

U.S. COAST GUARD
VOLUNTEER LOGICAL ACCESS CREDENTIAL (VoLAC) PROGRAM
STANDARD OPERATING PROCEDURE

- Ref: (a) US Coast Guard Information and Assurance (SIA) Manual, COMDTINST M5500.13 (series)
(b) Coast Guard Personnel Security and Suitability Program, COMDTINST M5520.12 (series)
(c) Next Generation Common Access Card (CAC) Implementation Guidance, Directive-Type Memorandum (DTM) 08-003
(d) Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals, DOD Instruction 1000.13 (series)
(e) Homeland Security Presidential Directive 12 (HSPD-12) of 27 Aug 04
(f) Trusted Associate Sponsorship System (TASS) TASM/TA User Manual (series)
(g) DMDC Security Online Web Application User Manual (series)
(h) TASS SPOC User Manual (series)
(i) HSPD-12 Suitability and Security Policies and Procedures, Commandant Instruction M5520.12 (series)
(j) Identification Cards For Members Of The Uniformed Services, Their Eligible Family Members, And Other Eligible Personnel, COMDTINST M5512.1A

1. **PURPOSE.** To provide Coast Guard Standard Operating Procedures (SOP) for the implementation, management, and oversight of the Coast Guard (CG) Volunteer Logical Access Credential (VoLAC) program. The VoLAC program is designed to allow for the issuance of logical access credential cards to authorized non-paid CG volunteers.
2. **BACKGROUND.** Each year, the CG receives mission support through unpaid volunteers, including interns. We initially identified approximately 150 CG volunteers who may require CG network access to support various CG missions. Per references (a) through (c), a non-paid volunteer (e.g. intern) is not authorized to be issued a Department of Defense (DoD) Common Access Card (CAC). The VoLAC program seeks to remedy this restriction.

VoLACs are a form of Personal Identification Verification (PIV) credential. The Trusted Associate Sponsorship System (TASS), formerly known as Contractor Verification System (CVS) has been designated by its owner, the Department of Defense (DoD), as the verification and input mechanism for volunteer PIV credentials. TASS is a web-based system that facilitates the application, validation, and approval of contractor and volunteer personnel data into Defense Enrollment Eligibility Reporting System (DEERS). As a TASS user, the CG is committed to using it for processing its contractor and volunteer PIV credentials. The Real-time Automated Personnel Identification System (RAPIDS) serves as the end-point at which volunteer access credentials are physically produced.

3. **SCOPE.** In accordance with the above references, this SOP outlines the CG's policies and procedures for VoLAC issuance. The VoLAC program requires a succinct set of administrative processes, procedures, and guidelines that strictly comply with overarching CG and DoD policies for PIV credential issuance. This includes a framework for logical access sponsorship that is accurate, responsive, and accountable from the time a volunteer is identified for VoLAC issuance to termination of the volunteer's eligibility. These provisions shall be applicable for all unpaid volunteers, with an initial focus on the following commands:
 - a. The Office of Legal Policy and Program Development (CG-094) / approx 50 VoLACs required.
 - b. Community Services Command (CSC) – MWR program & CG Exchange / approx 50 VoLACs required.
 - c. Health, Safety and Work-Life (CG-114) / approx 50 VoLACs required
4. **DEFINITIONS.**
 - a. **Volunteer Logical Access Credential (VoLAC).** A plastic smart card that contains CG Public Key Infrastructure (PKI) certificates and enables access to CG Standard Workstations (CGSW) and networks for the purpose of supporting CG missions and programs. VoLAC credentials are verified through TASS, processed through the DEERS, and issued by a RAPIDS ID card issuance facility. A VoLAC is similar in general appearance to a CAC, but it is not a CAC because it cannot be used for physical facility access. It does not display a photograph, does not convey benefits, entitlements, or privileges, and shall not be used for physical access. Physical access to CG and DoD facilities shall remain predicated upon a command's security policies, that may include presentation of personal identification.
 - b. **Volunteer.** Volunteers are non-paid persons supporting Coast Guard missions. Common examples are interns supporting work-life, legal, morale and CG exchanges. For CGSW access, volunteers must have a well-defined, well-justified, and sustained need (longer than 60 days) for logical access as verified by their sponsoring CG unit/office. VoLAC cards will not be issued for purposes of personal convenience or occasional use.
 - c. **VoLAC Sponsor.** The local CG unit or office that a volunteer supports and requires a VoLAC be issued to a volunteer. The Sponsor usually assigns work, provides day to day oversight, and is ultimately responsible for the actions of the volunteer and their use of CG systems and equipment. The Sponsor justifies the need for a VoLAC, obtains command endorsement, and must re-validate that need to the VoLAC Trusted Agent (TA) at least every 180 days from the date of issuance. The Sponsor is responsible for ensuring that eligibility requirements per references (a), (b), and (j) are met, and provides that information with command

endorsement to the designated TA. The Sponsor is also responsible for immediately notifying the TA whenever justification for VoLAC issuance no longer exists.

- d. **VoLAC Trusted Agent (TA).** Approved by the VoLAC TASS site TASM. TAs receive Sponsors' requests, and certifies and processes a volunteer's need for logical access to CG networks within TASS. TAs also assist the TASM with VoLAC administration. TAs must meet requirements and perform duties as outlined in references (f) and (g). Authorized TAs for VoLAC will be kept to a minimum.
- e. **VoLAC Trusted Agent Security Manager (TASM).** Appointed by the USCG TASS Service Point of Contact (SPOC) for user management and administration for VoLAC TASS site. The VoLAC TASM must meet requirements and perform duties as outlined in references (f) and (g). The VoLAC TASM shall only be assigned to military or civilian employees who have at least one full year remaining on their assignment to that office.
- f. **Common Access Credential (CAC).** A DoD smart card issued as standard identification for active-duty military personnel, reserve personnel, civilian employees, non-DoD other government employees and State Employees of the National Guard and eligible contractor personnel. The CAC enables encrypting and cryptographically signing email, facilitating the use of PKI authentication tools, and establishes an authoritative process for the use of identity credentials (i.e. certificates). The primary difference between a CAC and a volunteer PIV credential (e.g., VoLAC) is that a CAC is used both as a general identification card for physical access purposes as well as for logical access through DoD computers and networks.
- g. **Trusted Associate Sponsorship System (TASS).** The CG uses TASS to manage smart card issuance for contractors, other federal employees, Auxiliarists, and volunteers. TASS is a web based application hosted on a Defense Manpower Data Center (DMDC) server that allows for updating DEERS with DoD (or other agency) contractor personnel data. TASS updates the DEERS PDR with DoD contractor data and utilizes the DEERS Security Online Website of the Person Data Repository (PDR) to authenticate Trusted Agent Security Managers (TASM) and Trusted Agents (TA) as valid TASS users.
- h. **Defense Eligibility Enrollment Reporting System (DEERS).** Includes over 23 million records pertaining to active duty and reserve military and their family members, military retired, DoD civil service personnel, and DoD contractors. DEERS is comprised of the National Enrollment Database (NED), the Person Data Repository (PDR), and several satellite databases. This system provides accurate and timely information for supporting DoD ID smart cards.

- i. **Defense Manpower Data Center (DMDC).** Oversees the DoD's enterprise human resource information system(s) including but not limited to the TASS and DEERS.
 - j. **Logical Access.** Access which necessitates a CGSW account to input, review, manipulate, and extract data. It includes the need to access web sites, information systems, and software applications within the dot-mil domain.
 - k. **Personnel Security Investigation (PSI).** An investigation into an individual's background that enables the CG to determine whether or not the individual is suitable for a specified level of service within the CG organization. Minimum requirements for access to CG information systems are defined in references (a) and (b).
 - l. **Personal Identification Verification (PIV).** A credential that verifies the identity of the individual to whom it is issued. VoLACs are a form of PIV.
 - m. **Public Key Infrastructure (PKI).** The framework and services that provide for the generation, production, distribution, control, revocation, recovery, and tracking of public key certificates and their corresponding private keys.
 - n. **Security Center (SECCEN).** The CG's central facility for the processing, review, and adjudication of Personnel Security Investigations (PSI) and associated security clearances.
 - o. **Service Point of Contact (SPOC).** Appointed by an agency for day-to-day TASS management and operations. The SPOC meets requirements and performs duties as outlined in reference (d). The VoLAC SPOC is assigned within the Coast Guard Office of Procurement Policy and Oversight (CG-913).
5. POLICY.
- a. VoLAC issuance reflects paramount CG trust, and accordingly, VoLAC issuance and revocation shall strictly adhere to the guidelines established in this SOP.

TASS Organization

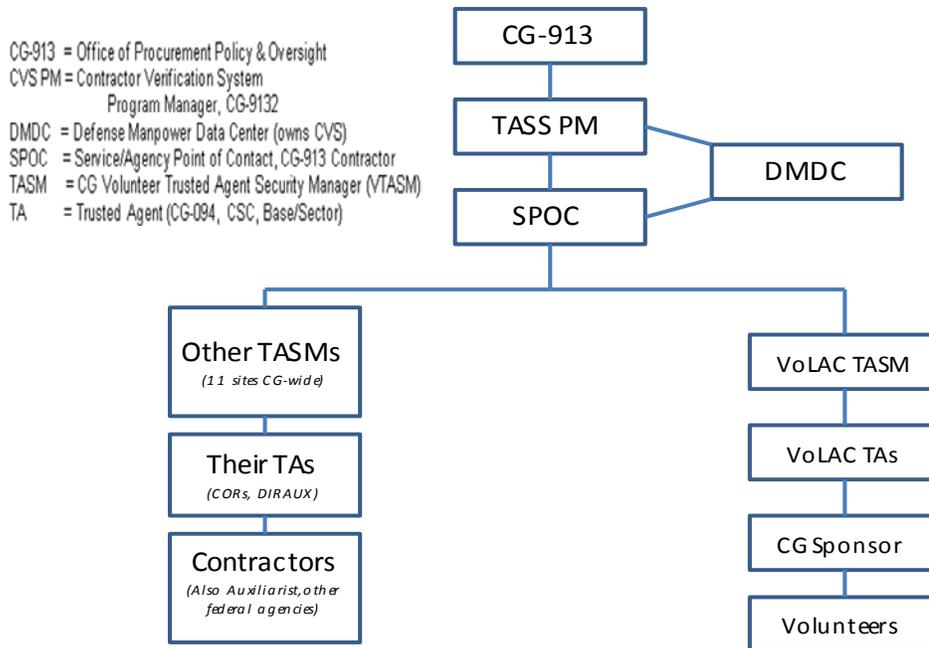


Figure 1

- b. The CG VoLAC TASM is supported by the CG’s Office of Procurement Policy and Oversight (CG-913) to execute VoLAC TASS site administration duties. The TASM shall serve as the primary point of contact for the Coast Guard’s VoLAC program, and shall be responsible for the oversight and management of all VoLAC TAs.
- c. TA Designations. A Base, Sector, or District representative shall serve as the TA for their respective geographic region. Commands who manage a large number of volunteers should identify and designate a single TA (e.g. CG-094, CG-114, CSC) and engage the TASM for approval. Other potential Sponsors with infrequent or a small number of volunteers, should coordinate between their Base, Sector, or District to identify and designate a TA. TAs shall only be assigned to military or civilian employees, and who have at least one full year remaining on their assignment to that office. To ensure adequate program controls and separation of duties, TAs designated to support contractors or other CG members (including Auxiliaries) are ineligible for VoLAC TA designation.
- d. CG commands and offices that sponsor volunteers for VoLAC issuance, because they derive benefit from the volunteers’ direct support, are responsible for all associated funding and equipment provision required to provide the volunteer with VoLAC capability (i.e., remote access).

- e. VoLAC TAsMs and TAs shall ensure that VoLACs are only issued to eligible volunteers. VoLAC's will be issued on a strictly controlled and limited basis. They will only be issued to non-paid volunteers who have a well-defined, well-justified, and sustained need (longer than 60 days) for logical access as verified by their sponsoring CG unit/office. VoLAC cards will not be issued for purposes of personal convenience or occasional use. Sponsors should work with their Command Security Officer (CSO) regarding personal security requirements of volunteers and facility access. The Sponsor must validate and provide the following VoLAC eligibility requirements to their TA, who verifies the information prior to initiating VoLAC processing through TASS:
- (1) Be a U.S. citizen.
 - (2) Be sponsored by a CG unit/office for the purpose of assignment to duties that require access to a CG information system or network to complete assigned responsibilities and be eligible for a CG-sponsored unclassified CGSW account.
 - (3) Have a favorable Federal background investigation per reference (b), at a minimum a National Agency Check with Inquiries (NACI). This may include agreement to be photographed and have fingerprints taken and stored within the DEERS record, as necessary.
 - (4) Sign the Automated Information Systems (AIS) User Acknowledgement, Form CG-5500A per reference (a).
 - (5) Shall complete the mandated Federal Cyber Awareness Challenge training, using the Learning Management System (LMS) within 96 hours after initial access has been granted, and annually thereafter per reference (a).
- f. Initiation of TASS account establishment, for the purpose of VoLAC issuance, may only occur after submission of the NACI paperwork *and* a favorable completion of the initial background check following fingerprint submission. A PSI may include a Federal Bureau of Investigation (FBI) fingerprint check, felony record check, and verification of U.S. citizenship.
- g. If the completed NACI is adjudicated unfavorably, the VoLAC will be immediately revoked without avenue for appeal.
- h. TAs shall ensure all data within TASS is complete and accurate prior to VoLAC issuance. The TA shall maintain an audit trail of all VoLAC issuance tasks and adhere to CG VoLAC and TASS policies.
- i. TAs shall ensure that all VoLACs under their purview are aligned with the proper CG Sponsor. Sponsors, through their supporting TA, shall validate current

VoLACs issued and submit semi-annual verification via email to the VoLAC TASM, no later than 30 June and 31 Dec each year.

- j. TAs shall ensure VoLAC Sponsors properly collected and return VoLACs for proper disposal upon verification that a VoLAC is no longer justified or warranted.

6. PROCEDURES.

- a. Sponsoring CG organizations desiring to authorize CAC issuance to non-CG personnel must identify their servicing TA. The designated TA must complete the TASS TA training and designation process detailed at <https://cgportal2.uscg.mil/units/cg9/1/CG913/CG9132/TASS/Pages/default.aspx>

- b. VoLAC TASM and TA accounts in TASS shall be created in accordance with references (f) and (h).

- c. The VoLAC TASM shall issue a Trusted Agent Appointment Letter to all registered TAs within 48 hours of being registered in Security Online. The appointment letter shall contain information necessary for the TA to access DMDC online training and the TASS.

- d. VoLAC Issuance.

- (1) As shown in Figure 2, the CG Sponsor shall work with their TA, who will add a Volunteer's entry into DEERS through TASS by first validating the need for logical access to a CGSW or network, and by establishing the volunteer's affiliation with the CG. Establishment of the volunteer's CG e-mail account is the responsibility of the Sponsor.

Process for Issuing Volunteers a LAC

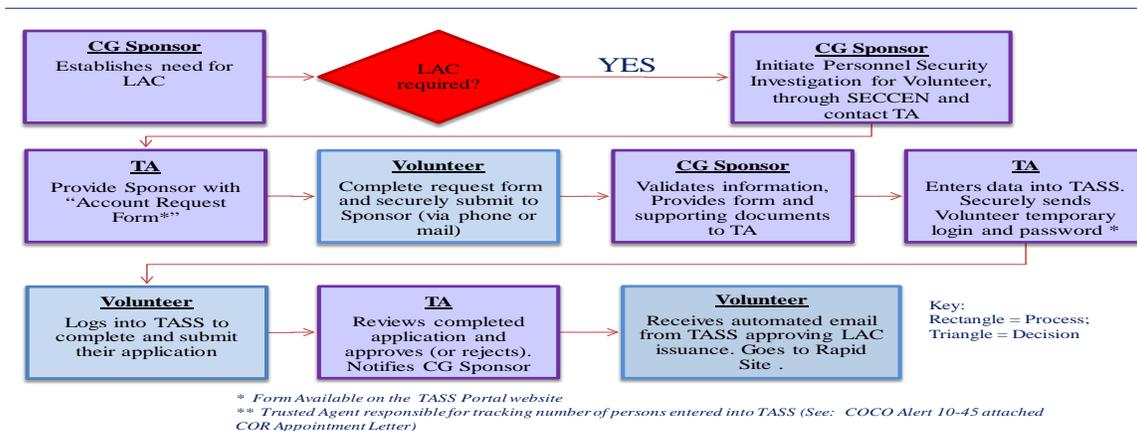


Figure 2

- (2) The TA shall send the Volunteer a LAC account request form. The Volunteer shall complete the VoLAC account request form and submit it to their TA, via their Sponsor, through secure e-mail (or in person). The form requests the following sensitive personally identifiable information (PII): name (last, first, middle), Social Security Number, e-mail address (must always be a .mil account), and date of birth.
- (3) Prior to entry into TASS, the TA shall verify that the Volunteer and Sponsor have completed and submitted all other appropriate security forms and documents for LAC processing, specifically:
 - (a) Electronic Questionnaire for Investigations Processing (eQIP).
 - (b) Fingerprint Card.
 - (c) CG-5588, for the minimum background investigation requirement NACI.
 - (d) VoLAC account request form is properly completed and discrepancies resolved.
- (4) The Sponsor shall work with the CG SECCEN, or their CSO, to ensure the receipt of the aforementioned security forms and documents. The TA must validate with the SECCEN that the volunteer's NACI package has been received and has commenced its processing, before proceeding with VoLAC issuance. This may be accomplished by obtaining a Personnel Security check report located on CG Business Intelligence (CGBI) either directly or through the Sponsor's CSO.
- (5) The VoLAC application shall be created in TASS in accordance with reference (f) by the TA. The TA shall log into TASS using their CAC and enter the information contained in the VoLAC account request form by using the "Create Application" link on the TA's TASS homepage. (*note: the TA may also use the second row navigation bar under Manage Applications*). The following items must be used for volunteer account creation:
 - (a) For Personnel category, choose "Affiliated Volunteers (requiring DoD Network Access)."
 - (b) From the Volunteer type drop down menu select applicable subcategory. A majority of requests will be "student intern". If the drop down menu does not have a description that matches the request contact the TASM.
 - (c) For VoLAC expiration date, VoLACs may only be issued for a period no longer than the projected term of the volunteer's affiliation with the CG.
- (6) The TA must hit the "Submit" button once all information has been entered into the application. The TA shall then confirm that all information entered

into the application is accurate by hitting the “Confirm” button which creates the Volunteer’s TASS account.

- (7) Following the creation of the Volunteer’s account in TASS, the TA is responsible for distributing the TASS website URL and associated account information in a timely manner, and by secure means, to the Volunteer. *(Note: this is NOT an automated process, and if it is not done within seven days the application will be automatically disabled).*
- (8) Once a Volunteer receives their log on credentials and TASS URL, they must navigate to the TASS website and complete their initial login. The initial login will prompt the Volunteer to review the Privacy Act Statement and create a new password. *(note: the “Contractor User Guide” section of reference (f) should be used to help guide the Volunteer through the application process).*
- (9) Once the password reset is completed, the Volunteer must navigate to the Homepage and select the “My Application” tab. The Volunteer must then verify and complete their application, and click the “Submit for Approval” button. This will generate an automated e-mail to the TA.
- (10) Once the TA receives the automated e-mail, they shall log into TASS and review the Volunteer’s application. If there are no errors, the TA shall approve the VoLAC. This generates an automated approval confirmation e-mail to the Volunteer. If there are errors in the Volunteer’s application, it shall be returned to the Volunteer for changes and resubmission.
- (11) Upon receipt of the TASS approval confirmation e-mail, the Volunteer shall proceed to the designated RAPIDS issuing facility to obtain the VoLAC. The Volunteer shall bring and present personal identification to the RAPIDS site (Authorized forms are listed as an Enclosure). At least one document must be a valid (i.e., unexpired) State or federal government-issued picture identification.
- (12) The TA shall provide continued oversight and follow-up of continued eligibility. The TA shall verify a Volunteer’s eligibility every six months (180 days) by confirming with the Sponsor the Volunteer’s continued affiliation with the CG, and continued need for an VoLAC in the TASS. The SECCEN shall advise the Sponsor of the final outcome of the Volunteer’s NACI when completed. If SECCEN makes an ineligible determination, then the Volunteer’s VoLAC eligibility shall be terminated and shall immediately return the VoLAC to Sponsor. The Sponsor shall immediately notify the TA, and cancel CGSW access. The TA shall revoke access within TASS. The Volunteer shall not be authorized any right of appeal. The TA shall confirm VoLAC return with the VoLAC Sponsor. An estimated timeline of VoLAC processing is shown in **Figure 3**.

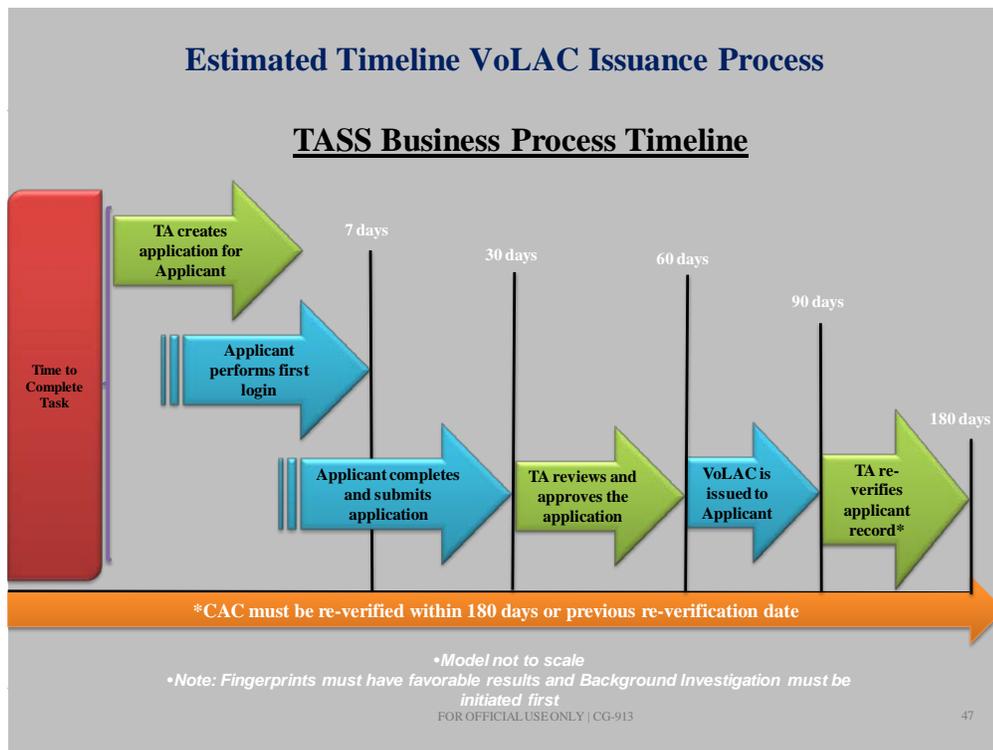


Figure 3

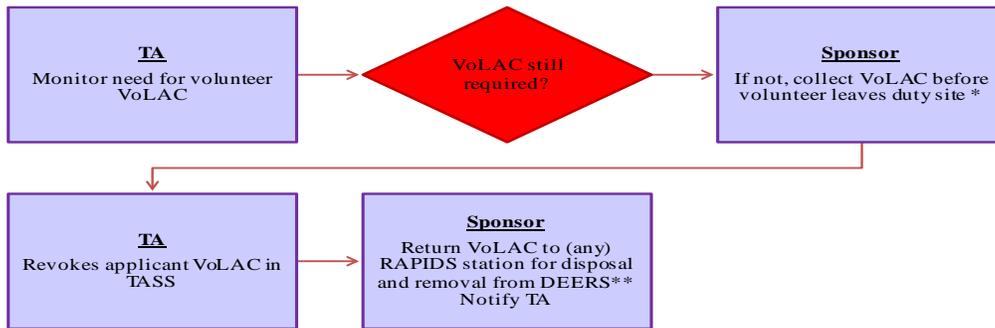
e. VoLAC TA Transfer.

- (1) When a TA can no longer perform the duties of TA for their area, they shall work with their office to identify another qualified TA as a replacement. Additionally, the new TA shall be registered by the TASM, complete all applicable TASS training, and log into TASS prior to accepting sponsorship of another TA's VoLACs.
- (2) The outgoing TA shall provide the TASM and the TASS Program Office via e-mail (TASS.Program@uscg.mil) the following pieces of data to ensure complete, timely and accurate transfer of VoLACs between TAs.
 - (a) The full name and Site ID of the outgoing TA (see TA Appointment Letter for Site ID).
 - (b) The full names of each Volunteers to be transferred.
 - (c) The full name and Site ID of the fully registered, incoming TA.
- (3) The TASS Program Office shall enter the transfer request into the online tracking system for issue management and reporting services. Once entered, the TASM shall execute the requested Transfer. *(Note: an automated email is generated by TASS to the SPOC, TASM, TA and Volunteer indicating the transfer has taken place).*

- (4) The TASM shall close out the transfer request in the online tracking system and report any issues to the TASS SPOC. Additionally, the TASM shall report and monitor trends in VoLAC account transfers to the SPOC as specified.

f. VoLAC Revocation.

Process for VoLAC Termination Procedures



** Referenced in ALCOAST 192/07; FAC 2005-48*
 ** RAPIDS site location link found on the CVS Portal website
 Key: Rectangle = Process; Triangle = Decision * Form found on the CVS Portal website

Figure 4

- (1) As shown in **Figure 4**, the TA shall verify the justified need for Volunteers to access government information systems and retain an VoLAC at least once every 180 days from the date of issuance. If for any reason, a Volunteer no longer requires or warrants access to a government information system, then the TA shall direct the Sponsor to immediately collect the Volunteer’s VoLAC. The TA shall also immediately revoke their active record within TASS. VoLACs shall be turned in immediately and the associated TASS records revoked for any of the following reasons:
- (a) The Volunteer no longer has a justified need for a VoLAC (e.g., the nature of the support provided by the Volunteer no longer requires CGSW access).
 - (b) The Volunteer is disenrolled for any reason.
 - (c) Any aspect of the Volunteer’s membership is suspended for any reason, or any form of disciplinary action is taken against the Volunteer.
 - (d) The Volunteer improperly uses the VoLAC or abuses the privilege of its possession.
 - (e) The TA determines that it is not in the CG’s interest for the Volunteer to possess a VoLAC.

- (2) Once a VoLAC is collected by the Sponsor, it shall be returned to the nearest RAPIDS station for proper disposal.
- (3) Invalid, inaccurate, inoperative, or expired credentials shall also be returned immediately to a RAPIDS issuing facility for disposition. VoLACs may not be retained for personal reasons upon expiration or when affiliation of the volunteer has been terminated because they are government property and must be returned to the government when no longer required.

g. VoLAC Issuance Criteria. VoLACs are costly to process in terms of resources and programming. They also allow logical access to clearly sensitive information systems and associated material. Therefore, VoLACs shall only be issued on a strictly controlled and limited basis to Volunteers who have well-defined, well-justified, and prolonged need for logical access to the dot-mil domain. They will not be issued for purposes of personal convenience or sporadic use. A CG command/office must submit a request to the cognizant regional TA in writing (e-mail acceptable) of the need for a Volunteer to be issued a VoLAC. Accordingly, VoLACs shall only be issued to Volunteers based on the following criteria:

- (1) The projected duration of need by the Volunteer will be for a minimum of at least 60 days.
- (2) The Volunteer has a sustained and frequent need for a VoLAC for the duration of its issuance due to the nature of the support that they provide directly to the command or office.
- (3) The primary CG information system(s) that will be used by the Volunteer in order to provide their direct support are identified.
- (4) The primary duty(ies) for which the Volunteer needs an VoLAC are identified.

7. REQUESTING CHANGES. Changes to this SOP can be requested through the VoLAC Program Manager.

Enclosures:



List_Of_Valid_IDs.pdf



Volunteer Account Request Form.doc



TA Account Request Form.docx

Contacts:

VoLAC TASM: LT Brad Hanover (bradley.s.hanover@uscg.mil)

The Office of Legal Policy and Program Development (CG-094) / approx 50 VOLACs required (LT Kate Grossman/Don Pedersen)

Community Services Command (CSC) – MWR program & CG Exchange / approx 50 VoLACs required. (Robert Davis)

Health, Safety and Work-Life (CG-114) / approx 50 VoLACs required (Robert Miller/CAPT Trenton Janda)

Identification Cards For Members Of The Uniformed Services, Their Eligible Family Members, And Other Eligible Personnel, COMDTINST M5512.1A/ VoLAC policy matters: Katherine Del Gesso, COMDT (CG-651),