

Temporary Procedures for Onboarding and Other Personnel Matters During COVID-19 Pandemic As of May 19, 2020

Introduction:

The Department (DOI) continues to take proactive steps to protect our employees and the public that we serve and help slow the spread of COVID-19, including efforts to maximize telework and other flexibilities to ensure social distancing, while still accomplishing our mission. In that context, managers must make deliberate and informed decisions regarding what would normally have been routine personnel actions. The following guidance is provided to ensure the Department maintains the ability to continue mission critical and essential functions, while mitigating risk to our employees and protecting the public interest. This guidance may evolve over time as the Department refines their virtual onboarding process. Human Resource professionals are encouraged to work with personnel security and other experts to develop their internal processes.

Mission Critical/Essential Hiring Posture

Managers will evaluate the urgency of hiring based on the position's relationship to the bureau's mission critical or **DOI Mission Essential Functions**, and should limit recruitment and hiring to those mission critical/essential positions until routine processes can be reestablished. Managers should delay Entry-On-Duty (EOD) for non-mission essential/non critical positions until that time.

Volunteers

Volunteers should not be onboarded, unless they are providing **mission critical functions** and can be fully vetted prior to onboarding. In rare cases, where the need for a volunteer is critical and the full vetting process cannot be accomplished the guidance below may be applied to those volunteers as well as new hires.

Risk-Based Onboarding Temporary Procedures

The following temporary procedures are not a waiver of on-boarding requirements, but only authorize delay or deferral of required onboarding steps to meet urgent and mission critical/essential needs when the normal onboarding processes cannot be followed. In locations where credentialing centers are available, the normal onboarding process shall be utilized. All deferred steps must be completed as soon as possible. Bureaus and offices are responsible for assessing the risks related to personnel on-boarded under these temporary procedures. Bureau and office heads must direct and implement local controls and processes that limit access to only those DOI facilities and data that are absolutely necessary to minimally accomplish mission critical and essential functions. For example, personnel who do not require access to information systems, sensitive records, limited access facilities, or data associated with supporting the public should not be permitted such access until they have completed the full on-boarding process.

Fingerprinting

To the maximum extent possible, DOI will continue to follow established on-boarding processes for vetting new hires and determining eligibility for issuance of a DOI Access Card. This includes capture of fingerprints at a USAccess Credentialing Center and simultaneous submission of fingerprints with the individuals eQIP forms to Defense Counterintelligence and Security Agency (DCSA).

However, during this pandemic Bureaus and offices that are unable to collect and process fingerprints (e.g. due to closure of USAccess Credentialing centers) and nonetheless need to proceed with onboarding

of mission critical/essential personnel, must obtain approval from the Bureau/Office Head. Bureau/Office Heads will make risk-based determinations, in consultation with their supporting personnel security experts, human capital officers, Identity, Credential, and Access Management (ICAM) leads, and, in the case of contractors, the contracting officer representative. This authority cannot be delegated further.

In these situations, the below guidelines are effective until further written notification:

- Bureau Directors/Heads must document the reasons for their risk-based decision to onboard personnel while deferring fingerprinting to a later date. Decision may be with respect to an occupational series or groups based on specific roles, (e.g. wildland fire fighters, law enforcement officers, or for specific positions performing mission critical/essential roles).
 - NOTE: Background investigations must still be submitted in e-QUIP for the new hire (when required) prior to establishing an EOD date.
- Human Resource Offices and Contractor Officer's Representatives must initiate the onboarding process using the DOIAccess System to enable follow up with collection of fingerprints at a later date.
- Personnel Security Offices must follow established guidelines to proceed with vetting, except that the collection and submission of fingerprints may be delayed until fingerprint processing is feasible, and no later than the date of termination of this temporary guidance.
- Once the ability to collect fingerprints is feasible, and no later than the termination of the OPM temporary guidance for vetting and appointment without fingerprinting, the agency must submit the fingerprints to DCSA as described in DCSA's procedure.

DOI has established a temporary onboarding process to support hiring of new individuals who cannot complete fingerprinting due to the closure of USAccess Credentialing Centers. The DOIAccess system has been modified to validate, track, and support Temporary Modified Onboarding cases. See Attachment **A, Temporary Procedures for New Employees/Contractors During COVID-19.**

New Hire Paperwork

Human Resources (HR) Offices shall maximize the use of electronic methods to complete necessary onboarding paperwork (i.e. confirmation letter, in-processing forms checklist). Recommended electronic methods include communication via email, the Entrance on Duty System (EODS), video conferencing, etc. HR Specialists will request that new hires send electronic versions of signed forms and documents via e-mail within three (3) business days of onboarding.

DOI Access Card

Every employee is required to obtain a DOI Access Card (PIV). Issuance of a DOI Access Card (PIV Card) requires in-person identity proofing and capture of biometrics, including photo and fingerprints; however, under temporary onboarding procedures due to COVID-19 this step may be deferred. As a result, new hires may not receive a DOI Access Card upon onboarding. However, once these individuals are able to visit a USAccess Credentialing Center and complete enrollment activities, a new **DOI Access Card will be issued immediately.** Since DOI Access Cards also represent proof of employment, HR offices will need to issue an employment verification letter in lieu of a DOI Access Card during this temporary process.

Access to Facilities and Network Resources

Individuals without a DOI Access Card must present their employment verification letter and a Government-issued ID for access to DOI facilities. Multi-Factor Authentication (MFA) is still required for remote access to all DOI systems. While the DOI Access Card and PIN provide the highest level of

security and are the Department standard for MFA, the OCIO, in cooperation with the Bureau and Office Associate Chief Information Officers (ACIOs), is developing an alternative MFA method that will support mission critical/essential personnel who do not have, cannot obtain, or cannot use the DOI Access Card. This alternative solution will be authorized for use only until the DOI Access Card can be issued. Access to DOI information systems for use by personnel hired under these temporary hiring procedures will only be authorized if such access is absolutely required to minimally accomplish urgent mission requirements. The OCIO will issue technical guidance regarding the alternative MFA methods through the ACIOs.

I-9 Forms

The Department of Homeland Security (DHS) has deferred the physical presence requirements associated with Employment Eligibility Verification (Form I-9). **Allowed as extended.**

- Employers exercising physical proximity precautions (e.g. telework or remote work) due to COVID-19 will not be required to review the employee's identity and employment authorization documents in the employee's physical presence.
- Section 2 documents must be inspected remotely, and the hiring agency must obtain, inspect and retain copies of the documents within three (3) business days for purposes of completing Section 2. "COVID-19" will be entered as the reason for the physical inspection delay in Section 2 Additional Information field, **once physical inspection takes place after normal operations resume.**
- All employees who were onboarded using remote verification, must report to their employer within three (3) business days for in-person verification of identity and employment eligibility documentation for Form I-9. Once the documents have been physically inspected, the employer should add "documents physically examined" with the date to the Section 2 Additional Information field, or to Section 3, as appropriate. Please refer to the DHS Guidance for more detailed instructions.

Oath of Office

The Oath of Office may be conducted virtually (telephonic) or remotely (e.g. video conference, Skype, FaceTime.). HR will collect an electronic version of the signed document (e.g. an image of the signed document or electronically signed document) and submitted to the EODS via email within three (3) business days of onboarding.

Medical Examinations/Testing

The below guidelines do not apply to positions with mandated certifications by other agencies, such as DOT or FAA. Managers will have to consult with those agencies for current guidance.

New Hires:

- 1) For routine positions without a mission critical/essential function for agency continuity or safety and security, management may defer the onboarding process and EOD until the capacity for routine medical appointments is restored.
- 2) For mission critical/essential positions for agency continuity or safety and security and **those with known arduous/hazardous functions**, medical examinations/testing may be deferred until the capacity for routine medical appointments is restored. In limited cases when an individual must be onboarded prior to receiving a full medical examination, a self-certification of health status form is available for verifying an applicant's current health status. This form should only

be used if a licensed health care provider is available to review and provide a limited physiological screen. These deferrals and self-certifications are temporary and full medical examinations will be accomplished as soon as the capacity for routine medical appointments is restored.

- 3) For new hires in occupations that have OPM and DOI **approved medical standards**, agencies should attempt to complete baseline examinations. If that is not possible, a self-certification of health status form is available for verifying an applicant's current health status. Bureaus/offices may use current alternative equivalent forms (e.g. wildland fire and law enforcement established forms) for this purpose. These occupations include Wildland Fire, Police Officer, Offshore Oil and Surface Mining Inspectors, and others with approved medical standards. Self-certifications are temporary and full medical examinations will be accomplished as soon as the capacity for routine medical appointments is restored.

Incumbent Employees:

Routine annual and/or periodic medical exams should be deferred until the capacity for routine medical appointments is restored. These deferrals are temporary and full medical examinations shall be accomplished as soon as the capacity for routine medical appointments are restored.

Drug Testing

The below guidelines do not apply to positions with mandated certifications by other agencies, such as the Department of Transportation (DOT). Managers can consult DOT Drug Testing and/or confer with the DOI Drug Testing points of contact.

Random Testing of Current Employees. Random drug testing is suspended until further notice.

Post Accident and Reasonable Suspicion Testing. Testing may still be necessary. Contact the DOI Drug Testing Program points of contact, [Alison F. Stockdale](#), 202-208-6312 Mobile: 202-409-9981 or [Bryan Castelow](#), 202-513-7786 Mobile: 202-437-1403, if you have this type of request.

New Applicant Testing

Drug testing for new hires onboarding into a Testing Designated Position (TDP) may be postponed; however, this postponement of drug testing does **not** apply to any DOT or DHS (including FMCSA, USCG, FRA, FAA) safety-sensitive positions or any employee performing DOT regulated duties. Additionally, postponement of drug testing does **not** apply to positions designated as Special-Sensitive, Critical-Sensitive, or Noncritical-Sensitive or employees in positions designated by the Secretary as sensitive in accordance with Executive Order No. 10450.

Offer letters for positions for which drug testing may be delayed will include language informing new hires into TDPs that their pre-employment drug test is being postponed, but they will be required to complete the drug testing requirement as soon as testing is resumed as a condition of employment.

Permanent Change of Station (PCS)

Permanent Change of Station reporting dates should be postponed for employees moving into non-mission critical/essential positions. Managers should consider restrictions issued by state and local authorities, limited airline operations, limitations on commercial temporary lodging, and other restrictions that impact movement before authorizing an employee to execute PCS movement. In cases where management determines a PCS move must occur (e.g. to a mission critical/essential position), Bureaus

and Offices may authorize the discretionary expense of temporary quarters (TQ) for transferring employees. The DOI limitations on the time allowed for TQ are temporarily removed and bureaus may authorize TQ for the maximum period allowed by the Federal Travel Regulations.

Non-PCS reassignments (inter-bureau transfers)

Bureaus should consider detailing to their future organization non-mission critical/essential individuals selected for a position in another bureau and delay formal HR actions until normal operations return. Mission critical/essential individuals can be transferred using the temporary onboarding procedures outlined in Attachment A, ***Temporary Procedures for New Employees/Contractors During COVID-19***.

References

- OMB [M-20-16](#), “Federal Agency Operational Alignment to Slow the Spread of Coronavirus COVID-19”, March 17, 2020
- OMB [M-20-19](#), “Harnessing Technology to Support Mission Continuity” March 22, 2020
- OPM, [“On-Boarding Processes for New Employees During the COVID-19 Emergency”, March 24, 2020](#)
- OPM, [“Temporary Procedures for Personnel Vetting and Appointment of New Employees during Maximum Telework Period due to Coronavirus COVID-19”, March 25, 2020.](#)

Attachment A: Temporary Onboarding Procedures for New Employees/Contractors During COVID-19

Bureau Human Resource Offices, Personnel Security Specialists and ICAM Leads will coordinate to complete the following steps:

1. Personnel selected and tentatively offered position.
2. Individual accepts position, completes appropriate entry on duty forms for their position including timely eQIP.
3. When eQIP is completed, Personnel Security reviews and submits for DCSA scheduling, marking it with FIPC COVID-19 Code (to be provided by DCSA TBD).
4. DOIAccess Sponsor completes remote identity proofing, creates record in DOIAccess, marks the record as mission-critical "Per E.O. 8781, COVID-19" and identifies the appropriate Risk Acceptance Category.
5. Personnel Security reviews remainder of onboarding packet. If favorable, sets the EOD date.
6. Personnel Security updates DOIAccess with NCHC Adjudication = "Deferred".
7. When individual reports to work on their EOD date, they will not receive a DOI Access Card. They should be issued an employment verification letter from HR as validation of their status.
8. Individual's processed under this modified on-boarding procedure are still required to complete the established onboarding process that includes attending an Enrollment appointment and having a background investigation completed.