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UNITED STATES SENDING STATE OFFICE FOR ITALY  
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U.S. SENDING STATE OFFICE FOR ITALY INSTRUCTION 2010.01

SUBJ: CIVILIAN COMPONENT AND TECHNICAL REPRESENTATIVE STATUS AND  
ACCREDITATION PROCEDURES

- Ref: (a) NATO SOFA: Agreement Between the Parties to the North Atlantic Treaty Regarding the Status of Their Forces signed on 19 June 1951 ratified in Italy as Law No. 1335 on 30 November 1955.
- (b) Shell Agreement: Memorandum of Understanding Between the Ministry of Defense of the Republic of Italy and the Department of Defense of the United States of America Concerning Use of Installations/Infrastructure by the U.S. Forces in Italy, 2 February 1995 (commonly referred to as the "Shell").
- (c) Tri-Service Directive on Personal Property, Rationed Goods, Motor Vehicles and Drivers' Licenses, Civilian Component and Technical Representative Status (COMUSNAVEUR INST. No. 5840.2E; USAREUR REGULATION No. 550-32; USAFE INSTRUCTION No. 36-101), 20 February 2004.
- (d) USEUCOM Policy Memorandum 04-04 (Civilian Personnel Accreditation in the Republic of Italy)

1. Purpose.

- a. This instruction provides overall guidance on accreditation of Civilian Personnel under the Shell who are not employed directly by the US Government in Italy.
- b. This instruction provides specific guidance on seeking accreditation of DoD contractor employees as Technical Representatives (TRs) in Italy.
- c. This instruction establishes procedures for defining contract positions that may qualify as TR positions, and for accrediting individual contractor employees as TRs.

2. Authority:

- a. Reference (d) confers executive agent authority on the United States Sending State Office (USSSO) to accredit civilian personnel.
- b. This authority extends throughout Italy for all service components.

### 3. Background.

a. The Shell Agreement provides that persons closely affiliated with the U.S. Forces and under their authority, but not employed by them, may be designated as Civilian Personnel. A Civilian Personnel employee is exempt from the payment of Italian income tax, is eligible for individual logistical support (ILS), and is required to be in possession of a mission visa, placed in a regular (tourist) passport prior to entry into Italy. Italian citizens, dual citizens of Schengen countries, and persons ordinarily resident in Italy cannot be accredited as Civilian Personnel.

### 4. Responsibilities.

a. United States Sending State Office for Italy (USSSO): The U.S. European Command (EUCOM) office, at the American Embassy, Rome, is responsible for implementing the accreditation of Civilian Personnel in accordance with references (a) through (c).

b. DoD Contractor Personnel Office (DOCPER): The office designated by EUCOM to process on behalf of the USSSO applications for accreditation as Civilian Personnel.

c. Servicing Staff Judge Advocate: The Staff Judge Advocate (SJA) office designated to carry out necessary legal functions in connection with the process of accreditation of Civilian Personnel. Each military component command may designate one or more such offices.

### 5. Definitions.

a. **Civilian Component** is defined in Article I (1.b) of reference (a) (NATO SOFA), as civilian personnel accompanying a force of a Contracting Party (the United States in this case), who are in the employ of an armed service of that Contracting Party, and who are not stateless persons, nor nationals of any State which is not a NATO Contracting Party, nor nationals of, nor ordinarily resident in the State in which the force is located.

b. **Civilian Personnel** is defined in reference (b) as persons who are closely affiliated with U.S. Forces and under their authority, but are not employed directly by them, on the condition that the presence of such persons in Italy is recognized by both governments as necessary in connection with the functioning of the installations. Personnel eligible for Civilian Personnel status are not stateless persons, nor nationals of any State which is not a NATO Contracting Party, nor nationals of, nor ordinarily resident in the State in which the force is located. Such persons include:

- (1) Employees of other U.S. Government Departments;

(2) Essential personnel of the USO, credit unions, schools/universities (other than Department of Defense Education Activity (DoDEA) schools) and the Red Cross.

(3) Technical representatives of organizations, companies, or private enterprises, having special relations with U.S. Forces when such persons come to Italy for other than temporary visits.

c. **Technical Representatives (TRs)** are persons who have a high degree of skill, or knowledge, in the systematic procedures by which a complex or scientific task is accomplished, as distinguished from routine mental or physical processes. The skills and knowledge must have been acquired through higher education or through a long period of specialized training and experience. Specific minimum qualifications for education are as follows:

(1) Bachelor's degree in a related field; or

(2) Associate degree in a related field and four years of recent specialized experience; or

(3) A major certification and six years of recent specialized experience; or

(4) A high school diploma and eight years of recent specialized experience; or

(5) For Aircraft Mechanics: An A&P (airframe and powerplant) license or FCC Radio operator license and five years of specialized experience.

(6) A certification is a "major certification" if it is widely recognized, independently administered, and difficult to obtain. Certifications listed on the DoD Contractor Personnel Office (DOCPER) website as major certifications or listed by the Department of Labor as major certifications, will be considered major certifications. Other certifications may be considered major certifications if sufficient evidence is provided to make the determination that they are widely recognized, independently administered, and difficult to obtain.

(7) Examples of positions that have been accredited as TRs include warranty repair technicians for repair of complex equipment; key executive and supervisor positions in government-owned, contractor-operated facilities that perform major maintenance on U.S. government-owned vehicles; and computer software engineers.

(8) Examples of positions that have been denied TR status include administrative personnel; automobile sales representatives; carpenters; masons; painters; plumbers; sales representatives for china, jewelry, clothes, computers, encyclopedias, and similar items; secretaries and typists.

d. **Ordinarily Resident.**

(1) A person is ordinarily resident (OR) if he/she physically resides in Italy for more than 90 days without a mission sojourn permit (*permesso soggiorno missione*) for NATO SOFA status, or remains less than 90 days and takes any of the following actions:

(2) Registered as a resident at the Municipal Register (*Ufficio Anagrafe*) in the town where residing (N.B.: Because of the residency rules of the European Union, citizens or dual citizens of any EU country are defined as ordinarily resident due to this requirement); or

(3) Taken other affirmative steps to avail him/herself of permanent resident benefits, including, but not limited to:

(a) voting, or registering to vote, in Italy;

(b) applying for unemployment benefits in Italy;

(c) obtaining, or having a legal obligation to obtain, documentation (such as a *scheda anagrafica* or *scheda professionale*) aimed at attaining employment on the economy in Italy;

(d) obtaining, or having a legal obligation to obtain, registration with the Italian national health care system;

(e) obtaining, or having a legal obligation to obtain, a work visa, or an employment contract of sojourn, or an employment sojourn permit, or an autonomous work sojourn permit, or a family sojourn permit, or another type of sojourn permit (*visto di ingresso per lavoro*, or *contratto di soggiorno per lavoro subordinato*, or *permesso di soggiorno per lavoro subordinato*, or *permesso di soggiorno per lavoro autonomo*, or *permesso di soggiorno per motivi familiari*, or *carta di soggiorno*), unless such permit was issued for employment with U.S. Forces in Italy; or

(f) paying, or having a legal obligation to pay, Italian income taxes or property taxes due to residency status.

e. A **temporary visit** is a physical presence in Italy of less than 90 days.

f. **Contracting Officer's Representative (COR)** serves as the liaison between the contracting officer, the contractor, the command installation, or activity where the work is being performed, and any other office or entity on matter pertaining to TRs performing work under the terms of the contract.

g. **Proponent Office** is the DoD agency, command, directorate, or office in Italy that is utilizing, or requires the services of, the DoD contractor, or the office closely affiliated with U.S. Forces that seeks to employ civilian personnel.

h. **Mission Visa** is the required Italian visa for all Civilian Component and Civilian Personnel assigned to U.S. military bases in Italy.

i. **Sojourn Permit** is a required Italian government document that certifies that U.S. Forces Civilian Component and Civilian Personnel are temporary legal residents of Italy. To obtain a sojourn permit, an individual must first obtain the mission visa prior to arrival in Italy. The

sojourn permit extends the Mission Visa from arrival until the individual's expected departure from Italy.

j. **Retiring or Separating Military Personnel** may apply for accreditation as Civilian Personnel but may not have dual status as both a member of the military and as Civilian Personnel. Retiring or separating military members applying for Civilian Personnel status are required to provide a copy of the DD-214 and are not eligible for employment as Civilian Personnel with U.S. Forces in Italy until the day following the separation date on the DD 214. Retiring or separating military members may be employed as members of the Civilian Component as soon as the day their terminal leave starts, if they have an approved waiver from the 180-day waiting period. Retiring or separating military members must obtain the appropriate passport and a Mission Visa and Sojourn Permit.

6. Civilian Component and Civilian Personnel Status in Italy.

a. Joint Civilian Personnel Committee – Italy. Implementation of the policies regarding Civilian Component status contained within this directive are the responsibility of the Tri-Service Joint Civilian Personnel Committee (JCPC) for Italy. All base/installation-level procedures regarding application for employment must be consistent with this directive and written guidance issued by the JCPC.

b. U.S. citizens and third country nationals of a NATO country, other than Italy or any other EU country, who are employed by U.S. commands and activities, and who otherwise meet the definition of Civilian Component, become members of the Civilian Component unless they are ordinarily resident in Italy.

c. Italian citizens, and citizens of other EU countries, may not obtain Civilian Component or Civilian Personnel status. Former Italian citizens present in Italy on orders, or orders of their sponsor, do not regain Italian citizenship without an affirmative act. U.S. citizens who may have acquired or reacquired Italian citizenship under Italian law may be required to obtain and file with civilian personnel offices, certificates from Italian authorities – (e.g., Italian consulates abroad, Ministry of Interior, municipality of birthplace) – stating that they are not Italian citizens, are not listed in Italian records as Italian citizens, or have renounced Italian citizenship.

d. Individuals who are ordinarily resident (OR) in Italy will not be accredited as Civilian Component or Civilian Personnel. U.S. citizens ordinarily resident in Italy are not eligible to be hired in U.S. designated positions.

e. Individuals applying for continuation or renewal of Civilian Personnel accreditation may have their application revoked, or renewal denied, if they have taken action consistent with OR status.

f. Persons who depart Italy after becoming OR, with the intent to establish permanent residence elsewhere, may be considered for Civilian Component or Civilian Personnel accreditation only if the facts and circumstances clearly demonstrate that they departed Italy with

the intent to establish permanent residence outside of Italy. Persons who have departed and spent at least 1 year outside of Italy will be presumed to not be OR in Italy, unless the facts and circumstances demonstrate otherwise. USSSO retains ultimate discretion to determine whether extraordinary circumstances exist that affect OR status in Italy.

g. Members of the Civilian Component must have the following identifying documentation:

(1) A current no-fee or official passport containing a U.S. Government endorsement that the bearer is abroad on official U.S. Government business.

(2) An Italian Mission Visa in the official or no-fee passport. Italian regulations require that the Visa must be applied for from the person's home of record in the United States, or if serving outside the United States, from the Italian Embassy or Consulate closest to their place of residence; and

(3) A sojourn permit (*permesso di soggiorno*) endorsed for "*Missione – componente civile*," or language to that effect<sup>1</sup>. The *permesso di soggiorno* must be requested within eight days of arrival of the Civilian Component member in Italy, through the appropriate office on the military installation.

h. Dependents of active-duty military members, Civilian Component personnel, and Civilian Employees are authorized to be employed on U.S. Forces installations without modification of their passports, visas, and sojourn permits that may otherwise reflect a family member status. Such employment must terminate upon the sponsor's departure from Italy unless the dependent self-sponsors.

i. Persons who acquire Civilian Component status may become "ordinarily resident" and lose civilian component status if at any time they take action contrary to NATO SOFA status. Loss of Civilian Component status may result in termination of employment or failure to maintain eligibility requirements.

j. DoD ID cards will be issued to all members of the Civilian Component, qualifying Civilian Personnel, and their eligible dependents.

k. Base/installation Civilian Personnel offices will determine Civilian Component status, after consultation with their servicing legal office. The affected individual/employee may request review of a negative determination. A request for review must be submitted within ten working days to the cognizant Component Commander at the address indicated below via the civilian personnel office that rendered the initial determination. The Component Commander's decision is final. For record purposes and to ensure consistency across the services, decisions

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<sup>1</sup> Civilian Component members continuously employed prior to the implementation of the Italian visa requirement in 1999/2000. Such persons must possess a no fee/official U.S. passport described above; however, civilian component sojourn permits issued prior to the visa requirement reflect an endorsement of "*lavoro subordinato componente civile personale NATO*." Upon renewal, these older sojourn permits must reflect the mission language described above.

will be reported to the U.S. Sending State Office for Italy and to the Chair, Joint Civilian Personnel Committee - Italy.

(1) Army: Headquarters, U.S. Army Europe and Africa, Unit 29351, Box 100, APO AE 09014-9351 (military); Clay Kaserne, 65205 Wiesbaden, Germany (civilian).

(2) Navy: COMUSNAVEUR PSC 809, Box 70, FPO AE 09622-0070 (military); 81030 Gricignano di Aversa, Province of Caserta, Italy 81030 (civilian).

(3) Air Force: HQ USAFE/DPC, Unit 3050 Box 25, APO AE 09094-5025 (military); HQ USAFE/DPC, Bldg. 525 66877, Ramstein Air Base, Germany (civilian).

7. Solicitations and Contracts for Technical Representatives.

a. Consistent with individual component contracting procedures, solicitations shall:

(1) Identify contract work that the U.S. Government intends to be performed by Technical Representatives (TRs), identify the positions that would conduct that TR work, and specify that any contractor employees sent by the contractor to Italy for other than a temporary visit who have not received TR accreditation and a mission visa, will not be accredited as a TR.

(2) Identify applicable regulations and policies concerning Individual Logistic Support (ILS) and state what ILS privileges, if any, will be provided to accredited TRs. If the availability of ILS is unknown, the solicitation shall so state.

b. Contracts to be used in Italy shall, to the extent possible:

(1) Identify positions for which TR accreditation will be requested.

(2) Define whether ILS will be provided to contractor employees who are accredited as TRs.

(3) Identify any applicable service component regulations and policies limiting ILS.

(4) State that no equitable adjustment will be made for unavailability of ILS to any non-TR positions or personnel.

(5) Contain a clause requiring the DoD contractor to ensure that positions intended to be filled by TRs need to be identified as soon as possible following award, and prior to the contract's first use in Italy, in accordance with this guidance. The contract also shall specify that any employee sent by the contractor to Italy, for other than a temporary visit, who has not received TR accreditation and a mission visa, will not be accredited as a TR.

c. A service component or individual base commander may notify USSSO or the DoD Contractor Personnel Office (DOCPER) at any time regarding the extent of ILS to be granted to TRs under any specific contract or located on specific installations.

8. Accreditation Process for Technical Representatives.

a. General: TR accreditation is a two part-process, involving the Contracting Officer's Representative (COR), DOCPER, USSSO and the vendor/contractor. The first part of the process is contract approval; the second part is accreditation of individual applicants for TR status.

b. There are two categories of DoD contractor employees in Italy:

(1) Those who are accredited as TRs require a mission visa and sojourn permit (*permesso di soggiorno*). They are considered Civilian Personnel and are exempt from Italian income taxation, labor legislation and social contributions. Eligibility for accreditation for TRs generally is addressed above in paragraphs 5(b) and 6. TRs are eligible for ILS, as described in 6.b. above.

(2) Those who are employed under locally prevailing conditions of employment, and are not considered TRs, require Italian working visas. In addition, they are subject to Italian income taxation, labor legislation, and social contributions; and they are not eligible for individual and family ILS.

c. Dependents may apply for positions as Civilian Personnel (either as Essential Personnel or TRs). Their status as Civilian Personnel expires upon their sponsor's end of tour in Italy, the sponsor's retirement, or for any other reason whereby the sponsor no longer retains his/her status as a member of the military, Civilian Component or Civilian Personnel. However, dependents may transition from being a sponsored dependent to self-sponsorship as Civilian Personnel. This transition would require the dependent to obtain the appropriate passport and mission visa if not already in their possession.

d. Accreditations for TRs are required for contractor employees on any new contract that proposes the use of TRs in Italy. Accreditations for TR are also required for the addition of new TRs on existing contracts. Each contract requires that a COR act as the link between DOCPER and the vendor or applicant. To begin the process, the COR must provide DOCPER the COR designation memorandum for the contract at issue. Upon receipt of the COR-Designation memorandum, and a favorable review of the Contracting Action Submission Form, contract, and Performance Work Statement (PWS) or Statement of Work (SOW), the new record will be opened in the European Contractor Online Processing System (ECOPS), DOCPER's online processing system. The COR will be given access to DOCPER's online processing system. Contracts will be approved if the contract's Statement of Work (SOW), i.e., purpose of the contract, and the positions to be used in contract performance meet the requirements for TR accreditation. All contracts listed below are to be submitted through DOCPER's online processing system.

(1) New Contracts: A new contract is any contract, newly awarded or existing, that has not yet been used in Italy. Follow-on or successor contracts, even if awarded to the same company with the same SOW (SOW) and job descriptions (JDs), are new contracts.



(2) Existing Contracts: Contracts for which TRs currently are approved. TRs may be added when a TR contractor employee terminates, or in the case of changed contractual requirements (described below). In general, only the Application for Accreditation as a Technical Representative in Italy is required.

(a) Extensions: Contract documents that extend the length of a contract must be submitted before the expiration of the existing period of performance to renew TR status for the accredited contractor employee.

(b) Modifications: Contract documents that materially amend the terms of a contract must be submitted. These modifications usually consist of one or more of the following:

1. Change in SOW; and
2. Change in type or number of TR positions; and
3. Change of performance location; and
4. Extensions of the Period of Performance beyond the contract final end date
5. Change/Removal/ and/or addition of new CORs

e. Contracts that propose performance by a TR require two determinations before contractor employees can be accredited TR status in Italy:

(1) Whether the positions to be utilized in contract performance meet the definition of TR positions, and,

(2) Whether the persons proposed to fill the positions can be accredited as TRs, including determination of whether such persons are ordinarily resident in Italy.

f. For each contract that proposes to use TRs in Italy, the Contracting Officer or the COR shall submit to DOCPER a completed Contracting Action Submission Form, COR designation letter, PWS, and awarded signed contract. The Contracting Action Submission Form, in addition to other references, are provided through DOCPER's website at <https://www.europeafrica.army.mil/contractor/>. Among other items, the Contracting Action Submission Form requires the following information:

- (1) Contract Number;
- (2) Name of contractor;
- (3) Date of contract award;
- (4) Contract expiration date;

- (5) Expiration date of current period of performance;
  - (6) Proponent office in Italy (name, address, POC, etc.);
  - (7) COR (name, address, etc.);
  - (8) Summary of work to be performed by the contractor, and job descriptions for positions requiring the use of TRs;
  - (9) The provisions in the contract that provide for ILS; and
  - (10) Total number of employees in each job description to be employed.
- g. For each employee proposed as a TR, the Contracting Officer, or the COR, shall provide to DOCPER a completed Application for Accreditation, through DOCPER's online processing system, as a Technical Representative in Italy, and include the following information:
- (1) Identification of employee by full name, date of birth, place of birth, and social security number, identification of spouse and nationality, and date of birth and relationship of all dependents.
  - (2) Information for each contractor employee necessary to verify nationality and ordinarily resident status. In particular, the contractor employee should provide legible photocopies of the inside cover of the tourist passport and front page with the photograph, and any pages containing Italian Visa Stamp(s), including the mission visa. Additionally, the contractor will provide legible copies of any previous sojourn, or applications for a sojourn, if applicable;
  - (3) Information identifying the contract, the position under the contract for which the TR accreditation is sought, and the anticipated location and start date of employment;
  - (4) Résumé of contractor employee. (The résumé should show dates and locations for each position held for the previous 10 years);
  - (5) Signature of contractor employee attesting to the truth of the information provided, and acknowledging that abuse of NATO SOFA privileges may result in loss of TR accreditation and its' attendant privileges, and that the U.S. Government retains the right to withdraw privileges as a result of contractor employee abuse at no additional cost to the U.S. Government.
- h. DOCPER will process the Contract Registration and Application for Accreditation as a Technical Representative in Italy and provide its recommendations to USSSO within 5 working days of receipt of all required information. USSSO will typically provide an accreditation decision within 10 working days of receipt of DOCPER's recommendation.

9. Approvals and Denials for Technical Representatives.

a. Initial accreditations: USSSO will evaluate each request for accreditation, and as appropriate, issue an individual letter of accreditation for each contractor employee to be accredited as a TR under the Shell Agreement, or issue a letter of denial for each contractor employee ineligible for TR accreditation. USSSO and DOCPER will maintain copies of submissions and letters of accreditation and letters of denial issued.

(1) Individual letters of accreditation and corresponding DD 1172-2 forms will be issued for the length of the current period of performance for each contractor employee determined eligible for TR accreditation.

(2) ILS: ILS will be authorized for TRs if the contract provides for ILS. If the contract does not provide for ILS, or service component regulations and policies preclude granting of ILS, the accreditation documents will provide for TR accreditation without ILS.

(3) USSSO shall issue individual letters of denial for those deemed not to qualify for accreditation as TRs. Denial letters will indicate whether the denial is based on the position (as defined by the SOW and JD), the individual's qualifications, or that the individual is ordinarily resident in Italy.

(4) USSSO shall transmit accreditation and denial letters through DOCPER to the Contracting Officer or COR, who shall transmit the determinations to the DoD contractor.

b. Renewal accreditations: DOCPER will evaluate renewal requests for accreditation and verify the contract period of performance for each contractor employee for whom renewal of TR accreditation is requested.

(1) DOCPER will issue individual letters of renewal of accreditation, if appropriate. Individual letters of renewal of accreditation and corresponding DD 1172-2 forms will be issued for the length of the current period of performance for each contractor employee determined eligible for renewal of TR accreditation.

(2) USSSO shall issue individual letters of denial for those deemed not to qualify for renewal accreditation as TRs.

(3) Accreditation and denial letters shall be transmitted by DOCPER to the Contracting Officer or COR, who shall transmit the determinations to the DoD contractor.

c. Upon receipt of the letter of accreditation or denial, the Contracting Officer or COR will notify the contractor regarding the disposition of TR status for each contractor employee for whom TR accreditation has been requested.

10. Accreditation Procedures for Civilian Personnel other than Technical Representatives.

a. Individuals accredited as Civilian Personnel require mission visas and sojourn permits. They are exempt from Italian income taxation, labor legislation and social contributions. Eligibility for accreditation for Civilian Personnel generally is addressed above in paragraphs 5(b) and 6.

b. To obtain accreditation, the proponent office shall submit to DOCPER the Application for Accreditation as a Member of the Civilian Personnel in Italy for each individual for whom the proponent office seeks such status.

c. List of Essential Personnel: Proponent offices for the USO, credit unions, schools/universities (other than DoDEA schools) and the Red Cross will propose to USSSO Rome through DOCPER a listing of job descriptions and salary scales of positions deemed by the proponent agency to qualify as “essential personnel.” The proponent office will describe why each position is essential, and the number and locations of the personnel to be assigned to such positions in Italy. The USSSO will determine which positions are essential in light of references (a) and (b) and respond with a final approved list of essential personnel to the proponent office. Employees in positions that are not approved as “essential personnel” cannot be accredited as Civilian Personnel, or continue their current status, if currently holding accreditation as Civilian Personnel.

d. Information Required for Accreditation: The Proponent Office may designate a representative (Proponent Office Designee or POD) to work with DOCPER in the process of approving applicants for essential personnel positions. Upon nomination of the POD, DOCPER will provide the POD access to DOCPER’s online processing system. The proponent office will submit a completed Application for Accreditation as a Member of the Civilian Personnel in Italy for each individual proposed for Civilian Personnel status, and include the following information:

(1) Identification of employee by full name, date of birth, place of birth, and social security number; identification of spouse and nationality, and date of birth and relationship of all dependents;

(2) Information for each employee necessary to verify nationality and ordinarily resident status. In particular, the employee should provide photocopies of the inside cover of the tourist passport and front page with the photograph, and any pages containing Italian Visa Stamp(s). Provide copies of any previous sojourn or applications for a sojourn, if applicable;

(3) Information identifying the organization, and the position in the organization that the individual will be assigned to. For the USO, credit unions, schools and the Red Cross, the position must be on the USSSO-approved listing of “essential personnel”;

(4) Resume of the employee. (The resume should show dates and locations for each position held for previous 10 years);

(5) Signature of the employee attesting to the truth of the information provided and acknowledging that abuse of NATO SOFA privileges may result in loss of status and its attendant privileges, and that the U.S. Government retains the right to withdraw privileges as a result of employee abuse at no additional cost to the U.S. Government.

e. DOCPER will process applications and provide its' recommendations to USSSO within 5 working days of receipt of all required information.

11. Approvals and Denials for Civilian Personnel other than Technical Representatives.

a. Initial Accreditations: USSSO will evaluate each request for accreditation, and as appropriate, issue an individual letter of accreditation for each individual to be accredited as a member of the Civilian Personnel under the Shell Agreement, or issue a letter of denial for each employee ineligible for accreditation. Each newly-approved applicant receives the following three items of documentation, all of which can be downloaded from DOCPER's online processing system:

(1) Memorandum to the Italian Consulate (signed by the Officer-in-Charge or delegate of the USSSO), which authorizes the Italian consulate nearest to the applicant's home of record to place the "mission" visa in the applicant's passport [NOTE: Not necessary nor authorized for dependents of military or civilian personnel already in Italy];

(2) Individual letters of accreditation signed by DOCPER for presentation to the Sojourn Liaison office on base [NOTE: Not necessary, nor authorized, for dependents of military or civilian personnel already in Italy];

(3) DOCPER authorized DD 1172-2 form to present to the US Government ID card processing facility to receive the correct identification card, which may be issued for up to three years or date of passport expiration, whichever is less. [NOTE: Dependents of military or civilian personnel are authorized a computer-use-only CAC].

(a) MP-ICAM Requirement. In order for an ID card facility to issue a CAC to the applicant, the Mission Partner Affiliation Sponsor (MPAS) must have approved the applicant in MP-ICAM using the same "Eligibility Expiration Date" as the CAC expiration date that DOCPER provided in the DD 1172-2 (Block #33). If the same date is not used, the ID card facility will not issue the CAC.

b. USSSO and DOCPER will maintain copies of submissions and letters of accreditation and letters of denial issued.

c. Individual letters of accreditation and corresponding DD 1172-2 forms will be issued for up to three years.

d. USSSO shall issue individual letters of denial for those deemed not to qualify for status.

e. USSSO shall transmit accreditation and denial letters to the proponent office, who shall transmit such determinations to the applicant.

f. Renewal accreditations: DOCPER will evaluate renewal requests for accreditation. DOCPER will issue individual letters of renewal of accreditation, if appropriate. Approved renewal accreditations will receive the same three documents as the approved initial accreditations. Individual letters of renewal of accreditation and corresponding DD 1172-2 forms will be issued for up to three years for each employee determined eligible for renewal of accreditation.

g. USSSO shall issue individual letters of denial for those deemed not to qualify for renewal accreditation.

h. Accreditation and denial letters shall be transmitted to the proponent agency, who shall transmit the determinations to the applicant.

i. Reconsideration Process: If the proponent office disagrees with the determination of USSSO to deny accreditation, the proponent office may request that the USSSO reconsider its decision.

(1) In coordination with the Servicing SJA, the proponent office will prepare an appeal letter setting forth the basis for its disagreement with the decision. The letter must be signed by an O-6 or above, or civilian equivalent and provided to USSSO within 30 days of the date of the decision under appeal.

(2) USSSO may consult with the servicing SJA or the proponent office prior to reaching its decision.

(3) The reconsideration decision of USSSO is final.

## 12. Civilian Personnel Compliance with Italian Requirements.

a. All Civilian Personnel for whom accreditation is granted will apply for and obtain a mission visa prior to arrival in Italy. This visa can be obtained from the Italian Consulate authorized to issue the mission visa for the jurisdiction in which the individual resides. Any employee arriving in Italy without the mission visa does not have Civilian Personnel status and may not commence work without a proper work visa.

(1) By direction of the Italian Ministry of Foreign Affairs, no Italian Consulate may issue the mission visa to a Civilian Personnel employee without presentation to Consulate authorities of a letter of accreditation issued by USSSO. A Civilian Personnel employee who improperly obtains the mission visa will be denied accreditation.

(2) Within eight (8) days of arrival in Italy, Civilian Personnel employees will report to the servicing Staff Judge Advocate (SJA) and present (i) a copy of the letter of accreditation;

and, (ii) the original passport containing the mission visa issued by an Italian consulate. If in order, the individual must then apply through the appropriate installation office for a sojourn from the local *Questura*.

(3) Note that neither a work visa nor a mission visa is required for personnel who are in a temporary visit status (less than 90 days in the European Union).

b. ID Cards:

(1) The employee shall take the sojourn permit (or a copy of the application letter for the sojourn permit), passport, letter of accreditation as a member of the Civilian Personnel, and accompanying form DD 1172-2 to the ID card facility to receive the United States DoD/Uniformed Services Identification and Privilege Card [also known as the Common Access Card (CAC)].

(2) All ID card facilities for all components shall be instructed to issue no ID cards granting status unless the Civilian Personnel employee presents both a valid accreditation letter and an accompanying DD 1172-2 signed by DOCPER. For TRs, the DD 1172-2 will be issued only for the length of the current period of performance in the contract and must be the same as the period of performance specified in the Letter of Accreditation. For other Civilian Personnel, the DD 1172-2 will be issued for up to three years.

c. Initial accreditation letters: Valid only if signed by USSSO.

d. Renewal accreditation letters: Valid only if signed by USSSO or DOCPER.

e. Termination of Civilian Personnel Status:

(1) For TRs, the COR and the contractor program manager will ensure that contractor employees follow installation procedures for returning identification cards, sojourn, access passes, or other documents granting privileges upon termination or transfer out of Italy of any contractor employee who is accredited as a TR. In cases where a TR loses his or her TR accreditation, the COR will notify the contractor that the contractor employee is no longer accredited as a TR. As the mission visa only is intended for those contractor employees with TR accreditation, the contractor employee is responsible for obtaining documents that allow that employee to remain lawfully in Italy.

(2) For other Civilian Personnel, the proponent office or the sponsoring agency will ensure that Civilian Personnel under their sponsorship follow installation procedures for returning identification cards, sojourns, access passes, or other documents granting privileges upon termination or transfer out of Italy. An individual losing his or her accreditation is responsible for obtaining any documents needed to remain lawfully in Italy.

13. Comprehensive Review of Civilian Personnel.

a. DOCPER may conduct a Comprehensive Review (CR) of current Civilian Personnel to re-assess the status of all individuals currently accredited as Civilian Personnel as necessary.

b. Prior to conducting a CR, DOCPER will issue specific guidance regarding the information required, responsible parties, and deadlines. Failure to submit required information during a CR will result in termination of Civilian Personnel accreditation.



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