AskPSMO-I Webinar: Click to Sign (C2S)

December 2015

Presented by:

Personnel Security Management Office for Industry (PSMO-I)
OPM started sending notification letters and PIN codes to individuals whose SSN and other PII were stolen in a cyber intrusion involving background investigation records. Notification process is expected to take up to 3 months.

Per the Federal Investigative Standards for National Security Investigations, OPM has implemented Tier 3 (T3) and Tier 3 Reinvestigation (T3R) investigative products into their systems effective October 1, 2015 to replace ANACI and NACLC for Secret and Confidential Eligibility.

- **INV Form 41**: For Tier 3 Investigations, a written request is the primary means of gathering information about a person's character, conduct and employment history. In these cases, FIS may send a written inquiry (INV 41, Investigative Request for Employment Data and Supervisor Information) to the employer in order to verify the subject's employment history, and gather relevant character and conduct information. Failing to respond to an INV 41 may delay...
Click to Sign (e-QIP)

Reduced Rejection of Signature Pages

Signature pages account for 95% of OPM rejections

Click to Sign is Coming  12 December 2015!

OPM-FIS now allows e-QIP applicants to digitally sign their certification and release forms as part of the “Click to Sign” feature.

e-QIP utilizes the appropriate safeguards to ensure that the digital signature captured in the e-QIP system is legally recognized in accordance with the Federal Electronic Signatures in Global and National Commerce Act (E-SIGN) 15 U.S.C. 7001 and the Uniform Electronic Transaction Act (UETA) which is a United States Uniform Law Commission between state level governments. Public Law 105-277, Title XVII states “Releases that are digitally signed are as valid as those with handwritten signatures.”

Simple & Seamless

No more printing & signing. Simply, click the box and proceed to the next step.
Impacts to Industry

Remains the same:
- User ID & password login capability (No PKI Cert required)
- Filling out the SF-86
- Applicant/FSO can print and save a copy to include release pages
- Submitting the SF-86 to FSO and PSMO-I

Eliminates:
- Printing and Signing
- Scan, Mail, Fax, Upload
- FSO ability to upload to JPAS
- OPM Rejects:
  - Wrong date (format)
  - Signatures outside the line or unreadable
What C2S Looks Like in e-QIP

<table>
<thead>
<tr>
<th>Signature (Sign in ink)</th>
<th>Full name (Type of print illegible)</th>
<th>Date signed (mm/dd/yyyy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Middle Last</td>
<td>First Middle Last</td>
<td>11/08/2011</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other names used</th>
<th>Date of birth</th>
<th>Social Security Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>01/01/1980</td>
<td>011-10-0101</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Current street address</th>
<th>Apt #</th>
<th>City (Country)</th>
<th>State</th>
<th>Zip Code</th>
<th>Home telephone number</th>
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Investigation Request Screen

- Selecting the ‘Documents’ link will display the documents confirmed as received by OPM. Afterwards, the applicable document types will be checked systematically.

- FSO will then submit Investigation Request (SF-86) to PSMO-I for review/approval.
Investigation Request Documents Screen

Click to Sign Documents Received at OPM

Person Summary Screen: Case link
When wet signature pages are in hand, please submit releases via Safe Access File Exchange (SAFE) to AskPSMO-I@dss.mil with “SF86 Release Pages” in the subject line. While completing the SAFE request following these specific instructions: Under the Recipient Information - When manually entering the AskPSMO-I@dss.mil email address, ignore the warning “Do not send SAFE packages to group email accounts.” PSMO-I confirmed the group email address works for the process. Under Email Settings select the first three check boxes only, Encryption and Notifications.
General Questions

1. **When is Click to Sign being implemented for Industry?**
   - A. This feature will not be available until December 12, 2015.

2. **How will Click to Sign effect fingerprints?**
   - A. Click to Sign will not affect fingerprints. Fingerprints should still be submitted within 14 days of the release of the eQIP and will be good for 120 days.

3. **What happens with the investigations that we currently have employees working in e-QIP... if they don't submit their completed e-QIP before the December 12th implementation, how will their applications be affected?**
   - A. There will be no impact to investigation requests which are currently in progress, effective December 12, 2015 an applicant that has not yet certified their SF-86 will have the option to do so digitally.

4. **Do they need a special software on the computer they are using to digitally sign?**
   - A. No special software is required.

5. **If the 12 Dec date slips, where will it be published? DSS website?**
   - A. Yes, the PSMO-I will post any relevant information regarding Click to Sign, delays in implementation, etc. Visit [http://www.dss.mil/psmo-i/index.htm](http://www.dss.mil/psmo-i/index.htm) for updates.
Initiation

1. If we have our PR's that are coming due now or the applicant is in the process of completing it, will it need to be submitted prior to Dec 12, or will they be able to Click to Sign if after Dec 12, or must we re-initiate, or wet signature only?

   A. So long as the periodic reinvestigation will not become overdue prior to December 12, 2015 it is at the discretion of the FSO on when to submit. If the periodic reinvestigation is overdue it must be submitted immediately.

2. If an applicant completes their SF-86 Questionnaire in e-QIP AND initially signs their release forms digitally then the FSO rejects their questionnaire can the member then elect to not sign their release forms digitally?

   A. Effective December 12, 2015 an applicant that has not yet certified their SF-86 will have the option to do so digitally.
Opt Out

1. Do we have to give our employees the option of manual or "print to sign"?
   
   A. The applicant is not required or forced to complete the signature process electronically, and is provided with the option to print their forms and sign using traditional pen and ink.

2. If an applicant opts-out of Click to Sign, how long does the FSO have to get PSMO-I the "wet" signature pages?
   
   A. Generally, 72 hours from the time the investigation request is received by PSMO-I. The 72 hour clock is used as an incentive to maximize participation in Click to Sign. Reasonable accommodation will be provided in the event the applicant "opts-out" of Click to Sign including consideration of weekends and federal holidays. Vacation and illness will not likely be acceptable circumstances for delay in providing certification and releases pages, as PSMO-I is managing the personnel clearance process for nearly one million cleared persons. In the event the applicant "opts-out" of Click to Sign, specific instructions will be provided to the FSO on methods for submitting the documents to PSMO-I.

3. If the "wet signature" pages aren't received within 72 hours of PSMO instructions will the investigation will be closed/delayed?
   
   A. In the event the certification and releases are not received in timely manner when an applicant "opts-out" of Click to Sign, the request will be rejected by PSMO-I.

4. If a person opts out of click to sign, and the FSO has 72 hours to submit, who do we contact for the process to submit hard signature pages?
   
   A. PSMO-I will send specific instructions via JPAS message for submission of hard copy signature pages in the event applicants opt-out of Click to Sign.
Opt Out, cont.

5. If an employee opts out of C2S, will the blank signature pages be available in JPAS to print or save in the case that employee makes a mistake or if they opted out of click to sign?

   A. The applicant must retrieve an archival copy of the signature pages prior to certifying the document and sending for FSO review. If the applicant opts-out and fails to retrieve the signature pages prior to releasing the request, the request must be rejected back to the applicant. At that time the applicant will again have the option to use Click to Sign or print an archival copy of the signature pages.

6. If the applicant Opt out, will they get a warning message suggesting that it is “highly recommended” to use C2S over wet signature pages, even though the Government cannot require it?

   A. No, there will not be a warning message.
Process - FSO

1. When our employees hits release, if they have not uploaded or printed their signature pages, and forgot, can the FSO print them and upload them?

   A. The FSO will no longer have the option to upload certification and release pages in JPAS. The FSO will be able to view and print documents in JPAS if the documents were digitally signed. In the event the applicant "opts-out" of Click to Sign, specific instructions will be provided to the FSO on submitting the documents to PSMO-I.

2. Will the FSO be able to print blank signature pages - in case the employee doesn't retain copies but we are asked for them?

   A. The applicant only has the ability to retrieve archival copies of the SF-86 or signature pages via e-QIP once the FSO initiates a new e-QIP.

3. Will the FSO see a notification in the document received section in JPAS that the appropriate click-to-sign signature pages were received?

   A. Yes, both in the documents section where the digitally signed signature pages are available and in the investigation request line which shows that a Digital Signature was used.

4. I have had two applicants this week who have already been able to use click to sign... Is there a way to know ahead of time when applicants will be piloting click to sign prior to it goes live on December 12?

   A. There is no pilot of click to sign for industry at this time. Any applicants who have been able to use Click to Sign may have been submitting via e-QIP Direct, where Click to Sign was implemented on October 1, 2015.
Process – FSO, cont.

5. **Will the Medical Form automatically be submitted even if they answer ‘No’ to Question 21?**

   A. We are working to obtain an answer to this question. In the event the Medical Release is not automatically required of the subject based upon his/her answer to Section 21 of the SF-86, the FSO will need to reject the investigation request if this release is missing with an affirmative answer to section 21.

6. **Since C2S will be optional, how will the FSO know which option was chosen by the candidate?**

   A. When reviewing the SF-86 for accuracy and completeness in JPAS, the FSO will see the digitally signed documents.
Process - Applicant

1. Do applicants have to have a CAC or PKI certificate to "click to sign"? What if they do not have a PKI token or CAC, how can they sign electronically?
   A. No, a CAC or PKI is NOT necessary to use Click to Sign. The applicant’s log-in to e-QIP is the basis for the authentication of the digital signature.

2. How will click to sign documents be handled if submitted by the applicant but the FSO rejects for corrections?
   A. The applicant would correct the issues and digitally sign the certification and release pages again.

3. It was stated the MBR can always go back into eQIP and print info/signature sheets for wet sign. Is this a change?
   A. The applicant must retrieve an archival copy of the signature pages prior to certifying the document and sending for FSO review. If the applicant opts-out and fails to retrieve the signature pages prior to releasing the request, the request must be rejected back to the applicant. At that time the applicant will again have the option to use Click to Sign or print an archival copy of the signature pages.

4. If the FSO reviews and sends the SF-86 back to the employee, can the Applicant change his mind and click to sign then?
   A. Yes

5. A lot of my employees who are completing e-QIP don't sign their complete name on the releases, if they are using the click to sign option and their name doesn't match what is printed, then what happens or will that problem be eliminated because of the click to sign?
   A. The e-QIP system will apply the digital signature based upon the applicant e-QIP profile.
Process - Applicant, cont.

6. Will the employee still be able to display and download a review copy?
   
   A. The applicant must retrieve an archival copy of the signature pages prior to certifying the document and sending for FSO review. If the applicant opts-out and fails to retrieve the signature pages prior to releasing the request, the request must be rejected back to the applicant. At that time the applicant will again have the option to use Click to Sign or print an archival copy of the signature pages.

7. Is the question to opt into or not for "Click to Sign" at the beginning of the eQIP process OR at the end of the process for submitting?

   A. At the end of the process, when the applicant certifies the SF-86.

8. Will applicant receive the 72 hour timeframe to return wet signatures?

   A. The instructions for submission of the wet signature pages will be done via JPAS message to the security office. It is recommend that the security office obtain the "wet" signature pages prior to releasing the investigation request to PSMO-I.

9. Does the applicant need special software on their computer in order to digitally sign?

   A. No special software is required.

10. Does applicant have to Click to Sign each release page, or just once to cover all?

    A. Yes, the applicant must click the link for each release page.
**Process - PSMO**

1. Will PSMO-I make the acceptance or rejection determination before the 72 hour release page delivery requirements start?
   
   A. No, the SF-86 will not be reviewed by PSMO-I until the SF-86 and Signature pages have been received.

**Policy**

1. **Current regulation is FSO maintains copies of the SF86 during the course of the investigation - with click to sign are we no longer maintaining that copy?**
   
   A. Click to Sign does not change current NISPOM requirements regarding retention and destruction of the SF-86. The FSO will be able to view and print documents in JPAS if the documents were digitally signed.

2. **PSMO-I isn't requiring C2S; is there anything prohibiting FSOs from requiring it?**
   
   A. The federal government cannot mandate use of C2S; we also cannot dictate how the FSO manages their specific program.
Other Questions

1. Please explain the out of sync issue that is happening with eQIPs that are sent back for revision?
   
   A. It is related to the shut-down of the e-QIP system in June 2015.

2. The FSO is still the only one submitting the final eQIPs to PSMO-I, correct?
   
   A. Correct

3. Where is OPM getting addresses for the cyber intrusion notification? I have had several employees move since they last completed an SF86?
   
   A. Please direct your question to the OPM Cybersecurity Center

4. Will the package get kicked back for no home phone number listed?
   
   A. It is not abnormal for personnel to no longer have a home telephone number. If the applicant does have a home phone number it should be provided.

5. If you kick back an e-QIP for corrections will it give the applicant a new investigation number?
   
   A. Yes

6. Who do I contact if I have an employees who clearance has been sent out for over 8 months and he just has his interim clearance?
   
   A. askPSMO-I@dss.mil
Other Questions

7. I was recently told that OPM was back logged and PR's are not being completed currently, do you know if that is accurate?
   A. The average timeframe for a PR investigation is about 200 days.

8. How does the subject notify the FSO that the SF 86 is ready for review?
   A. An investigation request line will be available in JPAS, as far as applicant.

9. How long is the e-QIP registration code active before it expires when PR is initiated?
   A. Until the applicant accesses e-QIP or 30 days after issuance if the applicant does not access e-QIP.

10. Will the OPM INV Form 41 have to be sent back or is it optional? Need to know if this will hold up the investigation.
    A. The form is optional but does holdup the investigation process as OPM places a waiting period on the return of the request. If the response is returned quickly it closes the lead.

11. Where is this information (form) coming from: OPM directly or an outsourced company? If so, who are the companies? Will the information only be sent via mail or will it come via fax?
    A. The form is mailed from OPM (Boyers, PA). It is not outsourced. The form is only sent through the mail.

12. Supervisors will be responsible for responding to the OPM INV Form 41 and failure to do so will impact the security office processing clearance investigation time lines, correct?
    A. The form is optional but does holdup the investigation process as OPM places a waiting period on the return of the request. If the response is returned quickly it closes the lead. If the employer refuses to complete the form, the investigation is delayed for 30 days.
Other Questions

13. Do we know what steps are being taken to protect the individuals personal information?
   A. Please direct your question to the OPM Cyber resource center via https://www.opm.gov/cybersecurity.

14. I received a letter last Friday from OPM, 4 Columbia Pike Annex, Washington, DC from a Beth F. Cobert, Acting Director, is this legit? Do you have a # we can contact to confirm the validity?
   A. Please visit https://www.opm.gov/cybersecurity for questions regarding correspondence related to the breach.

15. If you have not received the OPM notification, what is the next step?
   A. Please visit https://www.opm.gov/cybersecurity for questions regarding the security breach.

16. CAF asked for more information on one of our employees after he submitted his SF86. He is showing as eligibility pending since August. Does this mean he is not eligible for an interim?
   A. That is correct. Please contact us at askPSMO-I@dss.mil with specific information pertaining to this record. Please provide your CAGE Code and the Subjects Last name in the subject of the email.

17. Can a company initiate an investigation for an individual who is not currently in the company?
   A. Yes, per NISPOM provision 2-205, however the subject must be within the JPAS PSM Net in order to initiate an investigation request.
*Note: When using the e-fax option to submit SF-312s or any PII, encrypt the file in the first email and send the password in a separate email.

DoD Security Services Call Center

DMDC Contact Center

DoD CAF Call Center

For Further Assistance...

Address: Defense Security Service
ATTN: PSMO-I

Fax: (571) 305-6011 • PSMO-I.fax@dss.mil*
Email: AskPSMO-I@dss.mil • Policy_HQ@dss.mil

Phone: (888) 282-7682
Menu Options:
1 – OBMS/e-QIP/STEP/PISFD/NCAISS Account Lockout or Password Reset
2 – Personnel or Facility Security Clearance Inquiries
3 – OBMS
4 – e-QIP
5 – STEPP
6 – ISFD
7 – NCAISS
8 – General Inquiry

Phone: 1-800-467-5526
Email: dmdc.contactcenter@mail.mil • dmdc.swft@mail.mil
Menu Options:
1 – JPAS
3 – SWFT
4 – DCII
5 – Personnel Security Inquiry
6 – General Inquiry / Contact Center Information

Phone: 301-833-3850 (SSOs and FSOs ONLY)
Website: http://www.dodcaf.whs.mil/
Menu Options:
5 – Industry
Thank you for attending...