
Section C. Auxiliary Personnel Security Program

Introduction

Since establishment of the Coast Guard Auxiliary by law in 1939, it has played an increasingly vital role in support of Coast Guard missions. Following the tragic events of 11 September 2001, the Auxiliary has set the nation's standard for volunteerism and patriotism. As the leading volunteer organization in the Department of Homeland Security, the Auxiliary has significantly expanded its support to the Coast Guard's Maritime Homeland Security (MHLS) and Maritime Domain Awareness (MDA) efforts.

To increase its overall readiness and capability, the Auxiliary initiated Operation Patriot Readiness (OPR). As a direct result of this unprecedented undertaking, the Auxiliary has significantly enhanced its preparedness to support the Coast Guard.

In 2003, the Commandant mandated that all Auxiliarists undergo a Personnel Security Investigation (PSI) as criteria for enrollment in the Auxiliary. The reasons for this mandate centered on:

1. The Coast Guard's new and sensitive post-9/11 missions.
2. The Coast Guard's higher focus on security of all of its workforce elements.
3. Increased Auxiliary augmentation of Coast Guard units and billets.
4. Increased Auxiliary visibility to the public, the Coast Guard, and other DHS agencies.
5. Increased reliance on Auxiliarists to act as trusted agents of the Federal government.

The Auxiliary PSI program was established as a requirement to assess the suitability of individuals for membership in the Auxiliary.

C.1. Base Enrollment Date

The Base Enrollment Date (BED) for individuals who enroll in the Auxiliary for the first time shall be the date that the Director signs their enrollment application understanding that it has been received with all other required paperwork.

The BED for re-enrollment applicants shall recognize all prior documented and validated Auxiliary service regardless of whether such service was performed prior to the implementation of the Auxiliary PSI program or not.

C.2. Types and Durations of Personnel Security Investigations

There are three types of Auxiliary PSIs:

- a. Operational Support (OS) – applicable for entry level membership and most activities.
- b. Direct Informational (DI) – applicable for Auxiliarists who require access to Coast Guard Standard Work Stations (SWS) and/or networks (i.e., the dot mil domain) due to the nature of the support that they provide to a Coast Guard unit.
- c. Direct Operational (DO) – applicable for more advanced and mission-sensitive activities that effectively require an Auxiliarist to be security clearance-ready.

As a minimum, applicants for enrollment shall submit to and undergo an OS PSI. Appropriate paperwork to properly conduct the PSI shall be included as part of any enrollment package submission. With the exception of fingerprint cards, all required OS PSI documents are included with the online version of the Auxiliary enrollment application. A DI or DO PSI package is predicated on the same documents for an OS PSI. It also requires submission of an SF-85 (Questionnaire for Non-Sensitive Positions) package to complete a National Agency Check and Inquiries (NACI) or submission of an SF-86 (Questionnaire for National Security Position) to complete a National Agency Check with Law and Credit (NACLC), respectively.

If an individual has undergone a previous PSI that is still within its effective period and can provide appropriate source documentation, then the individual must include a copy of such documentation for SECCEN validation in lieu of standard PSI documents in order to avoid having to undergo an entirely new PSI process.

Favorable OS, DI, and DO PSI determinations principally reflect an individual's suitability for different types of service in the Auxiliary as defined in sections C.2.a, C.2.b, and C.2.c of this chapter. The suitability for these different types of service, as reflected by corresponding FAV PSI determinations, has no expiration date. Therefore, once an Auxiliarist has achieved a FAV OS, DI, or DO PSI determination, they may remain in that PSI status indefinitely without further review.

Favorable DI and DO PSI determinations also reflect a degree of readiness for the granting of more extensive access within Coast Guard information systems and to classified information, respectively. DI and DO PSIs are predicated on a NAC. NACs have an effective period of 10 years. If an Auxiliarist has a security clearance pursuant to the NAC performed as part of their FAV DI or DO PSI, and there is continued need for them to retain their security clearance, then they must undergo a NAC update by the end of their current NAC's 10-year effective period. It is the responsibility of an Auxiliarist with a FAV DI or DO PSI to monitor the effective period of their NAC, and submit a new NAC package at least one year in advance of its expiration if DI or DO PSI renewal is needed.

C.2.a.
Operational
Support (OS)

OS is defined as all Auxiliarists who are not designated as DI or DO in terms of a PSI. The centerpiece of an OS PSI is a Special Agreement Check (SAC). The SAC serves to:

- (1) Determine if there are convictions that would result in an Unfavorable (UNFAV) PSI determination.
- (2) Conduct a wants/warrants check.
- (3) Help verify U.S. citizenship.
- (4) Validate suitability for basic Auxiliary service.

Essential elements of an OS PSI are: Special Agreement Check (OFI-86C form); Authorization for Release of Information (SF-85 form, page 6 only); 2 fingerprint cards (FD-258 form); acceptable form for proof of U.S. citizenship (original birth certificate or original passport (current or expired) are most common).

C.2.a.(1)
Verification of
U.S. Citizenship

The verification of U.S. citizenship may only be performed by an Auxiliarist who possesses a FAV OS PSI and who has qualified as an Auxiliary FP Technician. Such verification shall be noted in the appropriate section of the enrollment application.

C.2.a.(2) OS
PSI Results

Results of the OS PSI process will be incorporated into the SECCEN personnel security suitability database and entered into AUXDATA by SECCEN personnel. Visibility will normally be limited to DHS, USCG, and the federal Office of Personnel Management (OPM) on a need-to-know basis only. However, all information is eligible for official sharing to other Federal agencies for official purposes if, and as needed, on a need-to-know basis. Auxiliarists shall only know that the results were FAV or UNFAV. No specific or personal data shall be disclosed to other Auxiliarists.

NOTE

Only FPs using black ink will be accepted. Non-black ink prints can occur when FPs are taken using an inkless method, electronic scan, or transfer method, and the FPs are taken through a heating-pad machine, potentially causing the ink to turn red. However, if the final FP ink remains black from an electronic FP process, then the FPs are acceptable.

C.2.b. Direct
Informational
(DI)

DI is defined as Auxiliarists who require access to Coast Guard Standard Work Stations (SWS) and networks (i.e., the dot mil domain) due to the nature of the support that they provide to a Coast Guard unit. DI is only necessary for the Auxiliarist to obtain the Auxiliary Logical Access Credential (ALAC) in order to perform authorized activities that require the SWS and/or dot mil domain. An ALAC is not a Common Access Card (CAC) in that it does not display a photograph, does not convey benefits, entitlements, or privileges, and shall not be used for physical access. Additional ALAC information can be found in Chapter 5 of this Manual.

C.2.b.(1)
National Agency
Check and
Inquiries (NACI)

The centerpiece of a DI PSI is a NACI. The NACI serves to:

- (a) Encompass all that is included in the SAC.
- (b) Validate suitability for service in programs and positions that require DI for ALAC issuance purposes. A NACI does not, in and of itself, make an Auxiliarist security clearance-ready as does a NACLIC, but it does satisfy requirements for SWS and/or dot mil domain access.

Essential elements of a DI PSI include the Questionnaire for Non-Sensitive Positions (SF-85 form) and other requirements as defined by SECCEN.

C.2.b.(2) DI PSI
Results

Results of the DI PSI process will be incorporated into the SECCEN personnel security suitability database and entered into AUXDATA by SECCEN personnel. Visibility will normally be limited to DHS, USCG, and the Federal Office of Personnel Management on a need-to-know basis only. However, all information is eligible for official sharing to other Federal agencies for official purposes if, and as needed, on a need-to-know basis. Auxiliarists shall only know that the results were FAV or UNFAV. No specific or personal data shall be disclosed to other Auxiliarists.

C.2.c. Direct
Operational
(DO)

DO is defined as Auxiliarists whose qualifications involve the following:

- (1) Air Operations.
- (2) Command Center/Operations Center/Communications Center watchstanding.
- (3) Auxiliary elected and staff officers as determined by active duty Operational Commander, Director of Auxiliary, or the Chief Director. Minimum elected officer DO requirements are contained in Appendix C.
- (4) As directed by a Coast Guard command authority for any Auxiliarist who, due to the nature of the support they provide, has a clear, articulable, and recurring need for a security clearance (e.g., an Auxiliary watchstander whose duties require access to and handling of classified material along with commensurate need-to-know).

C.2.c.(1)
National Agency
Check With Law
and Credit
(NACLC)

The centerpiece of a DO PSI is a NACLC. The NACLC serves to:

- (a) Encompass all that is included in the SAC.
- (b) Validate suitability for service in programs and positions that require DO.
- (c) Help expedite granting of a SECRET clearance, if necessary. It does not provide the complete base for the granting of a SECRET clearance. A SECRET clearance must be requested and justified by cognizant Coast Guard command authority.

Essential elements of a DO PSI are: Personnel Security Action (CG-5588 form); Questionnaire for National Security Positions (SF-86 form, submitted thru the Electronic Questionnaire for Investigations Processing (e-QIP) system); DHS Credit Release (DHS-11000-9 form); 3 fingerprint cards (FD-258 form).

C.2.c.(2) DO
PSI Results

Results of the DO PSI process will be incorporated into the SECCEN personnel security suitability database and entered into AUXDATA by SECCEN personnel. Visibility will normally be limited to DHS, USCG, and the Federal Office of Personnel Management on a need-to-know basis only. However, all information is eligible for official sharing to other Federal agencies for official purposes if, and as needed, on a need-to-know basis. Auxiliarists shall only know that the results were FAV or UNFAV. No specific or personal data shall be disclosed to other Auxiliarists.

C.2.d. Security
Clearances

The purpose of the Auxiliary PSI program is to determine suitability for service, not to grant security clearances. The Personnel Security and Suitability Program Manual, COMDTINST M5520.12 (series), contains appropriate policy and guidance for the request and granting of security clearances. Security clearances are only good for designated periods of time and are normally subject to review by the cognizant command authority to determine if renewal is appropriate.

To receive a SECRET clearance, the cognizant Coast Guard command authority that needs an Auxiliarist to have the security clearance must submit the request for such to the SECCEN and ensure that all appropriate paperwork is submitted, including a Personnel Security Action Request form (CG-5588) and a Classified Information Non-Disclosure Agreement form (SF-312). To receive a security clearance higher than SECRET, the Coast Guard command authority and the Auxiliarist must follow appropriate procedures as defined in the Personnel Security and Suitability Program Manual, COMDTINST M5520.12 (series).

The Coast Guard command authority shall notify the Director whenever it initiates the security clearance process for an Auxiliarist. Only SECCEN can grant an interim security clearance or a final security clearance for an Auxiliarist. SECCEN will notify the Director when it grants an interim security clearance or a final security clearance for an Auxiliarist.

**C.3. Security
Center
Determinations**

The SECCEN shall make all determinations regarding suitability for service in the Auxiliary. The SECCEN shall be governed by policy as set forth in the Personnel Security and Suitability Program Manual, COMDTINST M5520.12 (series). The SECCEN, under program management of the Office of Security Policy and Management (DCMS-34), is responsible for adjudicating PSI concerns.

The SECCEN shall make one of two types of determinations for any OS, DI, or DO package:

- a. Favorable (FAV)
- b. Unfavorable (UNFAV)

C.3.a. Favorable
Determinations

The Director shall notify AP Auxiliarists when their FAV PSI determination is received in order to commence the process for issuance of an Auxiliary ID card.

- (1) If an AP Auxiliarist receives a FAV PSI determination, then the Director shall change that Auxiliarist's status in AUXDATA to IQ, BQ, or AX, as appropriate.
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- (2) If an AP Auxiliarist is re-enrolling and receives a FAV PSI determination, then the Director shall restore that Auxiliarist's status of IQ, BQ, or AX, as appropriate.
 - (3) If an Auxiliarist receives a FAV DI PSI determination, then that Auxiliarist becomes eligible for issuance of an ALAC.
 - (4) If an Auxiliarist receives a FAV DO PSI determination, then that Auxiliarist becomes eligible to fully qualify and participate in any DO disciplines.
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C.3.b.
Unfavorable
Determinations

If an Auxiliarist in AP status receives an UNFAV OS PSI determination, then that Auxiliarist shall be disenrolled pursuant to the following provisions and paragraph C.4 below:

- (1) It is possible for an Auxiliarist who has received a FAV OS PSI determination to receive an UNFAV DI or DO PSI determination upon completion of the latter PSI process. Under such circumstances, the Auxiliarist shall be limited to Auxiliary activities that may only be performed by those with a FAV OS PSI.
 - (2) The confidentiality of the Auxiliarist during the PSI determination process and the appeal process, if pursued, is paramount. If the SECCEN makes an UNFAV determination, it shall notify the applicant via the Director in letter format (or other medium if a more timely method is warranted).
 - (3) The Director shall notify the Auxiliarist's FC. The FC is not authorized to notify anyone else until completion of the appeal and adjudication process, if pursued. If, at the completion of the appeal and adjudication process, the applicant is still found UNFAV, the Director shall notify the FC, who may in turn notify the Auxiliarist's mentor, if assigned. The mentor shall not notify anyone else. Only the applicant may notify others, if they so desire.
 - (4) If the Auxiliarist is an elected officer, then the Director shall also notify the next elected leader in the chain of leadership (e.g., if the Auxiliarist is an FC, then the Director shall also notify the Division Commander (DCDR)). If the Auxiliarist is an appointed staff officer, then the Director shall also notify the elected leader to whom the Auxiliarist reports (e.g., if the Auxiliarist is an SO-MS, then the Director shall also notify the DCDR). If the Auxiliarist is a National Staff officer, then the Director shall notify the NACO and the Chief Director. No person who has knowledge of a suspension is authorized to notify any other person. If any duly notified elected leader needs to inform someone else, they must obtain permission from the Director. This authority cannot be delegated.
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**C.4.
Adjudication,
Suspensions,
and Appeals**

The SECCEN shall notify the Director when it makes an UNFAV PSI determination on an Auxiliarist. The Director shall notify the Auxiliarist of such determination and advise them of their discretion to participate in the adjudicative process with the SECCEN in order to arrive at a final PSI determination. Adjudication of PSIs is coordinated by the SECCEN, and it is designed to settle any questionable matters that pertain to a PSI in process. It is the responsibility of the Auxiliarist to fully comply with the needs and direction of the SECCEN in order to properly and expeditiously complete the adjudicative process. Particularly, this means that the SECCEN has no obligation to unreasonably apply its staff and resources to pursue and garner information from the Auxiliarist, nor shall there be any expectation on behalf of the Auxiliarist of such. The Auxiliarist's failure to fully comply with the needs and direction of the SECCEN will likely result in a final UNFAV PSI determination. Further, the Auxiliarist is responsible for all associated personal expenses during the adjudicative process including the conduct of their own research and copies of any pertinent reference materials.

If an Auxiliarist in AP status receives an UNFAV OS PSI determination, then the Director may suspend any and all aspects of the Auxiliarist's membership including certifications, duties of office (elected and appointed), and/or membership itself and its privileges throughout the adjudicative process until final determination is made. No avenue of appeal of such suspension shall be afforded an Auxiliarist in AP status who is subject to these circumstances. An Auxiliarist who, upon completion of the OS PSI process including adjudication, receives a final UNFAV PSI determination shall be disenrolled. There is no avenue for appeal.

If an Auxiliarist who possesses a FAV OS PSI (and is pursuing a DI or DO PSI) receives an UNFAV DI or DO PSI determination, then the Director shall limit their activities to those within the scope of OS FAV while the DI or DO PSI is adjudicated. If a final UNFAV DI or DO PSI determination is made, then their activities shall be limited to those within the scope of OS FAV. There is no avenue for appeal.

In order to keep appropriate elements of an Auxiliarist's chain of leadership aware of these circumstances, the Director shall make specific notifications. For Auxiliarists in any of the above circumstances, the Director shall, as a minimum, notify the FC. If the Auxiliarist is a division staff officer, then the Director shall notify the FC and the DCDR. If the Auxiliarist is a district staff officer, then the Director shall notify the FC and the DCO. If the Auxiliarist is a national staff officer, then the Director shall notify the FC, the NACO, and the Chief Director. Anyone so notified shall not be authorized to notify anyone else without expressed approval by the Director, or the Chief Director for national staff officers.

**C.5.
Certifications**

To upgrade a certification into DI or any of the DO disciplines in paragraph C.2 above, a DI or DO PSI application package (SF-85 or SF-86, DHS 11000-9, fingerprint cards, etc.) must be submitted to the Director or the appropriate Coast Guard command authority that desires the Auxiliarist's upgraded PSI. The DI or DO PSI application package must be reviewed by the Director or the appropriate Coast Guard command authority that desires the Auxiliarist's upgraded PSI, and be deemed to have no obvious errors, omissions, or glaring issues prior to forwarding to the SECCEN.

**C.6.
Notifications to
SECCEN**

Upon becoming aware of the arrest of another Auxiliarist, an Auxiliarist is obligated to immediately notify the Director. The Director shall immediately notify the SECCEN and the appropriate Command Security Officer of same using a Coast Guard Personnel Security Action form (CG-5588).

Among all Coast Guard personnel, including Auxiliarists, marriage to or cohabitation with a non-U.S. citizen may result in the loss of eligibility for a security clearance and suitability for service. Therefore, if an Auxiliarist with a FAV DI or DO PSI marries or cohabitates with a non-U.S. citizen, then the Auxiliarist must immediately inform the Director of the marriage or cohabitation. The Director shall then immediately notify the appropriate Command Security Officer and submit a CG-5588 Form along with an OFI Form 86C to SECCEN within 30 days of the marriage or cohabitation. This must be done regardless of whether or not the Auxiliarist possesses a security clearance.

**C.7.
AUXDATA**

AUXDATA has been designed to assist Auxiliarists, Auxiliary leadership, the Director and the Chief Director, and the SECCEN in tracking, managing, and creating reports for implementation and management of the PSI program. Much of the policy as written in this section has been programmed to automatically generate the required reports, notifications, emails, etc.

**C.7.a. Security
Access**

In accordance with the requirements of 5 U.S.C. 552a, The Privacy Act of 1974, the Government shall not disclose any record contained in AUXDATA, by any means of communication, to any person without the prior consent of the individual to whom the record pertains. Therefore, access to the AUXDATA Security Tab shall be limited to "paid Federal Government employees" only, including Directors of the Auxiliary, their Operations Training Officer (OTO), and permanently assigned office staff. Access shall require special access authorization. This access authorization will not normally be granted to members of the Auxiliary, except under the circumstances discussed below.

SECCEN personnel who are required to enter the results of security checks will be granted special security access. Requests for this access may be made by the Director (in writing) to the Chief Director, with copy to the SECCEN.

C.7.b.
Exceptions to
Access
Requirement

One of the few exceptions to access limitation is for disclosures to members of the agency with a “need to know.” Determining who has a “need to know” is a matter of agency discretion. Further, if the Director cannot realign jobs/responsibilities within the Director’s office to free up permanently assigned employees to perform the Security AUXDATA work, and there is an absolute and justified agency “need” to grant access to an Auxiliarist, who is a member of the Director’s office team, then a waiver procedure based on a “need to know” and agency “need to perform required work” shall be followed.

C.7.c. Waiver
Request
Procedures

Waiver requests shall not be initiated until the Auxiliarist has submitted all required DI or DO PSI information and after careful personal review by the Director to ensure there are no glaring, potentially derogatory or questionable issues at time of submission/review. If any irresolvable issues arise during the investigation, AUXDATA security access will be reconsidered jointly by the Director and the Chief Director, and may be immediately revoked if deemed appropriate. The following procedures apply for requesting a waiver to the “paid Federal Government employee” requirement:

- (1) The Director shall submit a signed, written request for waiver (e-mail is acceptable) to the Chief Director that summarizes the attempts to realign office work to free up permanently assigned employees to perform the AUXDATA work along with justification to clearly establish the agency need. Additionally, the Director shall include any information about the Auxiliarist that may help review and consider the request.
 - (2) Blanket waivers will not be issued as a matter of controlling or limiting access. However, it is possible for a single Director’s office to have more than one Auxiliarist with access, based on the Director’s cited justification and need.
 - (3) The Chief Director shall review and either approve or disapprove all waiver requests and directly respond in writing (e-mail is acceptable) with copy to the SECCEN.
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