee's last completed investigation date or CV deferred date must be reported.

DD Form 254

Narrator: For the purpose of our discussion, I organized the reporting into eight digestible steps.

Now, let's take a closer look at the Contract Security Classification Specification, DD Form 254.

As you know, the SPO is responsible for ensuring that the DD Form 254, or a consultant agreement authorizing SAP access, has been verified and permits SAP access. This form furnishes SAP security guidelines to contractors whose duties require access to DOD SAP information. As a part of the nomination process, the SPO will ensure that the contractor requiring access has a DD Form 254 on file. They will also verify that the Commercial and Government Entity, or CAGE, code corresponds to the correct contract for which they will be accessing the SAP. Some employees may work on multiple contracts and may place an incorrect code on their DD-254. The final item the SPO will need to verify is that the SAP check box in Block 10 F is checked. If a consultation agreement is on file instead of a 254, then it would be acceptable as long as it states that SAP access is required. However, a DD Form 254 is far more common.

SPO DD Form 254 Review:

- The contractor requiring access has a DD Form 254 on file.

- The Commercial and Government Entity (CAGE) code corresponds to the correct contract.

- "SAP" is checked on block 10 F.

- Consultation Agreement stating SAP Access also acceptable (Less Common)

Letter of Compelling Need

Narrator: Nominees who do not meet nomination requirements will require a Letter of Compelling Need to accompany their nomination request. The SPO must review the LOCN and ensure the facts provided can support a determination in the interest of national security. Now that we have discussed the documentation included in a nomination package, check your understanding with some questions.

Review Activity 5

Question (multiple answer)

Under what conditions are SAP PSQs considered current and reciprocally accepted by all DOD Components? Select all that apply.

- o The prior security clearance eligibility determination without condition, deviation, or waiver
- o The signature date is within the last 180 days
- o All SAP PSQ answers are "no"
- o The signature date is within the last 365 days
- o When accompanied by a Letter of Compelling Need

Answer: For nominees that already have SAP access, their PSQs will be reciprocally accepted by all DOD Components when: The date of signature is within the last 365 days; All SAP PSQ answers are "no"; The prior security clearance eligibility determination has been made without condition, deviation, or waiver.

Review Activity 6

Question (multiple choice)

A nominee states on her PSQ that she has a sibling that lives in Australia that is not a U.S. citizen. Which PSQ template should the SPO have the nominee complete?

- o Foreign Associations
- o Other Than Government Travel
- o Foreign Affections
- o Personal Conduct

Answer: The Foreign Affections, PSQ Template 1, would be used when a foreign affection is a spouse, parent, sibling, child, cohabitant, stepparent, stepchild(ren), or step- or half-sibling that is NOT a citizen of the U.S.

Common Issues with Templates

Template 1 Foreign Affections

Narrator: Now that you are familiar with the documentation that goes into a Nomination Package, let's look at some of the common issues a SPO may encounter while reviewing the Pre-Screening Questionnaire templates, starting with Template 1, Foreign Affections.

One of the more common issues that SPOs may see on a nominee's Foreign Affections template is listing their in-laws on this form. In-laws are not considered immediate family; therefore, a nominee would have to list them on Template 2, Foreign Associations.

Another issue that SPOs find frequently is that nominees will only put the last four digits of their Social Security Number on the template. The full nine digits of the Social Security Number are required on the Foreign Affections template.

Sometimes a nominee will not provide enough detail when filling out the template. When this occurs in the occupation section, the SPOs cannot make a risk determination. One example would be listing "CEO" in that section. CEO of what company? Or listing "Engineer." Engineer where? The Israeli Defense Forces or IBM China? The SPO needs to help the nominee understand that when that conversation evolves beyond "where do you work and what do you do?", it might be reportable on the Foreign Associations template.

The last issue SPOs see on nominees' templates is listing all their affections on a single Foreign Affections template. The template is intended to contain the information for one affection only. If the nominee has multiple affections to report, they must complete an individual Foreign Affections template for each affection.

Foreign Affections Template Issues:

- Listing the nominee's in-laws here
    - Use Template Two, Foreign Associations
- Only entering the last four digits of a Social Security Number (SSN)
    - Requires all nine digits
- Lack of detailed explanation
    - Occupation not detailed sufficiently to make risk determination
    - When that conversation evolves beyond "where do you work and what do you do?", it might be reportable here.
- Multiple affections listed on one template
    - One affection per template

Template 2 Foreign Associations

Narrator: Some of the common issues encountered by SPOs while reviewing Template 2, Foreign Associations, are the same as those encountered with Template 1.

These include the nominee only entering the last four digits of their Social Security number; a nominee not providing detailed explanations; or listing multiple associations on a single template. An issue unique to the Foreign Associations template that SPOs find frequently is that nominees are not aware that the requirement to complete this template not only applies to them but it applies equally to their spouse or cohabitant.

If the nominee's spouse or cohabitant has foreign associations, the spouse or cohabitant will be required to complete a template for each association.

Foreign Associations Template Issues:

- Listing the Nominee's in-laws here
    - Use Template Two, Foreign Associations
- Only entering the last four digits of a Social Security Number (SSN)
    - Requires all nine digits
- Lack of detailed explanation
    - Occupation not detailed sufficiently to make risk determination
    - When that conversation evolves beyond "where do you work and what do you do?", it might be reportable here.
- Multiple associations listed on one template
    - One association per template
- Nominee's spouse or cohabitant has foreign associations
    - Spouse or cohabitant will be required to complete a template for each foreign association

Template 3 Foreign Travel

Narrator: Template three, Foreign Travel, has its share of common issues that a SPO can expect to encounter while reviewing a nominee's documentation. The first three common issues are closely related as they deal with the type of travel being reported. The Foreign Travel template is intended to capture all non-official U.S. Government foreign travel since the last completed investigation. That said, nominees sometimes report their official government business travel.

Some fail to report personal foreign travel they have taken since their last completed investigation or deferment in Continuous Vetting. Another common issue is not reporting personal foreign travel taken in conjunction with official government business.

Other issues tend to revolve around the information nominees are required to provide.

Some neglect to provide the required 30-day advance notice of personal foreign travel to their GSSO/CPSO. Other nominees may forget to provide the dates or estimated dates they reported foreign travel. Also, nominees sometimes fail to provide templates for events attended at foreign embassies inside and outside U.S. borders.

Sometimes a nominee will misinterpret the template instructions and use it incorrectly.

One of the more common mistakes made by nominees is reporting multiple trips on one template. As with the Foreign Affections and Associations templates, the nominee will need to provide a separate Foreign Travels template for each trip. Some submit multiple templates for a single trip to multiple countries. The template allows for listing multiple countries on a single trip. On occasion, a nominee may fail to annotate the citizenship of the family and friends visited when marking travel code 5 on the template.

Finally, the SPO must ensure that there are Foreign Affections and/or Foreign Associations templates included for any non-U.S. citizen family and friends listed.

Foreign Travels Template Issues:

- Reporting official government business
- Not reporting personal foreign travel since their last completed investigation or deferment in CV
- Not reporting personal foreign travel taken in conjunction with official government business
- Not providing 30-day advance notice to their GSSO/CPSO
- Not providing the dates or estimated dates they reported foreign travel
- Not providing templates for events attended at foreign embassies inside and outside U.S. borders
- Reporting multiple trips on one template
- Submitting multiple templates for one trip to multiple countries
- Verifying citizenship of family and friends under travel code 5
    - Ensuring citizenship of family/friends is annotated
    - Verifying there is a Template 1 or 2 for each individual if family/friends are not U.S. citizens

Template 4 Personal Conduct

Narrator: There are some common issues on Template four, Personal Conduct, a SPO should be on guard for while reviewing nomination package documentation. Nominees may fail to report all clearance and/or access suspensions, denials, and revocations since their last completed investigation, or deferment in Continuous Vetting. They may also neglect to provide specific details, such as dates, locations, or incident report or case numbers on the template. One of the most egregious issues a SPO may encounter is a nominee not reporting all arrests regardless of the arrests' outcomes.

Personal Conduct Template Issues:

- Not reporting all clearance and/or access suspensions, denials, and revocations, since their last completed investigation or deferment in CV
- Not providing specific details, including dates, locations, incident report/case numbers
- Not reporting all arrests regardless of outcome

Template 5 Financial Responsibility

Narrator: It is not uncommon for a SPO to find issues on Template 5, Financial Responsibility. Here are some of the more common ones. Sometimes nominees forget or neglect to report collection agency referrals, wage garnishments, tax liens, or bankruptcy since their last completed investigation or deferment in Continuous Vetting. Another issue a SPO may encounter is the nominee may not provide specific details, such as the date of occurrence and dollar amounts. Now that you are aware of the more common issues with the PSQ templates, let's test your understanding.

Financial Responsibility Template Issues:

- Not reporting collection agency referrals, wage garnishments, tax liens, or bankruptcy since their last completed investigation or deferment in CV
- Not providing specific details, including date of occurrence, dollar amounts, etc.

Review Activity 7

Question (multiple answer)

If a nominee selects travel code 5 (Visit family/friends) on their Foreign Travel template, what other templates should the SPO expect to be included in the nomination package? Select all that apply.

- o Template 5 with specific dates of occurrence
- o Template 1 for each non-U.S. citizen affection
- o Template 3 for each country visited on a single trip
- o Template 2 for each non-U.S. citizen association

Answer: If a nominee selects travel code 5 on their Foreign Travel template, the SPO should ensure that there are Foreign Affections and/or Foreign Associations templates included in the nominee's package for any non-U.S. citizen family and friends listed.

Administration

Access Decision

Narrator: With an understanding of the common issues which the SPO will encounter in PSQ templates, let's shift our focus to some of the administration functions involved in the nomination process, starting with a review of how the access decision is made. We have already discussed the SAP access lifecycle, so let's review the process up to the access determination.

The SAP nomination process begins with a request to grant a candidate SAP access made by an individual who already has access to the SAP. The candidate's nomination package is completed then the SAP Personnel Security Official, or SPO, evaluates the nomination package.

The final access determination—the decision whether to approve or disapprove the individual's SAP access—is then made by the Access Approval Authority.

The SAP access lifecycle:
- Access Request: Requestor initiates PAR and provides detailed justification. Only an individual currently accessed to the SAP may make a request for a nominated individual's SAP access.
- SPO Review: SPO ensures baseline eligibility standards are met and nomination package is accurate/complete.
- Risk Assessment: PSO/SAPCO review SAP PSQ Templates and LOCN.
- Access Determination: AAA reviews justification and coordinator recommendations and then either approves or disapproves access.
- Indoctrination: Nominee signs SAPIA and PSO, CPSO, or GSSO conducts indoctrination briefing.
- Continued Access: SAP-briefed individual continuously reports, updates PSQ as changes occur/annually, and has ongoing NTK.
- Debrief: No continued NTK, permanent change of station/position change, or access suspended or revoked by CA SAPCO or higher.

Annual Revalidation

Narrator: Once an individual has been approved for access to the SAP, they are required to revalidate access eligibility annually by one of two methods. First, SAP-accessed personnel may be able to revalidate access eligibility by recertifying the answers provided on their current PSQ and any supplemental information that was provided, or by completing a new PSQ.

Let's look at the conditions that determine which method they should use. For SAP-accessed personnel to revalidate the answers provided on their current PSQ and any supplemental information, the answers must remain exactly the same. If their documentation meets this condition, they may revalidate their SAP PSQ by signing and dating it and each template. But what if some of the answers change? What must SAP-accessed personnel do to revalidate their access eligibility in this situation? If there are changes to answers on the SAP PSQ from the previous year, the individual must provide a new PSQ and an associated template to explain the reason for the change. However, not all changes require that a new PSQ be completed and

submitted. Foreign Travel that has occurred in the year prior to revalidation that was previously reported is considered a historical record. Therefore, the PSQ would only need to be revalidated, not resubmitted.

Annual Revalidation:

- If the answers remain the same, the individual may revalidate their SAP PSQ by signing and dating the PSQ and each template.
- If there are changes to answers from the previous year, the individual must provide a new PSQ and a template to explain the reason for the change.
- If foreign travel has been previously reported, then it is considered a historical record. It needs to be revalidated, not resubmitted.

Records Management

Narrator: Another administration function that the SPO will need to be familiar with is records management. Nomination packages and associated personnel security files must be administered and maintained in accordance with DODD 5400.11, DOD Privacy Program. The SPO's record management responsibilities require maintaining the appropriate documents on file and could include uploading and maintaining Program Access Requests, Pre-Screening Questionnaires, Templates, Program Indoctrination Agreements, or PIAs, and other associated SAP personnel security records in the Joint Access Database Environment, or JADE. If you would like to learn more about JADE uploading, filing, and naming instructions, refer to the JADE Standard Operating Procedure. Let's test your knowledge.

Records Management:

- Upload and maintain PSQs, Templates, PARs, Program Indoctrination Agreements (PIAs), and other associated SAP personnel security records in JADE
- See JADE SOP for uploading, filing, and naming instructions

Review Activity 8

Question (multiple choice)

For the annual access eligibility revalidation, what action should SAP-accessed personnel take if they neglected to previously report foreign travel taken in the past year?

- o Resubmit a new PSQ and required templates.
- o Revalidate the current PSQ; do not resubmit.
- o Submit a new Template 3 for each trip taken.
- o Submit a new Template 3 with all trips listed on a single form

Answer: If SAP-accessed personnel neglect to previously report foreign travel taken in the past year they must resubmit a new PSQ and required templates. Foreign travel that has occurred in the year prior to revalidation that was previously reported is considered a historical record. Therefore, a PSQ would need to be revalidated.

Course Conclusion

Course Summary

Narrator: Information is power in today's world. To protect our nation and its warfighters, it is essential to control and limit access to sensitive information and programs. As you have learned in this course, SAP Personnel Security Officials need to stay especially vigilant when making determinations that may result in granting access to the country's Special Access Programs. As a SPO, you are a key component of the process used to assess whether a candidate is eligible for SAP access through the SAP Nomination Process. This course explained the process roles and responsibilities; the guidance, tools, and steps that are involved; and the common issues you may encounter.

Course Objectives

Narrator: Here is a list of the course objectives. You should now be familiar with the duties of a SPO as they relate to the SAP access nomination process. It is important to remember SPOs are the first checkpoint on the path to accessing our nation's classified information. For more information on the role of a SPO, visit the Course Resources page to view the forms, templates, and DOD guidance shown in the course as well as the job aid and the student guide.

Congratulations! You have completed the Special Access Program Personnel Security Official (SPO) Training.

- Describe the roles and responsibilities of the individuals involved in the SAP nomination process.
- List the procedures involved in the SAP nomination process.
- Describe the documentation that may be included in a Nomination Package.
- Identify common issues encountered when working with PSQ templates.
- Describe the major administrative actions required in the SAP nomination process.

If you are taking this course from the CDSE Security Awareness Hub, select the Take Exam button to take the online exam and receive your certificate. If you are taking this course from STEPP, select Exit to return to the course page; then, select Launch Exam to begin the online exam.