

## ACCOUNTABILITY OF SENSITIVE PERSONAL PROPERTY

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### I. PURPOSE

This directive establishes the United States Citizenship and Immigration Service's (USCIS) policies and procedures for managing sensitive personal property. It also assigns responsibilities for managing personal property to effectively carry out the accountability, use, maintenance, protection, transfer, and disposition of sensitive personal property.

### II. SCOPE

This directive applies to all USCIS organizational elements. Any supplemental internal policies must be coordinated with the USCIS Office of Administration.

### III. AUTHORITIES

The following acts, regulations, and standards govern this directive:

- A. Department of Homeland Security Management Directive Number 0565, "Personal Property Management Directive" and authorities contained therein.
- B. Department of Homeland Security Management Directive Number 11042.1, "Safeguarding Sensitive But Unclassified (For Official Use Only) Information."

### IV. DEFINITIONS

- A. **Accountable Property Officer (APO)**. The individual appointed in writing by the Director, Office of Administration to be responsible and accountable for all personal property in their area of jurisdiction.
- B. **Acquisition**.

1. The processes and actions, controlled by Federal law and regulation and DHS implementation guidance, that accomplish delivery of acceptable products and services in accordance with contract specifications. Included within “acquisition,” among other actions and responsibilities, are designation of a program office, development of requirements or specifications, conduct of the actual acquisition (including sample or product acceptance), and designation and performance of the duties of a “contracting officer’s technical representative” (COTR).
  2. ALL USCIS SENSITIVE PERSONAL PROPERTY ITEMS SHALL BE PURCHASED AND MANAGED CENTRALLY BY SPECIFICALLY DESIGNATED PROGRAMS, OFFICES, AND PERSONNEL. LOCAL OR SEPARATE ACQUISITION OF USCIS SENSITIVE PERSONAL PROPERTY ITEMS IS SPECIFICALLY PROHIBITED.
- C. **Badge.** Sometimes called a “shield,” the badge is a metal emblem that symbolizes authority. The stated or actual authority of the person who displays a badge is contained in an accompanying credential. USCIS badges are identified by unique titles and serial number combinations.
- D. **Central Issue Point(s).** The central issue point is an agency-designated point for receiving sensitive personal property items for purposes of controlled distribution. There are currently two central issue points for sensitive personal property items:
1. The central issue point for impression/dry seals, decision stamps and security ink is the Field Support Center in Burlington, VT.
  2. The central issue point for credentials and badges is the Corbin Production Facility in Corbin, KY.
- E. **Controlled Disposition.** The process of receipt, inventory, maintenance, destruction and other appropriate disposal of sensitive personal property under controlled conditions.
- F. **Credential.** USCIS Credentials are one-part identification cards containing an individual’s name, title, photograph, and signature. The credential is made with a transparent material containing numerous security features. The credential shows that an individual is entitled to represent or exercise official authority as an employee of USCIS. Component materials used to produce credentials (blank card stock, holographic materials, etc.) are themselves controlled items and must

be secured until issued to the individual employee, after which the finished credential is singularly controlled as a sensitive personal property item.

- G. **Credential Case.** The credential case is a black leather wallet-sized item used to display and protect a one-part credential and, when authorized, a badge. Credential cases issued to employees authorized to carry badges (shields) may have detachable badge holders that may be clipped over belts, displayed in or on pockets, or worn on chains around the wearers' necks.
- H. **Decision stamps.** Decision stamps are used to imprint documents with identifying marks that indicate decisions have been made regarding applications or petitions submitted to USCIS. Usually made of rubber with a plastic, wood or metal handle, each is individually serial-numbered. Decision stamps incorporate security features and must be used only with security ink.
- I. **Field Support Center.** The Field Support Center provides asset management support for USCIS and is located in Burlington, VT.
- J. **Forensic Documents Laboratory.** The Forensic Documents Lab is a component of United States Immigration and Customs Enforcement that provides a wide variety of forensic document analysis and operations support services, investigates potentially fraudulent immigration documents and provides expert testimony. The Forensic Documents Lab maintains a copy of all USCIS stamp and seal impressions.
- K. **Forms and Form Usage.**
- DHS Form G-504, Report of Property Shipped/Received. Used to record property, by serial number, shipped or transferred internally or externally.
  - USCIS G-1102, Individual Employee/Contractor Property Tracking Record. Sometimes referred to as a "Property Card", used to record individual property accountability.
  - DHS Form 200-2, Report of Survey. Used to report lost, damaged, stolen or destroyed personal property.
- L. **Identification Management System.** The Identification Management System is the database used for capturing and recording employees' photographs and

signatures and for custodial tracking of sensitive personal property issued to specific individuals. Appropriate data transfer between the Identification Management System and Sunflower Asset Management System (Sunflower) will be effected.

- M. **Impression Seals.** USCIS/DHS Impression seals, also known as dry or embossing seals, are used to validate the authenticity of various documents (e.g., naturalization certificates). Impression seals are usually incorporated into three types of configurations or mechanisms: (1) a desktop (or tabletop) model that is manually operated with a lever, (2) an electric model, and (3) a “handheld” model used in situations that require portability. USCIS/DHS impression seals contain security features and serial numbers unique to USCIS.
- N. **Program Manager.** The Program Manager is the individual within USCIS who has been designated to manage the acquisition of specific goods or services.
- O. **Property Custodian.** Responsible for the day-to-day support of personal property management programs. Provides technical advice and assistance to the APO.
- P. **Security Ink.** USCIS security ink has unique intrinsic security features or attributes. These security features are not readily apparent to the casual observer but are traceable by forensic document specialists. The security ink containers are serial numbered and must be used only with USCIS decision stamps.
- Q. **Sensitive Personal Property.** Personal property requiring a high degree of protection and control due to its high-risk nature or inherent attractiveness, portability, and/or sensitivity. Sensitive personal property includes, but is not limited to badges, credentials, decision stamps, security ink, impression/dry seals, radios, firearms/weapons, monocular, binoculars (infra-red), ceramic plates and body armor, laptop computers and portable secure communications devices.
- R. **Shipment by Accountable Means.** Shipment by a commercial carrier or the U.S. Postal Service whereby tracking and receipt of the shipment can be monitored.
- S. **Sunflower Asset Management System (Sunflower).** Sunflower is the only DHS-approved sensitive personal property management accounting system.

## V. RESPONSIBILITIES

- A. **USCIS Headquarters Office of Administration, Asset Management Branch** establishes policy and procedures for issuance, accountability, and retirement or disposal of sensitive personal property. Asset Management Branch also assures complete and current designations of accountable property officers throughout the agency.
- B. **Field Support Center Burlington** is responsible for establishing and maintaining a central issue point warehouse for processing requests, distributing and controlling disposition of sensitive personal property items. The Field Support Center Burlington is also responsible for destruction of sensitive personal property items other than USCIS credentials which are shredded locally.
- C. **Central Issue Point, Field Support Center Burlington**. The central issue point coordinator receives and processes approved requests for impression/dry seals, decision stamps and security ink. The central issue point coordinator maintains a database of Accountable Property Officers (APOs), locations, quantities, shipping dates and serial numbers of all shipped sensitive personal property. The central issue point is responsible for coordination of contracts for continued procurement of decision stamps, security ink and dry/impression seals and related shelf stock inventory and stock levels based on anticipated requirements.
- D. **Central Issue Point, Corbin Production Facility (Corbin)**. The Corbin Production Facility will produce credentials, assemble and ship them with badges (as authorized) with appropriate cases to USCIS federal employees, or will ship them to the APOs to issue to USCIS federal employees. Corbin shall enter appropriate sensitive personal property data into the Identification Management System or Sunflower, as required. Corbin is responsible maintaining adequate levels of credential cases, badges and supplies for producing credentials.
- E. **Office of Security and Investigations** is responsible for publication of guidance regarding the physical safeguarding of sensitive personal property items, and for investigation of losses and alleged misuse of all sensitive personal property, including badges, credentials, impression seals, decision stamps and security ink.
- F. **Property Management Officer**. An official (Director, Office of Administration) responsible for ensuring compliance with internal policies and Government-wide regulations regarding the acquisition, receipt, accountability, utilization, distribution, and disposal of sensitive personal property.
- G. **Program Heads, Regional Directors, District Directors, Service Center Directors, National Benefits Center Director, NRC Director, Corbin Production Facility Director, National Records**

**Center Director, Asylum Office Directors, Field Office Managers, and (in absence of a director or manager) the Senior USCIS Employees on Site** are responsible for implementation of the sensitive personal property accountability requirements in the office(s) for which they are responsible, including inventory, accounting, issuance and use. (The USCIS Adjudicator's Field Manual provides related direction.)

- H. **Program Manager**. The Program Manager determines the operational requirements for a specific sensitive personal property item, obtains required approvals to procure the items, prepares the required acquisition documents, ensures funds are available, monitors and manages the vendor's performance under the contract in conjunction with the contracting officer, and approves and processes internal requests for the sensitive personal property item.
- I. **Accountable Property Officer (APO)**. Each office has a designated APO who is responsible for ensuring the following actions are accomplished:
- Receiving new items from the USCIS central issue point or vendor
  - Reporting any discrepancies in shipment to the USCIS central issue point for resolution
  - Issuing sensitive personal property items to authorized employees on USCIS Form G-1102, Individual/Contractor Property Tracking Record.
  - Recording each item in the Identification Management System or verifying previously entered data, as well as entering the information in the Sunflower.
  - Receiving sensitive personal property items from employees, updating USCIS form G-1102, Individual/Contractor Property Tracking Record, Sunflower and the Identification Management System
  - Preparing the Report of Property Shipped/Received, USCIS form G-504 for custodial transfer purposes
  - Preparing DHS Form 200-2 Report of Survey for lost or damaged sensitive personal property
  - Appointing Property Custodians in writing

- Ensuring that all sensitive personal property items at their site are assigned to named employees.

J. **Property Custodian**. The property custodian is appointed in writing by the APO and is responsible for the day-to-day support of property management programs:

- Serving as a technical advisor to the APO.
- Maintaining current records for accountable property within the assigned area.
- Initiating or processing documents affecting the accountability or custody of equipment.
- Ensuring authorized use and proper care and protection of property.
- Reporting missing, lost, or stolen property, or property damaged beyond normal wear and tear.
- Assisting in locating property during physical inventories.
- Retaining documentation to support the audit trail for all acquisitions, transfers, and disposition activity.

K. **Identification Management System Coordinator**. Each office has a designated coordinator, usually as a collateral duty assignment, who is responsible for entering accountability data for sensitive personal property into the Identification Management System. The Identification Management System coordinator may also be the APO.

L. **USCIS Employee**

- Complies with all policies and procedures stated in this and referenced or applicable documents
- Maintains close and ongoing property accountability of all issued sensitive personal property items

- Notifies supervisor immediately of suspected or alleged loss, theft of, damage to, and misuse of sensitive personal property items
  - Uses sensitive property items only for intended official purposes and in the prescribed manners
  - May be subject to disciplinary action if, through negligence or willful disregard of procedures, they fail to properly account for and protect the sensitive property for which they are assigned.
  - Employees will use badges for identification purposes and to prove authorization to perform certain government services, as specified on the credential. At no time may the badge or credential be used directly or indirectly for personal gain or preferential treatment. Due to the extraordinary authority conferred by the USCIS badge, its loss or misuse will be treated with an elevated sense of urgency and importance.
  - In the event that a badge is lost, the employee responsible for the badge or the employee discovering the loss will take all immediate appropriate action to recover the badge and notify the APO, the office supervisor in which the incident occurred and the employee's supervisor, within 24 hours of discovery of the loss. Notification must be in writing and describe in detail how the loss or theft of the sensitive property occurred. In addition, the responsible employee together with the APO and PC, must prepare and submit form DHS 200-2, Report of Survey (ROS) to the Property Management Officer (PMO). The ROS must describe in detail how the loss or theft of the sensitive property occurred, date it was last seen, the circumstances surrounding the loss, and actions taken to prevent reoccurrence.
- M. **USCIS Employee on Detail.** While on assignment, employees on detail shall retain custody of initially assigned sensitive personal property items (except impression seals and security ink) required for performance of their detail responsibilities. All employees shall retain possession of issued USCIS credentials and badges as long as they remain in positions that warrant them. USCIS decision stamps issued to individuals shall be retained by those individuals and, when necessary, carried and used by them on detail or at different locations. The serial numbers of issued decision stamps are associated in pertinent records with named, individual employees. Use of serial numbered decision stamps shall always



correspond to those named employees, regardless of location, until such time as the employees either leave USCIS or transfer to other positions for which decision stamps are not authorized. The detailed employee shall use ink and seals available at the duty location.

## **VI. POLICY AND PROCEDURES**

### **A. Policy**

1. All documentation relating to the procurement of sensitive personal property that contains security features will be protected as Sensitive but Unclassified under the guidance provided in DHS Management Directive 10042.1.
2. USCIS Domestic Operations will provide a program manager for stamps, security ink, credential materials, seals and badges.
3. Only the Contracting Officer, in coordination with the Program Manager, will procure badges, credential materials, stamps, security ink and impression seals. Purchase cards or other local procurement methods will not be used to obtain these items. No other sensitive personal property items shall be procured without proper prior authorization as provided in other department or agency directives and policy guidance.
4. All permanent USCIS federal employees are authorized a credential and credential case. Temporary USCIS employees with appointments or terms of at least ninety (90) calendar days, other than “stay-in-school” employees, shall also be issued credentials and cases.
5. A list of USCIS employees to whom USCIS badges will be issued is TBD.
6. An employee who retires or departs from USCIS may elect, at their personal expense, to have their issued badge retired as a token of favorable service by having the badge encased in Lucite.
7. INS credentials may be retired by perforation with the word “VOID”. USCIS credentials will not be retired but must be surrendered upon retirement or departure from USCIS.

### **B. Procedures**

1. Central Issue Points.

- a. The central issue point for impression/dry seals, decision stamps and security ink is operated by the USCIS Field Support Center Burlington, Asset Management Branch, and is located at:

Mailing USCIS Field Support Center Asset Management  
Address: 70 Kimball Avenue  
South Burlington, VT 05403  
Phone: 802-872-4107  
Fax: 802-951-6455  
Email: asset-mgmt-fscb@dhs.gov

- b. The central issue point for credentials, credential cases and badges is the Corbin Production Facility, and is located at:

Mailing 203 Allison Blvd.  
Address: Corbin, KY 40701  
Phone 606-526-6761  
Fax: 606-526-0804  
Email: robert.alsup@dhs.gov

2. USCIS Property Accountability.

- a. Identification Management System Entries. Each USCIS decision stamp, container of security ink, credential, badge, and impression seal is considered to be a sensitive personal property item and subject to property accountability requirements described herein. Stamp pads used with security ink, though not numbered, also require controlled disposition. All sensitive personal property items will be on the appropriate employee records in the Identification Management System. Employees will inventory, account for, and report to the APO annually all sensitive personal property items in their possession in accordance with inventory schedules established by the Office of Administration, Asset Management Branch. Physical inventory results must be updated in Sunflower.
- b. Loss and Damage Reporting of Sensitive Personal Property.

- 1) The following procedures apply to loss or damage, regardless whether the loss was discovered during a regular inventory cycle or operational use:
  - a) The employee responsible for the sensitive property or the employee discovering the condition will take all immediate appropriate action to recover the sensitive property and notify the appropriate APO, the office supervisor in which the incident occurred, and the employee's supervisor within 24 hours of discovery of the loss. This notification must be in writing and describe in detail how the loss or theft of the sensitive property occurred.
  - b) The employee's supervisor will:
    - Notify the Director, Office of Security and Investigations immediately. The notification must be in writing and include the approximate time and date the sensitive property was discovered missing, the location where the sensitive property was last seen, and the circumstances surrounding the loss or damage.
    - The Director, Office of Security and Investigations will notify the DHS Office of Security of the loss and, if appropriate, recommend the DHS Office of Security transmit a description of the sensitive property to the National Crime Information Center (NCIC). The Office of Security and Investigations will determine if it is appropriate to notify local law enforcement officials of the loss.
- 2) Loss or Damage Discovered During Inventory. The following procedures apply in addition to those in Section VI.6.B.2.b.1) above. All items will be physically inventoried and records certified by the Identification Management System Coordinator not later than July 1<sup>st</sup> of each year, as well as in Sunflower during annual inventory of sensitive and personal property, as established by the Office of Administration, Asset Management Branch. All losses or damages will be immediately documented on a report of survey as shown below, submitted to the

APO, and have an internal investigation performed to determine root cause.

- a) Report of Survey, DHS Form 200-2, is initiated within 10 calendar days of discovery of the loss or damage by the person discovering the loss or damage who forwards it to the APO.
- b) The APO confirms that a sensitive personal property item is lost or damaged.
- c) The APO forwards the completed Report of Survey file to the USCIS Office of Administration, Asset Management Branch who will review the file before forwarding it to the Property Management Officer who will determine final disposition to include possible establishment of a Board of Survey.
- d) The Asset Management Branch notifies the APO of the outcome of the survey.
- e) The Asset Management Branch makes appropriate adjustments to property records in Sunflower.

### 3. Collection and Disposal of Sensitive Property

- a. Legacy Immigration and Naturalization Service (INS) Sensitive Personal Property. Legacy INS sensitive property will be collected and disposed of as follows:
  - 1) USCIS Headquarters announces the cutover date for use of USCIS decision stamps and security ink and provides requirements for inventory and accounting of legacy INS badges, credentials, impression seals, decision stamps and security ink.
  - 2) APOs review any existing property records for legacy INS custody and accounting data.
  - 3) APOs notify all affected employees of the requirement to surrender legacy INS items.

- 4) APOs receive items and prepare USCIS form G-504, Record of Property Shipped/Received for all surrendered legacy INS sensitive property items identified and shipped to the Central Issue Point, Field Support Center Burlington.
  - 5) The Central Issue Point, Field Support Center Burlington will notify the APO when shipment is approved.
  - 6) If the APO should report legacy INS items which were properly recorded but are not produced, located, or otherwise surrendered to Central Issue Point, to the CIP FSC who will notify HQ Asset Management Branch. The Asset Management Branch will notify Office of Security and Investigations for further investigation as appropriate.
  - 7) Central issue point receives legacy sensitive personal property items and maintains permanent accountability records of items received and their disposition.
  - 8) Central issue point destroys sensitive items or follows environmental rules for disposal.
- b. USCIS Sensitive Personal Property
- 1) Disposal of USCIS Security Ink and Empty Containers. APOs shall dispose of security ink and containers as follows:
    - a) USCIS Security ink will be consumed in normal use until the container is empty
    - b) The APO will notify the central issue point of any security ink that is on hand but not needed at the local office and the central issue point will provide redistribution instructions.
    - c) The APO will collect the empty security ink containers and ship them to the central issue point by an accountable means.
    - d) The central issue point will dispose of the containers in accordance with environmental laws and security procedures.
  - 2) Disposal of USCIS Impression Seals.

- a) Dies contained in some impression seals occasionally break if the two impression dies become misaligned. If a seal needs repair, the APO will prepare a G-504 documenting the shipment of the broken seal to the vendor and update Sunflower accordingly. The seal vendor will repair the seal and replace the broken seal with a new seal having a new serial number and return it to the accountable office. When the new or repaired seal is received, the APO will place an asset tag on the seal and create a new record in Sunflower. (USCIS seals are centrally obtained from an authorized contract source and the contract(s) will have warranty provisions. All actions concerning malperformance of USCIS seals will reported to the seal program manager for appropriate action.)
  - b) The APO will contact the Field Support Center for disposition instructions for seals that are broken or obsolete. No local disposal is authorized.
- 3) Disposal of unserviceable USCIS Decision Stamps and USCIS Badges. USCIS decision stamps and USCIS badges requiring disposal will be shipped by accountable means to the central issue point for destruction.
  - 4) Disposal of USCIS Credentials. USCIS credentials will be shredded locally with a crosscut shredder when no longer needed. If no crosscut shredder is available, the credentials shall be shipped by an accountable means to the Field Support Center. The APO will send an email to the central issue point certifying the destruction of credentials. Appropriate entries will be made immediately in the Identification Management System and Sunflower. USCIS Credentials will not be retired.
4. Procurement of Sensitive Personal Property Items.
    - a. Procurement Contracts. The Program Manager is responsible for determining anticipated requirements, monitoring inventory levels, maintaining acquisition contract oversight, ordering new items as needed, and monitoring item quality and vendor performance. The program manager will maintain coordination with the central issue point to determine when inventory levels are low and new orders are required.

The program manager will coordinate with the Office of Budget to ensure adequate funds are available.

b. Distribution of Sensitive Personal Property Items.

- 1) The APO identifies the need for sensitive personal property items and submits a written or email request to the Program Manager.
- 2) If the items are in stock the Program Manager approves the request and forwards to the central issue point with guidance to issue the requested item(s).
- 3) If the items are not in stock the Program Manager prepares the necessary documentation for a new purchase order or other contract vehicle and forwards to the Contracting Officer. The sensitive personal property items will be shipped to the appropriate central issue point for distribution and maintenance of stock levels for future requirements.
- 4) The central issue point prepares approved quantities for shipment by an accountable means to requesting activity APO or provides shipping guidance to the sensitive personal property item vendor.
- 5) The APO documents receipt of sensitive personal property items and notifies the central issue point.
- 6) The APO notifies the Identification Management System coordinator of shipment received and enters custodial usage data in the Identification Management System.

5. Special Provisions Regarding Accountability or Use of Specific Types of Sensitive Personal Property.

- a. Impression/dry seals. The APO of each office or district will designate individuals to be responsible and accountable for the new impression/dry seals that are used by more than one person. Because of operational security concerns and the grave potential for misuse if lost or stolen, all impression seals will be secured when not in active use.
- b. Decision stamps.

- 1) Two serial-numbered decision stamps are presently authorized for use: "APPROVED" and "DENIED." USCIS Decision stamps incorporate security features and unique serial numbers and must be used only with USCIS security ink. All initial issue stamps shipped to offices were delivered with a USCIS Form G-504, Record of Property Shipped/Received. Upon receipt of additional decision stamps, each office shall complete the USCIS Form G-504 confirming that the decision stamps and ink were received and accountability has been established. **Note:** No USCIS decision stamps shall be used with legacy INS security ink, and no legacy INS decision stamps shall be used with USCIS security ink. USCIS security ink and legacy INS security ink shall not be mixed in stamp pads.
- 2) USCIS Decision stamps will remain in the possession of the employees to whom they were initially issued initial assumption of duties and upon transfer to a new duty location, either permanent or temporary, if the positions to which they are transferred require or authorize use of the stamps. (Also see Paragraph V.L.) To facilitate investigations by the Forensic Documents Lab and other investigative agencies, issued stamps are associated with individual employees rather than with office locations. Security ink and impression/dry seals will remain with the office to which assigned and will be associated with that office in the Forensic Documents Lab records and in USCIS property records.
- 3) If an employee is detailed to a temporary duty location where the use of the employee's stamps will be required, the employee will take their stamps to the temporary location. (Neither the Identification Management System administrator for the office to whom the employee is detailed, nor the Identification Management System administrator for the employee's permanent duty office, need to take any action.) If an employee has never been issued decision stamps, and if the employee is in fact authorized to use decision stamps, the APO of the office where the need for stamps is identified will procure stamps for the employee. The employee will retain possession of the stamps upon return to his/her normal duty location or upon relocation or transfer to a new assignment/location only if the stamps will thereafter be used in the normal course of business.
- 4) When traveling with decision stamps by commercial transportation, the employee shall not place the stamps (or any sensitive personal



property item) in checked luggage. Stamps will accompany the employee at all times in carry-on luggage until they can be secured at the new duty location. When traveling by private conveyance, the seals will remain in the possession of the employee unless locked in a cargo/luggage compartment, the contents of which are not visible from outside the conveyance.

- 5) When an employee leaves government service, transfers to a position within USCIS for which use of decision stamps is unauthorized, or otherwise leaves USCIS, the stamps shall be secured from the departing employee and made available for reassignment to another employee. The APO shall immediately make the appropriate entries in Identification Management System and notify the Forensic Documents Lab of the change.
- c. Security Ink. Care must be taken to use USCIS security ink only with USCIS decision stamps, and stamp pads used exclusively with or for USCIS security ink (i.e., pads not used for either legacy INS security ink or any form or type of non-USCIS security ink). If ink is inadvertently mixed in a stamp pad, the pad shall be shipped by accountable means to the central issue point for destruction.
- d. Storage of Stamps, Pads, and Security Ink. Stamps, pads and security ink will be stored in a secure manner, under lock and key with appropriate access control. Questions concerning acceptable security and access controls should be directed to on-site USCIS security officers or to the Office of Security and Investigations.
- e. Excess Quantities On Hand. Dry seals, stamps and containers of security ink in excess quantities or no longer needed shall be reported to the central issue point coordinator who will provide disposition instructions. To ensure proper control and adequate stock of these items on a corporate basis, no office or intermediate point shall order or store any excess quantities. Needed items shall be quickly shipped when identified to the central issue point at the Field Support Center.
- f. Unserviceable or Obsolete Sensitive Personal Property. The Field Support Center is charged with the responsibility for the destruction of unserviceable or obsolete seals, stamps, and ink. Item(s) requiring

destruction will be described in an email to Field Support Center and the items shipped by an accountable means to the Field Support Center.

6. Requesting USCIS Credentials and Badges.

- a. Each USCIS office has a designated Identification Management System coordinator to capture the required information for credentials. When notified by the Identification Management System coordinator, eligible employees will provide name, Social Security Number, duty office and address, and duty phone number and obtain photographs and electronic signatures at the designated USCIS location. This data will be electronically transmitted to Corbin. Corbin will produce the credentials and assemble the credential cases with credentials and badges (if authorized). Assembled sets will be documented in the Identification Management System by Corbin and forwarded to the respective APOs for coordination with the Identification Management System Coordinators for issue to employees.
- b. Badges will be initially issued to employees based upon their specific position titles contained in the Identification Management System, and other applicable criteria and authorities.
- c. Employees entitled to issuance of badges will be identified in the Identification Management System and their credentials will be produced and issued with accompanying badges. Any eligibility for subsequent issuance of a differently titled USCIS badge shall require surrender of the previously issued badge.
- d. A record of each item issued and personal data of each employee will be loaded promptly into the Identification Management System and Sunflower for custodial tracking and accountability.
- e. Employees shall submit written requests with justifications through their respective chains of command to the Office of Security and Investigations if they believe that one or more of their employees, not initially identified as eligible for issuance of USCIS badges, should in fact be issued official USCIS badges.

7. Retirement of Badges.

- a. **USCIS Badges.** Information herein regarding retirement of USCIS badges is subject to DHS guidance and may be revised accordingly. Absent contradictory DHS guidance, an employee who retires or departs from USCIS may elect, at their personal expense, to have their issued badge retired as a token of favorable service by having the badge encased in Lucite. An employee issued a USCIS badge and retiring from federal service, regardless of the employee's duration with USCIS, shall be entitled to retire their issued badge as described. An employee issued a USCIS badge and leaving USCIS without retiring from federal service shall have served honorably with USCIS for twelve (12) months in order to retire their issued badge as described. Departing or retiring USCIS employees to whom USCIS badges were not issued shall not be permitted to retire USCIS badges. In no case, regardless of length of service or position, will an employee who leaves USCIS under unfavorable circumstances be permitted to retire a USCIS badge. If an employee to whom a USCIS badge was issued elects to not retire the issued badge, or does not satisfy the criteria stated above to retire the badge, he shall surrender the badge to the APO who shall ensure that the sensitive personal property records are immediately and accurately updated. All surrendered USCIS badges shall be identified to the Field Support Center, returned to inventory, and made available for reissue. Badges that have become disfigured or damaged shall be sent to the Field Support Center Burlington for disposition. Any such disfigured or damaged badge is not to be retained by an individual or office.
- b. **Legacy INS Badges.** A USCIS employee may wish to have his/her legacy INS badge or badges retired when the new USCIS badge is issued. To be eligible to retire an INS badge or badges issued to an employee, they must have been properly entitled to and issued the badge(s) per official documentation.
- c. **Badge Retirement Procedures.** The procedures outlined herein apply to retirement of either INS or USCIS badges. Retired badges shall be embedded or encased in Lucite at the employee's expense and provided to the employee as a memento of favorable USCIS service. No badges will be retired without documentation that conclusively affirms, shows or proves that the badge or badges have in fact been encased in Lucite. Officers who wish to retire their badge(s) will complete the Badge Retirement Request Form (Attachment 3). This form, a check or money order made payable to the designated vendor, and the badge will be presented to the APO who

will verify the badge number, place the form, check and badge in an envelope and initial across the envelope seal. The APO will collect and ship the envelopes to the designated vendor using an accountable shipping method. The APO shall maintain a log, packing lists, or copies of badge retirement request forms to account for badges by title, number and quantity. The APO will receive the embedded badges from the vendor, provide them to the employee, and delete the item from the property accountability records. Once the badge has been encased in Lucite and provided to the employee, it is no longer considered to be accountable sensitive personal property.

- d. The APO will ensure inventories of all badges not to be embedded in Lucite are documented on USCIS Form G-504 Record of Property Shipped and that items are shipped by an accountable means to the appropriate Central Issue Point. Ship USCIS badges to the Central Issue Point, Corbin Production Facility for reissue, ship legacy INS badges to Central Issue Point, Field Support Center Burlington for retention or controlled disposition.

#### 8. Retirement of Credentials.

- a. **Obligations and Liabilities.** All persons to whom either or both legacy INS credentials and USCIS credentials were or are issued have an affirmative obligation to account for their possession and the status of those credentials. Credentials are the official property of the U.S. Government and must be controlled as described hereafter. Persons inappropriately possessing or displaying legacy INS or USCIS credentials may be subject to official action and the consequences resulting therefrom.
- b. **USCIS Credentials.** USCIS credentials shall not be retired to the personal possession of any employee who leaves the agency or to any other person for any reason. Because of their intrinsic security features all issued USCIS credentials shall be surrendered by their possessors to APOs who shall record the relevant data. (See Section VI.C.2.d, *Disposal of USCIS Credentials*)
- c. **Legacy INS Credentials.** Legacy INS credentials have no intrinsic security characteristics and may be retired in accordance with guidance herein. At the time new credentials are issued, employees shall surrender their INS credentials and all other INS identification media (except building passes) using the following procedures:

- 1) All employees will complete the form at Attachment 4.
- 2) Employees desiring to retire their INS credential or other INS identification will attach them to the form found at Attachment 4, select option #1, sign and return the form and card (s) to their APOs. The APOs will consolidate these requests and forward them to the Field Support Center for perforation with the word "VOID" in capital letters in a prominent position as close to the center of the credential as possible. No other word or form of retirement is acceptable. The Field Support Center will retain the Attachment 4 form in a permanent record and return the perforated card(s) to the APO for distribution to the employees. The credential will then be removed from any existing legacy property records.
- 3) Only existing legacy INS credentials in the possession of employees may be retired. Legacy INS credentials shall not be produced only for the purpose of their immediate retirement. It is possible that an employee may have in their possession more than one form of legacy INS credential. Any and all such legacy INS credentials legitimately issued to the employee may be retired in the manner described above.
- 4) Employees possessing INS credentials and/or other INS identification media and not desiring to have them returned will check Option #2 on Attachment 4, sign and give the form with the INS credentials or INS identification media to their APO who will forward them to the Field Support Center. The Field Support Center will destroy the credentials/identification media by shredding and retain Attachment 4 in a permanent record. The credential will then be removed from the employee's property record.
- 5) Employees who do not have an INS credential or other identification media will select Option #3 on Attachment 4, sign and give the form to their APO. The APO will forward the form to the Field Support Center for retention in a permanent record.
- 6) All documents forwarded to the Field Support Center will be shipped by an accountable means.

## 9. Amnesty Period.

A period of three months following the issuance of permanent USCIS credentials to employees will be considered an amnesty period for individuals who have old or obsolete legacy agency badges, credentials, impression/dry seals, stamps or security ink (and ink pads used for legacy INS security ink) in their possession. All sensitive legacy INS items will be surrendered without penalty during the transition period. Thereafter, persons inappropriately possessing or displaying the listed sensitive legacy INS items may be subject to official action and the consequences resulting therefrom.

10. Destruction of USCIS Credential Materials.

Credential materials that are damaged or unacceptable for use must be destroyed at Corbin with permanent records maintained of the materials destroyed.

11. Disposal of Legacy INS Credential Materials.

INS credential materials that are not sensitive or controlled items shall be destroyed locally.

12. Disposal of INS Credentials Not Being Retired.

INS Credentials will be shredded locally with a crosscut shredder when no longer needed. If no crosscut shredder is available, the credentials shall be shipped by an accountable means to the Field Support Center. The credential will then be removed from any existing legacy property records.

13. Disposal of Legacy INS Stamps, Ink and Stamp Pads.

APOs will inventory all legacy INS Stamps, security ink, empty security ink containers and stamp pads and ship (by an accountable means) on USCIS Form G-504 to the Central Issue Point, Field Support Center Burlington for disposal. None may be retained for any reason by individuals or offices. The Central Issue Point, Field Support Center Burlington will destroy these items and notify the Forensic Documents Lab and the APO that the destruction is complete by returning an annotated copy of the USCIS Form G-504 to the APO with a copy to the Forensic Documents Lab.

14. Disposal of Legacy INS Impression or Dry Seals.

All legacy INS dry seals are U.S. Government accountable property items. Upon announced transition to exclusive use of USCIS dry seals, or as otherwise required in conjunction with issued guidance pertaining to contracts centrally awarded to obtain USCIS dry seals, all legacy INS dry seals MUST be accounted for and properly dispositioned. NO legacy INS dry seals are authorized for personal possession or for retention in USCIS offices and activities.

## VII. QUESTIONS OR CONCERNS

Questions or concerns regarding this directive should be addressed to:

- Office of Administration, Chief, Asset and Acquisition Management Division, phone 202-272-1575
- Director, Office of Security and Investigations, phone 202-272-1500

## VIII. ATTACHMENTS

Attachment 1, DHS Form G-504, Report of Property Shipped/Received

Attachment 2, USCIS Form G-1102, Individual Employee/Contractor Property Tracking Record

Attachment 3, DHS Form 200-2, Report of Survey

Attachment 4, Badge Retirement Request

Attachment 5, INS Credential Retirement Request

Approved by:



Chief Administrative Officer  
USCIS, Office of Administration



Date