



CLARIFYING GUIDANCE ON U.S. CITIZENSHIP VERIFICATION

To ensure full compliance and maintain the integrity of the security clearance process, we are providing essential clarification for our industry partners regarding the verification of U.S. citizenship for applicants requiring access to classified information. Adherence to these procedures is required.

Core Requirement: Your FSO or an authorized representative must verify the U.S. citizenship of every applicant. This verification must be based on the list of acceptable documents outlined in [32 CFR 117.10\(c\)](#). To provide further clarity, please see the following guidance on specific documents and systems:

Document/System	Acceptable Proof for PCL Applicants?	Reason
Enhanced Driver's License (EDL)	No	An EDL is a secure document issued by certain border states that serves as proof of both identity and citizenship for specific land and sea border crossings. However, the EDL is not listed as an acceptable document in the NISPOM to corroborate U.S. citizenship for security clearance applicants.
Form I-551 (Green Card)	No	Though referenced in 32 CFR 117.10(c)(2)(ii), the Form I-551 (Permanent Resident Card or passport stamp) confirms that a person is a lawful permanent resident (green card holder) or conditional resident, not a U.S. citizen.
Standard REAL ID	No	A REAL ID confirms identity and lawful presence, but since non-citizens can obtain one, it does not corroborate U.S. citizenship.
DISS Verification	No	The Defense Information System for Security (DISS) is an internal government database and cannot be used as an official source to validate U.S. citizenship for security clearance applicants.

Mandatory In-Person Verification: It is crucial that applicants present either the **original documents or certified copies** for verification. To confirm the integrity of the documentation, the FSO or representative must view the documents in person.

- **Prohibited Methods:** Using email, video technology, or any other remote method to view citizenship is **not authorized**.

Using a Third Party for Verification: In cases where operational needs prevent your FSO or representative from conducting the verification in person, you may authorize a trusted third party.

- **Authorized Parties:** Examples include notaries, outside legal counsel, or other government representatives.
- **Written Procedures Required:** Before a third party can act on your behalf, your company must establish clear, written procedures. These procedures must ensure the third party is fully aware of their obligation to validate U.S. citizenship using only the authorized documents and must outline exactly how they will communicate the successful validation back to your FSO.

We encourage you to review and update your internal procedures to align with this guidance.