

## DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY

## **Management of the Defense Information System for Security (DISS)**

The below procedures are provided for cleared contractors under DCSA cognizance to annotate and maintain records for break in access, break in employment, and new hires in DISS.

**Break in access** is the point when a cleared person remains employed by a contractor but no longer has a current requirement to access classified information (per 32 CFR Part 117.10(i)).

- 1. If an employee no longer has a requirement to access classified information, remains employed by the contractor, and the contractor determines there is a reasonable expectation<sup>1</sup> that the employee will require access to classified information again in the future while employed by the contractor, the contractor will complete the following actions:
  - Remove the employee's access in DISS (this is called "debrief" in DISS)
  - Maintain an affiliation with the employee's eligibility record under the contractor's Security Management Office (SMO) in DISS until a separation action is necessary
  - Ensure the employee remains enrolled in Continuous Vetting (CV), including submitting the Questionnaire for National Security Positions Standard Form 86 (SF 86) through the National Background Investigation Services (NBIS) electronic application (eAPP) at 5-year intervals<sup>2</sup>
  - Submit Security Executive Agent Directive 3 (SEAD 3) and adverse information reports from or about the employee in accordance with Industrial Security Letter (ISL) 2021-02
  - Provide the employee with annual refresher training

If the employee again requires access to classified information during their employment, the contractor may update the employee's DISS record with the appropriate access level if the employee remains eligible for access to classified information. There is no requirement for the contractor to grant the employee access within a certain timeframe. The contractor can keep the employee in the SMO without access as long as they continue to determine the employee has a reasonable expectation to access classified information in the future.

- 2. If an employee no longer has a requirement to access classified information, remains employed by the contractor, and the contractor determines there **is no reasonable expectation**<sup>1</sup> that the employee will require access again while employed by the contractor, the contractor will complete the following actions:
  - Remove the employee's access in DISS (this is called "debrief" in DISS)
  - Add a separation date to the employee's profile in DISS
  - Out-process the employee's eligibility record from the SMO in DISS
  - Provide the employee with a security debriefing<sup>3</sup>



**Break in employment** is the point when a cleared contractor terminates the employment of an employee with eligibility for access to classified information regardless of the reason for termination, and regardless of whether the termination was initiated by the company, the employee, or by mutual agreement (per 32 CFR Part 117.10(j)).

When a contractor terminates the employment of an employee who is eligible for access to classified information, the contractor will complete the following actions (if not already completed):

- Remove the employee's access in DISS (this is called "debrief" in DISS)
- Add a separation date to the employee's profile in DISS
- Out-process the employee's eligibility record from the SMO in DISS
- Provide the employee with a security debriefing<sup>3</sup>

**New hire** is the point when a cleared contractor hires an employee with or without current eligibility for access to classified information (per 32 CFR Part 117.10(j)).

- 1. When a contractor hires an employee with current eligibility, but the contractor **has no reasonable expectation**<sup>1</sup> of granting access to the employee in the future, the contractor will not establish an affiliation with the employee's eligibility record in DISS.
  - The contractor is not required to provide the employee with annual refresher training and the employee is not subject to SEAD 3/adverse information reporting requirements.
- 2. When a contractor hires an employee with current eligibility and the contractor **has a reasonable expectation**<sup>1</sup> of granting access to the employee in the future, the contractor may establish an affiliation with the employee's eligibility record under the contractor's SMO in DISS. If access is not immediately required, the contractor will follow the procedures under "break in access" item 1 above.
  - If the subject has current eligibility and is not enrolled in CV, an updated SF-86 must be submitted to DCSA's Adjudication and Vetting Services (AVS) who will enroll the employee into CV.
- 3. When a contractor hires an employee with no current eligibility but access to classified information is required, the contractor will create a personnel record if one doesn't exist and establish an affiliation with the employee's record under the contractor's SMO in DISS.
  - The contractor must submit an initial investigation request<sup>2</sup> if there is no eligibility on the subject's record in DISS. AVS will conduct an interim eligibility determination and release for an initial investigation.



## **Investigations for Other than Access to Classified Information**

DISS is the official system of record for personnel security, suitability, and credential management. The processing of investigations for purposes other than access to classified information related to a classified contract is the responsibility of the government contracting activity (GCA). When requested by the GCA to process investigations for purposes other than access to classified information, contractors are encouraged to advise their customer that they cannot process those investigations through DCSA. Examples of investigations for other than access to classified information include but are not limited to base access, suitability for logical access to unclassified information systems, positions of trust, and unclassified information systems administrator access (IT Levels). The GCA is responsible for funding, submitting, and managing these types of investigations which are outside the National Industrial Security Program (NISP).

However, contractors are authorized to establish/maintain a SMO affiliation with these employees' records in DISS.



<sup>&</sup>lt;sup>1</sup> The contractor, not DCSA, determines if there is a reasonable expectation that the employee will require access again while employed at their facility. A "reasonable expectation" is something the contractor can logically infer based on their mission objectives and operations.

<sup>&</sup>lt;sup>2</sup> Per NISPOM 117.10(a)(5), "contractors must limit investigation requests for eligibility determinations for access to classified information to the minimum number necessary to not establish a cache of cleared employees." This is referring to personnel who do not have current eligibility for access to classified information. Maintaining cleared personnel in the DISS SMO without access under the "reasonable expectation" determination is not considered establishing a cache of cleared employees even when an SF 86 is submitted for CV purposes.

<sup>&</sup>lt;sup>3</sup> The contractor must debrief a cleared employee when there is no longer a reasonable expectation for the employee to access classified information at the contractor's facility. Although there is no policy requirement to obtain a signed debriefing, nor are there specific elements that must be covered during the security debriefing, as a best practice, DCSA encourages contractors to share the information from the SF 312 "debriefing" section.