



Completing the Suitability Process: A Guide for State Vocational Rehabilitation Agencies

**Ticket to Work Program
Operations Support Manager**

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Introduction

This Guide is a tool to assist State Vocational Rehabilitation (VR) agencies in understanding the Social Security Administration's (Social Security) rules, policies and procedures concerning conducting of background investigations (referred to as both security clearances and suitability determinations).

Purpose

The purpose of a suitability investigation is to determine which employees, contractor and, as appropriate, subcontractor employees are deemed suitable to have access to Social Security beneficiary-related information. Access, as defined is having physical access to any Social Security facility or site, access to any Social Security information system, or access to programmatic or sensitive information, also known as "Personally Identifiable Information" or PII. This also applies to any access, including access through automated processes administered by the Operations Support Manager (OSM) for the Ticket to Work program.

Personally Identifiable Information (PII)

Accessing and exchanging PII on individuals currently receiving or who previously received Social Security disability benefits is necessary for an organization to operate under the Ticket to Work program. As a result, key staff at every agency that requires access must complete the suitability process prior to initiating its Ticket program operations, including securing Ticket assignments. The suitability process for is administered by Social Security's Center for Personnel Security and Project Management (CPSPM). PII includes, among other things, a person's name, date of birth, Social Security Number (SSN), address, bank account information, health records and Social Security benefit payment data. PII can be any one piece of information or a combination of several pieces of information that can be used to identify a specific individual.

Completing the Suitability Process

To complete the Suitability process, you must complete the following steps. To ensure that all of the information submitted throughout the Suitability process is properly processed, always use your VR's State Code number (3 digits) in all correspondence with the Social Security Administration, including all emails, cover sheets and suitability packages.

Step 1: Initiating the Suitability Process

The State Vocational Rehabilitation (VR) agency will receive an Electronic Questionnaire for Investigations Processing (eQip) applicant list from the Operations Support Manager (OSM) and in turn must fax the list of staff (i.e., applicants) requesting Suitability determinations to the Social Security Administration CPSPM Suitability Team, at 410.966.0640. Receipt of this fax will initiate the Suitability process. The form used to

provide this information is the eQIP Applicant Listing. This form requires the following information:

- Name of the VR
- VR State Code (3 Digits)
- Name and contact information of the Point of Contact
- For each VR employee applying for Suitability, provide his/her
 - Full name
 - SSN
 - Date of birth
 - Place of birth (including the city and state if born in the U.S. or the City and country if born outside the U.S.)

If an employee that has been identified as requiring a security determination has received a favorable Suitability determination from Social Security or another Federal agency within the last five years, CPSPM will consider accepting this in place of a new security clearance. In such situations, information about the prior suitability determination should be included on the eQIP Applicant Listing next to the person's name, noting the Federal agency that made the determination and the date of the determination. If CPSPM decides a new suitability determination is not required, a letter will be sent to the Point of Contact (POC) indicating that the person was previously cleared and will not need to go through another suitability determination. The only additional information that will need to be provided on this person when the completed suitability package is submitted is a completed Declaration of Federal Employment form (i.e., Optional Form 306).

Step 2: Invitation to Sign in to the Electronic Questionnaire for Investigations Processing System

All VRs are required to register in the eQIP System. Within seven 7 to 10 days of receipt of the eQIP Applicant Listing, CPSPM will provide an email notification to the POC that each applicant has been invited into the eQIP website to electronically complete their background investigation form. To prevent this email from going to a Spam or Junk folder, it is advisable for the POC to add dchr.ope.css@ssa.gov and ssa.gov to the safe sender list in his/her email mailbox.

It is extremely important to alert the POC to look for this emailed invitation as each applicant only has seven **calendar** days from the day the POC receives the eQIP invitation to log into the eQIP website, work out any login issues, and complete the background investigation, Form 85. If the form is not completed within the designated timeframe, the eQIP link will expire. When the link expires, the POC will have to email CPSPM and start the process over from the beginning.

It is strongly recommended that every applicant review the "Quick Reference Guide for eQIP Applicants" ([eQIP - Quick Reference Guide for the Applicant](#)) and the "Frequently Asked Questions" (<http://www.opm.gov/investigations/e-qip-application/e-qip-fags/>) prior

to starting the eQIP questionnaire. VRs should encourage their applicants to review this information prior to receiving the eQIP invitation. The Guide offers useful information, including tips on configuring different browsers and JAWS Screen-Reading Software to complete the application online.

Step 3: Completing the eQIP Form

Each designated VR staff person that was listed on the email invitation to log into eQIP must log in to the eQIP website and complete Standard Form 85, *Questionnaire for Non-Sensitive Positions*, online within seven calendar days of the date the POC received the eQIP invitation. Go to <http://www.opm.gov/e-qip> and click on the “Enter eQIP Applicant Site” link to complete the Form 85 questionnaire. Once all questions are completed, each applicant should:

1. Print a completed copy of the form to be kept on file
2. Sign and date the eQIP signature pages
3. Provide the original signed signature pages to the POC
4. Keep a copy of the completed questionnaire and the signed signature pages with his/her personal records.

If the POC mistakenly overlooks the eQIP invitation or the State VR agency is unable to get all individuals on the applicant list to log in and complete Form 85 within the 7 day deadline, the VR can email enservice@ssa.gov or natalie.sendldorfer@ssa.gov and request another eQIP invitation.

Helpful for completing the eQIP process:

- Make sure the name, date of birth, place of birth and SSN for each applicant matches the “Golden Questions/Answers” in eQIP. This information is generated from the eQIP Applicant Listing which was sent to CPSPM to initiate the suitability process.
- Report eQIP login issues immediately to enservice@ssa.gov, including details on the reasons for the unsuccessful login and/or problems with the “Golden Answers.” In most instances, issues will be addressed within 24 hours.

Note: A sample of a completed Standard Form 85 is available at: http://www.ssa.gov/oag/acq/Sample_Security_Requirement_Docs.pdf

Important Reminder: The background investigation cannot begin until all required information is received by CPSPM.

Step 4: Social Security Review of Completed eQIP Forms

As your sponsoring agency, Social Security’s CPSPM will carefully review the eQIP form completed by each applicant at your agency. If the information or attachments are incomplete for any or all applicants, CPSPM may return the information provided in eQIP and contact the POC of the need for the applicant(s) to make necessary corrections to the form.

To make corrections to the form, the applicant will need to:

1. Log into eQIP.
2. Review the details of the request and make corrections via the eQIP system.
3. Re-certify and print a new archival copy of the form.
4. Print, sign and attach new signature pages.
5. Provide the original signature pages to the POC to be sent to CPSPM.

Step 5: Completing Additional Required Forms

There are three additional forms that each applicant must complete before submitting all of the required information to Social Security's CPSPM to complete the suitability process. As soon as the eQIP list is faxed, the person designated as the point of contact for the suitability process may begin collecting these forms from each person listed on the eQIP Applicant Listing.

[Form 306 - Declaration for Federal Employment](#)

Each applicant at the VR must complete this form as part of the suitability process. It requires the applicant's full name; SSN; place of birth; U.S. citizenship status; other names used such as your full maiden name or a nickname; phone numbers; Selective Service registration status; military service; and information on convictions, imprisonment, and/or being discharged from a job in the last 5 years; being delinquent on any Federal debts, etc.

All responses must be truthful and complete.

Each applicant must respond to every question on the form before signing and dating Section 17a of the form (Applicant's Signature) in ink.

[Fair Credit Reporting Act \(FCRA\) Authorization Form](#)

In completing, signing and dating this form, the applicant is authorizing the Social Security Administration to obtain credit reports from any consumer/credit reporting agency for the purpose of completing the security clearance. The information obtained through a Fair Credit Report may be re-disclosed to other Federal agencies for the purpose of a security clearance to the extent that such disclosure is permitted by law.

[Applicant Fingerprint Charts \(FD-258 Charts\)](#)

Social Security will mail each VR office two fingerprint cards. As soon as the fingerprint charts are completed, they should be given the VR staff person responsible for pulling all of the suitability information together to be submitted to Social Security.

Applicants have three other options for obtaining approved fingerprint charts.

1. Contact Natalie Sendldorfer (Natalie.Sendldorfer@ssa.gov) at Social Security.

2. Visiting a local police station and completing two official fingerprint charts at the station. Not all local police stations offer this service and there is usually a small fee for this service. Applicants need to make sure the police station uses the correct form, i.e., FD-258.
3. Googling a local fingerprinting service. If using this option, make sure the service uses the FD-258 chart and make sure the cards are printed as Social Security does not currently access LiveScan electronic fingerprints. Do not use the chart that can be downloaded from the FBI website. It will not be accepted.

Note: Examples of completed forms, including the Applicant Fingerprint Chart (FD 258), the Declaration for Federal Employment Form (Optional Form 306), and the Fair Credit Reporting Act Authorization Form, are available at:

http://www.ssa.gov/oag/acq/Sample_Security_Requirement_Docs.pdf

Step 6: Gathering All Required Forms and Information

Once all of the required forms and information is obtained from each applicant, the POC should review the entire application packet to ensure that all forms are included and completed correctly prior to submitting the packet to Social Security's CPSPM for processing. Check to make sure written information is legible and all forms are signed and dated in all indicated places.

The completed suitability package must include the following items:

- The eQIP Paperwork Cover Sheet which will include the following information exactly as provided on the eQIP Applicant Listing faxed to CPSPM at the onset of this process.
 - Contract number (i.e., VR State Code),
 - Each applicant's full name,
 - Each applicant's SSN,
 - Each applicant's date of birth, and
 - Each applicant's place of birth.
- Original signed and dated eQIP signature pages for each applicant.
- [Form 306 - Declaration for Federal Employment](#) for each applicant.
- [Fair Credit Reporting Act \(FCRA\) authorization form](#) for each applicant.
- Two fingerprint cards (Field Division-258 charts) for each applicant.
- If the contractor, contractor employee, subcontractor or subcontractor employee is not a U.S. Citizen, the VR must include a legible photocopy of the applicant's work authorization permit and Social Security card.

Step 7: Mailing the Completed Application Package to CPSPM

Completed application packages must be mailed by traceable mail (i.e., FedEx, UPS or USPS Certified) to Social Security at the following address:

Social Security Administration
Attn: CPSPM Suitability Program Officer
6401 Security Boulevard
Room 1260 Dunleavy Building
Baltimore, MD 21235

Completed packages should be mailed within two weeks of receipt of the packet. If the VR experiences any problems in gathering or sending the required forms and information, questions and concerns should be sent via email to the Suitability Regional Coordinator.

Step 8: The Suitability Investigation

The completion of an eQIP form generates an investigation of the applicant that completed the form. Each applicant may be contacted by an investigator to schedule a personal interview. If an interview is required, the applicant must provide photo identification such as a valid state driver's license. In some situations, the applicant may be required to provide other documents to verify his/her identity. When the investigator calls to set up the interview, he/she will let the applicant know what is required.

Delays to the Suitability Process

It can take anywhere from 15 days to several months for a VR to complete the entire suitability process. Delays in processing an application package are typically the result of one or more of the following:

- Submitting suitability packages that are incomplete or not completed properly, or contain written information that is illegible.
- Packages submitted without the VR agency's State Code number on the mailing label, cover sheet and/or contents.
- Packages that do not include all of the required information on all applicants seeking suitability clearance.
- Fingerprint cards that are on the wrong form, not formatted correctly or electronic/scanned.
- Glitches with the eQIP System.
- Failure to respond in a timely manner to requests for missing information.
- Backlogs in processing packages.

Possible Responses to Suitability Applications

There are four possible determinations in response to the submission of a Suitability package:

1. **Suitable:** Applicant is cleared to access Social Security's Portal.

2. **Prescreened Denied:** Applicant is not authorized to access the Portal due to not providing requested information by the deadline. Applicant can reapply within 90 days.
3. **Unsuitable:** Applicant is not authorized to access the Portal for your VR. Applicant can appeal through the appeals email. (This is generally for applicants with a record or federal debt not in payback status.)
4. **Denied/Incomplete:** A denied/incomplete application package occurs when the application package CPSPM receives is incomplete. A notice is forwarded to the VR's POC indicating the application status to include a checklist indicating the specific missing requirements. The VR has 30 days to respond by resubmitting the application package with the missing information. If no response is received within 30 days, the VR is required to repeat the entire application process.

Appealing an Unsuitable Determination

The notice that an employee received an unsuitable determination is sent to the VR's POC. A VR employee that receives an unsuitable determination from Social Security may appeal the decision in writing. The appeal must be submitted within 30 days of the date of the determination and should describe why the applicant believes Social Security should review and reevaluate his or her application. The VR may not file appeals on behalf of its employees, subcontractors or subcontractor employees. The applicant must file his or her own individual appeal to by submitting the clarification and/or the appeal to:

Social Security Administration
Attn: CPSPM Suitability Program Officer
6401 Security Boulevard
Room 1260 Dunleavy Building
Baltimore, MD 21235

Questions about Suitability or the Suitability Process

Email all VR security/suitability questions to the Suitability Regional Coordinator.



Appendix A: Helpful Hints for Completing the Suitability Process

Helpful Hints for Completing the Suitability Process

Throughout the Process

Avoid the need to resubmit information and delays in processing requests by using your VR State Code in all correspondence with the Social Security Administration. This includes e-mails, cover sheets and suitability packages (labels and contents).

Follow-up via email at (enservice@ssa.gov) throughout the process if things are taking longer than expected, e.g., if the eQIP invitation has not arrived within 7 to 10 days after submitting the list of applicants for clearance.

- Ask questions and be sure you are clear on the responses. If still unclear, ask more questions.
- If the instructions on a form are not clear, ask for clarification.

At the Beginning of the Process

- Prepare a list of employees and, as appropriate, subcontractor employees who will be completing the suitability process. Use the eQIP Applicant Listing found at the Resources tab for the Suitability Training or to record each applicant's full name, Social Security Number (SSN), date of birth (mm/dd/yyyy), and place of birth (City/State/Country). Fax this list to 410.966.0640 as soon as possible as this will initiate the first step in the suitability process.
- Alert the Signatory Authority/Commissioner or Director to be looking for the email invitation from Social Security's Center for Personal Security and Project Management (CPSPM) to complete the eQIP. This email should arrive approximately seven days after faxing the eQIP Applicant Listing. To prevent this email from going to the Spam or Junk folder, the Signatory Authority should add dchr.ope.css@ssa.gov and ssa.gov to the safe sender list for his/her email mailbox.
- As soon as the Applicant Fingerprint Charts (FD-258) are received from Social Security, distribute them to the employees (and contractor employees if appropriate) listed on the eQIP Applicant Listing and ask them to get their fingerprints done as quickly as possible.
- Ask each applicant to read over the required forms and questionnaires carefully and begin gathering the information needed to complete each form. Skipping questions on these forms is a common mistake that can be avoided with a careful review.
- In preparation for completing the eQIP questionnaire (SF-85, Questionnaire for Non-Sensitive Positions), each applicant should log onto the eQIP website and review the "Quick Reference Guide for eQIP Applicants" and the "Frequently Asked Questions" prior to completing SF-85. Both can be accessed on the eQIP website at: <http://www.opm.gov/investigations/e-qip-application/%23url=Quick->

Reference-Guide. Each applicant will need to carefully review the “Before You Begin” section, which includes instructions on how to configure the browser on a computer to submit information through the eQIP site.

- Each applicant should review the SF-85 form carefully and begin gathering the information that will be needed to complete the form. Gathering this information ahead of time can be critical to the timely completion of this process. Social Security expects this form to be completed within seven calendar days of receiving the invitation to access the eQIP system. This information includes, among other things:
 - Proof of citizenship, if applicable, such as: passport, Citizenship Certificate, Naturalization Certificate, or Alien Registration Number. You may be able to obtain assistance with lost or unknown information at the [U.S. Citizenship and Immigration Services website](#) (wait for external link to connect).
 - Employment history for the last five years, including current and previous work location addresses, names of supervisors, addresses, and contact information.
 - Personal residence(s) for the last five years, including the name, address, and phone number of a person who knew you at each address.
 - Contact information on three personal references.
 - Relatives’ citizenship information, aliases, employer, and foreign activities.
 - Selective Service ID number, if applicable. If you need your Service Number call 1.847.688.6888 or visit the [Selective Service System website](#).

Responding to the eQIP Invitation

Notify all applicants immediately when the eQIP invitation is received by the Signatory Authority/Director or Commissioner. Stress the fact that each applicant has only seven calendar days from the date the invitation is received to log in to the eQIP System and complete SF-85. Failure to meet this seven-day deadline will necessitate contacting CPSPM to request another eQIP invitation and the applicant will need to start the process all over again.

Report eQIP login issues immediately to enservice@ssa.gov, including details on the reasons for the unsuccessful login and/or completion of “Golden Answers.” In most cases, issues will be addressed within 24 hours.

Completing the eQIP Questionnaire

- If they have not already done so, each applicant should review the “Quick Reference Guide for eQIP Applicants” and the “Frequently Asked Questions” prior to starting the questionnaire. Both can be accessed at: <http://www.opm.gov/investigations/e-qip-application/#url=Quick-Reference-Guide>.

- Each applicant needs to make sure the name, date of birth, place of birth and SSN he/she enters into the eQIP system is the exact same information that was submitted on the eQIP Applicant Listing.
- Each applicant must make sure every question on the eQIP questionnaire is completed honestly and with all required information. If the eQIP application is missing required information, there can be a significant delay before the VR is notified of the omission(s). Two common errors are:
 1. Failing to account for breaks in employment (even when the break is only a month to six weeks), and
 2. Not including the full maiden name of the applicant's mother.
- Each applicant must print the completed eQIP form, and then sign and date the signature pages. The originals of the signature pages should be given to the person collecting the information to complete the suitability package. Each applicant should keep a copy of the completed SF-85 form, including copies of the signature pages, with his/her personal records.

Prior to Submitting the Suitability Package

The person responsible for submitting the completed suitability package should:

- Review all information/forms to make sure everything has been filled out completely and all hand written information is neat, clear and legible. A thorough review will prevent common mistakes such as:
 - Skipped questions.
 - Forms not being signed and dated in every place indicated.
 - The name and contact information for the Signatory Authority being illegible.
 - Always keep a copy of everything that is being submitted to CPSPM.

As soon as the completed suitability package has been submitted to CPSPM, the Signatory Authority should be notified to be on the alert for emails from CPSPM requesting additional information or corrections to the information that was submitted.

Things That Can Delay the Suitability Process

Processing delays are typically the result of one of more of the following:

- The submission of suitability packages with information that is illegible, incomplete or not completed properly.
- Packages submitted without the VR state code on the mailing label, cover sheet and/or contents.
- Packages that do not include all of the required information on all applicants seeking suitability clearance. Do not send information piecemeal.
- Fingerprint Charts that are on the wrong form or not formatted correctly.
- Glitches with the eQIP System.
- Failure to respond in a timely manner to requests for missing information.

- Backlogs in processing packages

Questions about Suitability or the Suitability Process

Email all security/suitability questions to enservice@ssa.gov.

- Always reference your VR state code number in the email
- Use this dedicated mailbox for questions and issues about the process.

- **CPSPM Contact Information**

If you have any questions or need status updates, please contact the CPSPM Suitability Representative associated with your region.

Region 1 – Boston

Charles Dibley Charles.n.dibley@ssa.gov

Micheal Joseph micheal.joseph@ssa.gov

Region 8 – Denver

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