



DEPARTMENT OF THE ARMY
OFFICE OF THE CHIEF OF CHAPLAINS
2700 ARMY PENTAGON
WASHINGTON DC 20310-2700

DACH-ZA

20 March 2017

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Standard Operating Procedure for Child Protection at Chaplain Corps Activities –
Update 1

1. Purpose. This standard operating procedure (SOP) is issued in accordance with two essential implementing guidance documents published by the Office of the Chief of Chaplains on 10 March 2016. The guidance documents are Chief of Chaplains Child Protection Guidance (CCCPG) and Implementing Guidance on Chapel Volunteer Management (CVM).
2. Applicability. This SOP applies to all chaplains, facilities, services, and programs sponsored or sanctioned by the Army. This includes all Religious Support Personnel (military and civilian), contractors, and volunteers. The SOP is organized by personnel categories with attached forms.
3. Effectiveness. This SOP will be reviewed (and re-published) by the Office of the Chief of Chaplains annually, or upon distribution of a new DA directive on background checks.
4. POC. The points of contact for CVM and CCCPG are the Director, Sustainment and Information, (571) 256-8750, and/or IMCOM Religious Education Program Director, (210) 466-0726.

Encls

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References

1. DoDI 1402.05 Background Checks on Individuals in DoD Child Care Services Programs, Incorporating Change, 14 July 2016
2. DoDI 6400.01, (2015) Family Advocacy Program (FAP) (2015)
3. Army Directive 2014-23, Conduct of Screening and Background Checks for Individuals Who Have Regular Contact With Children in Army Programs, 10 September 2014
4. AR 165-1, Army Chaplain Corps Activities, 23 June 2015
5. AR 215-3, Non-appropriated Funds Instrumentalities Personnel Policy (2015)
6. AR 608-1 Army Community Service Center (2013)
7. Additional Guidance on Army Directive 2014-23, 6 January 2016
8. Implementing Guidance Chapel Volunteer Management (CVM), 10 March 2016
9. Chief of Chaplains Child Protection Guidance at Chaplain Sponsored Events and Programs (CCCPG), 10 March 2016
10. IMCOM OPORD 16-013, Guidelines for Approval as a Distinctive Religious Group Leader
11. Office of the General Counsel Legal Review Memorandum, Request for Guidance on Background Checks for Community-Based Childcare Providers, 2 June 2016
12. Memorandum, Army Federal Investigative Standards (FIS) Implementation, 12 Jan 2016
13. Memorandum, Guidance on Records Checks for Military Supervisors of Minors, 9 Sep 2015

Background Check Verification Checklists

The use of a form or checklist to verify background checks for all Army Chaplain Corps Activities varies per command, region, and locale. These checklists are essential for proper accounting and support tracking efforts. A standardized form is under development.

Comply with the requirements of this SOP and use an appropriate form authorized by the respective command or region.

Background Check Progress Tracking

Background checks are essential in child protection. Each background check conducted involves several gateways; pre-screening, preliminary, and completed. These gateways are labor intensive and take significant amounts of time to complete. Therefore, appropriate tracking must be conducted for all Army Chaplain Corps Activities. A standardized approach to track progress is under development.

Comply with the requirements of this SOP and utilize an appropriate tracker authorized by the respective command or region.

Line of Sight Supervision (LOSS)

1. This SOP is for use by Army chaplain sponsored events and programs. On occasions where the Commander or Chaplain requirements exceed this SOP, then those guidelines apply.
2. Line-of-Sight Supervision (LOSS). Continuous visual observation and supervision of an individual whose background check has not yet cleared, and has a favourable interim suitability or fitness determination, while engaged in child interactive duties, or in the presence of children in a DoD-sanctioned program or activity. The person providing supervision must have undergone a background check and received a favourable suitability or fitness determination and be current on all periodic reinvestigations as required by CCCPG. (ref. DoDI 1402.05 Definition)
3. LOSS is only implemented with Commander written approval.
 - a. The Commander may deny LOSS requests.
 - b. The process for LOSS requests is as follows; through the DRE or sponsoring chaplain who then requests to Senior Chaplain. If concurring, then the Senior Chaplain makes request to Garrison Commander.
 - c. There are 3 sample ways of Commander granting requests each with sample memoranda in the attached enclosures.
 - 1) Commander grants approval only for particular individuals in particular situations. (LOSS Sample 3)
 - 2) Commander delegates authority for LOSS approval to Senior Chaplain for a particular program. (LOSS Sample 4)
 - 3) Commander delegates authority for LOSS approval to Senior Chaplain for all religious support programs. (LOSS Sample 5)
4. Methods for LOSS identification.
 - a. LOSS identification is required for all LOSS Supervisors and for all individuals serving under LOSS.
 - b. To ensure clarity of identification, individuals with complete and favorable background checks also should be identified.
 - c. The LOSS identifiers may include nametag with name and status (complete and favorable; LOSS supervisor; LOSS recipient).
 - d. The ratio of LOSS supervisors to individuals serving under LOSS is determined by Commander SOP. Considerations include the complexity of the program, the size of the program space (inside, outside, classroom, large room, etc.), the number of participants, and the experience of the LOSS supervisor.

5. Individuals serving under LOSS must be conspicuously identified by distinctive clothing (identifiable colors), badges, wristbands or other apparent markings that are fully visible when viewed from all angles. (AD 2014-23) The purpose of such markings must be communicated to staff, customers, parents, and guardians by conspicuous posting or printed information. (DoDI 1402.05)

6. LOSS Supervisors

a. Eligibility to be a LOSS Supervisor is for an individual who:

1) Has undergone a Tier 1 investigation with State Criminal History Repository (SCHR) and received a favorable suitability or fitness determination;

NOTE: Tier 1 Investigation with State Criminal History Repository Check (SCHR) used to be called CNACI. If you already have a completed/cleared CNACI equivalent, notify the CDE. The terminology became effective 1 April 2016 per the Federal Investigative Standards (FIS) published 12 Jan 16 and included as a reference in this SOP.

2) Has met periodic reverification requirements under this directive; and

3) Has not previously exhibited wanton or reckless disregard for an obligation to supervise a religious support personnel (military, civilian, contractor, or volunteer) in accordance with (IAW) AD 2014-23.

b. Religious Support Personnel (Military and Civilian) may provide LOSS to all personnel types.

c. Contractors with a completed Tier 1 with SCHR background check can provide LOSS for chapel volunteers, to include military members and civilians providing volunteer support to a chapel program, and other contractors involved in chapel support. LOSS supervision must be listed in the Performance Work Statement (PWS) and included as a Contract Line Number (CLN).

7. Eligibility to serve under LOSS.

a. Position appropriate minimum prescreening and background check IAW CCCPG.

b. LOSS is also possible during adjudication of derogatory findings. (AD 2014-23, encls 6)

c. LOSS permission memoranda will be kept in the background check file. Notation will be made on a background check verification form and in an authorized background check tracker.

8. IAW AD 2014-23, individuals otherwise required to perform duties only under LOSS may perform duties without LOSS supervision if interaction with the child:

a. Occurs in the presence of the child's parent or guardian;

b. Is in a medical facility, subject to the supervisory policies of the facility and in the presence of a mandated reporter of child abuse; or

c. Is necessary to prevent the death of or serious harm to the child, and supervision is impractical or infeasible (for example, medical emergency or emergency evacuation of a child from a hazardous location).

Religious Support Personnel (Military) - Staff Instructions

1. Purpose. To provide standard operating procedure (SOP) for required background checks of Religious Support Personnel (Military) whose service includes regular interaction with children (0-18 years).

2. Scope. This SOP applies to all Army Religious Support (RS) programs or activities. Military Members (Chaplains and Religious Affairs Specialists) whose service includes regular interaction with children will have a completed and favorable background check or serve under Line of Sight Supervision (LOSS) with written command approval.

3. All Military background checks are subject to the Military Personnel Office (MILPER). This office has the final authority for military background checks but the proponent for the military check action is the Commander's Designated Entity (CDE) SOP. Alternatively, the Senior Chaplain provides oversight under the instruction of the Commander.

a. When a new Military check is required, the candidate will coordinate with the Senior Chaplain for the most current edition of the RSP (Military) Background Check packet.

1) The Religious Support Personnel (Military) Background Check Packet is attached, updates will be on the OCCH SharePoint. Coordinating instructions will follow the Commander and/or Commander's Designated Entity (CDE) instructions for additional requirements and updates prior to each distribution.

2) The Supervisor will maintain child protection files with supervision records. These will include a background check verification form and all documents related to the prescreening of the military member. The supervisor will track renewals for all prescreening and investigations. The file will be secured and maintained by the Supervisor or an appointed representative; the military member will not control or process the file.

3) All files will be kept IAW AD 2014-23. Follow local SOPs.

4. During the period of publishing for this SOP, further details of the vetting process came under DA level staffing advisement and could not be released. Therefore, those details will publish through a revision of this SOP or as an amendment.

Religious Support Personnel (Civilian) - Staff Instructions

1. Purpose. To provide standard operating procedure (SOP) for required background checks for chapel Religious Support Personnel (Civilian) whose service includes interaction with children (0-18 years). The term civilian is used instead as DA Civilian because some OCONUS locations employ host nation or local national civilians.

2. Scope. This SOP applies to all Army Religious Support (RS) including programs or activities within RS facilities or in RS sponsored or sanctioned programs or activities. Civilians whose service includes interaction with children will have a completed and favorable background check or serve under Line of Sight Supervision (LOSS) per written command approval.

3. All Civilian background checks are subject to the Civilian Personnel Advisory Center (CPAC), and IAW the CDE SOP.

a. When a new Civilian check is required, the candidate will coordinate with CPAC for the most current edition of the RSP (Civilian) Background Check packet.

1) The Religious Support Personnel (Civilian) Background Check Packet is attached and any updates will be on the OCCH SharePoint. The CPAC will coordinate with OCCH, IMCOM (if applicable), the Commander, and Commander's Designated Entity (CDE) for additional requirements and updates prior to each distribution.

2) The Supervisor will maintain child protection files with supervision records. These will include a background check verification form and all documents related to prescreening of the civilian. The supervisor will track renewals for all prescreening and investigations. The file will be secured and maintained by the Supervisor or an appointed representative; the civilian will not control or process the file.

3) The CPAC should start a file on the individual at this time to include a background check verification form and position description.

4) All files will be kept IAW AD 2014-23.

b. Throughout this process, CPAC will coordinate between the CDE and the Civilian. The Civilian will not contact the CDE directly.

c. As each part of the investigation is completed, the CPAC should update the background check verification form.

d. Commander or CPAC may have additional requirements or stringencies which must be followed. For instance, some garrisons require Host Nation checks, and others do not. The local commander's requirement will be followed.

e. During this process, if derogatory information is found, then CPAC will coordinate with the CDE for appropriate action IAW AD 2014-23 and the CPAC requirements.

4. The civilian will complete the forms in the packet and return to the CPAC.

a. Once the packet is received, the CPAC compares each form to the sample file to ensure completion and returns forms to the civilian for correction as needed.

b. The background check verification form indicates which elements of the packet are required for prescreening and any requirements for additional documents such as solicitation and attachment 1, the prescreening interview.

c. If all of the prescreening is complete and favorable, then the CPAC:

1) Continues the order of the background check ICW the CDE to ensure the individual is suitable for work with children.

2) Ensures the Child Protection Prescreening Interview or a memorandum stating that the organization has interviewed and determines the individual suitable stays in the individual's file.

3) Contacts the CDE where the civilian will be assigned and coordinates the preliminary investigation.

4) Contacts the Supervisor to ensure complete screening, investigation, and renewals.

d. If the prescreening is not complete and favorable, then the CPAC and CDE will coordinate IAW AD 2014-23, Enclosure 6 and the CPAC requirements.

5. The CPAC should track the file of the individual.

a. When the file is complete and favorable, the CPAC will notify the individual and the supervisory chaplains. The CPAC will send a copy of the full file to the appropriate chaplain supervisor where the file copy will be kept and audited as part of Senior Chaplain's child protection background checks.

b. The CPAC will coordinate with the OCCH POC for child protection and with the CDE of the Commander to ensure the current renewal schedule is followed.

c. If a file requirement expires without renewal, then the individual will need to be removed from service with children or (with Commander's written permission) be placed under LOSS.

d. If new derogatory information is found at any time during the individual's service, then the individual will need to be removed from service with children or (with Commander's written permission) be placed under LOSS.

e. If there has been adjudication, then the relevant memoranda will be included in the file with dates of memoranda listed in the derogatory block of the background check verification form.

f. When the individual otherwise ceases service, then the CPAC will move the file to an inactive status and coordinate with the OCCH POC for child protection for the length of file maintenance.

All Volunteers - Staff Instructions

1. Purpose. To provide standard operating procedure (SOP) for files of all volunteers including required background checks and files for volunteers whose service includes interaction with children (0-18 years).

2. Scope. This SOP applies to all Army Religious Support (RS) including programs or activities within RS facilities or in RS sponsored or sanctioned programs or activities. Volunteers whose service includes interaction with children will have a completed and favorable background check or serve under Line of Sight Supervision (LOSS) per written command approval.

a. IAW AD 2014-23 (Enclosure 3), Religious Support Personnel and contractors when serving in a religious program as assigned duty are not volunteers. These personnel will have background checks IAW AD 2014-23 (Enclosure 3) and enclosures 5-6 of this SOP.

b. When their duty assignment is other than chapel service, then personnel, military and civilian, may be considered volunteers and have child protection background checks IAW AD 2014-23 (Enclosure 5) and enclosures 7-11 of this SOP.

3. Senior Chaplains, DREs, and sponsoring chaplains will determine the classification of volunteer position descriptions. The file and process used for a volunteer depends upon this classification. See Table 1 for a classification matrix.

a. Volunteer status is based on the volunteer's position description.

b. To ensure regulatory compliance, contact the OCCH or IMCOM POC for child protection and volunteer management for volunteer position description review and guidance.

c. Based on the precedent set by Chapel Volunteer Management System (2007 & 2011) now Chapel Volunteer Management (CVM) March 2016, not all volunteers for Chaplain Corps activities are reportable volunteers.

d. A volunteer's service is reportable when it is:

1) In any capacity with children or youth under the age of 18.

2) Handle money or food.

3) Work 10 hours or more per month in religious support programs or activities.

4) Have specifically requested that their hours be recorded.

e. Voluntary service which is deemed to be non-reportable is not tracked as individual volunteers but as total number of volunteer hours and is included in the relevant program reports.

f. See the attached enclosure for SOP by volunteer classification.

4. Roles are determined by AR 165-1, AD 2014-23, and CVM 2016.

a. Key roles include Senior Chaplain, Sponsoring Chaplain, Senior NCO, Director of Religious Education, and Volunteer Coordinator.

b. For the purposes of this SOP, Organizational Point of Contact (OPOC) is used for the individual who has the primary contact with the volunteer. The Senior Chaplain will determine the OPOC for each sponsored/sanctioned program. The OPOC can be any of the individuals listed in paragraph 4.a. of this enclosure or may be a statutory specified volunteer position.

c. The volunteer’s file will be secured and maintained by the Senior Chaplain or OPOC; the volunteer will not control or process his/her own file.

5. The chaplain will coordinate with the Commander for local instruction.

Table 1 Matrix - Voluntary Service Classification

Matrix - Voluntary Service Classification			
Classification	Criteria	Actions	Specified vs Non-Specified
Student Intern	Enrollment in an educational institution.	Coordinate with educational institution, CPAC, and Chaplain for initial permission before starting background checks. Intern agreement is from CPAC.	Can be Specified or Non-Specified depending on the position description and contact with children. Implement Tier 1 per CPAC and commander requirement. If they are expected to be a LOSS supervisor, then must have Tier 1 with SCHR and JAG and Commander approval.
Private Organization	Individuals who will be working under the leadership of a non-DoD organization which has no contractual status with chaplains.	Coordinate with chaplain and with organization’s leaders. JAG and Commander review and approval are advised before starting background checks.	Can be Specified or Non-Specified depending on the position description and contact with children. May not provide LOSS.
Persons Providing Gratuitous Service	If an individual wants to provide unpaid service but does not want or cannot have statutory classification. Primarily this is Religious Support personnel who will provide service which is not included in their PD/SOW.	JAG and Commander written approval is required to be in the file.	Can be Specified or Non-Specified depending on the position description and contact with children. May not provide LOSS.
Statutory Volunteer	This is the most common volunteer classification. The individual may not fit any of the other classifications.	Check with command SOP to see if registration in VMIS is recommended for statutory volunteers who require a background check.	Can be Specified or Non-Specified depending on the position description and contact with children. If they are expected to be a LOSS supervisor, then must have Tier 1 with SCHR and Commander approval.
Specified – Working with children. Position description lists <i>specified</i> as classification. Background check is required. Non-Specified – Not working with children or limited work with children. Position description lists <i>Non-Specified</i> as classification. Background check is not required, but LOSS must be implemented with written Commander approval when with children who are in Army Chaplain Corps activities or programs without their parents.			

Statutory Volunteer Files and Background Checks

1. The following is for use if a volunteer or volunteer position description is classified as Statutory based on the enclosure 7 of this memorandum.
2. Volunteer background checks are processed IAW Commander's Designated Entity (CDE) SOP.
 - a. When a new statutory volunteer check is required, the Organizational Point of Contact (OPOC) will send to the volunteer the most current edition of the RSO Statutory Volunteer packet.
 - 1) The Statutory Volunteer Background Check Packet is attached to this SOP. Updates will be on the OCCH SharePoint. The OPOC will check with OCCH, IMCOM (if applicable), the Commander and CDE for additional requirements and updates prior to each distribution.
 - 2) The OPOC will start a file on the volunteer at this time to include background check tracking and background check verification forms.
 - 3) If the volunteer is non-specified, the file will include a non-specified volunteer verification form.
 - 4) All files will be kept in accordance with (IAW) AD 2014-23 and AR 608-1.
 - b. Throughout this process, the OPOC will coordinate between the CDE and the volunteer. The volunteer will not contact the CDE directly.
 - c. Where a form lists supervisor, for the purposes of volunteers, the supervisor is the DRE or sponsoring chaplain.
 - d. As each part of the investigation is completed, the OPOC will enter updated information into a background check verification forms and/or background check tracking system.
 - e. If not using Volunteer Management Information System (VMIS), DA Form 4713, is the best alternate collection method. Volunteer hours and volunteer position descriptions are correlated for the volunteer's service.
 - f. If the volunteer has elected to use VMIS, then the OPOC will approve the volunteer application in VMIS, annotate a background check verification form accordingly, and use VMIS to track the volunteer's service. The volunteer's position description will be in VMIS.
 - g. Commander may have additional requirements or stringencies which must be followed. For instance, some garrisons require Host Nation checks, and others do not. The local commander's requirement will be followed.
 - h. During this process, if derogatory information is found, the Senior Chaplain will coordinate with the CDE for appropriate action IAW AD 2014-23.
3. The volunteer will complete the forms in the packet and return to the OPOC.

a. In the case of Specified Volunteers, reference forms will be received by the OPOC via encrypted email (from a US government account to a US government account) or other secure method.

b. The OPOC compares each form to the sample file to ensure completion. Return forms to the volunteer for correction as needed.

c. The OPOC review includes evaluation for the volunteer's suitability. During the review, the OPOC updates a background check verification form, and/or an applicable tracker.

d. The background check verification form indicates which elements of the packet are required for prescreening and any requirements for additional documents such as solicitation and attachment 1, the prescreening interview.

e. If all of the prescreening is complete and favorable and this is for a Non-Specified position, then the OPOC contacts the volunteer and arranges for voluntary service to begin. If that service includes work with children, then the Senior Chaplain will get written permission for LOSS from the Garrison Commander, and the LOSS SOP will be followed.

f. If all of the above prescreening is complete and favorable and this is for Specified position, then the OPOC Interviews the volunteer and inserts a Child Protection Prescreening Interview or a memorandum with interview content and a statement that the volunteer is suitable to provide this voluntary service. (see example attachment 1)

1) The OPOC contacts the CDE where the volunteer will be assigned. The OPOC will send the forms for preliminary investigation to the CDE. Forms will be sent via encrypted email (from a US government account to a US government account) or other secure method.

g. If the prescreening is not complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.

4. The CDE starts the preliminary investigation.

a. The CDE uses an Army-wide CDE SOP.

b. The OPOC and CDE will coordinate with the volunteer for the initiation of FBI fingerprint checks. This is the first time that the volunteer will visit or contact the CDE directly.

1) If the volunteer is not located near the receiving Commander's installation, then the CDE will request a convenient installation Security Office for Fingerprint facilitation.

2) If the volunteer is not located near any DoD installation, then the Security Officer will coordinate with the OPOC and volunteer for a local law enforcement office to provide digital fingerprint support.

3) Additional forms and requirements (such as birth certificate, PSIP worksheet, etc.) will be identified by the CDE if necessary.

4) The CDE of the receiving Commander has the lead on this process and will get the tracking numbers from other locations which might provide fingerprint facilitation.

c. The OPOC will track the process with the CDE.

d. The OPOC will coordinate with the CDE and the volunteer if there are additional forms or checks required.

5. These preliminary investigation results are returned to the OPOC.

a. If these preliminary investigations are not returned complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.

b. If these investigations are all returned complete and favorable, then the CDE will notify the OPOC.

c. The volunteer's background check verification form and/or tracking system are updated.

d. If the entire file is complete, then the volunteer will be notified and may begin to provide voluntary service IAW Army Chaplain Corps activities child protection standards.

6. If the volunteer is in a position which requires a Tier 1 Investigation with State Criminal History Repository Check (SCHR), then OPOC and CDE will coordinate with the volunteer for the initiation of this check.

a. The CDE has the lead on the Tier 1 with SCHR and will provide direction to the OPOC and volunteer.

b. The OPOC will track Tier 1 with SCHR progress with the CDE providing appropriate updates to the volunteer.

7. The Tier 1 with SCHR results are returned to the OPOC.

a. If the Tier 1 with SCHR is not returned complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.

b. If the Tier 1 with SCHR is returned complete and favorable, then the OPOC will notify the volunteer and organizational POC.

c. The volunteer's background check verification form and/or tracking system are updated with the results of the Tier 1 with SCHR.

8. The OPOC will continue to track the file of this volunteer.

a. When the file is complete, the OPOC will notify the volunteer and the supervisory chaplains.

1) If the voluntary service occurs at an installation different from the OPOC's office, then the OPOC will send a copy of the background check verification form to the sponsoring chaplain who will maintain this authenticated form with secure, personally identifiable information, files.

b. If a file requirement expires without renewal, then the volunteer will need to be removed from service with children or (with Commander's written permission) be placed in a volunteer position which can be classified as Non-Specified and only service under LOSS when serving with children.

c. If new derogatory information is found at any time during the volunteer's service, then the volunteer will need to be removed from service with children or (with Commander's written permission) be placed in a volunteer position which can be classified as Non-Specified and only service under LOSS when serving with children.

d. If there has been adjudication, then the relevant memoranda will be included in the file with dates of memoranda listed in the derogatory block of a background check verification form.

e. When the program ends or the volunteer otherwise ceases service, then the OPOC will move the file to inactive, mark the tracker, and coordinate with OCCH if necessary. Unless otherwise indicated, the OPOC and CDE will mark a file as inactive on the Date Eligible for Return from Overseas (DEROS).

Individual Providing Gratuitous Service Files and Background Checks

1. The following is for use if a volunteer or volunteer position description is classified as Individual Providing Gratuitous Service based upon enclosure 7 of this memorandum.

2. Individual Providing Gratuitous Service background checks are IAW the Commander's Designated Entity (CDE) SOP.

a. When a new Individual Providing Gratuitous Service check is required, the Organizational Point of Contact (OPOC) will send to the Individual Providing Gratuitous Service the most current edition of the RSO Individual Providing Gratuitous Service Volunteer packet.

1) The Individual Providing Gratuitous Service Volunteer Background Check Packet is attached, updates will be on the OCCH SharePoint. The OPOC will coordinate with OCCH, IMCOM (if applicable), JAG (per AR 608-1), and the CDE for additional requirements and updates prior to each distribution.

2) IAW AR 608-1, written permission will be given by the Commander and JAG.

3) The OPOC will start a file on the Individual Providing Gratuitous Service at this time to include a background check verification form and or tracking system.

4) If the Individual Providing Gratuitous Service is Non-Specified, the file will include a Non-Specified Individual Providing Gratuitous Service verification form.

5) All files will be kept in accordance with (IAW) AD 2014-23 and AR 608-1.

b. Throughout this process, the OPOC will coordinate between the CDE and the Individual Providing Gratuitous Service. The Individual should not contact the CDE directly.

c. In cases where a form lists supervisor, for the purposes of Individual Providing Gratuitous Service, the supervisor is the DRE or sponsoring chaplain.

d. As each part of the investigation is completed, the OPOC will enter updated information into a background check verification form and/or applicable tracking system.

e. The OPOC will use the documents of the volunteer file to track the volunteer's service and maintain the volunteer position description.

f. Commander and/or JAG may have additional requirements or stringencies which must be followed. For instance, some garrisons require Host Nation checks, and others do not. The local commander's requirement will be followed.

g. During this process, if derogatory information is found, the Senior Chaplain will coordinate with the CDE for appropriate action IAW AD 2014-23.

3. The Individual Providing Gratuitous Service will complete the forms in the packet and return to the OPOC.

a. In the case of Specified Individual Providing Gratuitous Service, reference forms will be submitted from referees to the OPOC via encrypted email (from a US government account to a US government account) or other secure method.

b. The OPOC compares each form to the sample file to ensure completion. Return forms to the Individual Providing Gratuitous Service for correction as needed.

c. The OPOC review includes evaluation for the volunteer's suitability. During the review, the OPOC will update a background check verification form and/or applicable tracking system.

d. The background check verification form indicates which elements of the packet are required for prescreening and any requirements for additional documents such as solicitation and attachment 1, the prescreening interview.

e. If all of the prescreening is complete and favorable and this is for a Non-Specified position, then the OPOC contacts the Individual Providing Gratuitous Service and arranges for service to begin. If that service includes work with children, then the Senior Chaplain will get written permission or LOSS from the Garrison Commander, and the LOSS SOP will be followed (Enclosure 4).

f. If all of the above prescreening is complete and favorable and this is for Specified position, then the OPOC Interviews the Individual Providing Gratuitous Service and inserts a memorandum with interview content and a statement that the volunteer is suitable to provide this service.

1) The OPOC contacts the CDE where the Individual Providing Gratuitous Service will be assigned. The OPOC will send the forms for preliminary investigation to the CDE. Forms will be sent via encrypted email (from a US government account to a US government account) or other secure method.

g. If the prescreening is not complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.

4. The CDE will start the preliminary investigation.

a. The CDE uses an Army-wide CDE SOP.

b. The OPOC will track the process with the CDE.

c. The OPOC and CDE will coordinate with the Individual Providing Gratuitous Service for the initiation of FBI fingerprint checks. This is the first time that the Individual Providing Gratuitous Service will visit or contact the CDE directly.

1) If the Individual Providing Gratuitous Service is not located near the receiving Commander's installation, then the CDE will request a convenient installation Security Office for fingerprint facilitation.

2) If the Individual Providing Gratuitous Service is not located near any DoD installation, then the Security Officer will coordinate with the OPOC and Individual Providing Gratuitous Service for a local law enforcement office to provide digital fingerprint facilitation.

3) Additional forms and requirements (such as birth certificate, PSIP worksheet, etc.) will be identified by the CDE.

4) The CDE of the receiving Commander has the lead on this process and will get the tracking numbers from other locations which might provide fingerprint facilitation.

d. If there are requests for further information or clarification, the CDE will email the Individual Providing Gratuitous Service and copy the OPOC.

e. The OPOC will coordinate with the CDE and the volunteer if there are additional forms or checks required.

5. These preliminary investigation results are returned to the OPOC.

a. If these preliminary investigations are not returned complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.

b. If these preliminary investigations are all returned complete and favorable, then the CDE will notify the OPOC. The Individual Providing Gratuitous Service's background check verification form and/or applicable tracking system are updated.

c. If the entire file is complete, then the Individual Providing Gratuitous Service will be notified and may begin to provide voluntary service IAW Army Chaplain Corps child protection standards.

6. The OPOC will continue to track the file of this Individual Providing Gratuitous Service.

a. When the file is complete, the OPOC will notify the Individual Providing Gratuitous Service and the supervisory chaplains.

1) If the gratuitous service occurs at an installation different from the OPOC's office, then the OPOC will send a copy of the background check verification form to the sponsoring chaplain who will maintain this authenticated form with secure, personally identifiable information, files.

b. If a file requirement expires without renewal, then the volunteer will need to be removed from service with children or (with Commander's written permission) be placed in a volunteer position which can be classified as Non-Specified and only service under LOSS when serving with children.

c. If new derogatory information is found at any time during the gratuitous service, then the volunteer will need to be removed from service with children or (with Commander's written permission) be placed in an Individual Providing Gratuitous Service position which can be classified as Non-Specified and only service under LOSS when serving with children.

d. If there has been adjudication, then the relevant memoranda will be included in the file with dates of memoranda listed in the derogatory block of a background check verification form.

e. When the program ends or the volunteer otherwise ceases service, then the OPOC will move the file to inactive, mark the tracker, and coordinate with OCCH for the length of file maintenance. Unless otherwise indicated, the OPOC and CDE will mark a file as inactive on the Date Eligible for Return from Overseas (DEROS).

Student Intern Volunteer Files and Background Checks

1. The following is for use if a volunteer or volunteer position description is classified as Student Interns based on enclosure 7 of this memorandum.

2. Student Intern volunteer background checks are IAW the Commander's Designated Entity (CDE) SOP.

a. When a new student intern volunteer check is required, the Organizational Point of Contact (OPOC) will send to the student intern volunteer the most current edition of the RSO Student Intern Volunteer packet.

1) The Student intern Background Check Packet is attached. Updates will be on the OCCH SharePoint. The OPOC will check with OCCH, IMCOM (if applicable), the Commander, CPAC/OPM (per AR 608-1), and the Commander's Designated Entity (CDE) for additional requirements and updates prior to each distribution.

2) The OPOC will start a file on the student intern at this time to include a background check verification form and/or an applicable tracking system.

3) If the student intern position is Non-Specified, the file will include a Non-Specified volunteer verification form.

4) All files will be kept in accordance with (IAW) AD 2014-23 and AR 608-1.

b. Throughout this process, the OPOC will coordinate between the CDE and the student intern. The intern should not contact the CDE directly.

c. Where a form lists supervisor, for the purposes of student interns, the supervisor is the DRE or sponsoring chaplain.

d. As each part of the investigation is completed, the OPOC will enter updated information into a background check verification form and/or applicable tracking system.

e. If the student intern has elected to use Volunteer Management Information System (VMIS), then the OPOC will upload the student intern application in VMIS, annotate a background check verification form accordingly, and use VMIS to track the student intern's service. The student intern's position description will be in VMIS.

f. If not using VMIS, then insert volunteer position description and use this file to track the volunteer's service.

g. Commander may have additional requirements or stringencies which must be followed. For instance, some garrisons require Host Nation checks, and others do not. The local commander's requirement will be followed.

h. During this process, if derogatory information is found, then the Senior Chaplain will coordinate with the CDE for appropriate action IAW AD 2014-23.

3. The student intern will complete the forms in the packet and return to the OPOC.

a. In the case of Student Interns in specified volunteer positions, reference forms will be submitted from referees to the OPOC via encrypted email (from a US government account to a US government account) or other secure method.

b. The OPOC compares each form to the sample file to ensure completion. Return forms to the student intern for correction as needed.

c. The background check verification form indicates which elements of the packet are required for prescreening and any requirements for additional documents such as solicitation and attachment 1, the prescreening interview.

d. If all of the prescreening is complete and favorable and this is for a Non-Specified position, then the OPOC contacts the student intern and arranges for voluntary service to begin. If that service includes work with children, then the Senior Chaplain will get written permission for LOSS from the Garrison Commander, and the LOSS SOP will be followed.

e. If all of the above prescreening is complete and favorable and this is for Specified position, then the OPOC Interviews the student intern and inserts attachment 1, Child Protection Prescreening Interview or a memorandum with interview content and a statement that the student intern is suitable to provide this voluntary service.

1) The OPOC contacts the CDE where the student intern will be assigned. The OPOC will send the forms for preliminary investigation to the CDE. Forms will be sent via encrypted email (from a US government account to a US government account) or other secure method.

f. If the prescreening is not complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.

4. The CDE will start the preliminary investigation.

a. The CDE uses an Army-wide CDE SOP.

b. The OPOC and CDE will coordinate with the student intern for the initiation of FBI fingerprint checks. This is the first time that the student intern will visit or contact the CDE directly. If a Tier 1 Investigation with State Criminal History Record Check (SCHR) is needed for this student intern's position, then coordinate with the CDE so that the Tier 1 with SCHR could be done with these same fingerprints.

1) If the student intern is not located near the receiving Commander's installation, then the CDE will request a convenient installation Security Office for fingerprint facilitation.

2) If the student intern is not located near any DoD installation, then the Security Officer will coordinate with the OPOC and student intern for a local law enforcement office to provide digital fingerprint facilitation.

3) Additional forms and requirements (such as birth certificate, PSIP worksheet, etc.) will be identified by the CDE.

4) The CDE of the receiving Commander has the lead on this process and will get the tracking numbers from other locations which might provide fingerprint facilitation.

- c. The OPOC will track the process with the CDE.
 - d. If there are requests for further information or clarification, the CDE will email the student intern and copy the OPOC.
 - e. The OPOC will coordinate with the CDE and the student intern if there are additional forms or checks required.
5. These preliminary investigation results are returned to the OPOC.
- a. If these preliminary investigations are not returned complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.
 - b. The student intern's background check verification form and/or applicable tracking system will be updated.
 - c. If the entire file is complete, then the student intern will be notified and may begin to provide voluntary service IAW Army Chaplain Corps child protection standards.
6. If the student intern is in a position which requires a Tier 1 with SCHR, then OPOC and CDE will coordinate with the student intern for the initiation of the Tier 1 with SCHR.
- a. The CDE has the lead on the Tier 1 with SCHR and will provide direction to the OPOC and student intern.
 - b. The OPOC will track Tier 1 with SCHR progress with the CDE providing appropriate updates to the student intern.
7. The Tier 1 with SCHR results are returned to the OPOC.
- a. If the Tier 1 with SCHR is not returned complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.
 - b. If the Tier 1 with SCHR is returned complete and favorable, then the OPOC will notify the student intern and organizational POC.
 - c. The student intern's background check verification form and/or an applicable tracking system are updated with the results of the Tier 1 with SCHR.
 - d. The chaplain supervisor can confirm with the CDE and OPOC that no further questions or issues are present. If no issues or objections, then the student intern may provide the service which required a Tier 1 with SCHR. The file will be documented accordingly.
8. The OPOC will continue to track the file of this student intern.
- a. When the file is complete, the OPOC will notify the student intern and the supervisory chaplains.
 - 1) If the voluntary service occurs at an installation different from the OPOC's office, then the OPOC will send a copy of the background check verification form to the sponsoring chaplain who will maintain this authenticated form with secure, personally identifiable information, files.

b. The OPOC will coordinate with the OCCH POC for child protection and with the CDE of the receiving Commander, to ensure the current renewal schedule is followed.

c. If a file requirement expires without renewal, then the student intern will need to be removed from service with children or (with Commander's written permission) be placed in a volunteer position which can be classified as Non-Specified and only serve under LOSS when serving with children.

d. If new derogatory information is found at any time during the student intern's service, then the student intern will need to be removed from service with children or (with Commander's written permission) be placed in a student intern position which can be classified as Non-Specified and only service under LOSS when serving with children.

e. If there has been adjudication, then the relevant memoranda will be included in the file with dates of memoranda listed in the derogatory block of a background check verification form.

f. When the program ends or the student intern otherwise ceases service, then the OPOC will move the file to inactive, mark the tracker, and coordinate with OCCH for the length of file maintenance. Unless otherwise indicated, the OPOC and CDE will mark a file as inactive on the Date Eligible for Return from Overseas (DEROS).

Private Organization Volunteer Files and Background Checks

1. The following is for use if a volunteer or volunteer position description is classified as Private Organization volunteer based on enclosure 7 of this memorandum.

2. Private Organization background checks are IAW the Commander's Designated Entity (CDE) SOP.

a. When a new private organization volunteer check is required, the Organizational Point of Contact (OPOC) will send to the private organization volunteer the most current edition of the RSO Private Organization Volunteer packet.

1) The Private Organization Volunteer Background Check Packet is attached updates will be on the OCCH SharePoint. The OPOC will check with IMCOM (if applicable), the Commander, JAG (per AR 608-1), and the CDE for additional requirements and updates prior to each distribution.

2) In particular, the OPOC and the Senior Chaplain will need to ensure correct installation access permissions and processes if this volunteer is not already authorized and assigned garrison support.

3) The OPOC will start a file on the volunteer at this time to include a background check verification form and/or applicable tracking system.

4) If the volunteer is Non-Specified, the file will include a Non-Specified volunteer background check verification form.

5) All files will be kept in accordance with (IAW) AD 2014-23 and AR 608-1.

b. Throughout this process, the OPOC will coordinate between the CDE and the volunteer. The volunteer should not contact the CDE directly.

c. In cases a form lists supervisor, for the purposes of volunteers, the supervisor is the DRE or sponsoring chaplain.

d. As the each part of the investigation is completed, the OPOC will enter updated information into a background check verification form and/or applicable tracking system.

e. The OPOC will use the documents of the private organization volunteer file to track the volunteer's service.

f. Commander and JAG may have additional requirements or stringencies which must be followed. For instance, some garrisons require Host Nation checks, and others do not. The local commander's requirement will be followed.

g. During this process, if derogatory information is found, then the Senior Chaplain will coordinate with the CDE for appropriate action IAW AD 2014-23.

3. The private organization volunteer will complete the forms in the packet and return to the OPOC.

a. In the case of Private Organization Volunteers in Specified positions, reference forms will be submitted from referees to the OPOC via encrypted email (from a US government account to a US government account) or other secure method.

b. The OPOC compares each form to the sample file to ensure completion. Return forms to the volunteer for correction as needed.

c. The OPOC review includes evaluation for the volunteer's suitability. During the review, the OPOC updates a background check verification form and/or applicable tracking system.

d. The background check verification form indicates which elements of the packet are required for prescreening and any requirements for additional documents such as solicitation and attachment 1, the prescreening interview.

e. If all of the prescreening is complete and favorable and this is for a Non-Specified position, then the OPOC contacts the private organization volunteer and arranges for voluntary service to begin. If that service includes work with children, then the Senior Chaplain will get written permission for LOSS from the Garrison Commander, and the LOSS SOP will be followed.

f. If all of the above prescreening is complete and favorable and this is for Specified position, then then the OPOC Interviews the volunteer and inserts a memorandum with interview content and a statement that the volunteer is suitable to provide this voluntary service. At a minimum, the interview will cover the topics on attachment 1, Child Protection Prescreening Interview.

1) The OPOC contacts the CDE where the volunteer will be assigned. The OPOC will send the forms for preliminary investigation to the CDE. Forms will be sent via encrypted email (from a US government account to a US government account) or other secure method.

g. If the prescreening is not complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.

4. The CDE will start the preliminary investigation.

a. The CDE uses an Army-wide CDE SOP.

b. The OPOC will track the process with the CDE.

c. If there are requests for further information or clarification, the CDE will email the private organization volunteer and copy the OPOC.

d. The OPOC will coordinate with the CDE and the volunteer if there are additional forms or checks required.

e. The OPOC and CDE will coordinate with the volunteer for the initiation of FBI fingerprint checks. This is the first time that the volunteer will visit or contact the CDE directly. If a Tier 1 is needed for this volunteer's position, then coordinate with the CDE so that the Tier 1 could be done with these same fingerprints.

1) If the volunteer is not located near the receiving Commander's installation, then the CDE will request a convenient installation Security Office for fingerprint facilitation.

2) If the volunteer is not located near any DoD installation, then the Security Officer will coordinate with the OPOC and volunteer for a local law enforcement office to provide digital fingerprint facilitation.

3) Additional forms and requirements (such as birth certificate, PSIP worksheet, etc.) will be identified by the CDE.

4) The CDE of the receiving Commander has the lead on this process and will get the tracking numbers from other locations which might provide fingerprint facilitation.

5. The preliminary investigation results are returned to the OPOC.

a. If these results are not returned complete and favorable, then the Senior Chaplain and CDE will coordinate IAW AD 2014-23, Enclosure 6.

b. If these fingerprints are all returned complete and favorable, then the CDE will notify the OPOC.

c. The volunteer's a background check verification form and/or applicable tracking system are updated.

d. If the entire file is complete, then the volunteer will be notified and may begin to provide voluntary service IAW Army Chaplain Corps child protection standards.

6. The OPOC will continue to track the file of this volunteer.

a. When the file is complete, the OPOC will notify the private organization volunteer and the supervisory chaplains.

1) If the voluntary service occurs at an installation different from the OPOC's office, then the OPOC will send a copy of the background check verification form to the sponsoring chaplain who will maintain this authenticated form with secure, personally identifiable information, files.

b. There are renewal requirements with varying timelines. Some portions of the file must be renewed annually. Other portions are less frequently.

c. The OPOC will coordinate with the OCCH POC for child protection and with the CDE of the receiving Commander, to ensure the current renewal schedule is followed.

d. If a file requirement expires without renewal, then the volunteer will need to be removed from service with children or (with Commander's written permission) be placed in a volunteer position which can be classified as Non-Specified and only service under LOSS when serving with children.

e. If new derogatory information is found at any time during the volunteer's service, then the volunteer will need to be removed from service with children or (with Commander's written permission) be placed in a volunteer position which can be classified as Non-Specified and only service under LOSS when serving with children.

1) If there has been adjudication, then the relevant memoranda will be included in the file with dates of memoranda listed in the derogatory block of a background check verification form and/or applicable tracking system.

f. When the program ends or the volunteer otherwise ceases service, then the OPOC will move the file to inactive, mark the tracker, and coordinate with OCCH for the length of file maintenance. Unless otherwise indicated, the OPOC and CDE will mark a file as inactive on the Date Eligible for Return from Overseas (DEROS).

Contractors – Staff Instructions

1. Purpose. To provide standard operating procedure (SOP) for required background checks for Army Chaplain Corps contractors whose service includes interaction with children (0-18year olds).
2. Scope. This SOP applies to all Army Religious Support (RS) including programs or activities within RS facilities or in RS sponsored or sanctioned programs or activities. Contractors whose service includes interaction with children will have a completed and favorable background check or serve under Line of Sight Supervision (LOSS) per written command approval.
3. All contractor background checks are IAW the Commander's Designated Entity (CDE) SOP.
 - a. When a new contracted individual check is required, the Contracting Officer Representative (COR) will send to the individual the most current edition of the RSO Contractor Background Check packet.
 - 1) The Contractor Background Check Packet is attached, updates will be on the OCCH SharePoint. The COR will check with OCCH, IMCOM (if applicable), CDE for additional requirements and updates prior to each distribution.
 - 2) The COR will start a file on the individual at this time with a background check verification form and statement of work.
 - 3) All files will be kept in accordance with (IAW) AD 2014-23.
 - 4) The file will be secured and maintained by the COR or an appointed representative; the contractor will not control or process the file.
 - b. Throughout this process, COR will coordinate between the CDE and the Contractor or Contracted Organization. The Contractor should not contact the CDE directly.
 - c. Where a form lists supervisor, for the purposes of contractors, the supervisor is the COR.
 - d. As the each part of the investigation is completed, the COR will enter updated information into a background check verification form and/or applicable tracking system.
 - e. Commander or contract may have additional requirements or stringencies which must be followed. For instance, some garrisons require Host Nation checks, and others do not. The local commander's requirement will be followed.
 - f. During this process, if derogatory information is found, then COR will coordinate with the Contracting Officer (KO) and the CDE for appropriate action IAW AD 2014-23 and the contract.
4. The individual will complete the forms in the packet and return to the COR.
 - a. Reference forms will be submitted from referees to the COR via encrypted email (from a US government account to a US government account) or other secure method.
 - 1) The COR compares each form to the sample file to ensure completion. Return forms to the contractor for correction as needed. The COR review includes evaluation of responses

for any questions of the individual's suitability. During the review, the COR updates a background check verification form and/or applicable tracking system.

b. The background check verification form indicates which elements of the packet are required for prescreening and any requirements for additional documents such as solicitation and attachment 1, the prescreening interview.

c. If all of the prescreening is complete and favorable, then:

1) Whereas the individual is an employee of a contracted organization, then the COR:

(1) Inserts into the file a COR memorandum stating that the COR has reviewed and determines the individual suitable for possible contract service with children.

(2) Receives from the organization a memorandum stating that the organization has interviewed and determines the individual suitable to provide this contract service. At a minimum, the interview will cover the topics on attachment 1, Child Protection Prescreening Interview.

2) Whereas the individual is an individual contractor, then the COR:

(1) Inserts into the file a copy of the contract solicitation.

(2) Interviews the individual and inserts attachment 1, Child Protection Prescreening Interview or a memorandum with interview content and a statement that the individual is suitable to provide this contract service. At a minimum, the interview will cover the topics on attachment 1, Child Protection Prescreening Interview.

3) The COR contacts the CDE where the contractor will be assigned. The COR will send the forms for preliminary investigation to the CDE. Forms will be sent via encrypted email (from a US government account to a US government account) or other secure method.

d. If the prescreening is not complete and favorable, then the COR and CDE will coordinate IAW AD 2014-23, Enclosure 6 and the contract.

5. The CDE starts the preliminary investigation.

a. The CDE uses an Army-wide CDE SOP.

b. The COR will track the process with the CDE.

c. The COR and CDE will coordinate with the individual for the initiation of FBI fingerprint checks. This is the first time that the individual will visit or contact the CDE directly.

1) If the individual is not located near the receiving Commander's installation, then the CDE will request a convenient installation Security Office for fingerprint facilitation.

2) If the individual is not located near any DoD installation, then the Security Officer will coordinate with the COR and individual for a local law enforcement office to provide digital fingerprint facilitation.

3) Additional forms and requirements (such as birth certificate, PSIP worksheet, etc.) will be identified by the CDE.

4) The CDE of the receiving Commander has the lead on this process and will get the tracking numbers from other locations which might provide fingerprint facilitation.

5) In preparation for the Tier 1, coordinate with the CDE so that the Tier 1 could be done with these same fingerprints.

d. If there are requests for further information or clarification, the CDE will email the contracted individual and COPY the COR.

e. Coordinate with the CDE and the individual if there are additional forms or checks required.

6. These preliminary investigation results are returned to the COR.

a. If these preliminary investigations are not returned complete and favorable, then the COR and CDE will coordinate IAW AD 2014-23, Enclosure 6 and the contract.

b. If these preliminary investigations are all returned complete and favorable, then the COR and CDE will coordinate with the individual for the initiation of Tier 1 Investigation with State Criminal History Record Check (SCHR).

c. The CDE has the lead on the Tier 1 with SCHR and will provide direction to the COR and individual.

d. The COR will track Tier 1 with SCHR progress with the CDE providing appropriate updates to the individual.

7. Once the CDE documents that all prescreening and preliminary checks are complete and that the Tier 1 with SCHR has been initiated, then the COR may assist the organizational point of contact (OPOC) to decide if the contractor might be able to start contract service under LOSS.

a. If the COR and OPOC concur with the contractor to start service, then a request will be made to the Commander.

b. If the Commander grants LOSS permission, then the LOSS plan and permission will be printed and inserted into the individual's file with notation a background check verification form and/or applicable tracking system.

8. The Tier 1 with SCHR results are returned to the COR.

a. If the Tier 1 with SCHR is not returned complete and favorable, then the COR and CDE will coordinate IAW AD 2014-23, Enclosure 6 and the contract.

b. If the Tier 1 with SCHR is returned complete and favorable, then the COR will notify the individual and organizational POC.

c. The individual's background check verification form and/or applicable tracking system will be updated with the results of the Tier 1 with SCHR.

d. If LOSS has been implemented, then the COR can confirm with the CDE and organizational POC that no further questions or issues are present. With no issues or objections, then the individual may be removed from LOSS. The file will be documented accordingly.

9. The COR will continue to track the file of this individual.

a. When the file is complete, the COR will notify the individual and the organizational POC.

1) If this is centralized contract, then the COR will send a copy of the full file to the appropriate garrison where the file copy will be kept and audited as one of the garrison's child protection background checks.

2) If this is a single garrison contract, but the contract service occurs at an installation different from the COR's office, then the COR will send a copy of the background check verification form to the sponsoring chaplain who will maintain this authenticated form with secure, personally identifiable information, files.

b. The COR will coordinate with the OCCH POC for chapel child protection, with the CDE of the receiving Commander, and with the Contracting Officer to ensure the current renewal schedule is followed.

c. If a file requirement expires without renewal, then the individual will need to be removed from service with children or (with Commander's written permission) be placed under LOSS.

d. If new derogatory information is found at any time during the individual's service, then the individual will need to be removed from service with children or (with Commander's written permission) be placed under LOSS.

e. If there has been adjudication, then the relevant memoranda will be included in the file with dates of memoranda listed in the derogatory block of a background check verification form.

f. When the contract expires or the individual otherwise ceases service, then the COR will move the file to inactive, mark the tracker, and coordinate with OCCH POC for child protection for the length of file maintenance.

Community-Based Childcare Providers - Guidance

1. Purpose. To provide guidance regarding Community-Based Childcare provisions for chaplain-led activities and programs.
2. Scope. This guidance applies to all Army Religious Support (RS) activities that are chaplain-led unit functions and do not constitute a sponsored or sanctioned program or activity. According to reference 11, an OGC legal review dated 2 June 16 cites that ICW paragraph 8a (4) of Enclosure 3 to DoDI 6060.02, community-based care programs shall meet state licensing standards for backgrounds checks. Additionally, ICW DoDI 1402.05, DoD sanctioned and operated programs do not include programs operated by other State or federal government agencies or private organizations.
3. In consideration of the aforementioned scope, those chaplain-led activities that meet the intent of the OGC legal review and utilize commercial vendors will only require background checks of those personnel to equal the standard set by the State in which the provider is employed or is practicing, whichever is higher. Some examples of these specific chaplain-led programs include; Strong Bonds training events where training is conducted off-post in select venues where parents are on site, religious retreats conducted by chaplains supporting garrison ministries and in the same nature and practice as SB training events (off-site venue, parents onsite), and unit events sponsored by command but training is chaplain-led utilizing off-post venues and parents are on-site at the training.
 - a. Prior to executing a program as a Community-Based Childcare the Senior Chaplain will have review by the Commander's JAG to confirm that this is the correct classification of the program.
 - b. The Senior Chaplain will have documentation of the completed licensing and background checks for each individual.
 - c. The Senior Chaplain will coordinate with the OCCH POC for child protection.