

GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

ADM 5400.2A
March 27, 2024

GSA ORDER

SUBJECT: General Services Administration Heads of Services and Staff Offices' and Requesting Officials' Roles and Responsibilities to Implement Homeland Security Presidential Directive-12

1. Purpose. This Order defines the roles and responsibilities of Heads of Services and Staff Offices (HSSO) and Requesting Officials (RO), who may be the Contracting Officers (CO) or a designated Contracting Officer's Representative (COR), to implement Homeland Security Presidential Directive-12: Policy for a Common Identification Standard for Federal Employees and Contractors (August 27, 2004) (HSPD-12) background investigations and credentialing at the U.S. General Services Administration (GSA). In addition, it supports the Office of Personnel Management's (OPM) policy "Credentialing Standards Procedures for Issuing Personal Identity Verification Cards under HSPD-12 and New Requirement for Suspension or Revocation of Eligibility for Personal Identity Verification Credentials."
2. Background.
 - a. HSPD-12 requires Federal agencies to issue a secure and reliable standardized form of identification that: (a) is issued based on sound criteria for verifying an individual employee's identity; (b) is strongly resistant to identity fraud, tampering, counterfeiting, and exploitation; (c) can be rapidly authenticated electronically; and (d) is issued only by providers whose reliability has been established by an official accreditation process to its employees and contractors (including contractor employees). Departments and agencies are further directed to require the use of identification by Federal employees and contractors that meet the standard in gaining physical access to Federally-controlled facilities and logical access to Federally-controlled information systems.

- b. On May 21, 2019, the Office of Management and Budget (OMB) issued Memorandum M-19-17, “Enabling Mission Delivery through Improved Identity, Credential, and Access Management” requiring each Federal agency to issue a policy requiring the use of Personal Identity Verification credentials as the common means of authentication for access to Federal facilities, networks, and information systems and align with Federal Identity, Credential, and Access Management (FICAM). To comply with HSPD-12, GSA issued GSA Order ADM 2181.1A, “Homeland Security Presidential Directive-12 Personal Identity Verification and Credentialing Policy, and Background Investigations for Contractor Employees” dated March 27, 2024, which provides policies and procedures for issuing and maintaining a Personal Identity Verification credential (commonly known as the GSA Access Card).
3. Scope and Applicability. This Order applies to:
 - a. All GSA Requesting Officials. This Order supplements GSA Order ADM 2181.1A, Homeland Security Presidential Directive-12 Personal Identity Verification and Credentialing Policy, and Background Investigations for Contractor Employees.
 - b. The Civilian Board of Contract Appeals (CBCA), but only to the extent that CBCA determines it is consistent with CBCA’s independent authority under the Contract Disputes Act and it does not conflict with other CBCA policies or CBCA’s mission.
 - c. The Office of Inspector General (OIG), but only to the extent that OIG determines it is consistent with OIG’s independent authority under the Inspector General Act and it does not conflict with other OIG policies or OIG’s mission.
4. Cancellation. This Order supersedes GSA Order ADM 5400.2, “General Services Administration Heads of Services and Staff Offices’ and Requesting Officials’ Roles and Responsibilities to Implement Homeland Security Presidential Directive-12,” dated September 30, 2016.
5. Summary of Changes.
 - a. Added responsibilities for ROs, requiring them to follow all HSPD-12 requirements in the General Services Administration Acquisition Regulation (GSAR) and General Services Administration Acquisition Manual (GSAM), as well as complete the necessary documents when a contractor employee’s GSA Access Card is lost, stolen or uncollectible.

- b. Updated scope and applicability paragraph for clarity.
 - c. Updated to reflect new GSA policies.
 - d. Updated contact reference due to changes in organizational structure.
6. Roles and Responsibilities.
- a. HSSOs, Commissioners, Regional Commissioners, and Assistant Commissioners must implement HSPD-12 requirements, including background investigations and credentialing procedures for all GSA contractor employee personnel that require routine physical access to a Federally-controlled facility under GSA's jurisdiction, custody, or control (GSA-controlled) and/or routine access to a Federally-controlled information system pursuant to a contract for their Service, Staff Office, or Region.
 - b. All GSA ROs must comply with HSPD-12 policies for contractor personnel who are required to have routine physical access to a GSA-controlled facility and/or routine access to a Federally-controlled information system. ROs must have knowledge and understanding of Federal Acquisition Regulation (FAR) § 52.204-9, Personal Identity Verification of Contractor Personnel. ROs are also accountable for assisting and supporting the entire HSPD-12 background investigation and credentialing process for the contract(s) they administer. ROs must:
 - (1) Properly and timely administer contracts containing FAR § 52.204-9, Personal Identity Verification of Contractor Personnel;
 - (2) Follow GSAR and GSAM requirements pertaining to HSPD-12;
 - (3) Delegate in writing and in accordance with agency procedures, as appropriate, the following responsibilities to the COR, (note: the CO shall remain accountable for these responsibilities unless so delegated):
 - (a) Identifying contractor employees who need a background investigation and GSA Access Card;
 - (b) Requesting contractor employee background investigations and GSA Access Cards;
 - (c) Assisting the contractor with any questions relating to completion of the background investigation and credentialing processes;

- (d) Prohibiting contractor employees who need a background investigation from starting work without completion of the appropriate background investigation;
- (e) Notifying Office of Mission Assurance (OMA) staff when there is a change in building location, company information, point-of-contact information, or any other information on the Contractor Information Worksheet (CIW), GSA Form 850;
- (f) Completing all required documentation when a contractor's GSA Access Card is lost, stolen, or uncollectible; and
- (g) Ensuring the following duties are completed when the GSA Access Card is no longer needed for contract performance, a contractor employee leaves a contract for any reason (including when the employment of the contractor employee ends), or when the contract is terminated, canceled, or expires:
 - 1. Notify OMA staff of the departure by email to the HSSO HSPD-12 POCs.
 - 2. Retrieve all GSA Access Cards and all other GSA-issued credentials from the contractor employee or their company; and
 - 3. Forward by mail or in person GSA Access Cards and all other GSA-issued credentials for destruction to the attention of the OMA Staff for the Region in which the contract was or is administered or to the Director of the Personnel Security Division for contracts administered in Central Office.

7. Definitions.

- a. Background Investigation. Type of investigation covering specific areas of a person's background. The background investigation consists of a record search, credit search, and a necessary Defense Counterintelligence and Security Agency (DCSA) investigation as needed. The levels of investigation are Special Agreement Checks (SAC) and any Tier background investigations.
- b. Contractor Information Worksheet (CIW). GSA Form 850 used to obtain contractor information pertaining to HSPD-12 and background investigation processes.

- c. Defense Counterintelligence and Security Agency (DCSA). Organization that provides background investigations for GSA.
- d. Employee. A person that has a GSA position description (PD), on a full-time or part-time basis (e.g., CO or COR).
- e. GSA-Controlled Facilities. For the purposes of this policy and in relation to HSPD-12 guidance concerning routine physical access, facility is defined as the physical structure (brick and mortar) and/or interior tenant space under the jurisdiction, custody, or control of GSA.
- f. GSA Access Card. The name of a Personal Identification Verification credential within GSA.
- g. Personal Identification Verification (PIV) Credential. A physical artifact (e.g., identity card, smart card) issued to an individual that contains stored identity credentials (e.g., photograph, cryptographic keys, and digitized fingerprint representation) so that the claimed identity of the cardholder can be verified against the stored credentials by another person (human readable and verifiable) or an automated process (computer readable and verifiable). Known within GSA as GSA Access Card or PIV Card.
- h. Requesting Officials (RO). Staff that includes Contracting Officers (CO) and Contracting Officer's Representatives (COR) as designated and authorized by the CO.
- i. Routine (Physical) Access. Regularly scheduled access to a GSA-controlled facility at a minimum of once a week. For example, a contractor employee who reports to a GSA-controlled facility once per week is determined to be a long-term contractor employee (if work duration on a contract is 6 months or longer) and should go through the appropriate Tier background investigation and may obtain a GSA Access Card.
- j. Special Agreement Check (SAC). A background investigation for short-term contractor employees (work duration of less than 6 months) and non-United States citizen contractor employees with less than three consecutive years of residency in the United States or its territories that allows them to work on a GSA contract.
- k. Tier Background Investigations. A background investigation for employees and long-term contractor employees. Tier background investigations are referenced in publication Investigation (INV) 15, Requesting OPM Personnel Investigations (or its successor).

8. References.

- a. HSPD-12, "Policy for a Common Identification Standard for Federal Employees and Contractors," August 27, 2004.
- b. OMB Memorandum M-05-24, "Implementation of Homeland Presidential Directive 12 (HSPD) – Policy for a Common Identification Standard for Federal Employees and Contractors," August 5, 2005.
- c. OMB Memorandum M-19-17, "Enabling Mission Delivery through Improved Identity, Credential, and Access Management," May 21, 2019.
- d. GSA Order ADM 2181.1A, Homeland Security Presidential Directive-12 Personal Identity Verification and Credentialing Policy, and Background Investigations for Contractor Employees, March 27, 2024.
- e. Contact. For further information on HSPD-12 implementation, please contact hspd12.security@gsa.gov.

9. Signature.

/s/

ROBIN CARNAHAN
Administrator