December 12, 2005

Memorandum for Deputies of Executive Departments and Agencies

From: Clay Johnson III
           Deputy Director for Management

Subject: Reciprocal Recognition of Existing Personnel Security
           Clearances

The Federal government is committed to significantly improving the process by which we determine eligibility for access to Classified National Security Information. This commitment is reinforced by requirements to improve the security clearance process included in Title III or Public Law 108-458 (The Intelligence Reform and Terrorism Prevention Act of 2004) and Executive Order 13381 (Strengthening Processes Relating to Determining Eligibility for Access to Classified National Security Information). A significant part of this reform is ensuring that background investigations are conducted to grant new security clearances <u>only</u> when they are actually required.

The attached paper outlines the various issues currently inhibiting reciprocity of security clearances, and the actions you and others are required to take to address them. **Your department or agency, and all others, are responsible for the actions highlighted in bold.**

This reciprocity guidance was developed by a Security Clearance Oversight Steering Committee, which includes representatives from DoD, DHS, DOE, DOJ, DOT, DOC, DOS, the DNI, the NSC, and the National Archives and Records Administration. I am the Chairman.

If you have any questions about the requirements contained in this document, please contact me at (202) 456-7070.

cc: Departments and Agencies Directors of Security

Enforcing Reciprocity of Existing Personnel Security Clearances

1. **Issue:** There is an inconsistent understanding among the agencies with respect to when reciprocal recognition of an existing clearance is required.

   (a) **Required Action:** The **attached checklist** is designed to assist agencies in determining when reciprocal recognition of existing clearances is required and **should be used whenever applicants indicate that they posses an existing access eligibility determination at the same or higher level than currently needed.**

2. **Issue:** The existing central database does not provide sufficient clearance verification information on a real-time basis to enable agencies to ascertain the status of an individual's security clearance.

   (a) **Required Action:** OPM has added additional data fields to the Clearance Verification System (CVS) so as to differentiate between those access eligibility determinations that require reciprocal recognition and those that do not (see attachment 2 for required data fields and explanation). These additional fields will be fully incorporated in CVS by December 17, 2005.

   (b) **Required Action:** While agencies are migrating to CVS, OPM will develop and promulgate guidance that directs agencies to: i) query DoD's JPAS database if the existing clearance was issued by a DoD activity; ii) query the Intelligence Community's Scattered Castles database if the existing clearance was issued by an intelligence community agency; or iii) query the appropriate agency via phone or fax using a comprehensive master list of agency points of contacts to be developed and promulgated by OPM (see attachment 3 for prescribed "Inter-Agency Clearance Verification Request" and attachment 4 for a draft "Master List of Agency Contacts"). A listing of agency points of contact is posted along with prescribed verification format to OPM's web portal site, https://opmis.xsp.org.

   (c) **Required Action: Agencies will begin daily updates to OPM's Clearance Verification System (CVS) and to update existing entries by March 31, 2006.** This date is dependent upon the ability of affected agencies to develop and implement the necessary technical interfaces that will permit daily updates. An OPM directed working group is currently examining what barriers exist to all agencies using this system and will resolve those issues as they arise.

3. **Issue:** A permitted exception to reciprocity may occur when an individual is being considered for access to a program of a sensitivity level different from that of the existing program. This step only applies to SCI, SAP and Q programs and only when the new program has investigative and/or adjudicative criteria at the time the program is approved by the agency head or deputy that are higher than standards set forth in Executive Order 12968 (applies to State, Energy, Defense, DHS, CIA and DNI only – the only agencies authorized to establish SAPs). Reciprocity has proved most elusive when individuals (especially cleared contractors) cross over to different programs that entail access to TOP SECRET, SAP and/or SCI information. This is due, in part, to the significant discretion agency heads had been granted by Executive Order 12968 to establish "additional but not duplicative

investigative or adjudicative criteria" for SAPs, to include SCI. While no standards exist
regarding acceptable higher investigative or adjudicative criteria and the circumstances under
which they are appropriate – the two most common are: i) a requirement for a polygraph
examination, and ii) outright disqualification based upon non-U.S. immediate family
members (although the latter is the most frequently waived disqualifier).

(a) **Required Action:** OPM is configuring CVS to reflect on a real-time basis those
individuals who have undergone a polygraph (as the Intelligence Community's Scattered
Castles database currently does) and agencies must begin inputting required data for all
new and existing clearances on December 17, 2005.

(b) **Required Action:** For those agencies without access to Scattered Castles, or to verify
polygraphs at agencies that don't post to Scattered Castles, OPM will provide in the
aforementioned clearance verification request and master list of agency points of contact
the means to manually verify via phone or fax whether an individual has undergone a
polygraph examination. This information can be found on OPM's web portal
(https://opmis.xsp.org).

(c) **Required Action: Agencies will update by March 31st, 2006 their records in OPM's
Clearance Verification System to reflect those cleared individuals who have
undergone a polygraph and/or, to the extent practical, have non-U.S. immediate
family members.** (While reflecting non-U.S. immediate family members for new
clearances should not prove difficult, it may be problematic for those agencies without
the authority to grant SCI or SAP access to annotate existing records).

(d) **Required Action: While Executive Order 12968 allows agency heads to establish
additional but not duplicative investigative or adjudicative requirements for SAPs,
to include SCI, agencies will, in accordance with Executive Order 13381:**

- **Limit such additional requirements to the polygraph examination and/or
disqualifying individuals based upon non-U.S. immediate family; and**
- **Ensure that programs desiring to utilize or continue to use additional
requirements other than the above for the purpose of determining eligibility for
access to classified information first obtain the approval of the Director of OMB
in accordance with §3001(d)(3)(A), Title III, Public Law 108-548 by January 31,
2006 and as new programs are established thereafter.**

(e) **Required Action:** The Personnel Security Working Group of the Records Access and
Information Security PCC will evaluate the need to formalize changes to existing policy
documents that codifies the above by January 31, 2006.

4. **Issue:** Oftentimes, it is difficult to distinguish between employment suitability issues and
security clearance trustworthy issues. Unique suitability issues serve as impediments to
reciprocity. For example, a military veteran or a contractor employee with a current, final
Secret clearance is not eligible for immediate Federal employment since the suitability
investigation for Federal employment differs from the investigation for a Secret clearance.

(a) **Required Action:** The Personnel Security Working Group of the Records Access and Information Security PCC will evaluate by February 28, 2006 the need for policy changes that ensure consistency between the basic investigative requirement to determine suitability for Federal employment and the basic investigative requirement for access to information classified Secret and below.

(b) **Required Action:** As this is being developed, agencies must be cognizant that unique suitability issues such as requirements for psychological or medical evaluations as well as the unwillingness to accept certain mitigated issues (e.g. past drug usage of any vintage serving as a bar to employment as a DEA agent) will always contribute to the perception that reciprocity is not being honored. **Agencies must ensure that in such instances, the completion of an entirely new security questionnaire or the conduct of duplicative investigative checks does not occur. Rather, only additional, not duplicative, investigative and adjudicative procedures will be completed.**

5. **Issue:** Lack of reciprocity often arises when there is reluctance to be accountable for poor quality investigations and/or adjudications conducted by prior agencies or organizations. While reciprocity has proved elusive by fiat and in the absence of any accountability for performance, confidence among security practitioners in the quality of each other's work can be increased.

(a) **Required Action:** Working with the Department of Defense, the Intelligence Community has developed standardized training for all adjudicators. This week-long course enhances the level of competence and understanding of adjudication fundamentals to include the principles of reciprocity by systematically presenting the Adjudicative Guidelines, providing practical hands-on case studies, and exposing students to a coherent way of thinking about adjudication. In this vein, the Reciprocity Working Group will identify by February 15, 2006 additional opportunities to provide such content to adjudicators Executive branch-wide through uniform, high quality training, along with opportunities for better communication with all security managers and adjudicators to ensure familiarity with and understanding of the "new way of doing business."

(b) **Required Action:** An important way to foster mutual confidence is to provide mechanisms where personnel security practitioners can collaborate on issues of common interest. The intelligence community is convening a forum for such collaboration under the name "Common Adjudicative Procedures for the SCI Community" or CAPSC. This forum shall be expanded Executive branch-wide to include the non-SCI community and be assigned specific responsibilities to report to OMB.

6. **Issue:** Metrics are essential in order to measure progress.

(a) **Required Action:** The aforementioned CAP Forum, with respect to any agency's adjudicative activity relating to the issuing of security clearances to include posting data to CVS, is assigned responsibility to: consider and make recommendations to OMB on complaints and suggestions; organize and oversee periodic on-site peer reviews; and provide quarterly progress reports to OMB.

(b) **<u>Required Action:</u>** For industry, through the "MOU Associations," contractors shall report quarterly, on a voluntary basis, the total number of times their employees have completed a security questionnaire and of those, the number of times it appeared to the contractor to be in contravention of the "Checklist of Acceptable Exceptions to Reciprocity." These trend reports would be submitted through the Information Security Oversight Office.

(c) **<u>Required Action:</u>** Additional metrics for measuring agencies' progress toward meeting the reciprocity standards will be developed within 60 days and provided to you.

(d) **<u>Required Action:</u> Agencies will be expected to report to OMB by April 1, 2006, the status of their implementation of the new procedures relative to the reciprocity of access eligibility determinations, to include the updating of agency regulations, as appropriate. OMB will provide you with a format for that report.**

(e) **<u>Required Action:</u>** OMB will issue a report by May 1, 2006 which provides feedback to agencies on the progress made Executive branch-wide with respect to the reciprocity of access eligibility determinations.

Milestones

Task	Responsible Party	Due Date
1. Master List of Agency Contacts posted to OPM web portal	OPM	Complete
2. Procedures for verifying existing access eligibility determinations posted to OPM web portal	OPM	12/15/05
3. Procedures for joining collaboration forum for adjudicators posted to OPM web portal	OPM	12/15/05
4. Finalize format for industry trend reports	NARA	Complete
5. Initial organizing meeting of collaboration forum	DNI	12/15/05
6. Additional data fields essential for reciprocity available in CVS	OPM	12/17/05
7. Deadline for agencies wanting to continue criteria over and above polygraph and non-U.S. immediate family member disqualifier for existing programs to request specific approval from OMB	Agencies	1/31/06
8. Reciprocity Working Group to identify additional opportunities to present uniform, high quality training and to enhance communication	NARA	2/15/06
9. Reciprocity WG to identify additional metrics for measuring agencies progress toward meeting the reciprocity standards	NARA	2/15/06
10. PCC evaluation of need for additional policy changes	PCC	2/28/06
11. Initial peer review of agency adjudicative responsibilities	NARA	3/1/06
12. Initial agency implementation reports submitted to OMB	Agencies	4/1/06
13. Initial forum report to OMB	DNI	4/1/06
14. Initial trend report from industry groups	NARA	4/1/06
15. Initial OMB report on the state of reciprocity	OMB	5/1/06
16. CVS IOC which allows agencies to update entries daily	OPM	TBD
17. CVS FOC which requires agencies to update daily those data fields essential for reciprocity for existing and new entries	OPM	TBD

Checklist of Permitted Exceptions to Reciprocity
(to be used whenever you make an eligibility determination for access to classified information for an individual who has a current access eligibility based upon the requisite investigation (i.e. ANACI, NACLC, SSBI, or SSBI-PR)

For the purpose of determining eligibility for access to classified information, to include highly sensitive programs (i.e. SCI, SAPs and Q), as the gaining activity/program for an individual who has current access eligibility with another Federal agency or program:

- **you cannot request the individual to complete a new security questionnaire;**
- **you cannot review existing background investigations for the individual;**
- **you cannot review existing security questionnaires for the individual;**
- **you cannot initiate any new investigative checks;**

unless one or more of the questions below can be answered in the affirmative.

	Yes	No	N/A
1. Is the existing clearance granted on an interim or temporary basis?			
2. Is the investigation upon which the existing clearance is based more than seven years old for TOP SECRET, ten years old for SECRET and fifteen years old for CONFIDENTIAL?			
3. Is your activity (i.e. the gaining activity) aware (i.e. **already** in possession) of substantial information indicating that the standards of E.O. 12968 may not be satisfied?			
If the individual is being considered for access to a highly sensitive program (i.e. SCI, SAP or Q) at your activity:			
4. Is the existing access eligibility determination based upon a waiver or deviation, or is access otherwise subject to conditions?			
5. **If applicable**, does the individual **not** satisfy a polygraph requirement imposed by the new program, as approved by the agency head or deputy?[*]			
6. **If applicable**, does the individual **not** satisfy a requirement imposed by the new program that does **not** allow **any** non-U.S. immediate family, as approved by the agency head or deputy?[*]			
7. **If applicable and if approved by OMB**, other than for questions 5 and 6 above, does the individual not satisfy an investigative and/or adjudicative criterion that is additional to the standards set forth in E.O. 12968?[*]			

Items 1 and 2 and 4 through 6 above can be verified by querying OPM's Clearance Verification System (CVS), the Department of Defense's Joint Personnel Adjudication System (JPAS), or the Intelligence Community's Scattered Castles database. If you do not have on-line access to the appropriate database, or if the record is otherwise incomplete, you can fax an "Inter-Agency Clearance Verification Request" to the appropriate agency. The request form and appropriate fax numbers can be found at: https://opmis.xsp.org

---

[*] Under such circumstances, the completion of an entirely new security questionnaire is not authorized. Rather, only additional – not duplicative – investigative or adjudicative procedures will be completed.

CVS Reciprocity Data Elements

      The following 19 items are the data elements required to be in the Clearance Verification System in order to support reciprocity. The remarks, keyed to the line numbers, explain what each element includes and, where necessary, detailed information about how to formulate it.

Identity

1. Name, last
2. Name, first
3. Name, middle
4. Name, suffix
5. SSN
6. DOB

Investigation

7. Investigation type
8. Investigation date
9. Polygraph type
10. Polygraph agency
11. Polygraph date

Clearance

12. Clearance Level
13. Special Access
14. Date of Eligibility
15. Interim clearance
16. Status
17. Adjudicative authority

Alerts

18. Non-US Immediate Family
19. PLEASE CALL

REMARKS

      Entries are in ALL CAPS.

     1. Last name. Convention: Reflect spacing in multi-word names (e.g., DE SILVA, not DESILVA), hyphens in hyphenated names (e.g., SCHMITT-WALTER, not SCHMITT WALTER or SCHMITTWALTER), and apostrophes in names with them (e.g., O'NEILL, not ONEILL). Ignore non-standard characters (e.g., GLUCK, not GLÜCK; GUINOT, not GUINÔT; NGO DINH, not NGÔ ĐÌNH). Treat ligatures as separate letters (e.g., FAERNISE, not FÆRNISE); reflect German ß as SS.

2. First name. Convention: as above. Use "(IO)" to indicate initial only [e.g., E. (IO)]. Include periods with initials.

3. Middle name. Convention: as above. Use "(IO)" to indicate initial only [e.g., E. (IO)]; use "(NMN)" to indicate no middle name. Include periods with initials. If a person has more than one middle name, include only the first (e.g., reflect John Robert Thomas Duran's middle name as ROBERT, not ROBERT THOMAS).

4. Suffix. JR., SR., II, III, IV, etc. Do not include honorifics (e.g., ESQ.), degrees (e.g., M.D.) or anything else not integral to the person's name. If none, leave blank.

5. SSN. Use nine consecutive digits, without spaces or hyphens (e.g., 000000000, not 000-00-0000 or 000 00 0000).

6. DOB. Use the DD-MMM-YYYY convention: thus reflect July 4, 1976 as 04-JUL-1976.

7. Investigation type. List the most recently completed personnel security investigation, using standard designators, e.g., SSBI, SSBI-PR, NACLC, ANACI, NACI, MBI.

8. Investigation date. Use the closing date appearing on the investigation, *not* the initiation date or date of adjudication. Use the DD-MMM-YYYY convention.

9. Polygraph type. This and the following two fields relate only to polygraphs administered as a part of security processing. Record only the most recent polygraph. Reflect the type as either CI (counterintelligence scope) or FS (full scope). If there is no polygraph, enter NONE.

10. Polygraph agency. Use the standard designator for the agency administering the polygraph (e.g., CIA, NRO, NSA). Use USAF for Air Force, USN for Navy, and USA for Army.

11. Polygraph date. Use the date of the examination as reflected in agency records.

12. Clearance level. Reflect the highest level of clearance: Use CONF for Confidential, SEC for Secret, and TS for Top Secret. Use NONE if no clearance determination has been made or if the person has been determined ineligible (denied or revoked). For DOE access authorizations, use L or Q.

13. Special Access. Reflect whether the person has been determined eligible for either Sensitive Compartmented Information, other Special Access Programs, or both. Use SCI, SAP, and SAPSCI. If no special access eligibility has been determined, enter NONE.

Note: Items 12 and 13, when taken together, indicate the type of adjudication the person has undergone. Some examples:

Clnc Level	Sp Acc	Meaning
TS	NONE	Favorable adjudication for TS, no SCI or SAP determination
TS	SCI	Favorable adjudication for Top Secret with eligibility for SCI
SEC	NONE	Favorable adjudication for Secret, no SAP determination
SEC	SAP	Favorable adjudication for Secret and for SAPs at the Secret (but not Top Secret) level
TS	SAPSCI	Favorable adjudication for Top Secret with eligibility for both Top Secret SAPs and SCI

14. Date of eligibility. Date of the most recent favorable adjudication. Use the DD-MMM-YYYY convention.

15. Interim clearance. Indicate YES if the clearance level reflected in the record is based on an open investigation. Otherwise enter NO.

16. Status. Use ACTIVE (meaning the person currently occupies a position requiring some level of classified access), SUSP (meaning the person has been suspended from access but not debriefed), or DEBR (meaning the person is currently debriefed from all classified access). DEBR is without respect for reason.

17. Adjudicative authority. Standard designator of the agency granting the clearance eligibility.

18. Non-US immediate family. Enter YES if any of the person's living immediate family members (father, mother, brother, sister, spouse, son, daughter, or cohabitant) is not a US citizen. Each of these terms includes all its variants; e.g., "sister" includes sister by blood, sister by adoption, half-sister, stepsister, and foster sister. If all immediate family members are US citizens, enter NONE.

19. PLEASE CALL. Use PLEASE CALL to alert system users only if one of the following applies:

♦ waivers (access eligibility granted or continued despite the presence of substantial issue information that would normally preclude access);

♦ conditions (access eligibility granted or continued with the proviso that one or more additional measures will be required, such as additional security monitoring, restrictions on access, and restrictions on an individual's handling of classified information);

♦ deviations (access eligibility granted or continued despite either a significant gap in coverage—meaning complete lack of coverage of a period of six months or more within the most recent five years investigated—or a significant deficiency in the scope in the investigation, such as the absence of all employment checks);[1]

♦ suspensions of access;

♦ revocations of access;

♦ denials of access; and

♦ ongoing investigations that could affect the person's continued eligibility for access.

---

[1] Do *not* use PLEASE CALL to flag cases with out-of-date investigations unless one of the other reasons in this list applies.

Some Sample Records

1. TS clearance, no SAP or SCI

Name *Last*	Name *First*	Name *Middle*	Name *Suffix*	SSN	DOB
BRAUNBOX	THEODORE	MICHAEL	JR.	000000000	03-MAY-1902
Inv Type	**Inv Date**	**Poly Type**	**Poly Agency**	**Poly Date**	
SSBI-PR	05-JUN-2002	NONE			
Clnc Level	**Spec Access**	**Date of Elig**	**Interim Clnc**	**Status**	**Adj Auth**
TS	NONE	06-AUG-2002	NO	ACTIVE	JUSTICE
Non-US Fam					
NONE					

2. Secret clearance, foreign relatives

Name *Last*	Name *First*	Name *Middle*	Name *Suffix*	SSN	DOB
LAUFKOETTER	MARY	(NMN)		000000000	06-DEC-1983
Inv Type	**Inv Date**	**Poly Type**	**Poly Agency**	**Poly Date**	
NACLC	30-APR-2005	NONE			
Clnc Level	**Spec Access**	**Date of Elig**	**Interim Clnc**	**Status**	**Adj Auth**
SEC	SAP	06-MAY-2005	NO	ACTIVE	USAF
Non-US Fam					
YES					

3. TS clearance, SCI eligibility with a condition applied, polygraph

Name *Last*	Name *First*	Name *Middle*	Name *Suffix*	SSN	DOB
QWINE	FRANK	R. (IO)		000000000	17-FEB-1950
Inv Type	**Inv Date**	**Poly Type**	**Poly Agency**	**Poly Date**	
SSBI	26-MAY-2000	FS	CIA	13-JUN-2001	
Clnc Level	**Spec Access**	**Date of Elig**	**Interim Clnc**	**Status**	**Adj Auth**
TS	SCI	10-NOV-2003	NO	ACTIVE	CIA
Non-US Fam					
NONE	PLEASE CALL				

4. Favorably adjudicated for Secret, not currently in access

Name *Last*	Name *First*	Name *Middle*	Name *Suffix*	SSN	DOB
ASQUE	SANDRA	SARAH		000000000	09-NOV-1961
Inv Type	**Inv Date**	**Poly Type**	**Poly Agency**	**Poly Date**	
ANACI	05-MAR-2004	NONE			
Clnc Level	**Spec Access**	**Date of Elig**	**Interim Clnc**	**Status**	**Adj Auth**
SEC	NONE	11-APR-2004	NO	DEBR	TREASURY
Non-US Fam					
NONE					

5. Temporary access eligibility

Name *Last*	Name *First*	Name *Middle*	Name *Suffix*	SSN	DOB
HEAP	URIAH	DICKENS	III	000000000	22-AUG-1970
Inv Type	Inv Date	Poly Type	Poly Agency	Poly Date	
NONE		NONE			
Clnc Level	Spec Access	Date of Elig	Interim Clnc	Status	Adj Auth
SEC	NONE	6-AUG-2002	YES	ACTIVE	COMMERCE
Non-US Fam					
NONE					

5. Access revoked

Name *Last*	Name *First*	Name *Middle*	Name *Suffix*	SSN	DOB
MALAHIDE	MARY	BARBARA		000000000	05-MAY-1977
Inv Type	Inv Date	Poly Type	Poly Agency	Poly Date	
SSBI	17-MAY-2002	CS	USAF	03-NOV-2004	
Clnc Level	Spec Access	Date of Elig	Interim Clnc	Status	Adj Auth
NONE	NONE		NO	DEBR	USAF
Non-US Fam					
NONE	PLEASE CALL				

6. Access suspended

Name *Last*	Name *First*	Name *Middle*	Name *Suffix*	SSN	DOB
BOSKNECHT	IAGO	RONALD	SR.	000000000	30-JUN-1935
Inv Type	Inv Date	Poly Type	Poly Agency	Poly Date	
SSBI	17-MAY-2002	NONE			
Clnc Level	Spec Access	Date of Elig	Interim Clnc	Status	Adj Auth
TS	SCI	27-MAY-2002	NO	SUSP	USAF
Non-US Fam					
NONE	PLEASE CALL				

Inter-Agency Clearance Verification Request

The U.S. Government agency indicated below is requesting that you provide them with specific data pertaining to security clearance information your agency might maintain on the subject whose identifying information is provided hereon. This request is being made because a search of appropriate databases failed to disclose pertinent information.

SUBJECT NAME: _____
               Last   *First*   *Middle*   *Suffix*
      SSN: _____ **DOB:** _____

CLEARANCE (C/S/TS): _____ **GRANT DATE:** _____

IS THIS CLEARANCE ACTIVE? YES_____ NO _____

      **IF NO, WAS THIS CLEARANCE: SUSPENDED _____ REVOKED _____
ADMINISTRATIVELY WITHDRAWN _____ DENIED _____
PROVIDE DATE OF ACTION FOR ANY OF THE ABOVE: _____**

IS THIS AN INTERIM OR TEMPORARY CLEARANCE? YES _____ NO _____

WHAT AGENCY ADJUDICATED THIS CLEARANCE? _____

INVESTIGATIVE BASIS:

TYPE OF INVESTIGATION: _____ DATE INVESTIGATION CLOSED: _____

WHAT AGENCY CONDUCTED THE INVESTIGATION? _____

(FOR ACCESS TO HIGHLY SENSITIVE PROGRAMS ONLY)

COMPLETE THE BELOW ITEMS ONLY IF CHECKED:

**_____ DOES THIS CLEARANCE CARRY ANY WAIVERS, DEVIATIONS OR CONDITIONS?
    YES _____ NO _____**

_____ WAS A POLYGRAPH EXAMINATION CONDUCTED? YES_____ NO _____

    IF YES, INDICATE TYPE: _____ DATE: _____ AGENCY: _____

**_____ DOES THE SUBJECT HAVE ANY NON-U.S. FAMILY MEMBERS?
    YES _____ NO _____**

PLEASE COMPLETE THIS FORM AND RETURN IT AS SOON AS POSSIBLE TO:

AGENCY NAME: _____

CONTACT PERSON: _____

FAX: _____ **PHONE:** _____