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# DoD 8140 Personnel Qualification Waiver Supplemental Information

## Prepared by the DoD CIO Workforce Innovation Directorate (WID) 03 June 2025

### Purpose

To issue supplemental guidance regarding DoD 8140 personnel qualification waiver eligibility in accordance with Department of Defense Manual (DoDM) 8140.03, “Cyberspace Workforce Qualification and Management Program” (Pub. 15 February 2023) for military and civilian personnel in positions that are assigned DoD Cyber Workforce Framework (DCWF) work role codes.

Components may further promulgate guidance to support DoD 8140 waiver implementation and guidelines provided by DoD Chief Information Officer (CIO).

### DoDM 8140.03 Policy

DoD military and civilian personnel must complete DoD 8140 foundational qualification requirements within nine (9) months of assignment to a DCWF cyberspace work role, and Component/organizational residential qualification requirements within twelve (12) months of assignment to a DCWF cyberspace work role.

For DoD cyber workforce personnel (i.e., military and civilian personnel in positions with DCWF primary and/or additional work role code(s) assigned) who may require a DoD 8140 qualification waiver, the governing policy is DoDM 8140.03, Section 4, paragraphs 4.2c. and 4.2d. on page 20 which specifies:

*“4.2c. OSD and DoD Component heads, or a delegated authority, may waive the qualification requirements for DoD civilian employees and Service members only under severe operational or personnel constraints.”*

*(1) OSD and DoD Component heads:*

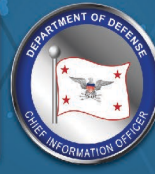
*(a) May delegate waiver authority, as appropriate, while retaining oversight of subordinate use of waiver authority.*

*(b) Will document, in a memorandum for the record, the justification for any granted waiver and the final plan to rectify the constraint.*

*(2) Waivers must include an expiration date, not to extend beyond 6 months, except in an emergency situation during a deployment to a combat environment. In this event, DoD civilian employees and Service members will make every attempt to achieve qualification without sacrifice to the mission requiring deployment. The 6-month waiver timeline will commence upon return from deployment, and the dates must be updated in all waiver documentation.*

*(3) Consecutive waivers for DoD civilian employees and Service members are not authorized. Waivers must be a management review item in accordance with DoDI 8500.01.*

*4.2d. OSD and DoD Components must track cyberspace workforce qualifications against positions with cyberspace work role requirements in accordance with DoDI 8140.02, “Identification, Tracking, and Reporting of Cyberspace Workforce Requirements” (Pub. 21 December 2021) and this issuance.*



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*(1) OSD and DoD civilian employees and Service members assigned to positions identified as requiring the performance of more than one cyberspace work role must achieve qualification requirements for each cyberspace work role, unless an OSD or DoD Component head or a designated authority issues a waiver.”*

### **Additional Guidance from DoD CIO**

Military service and federal civilian employment are governed by differing laws and regulations; civilians are also governed by human resources policies codified by the U.S. Office of Personnel Management (OPM). The following guidance considers typical absences by military and civilian personnel that would warrant DoD 8140 waiver eligibility to ensure that DoD cyber workforce members are not unduly impacted by situations practicably or legally considered to be outside of their control.

**The criteria below are not intended to be all inclusive;** Components should develop supplemental guidance and procedures in alignment with this policy and provide oversight of the waiver process to promote consistent application of policy and guidance across the workforce.

Components have the authority to approve waivers and the responsibility to document the justification for any waiver granted for DCWF work role qualification timelines, including plans to rectify constraints. DoD 8140 waiver eligibility related to DoD 8140 foundational & residential qualification timelines, in the cases of “severe operational or personnel constraints,” may include the following:

#### ➤ **Severe Operational Constraints**

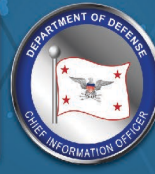
- Unscheduled telework, leave, or weather/safety emergencies
  - Examples: If an agency announces unscheduled telework or an unforeseen operating status that would prevent the employee from working in-person, if an employee cannot report to work due to unforeseen circumstances, or if the work environment is unsafe and prevented the employee from performing work due at the approved location due to unexpected/severe weather conditions or an emergency condition. Components are delegated the authority to exercise discretion for determining impacts to qualification timelines.
- A special detail directed by the DoD Component’s commanding officer or official less than 120 days
  - Examples: A short-term, temporary assignment of an employee to a different position or DCWF work role within or outside the DoD Component, to support a specific, assignment, project or task.
  - A special detail’s purpose would include: Handling crises or unexpected events, coping with unexpected increases in workload, covering vacancies or filling specific skill gaps, participation in short-term projects or studies, gaining experience in a different area or skill, or adapting to temporary changes in the agencies structure.
- Deployment to a combat environment
- Long-term temporary duty (TDY) (over 30 days)

*If these constraints affect groups of personnel, then all personnel in the group may be eligible for a waiver eligibility.*

#### ➤ **Personnel Constraints**

*Extended special leave and absences generally exceeding one month, excluding routine or regularly scheduled leave or time off, may warrant a waiver. Examples include:*

- sick/convalescent leave



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- authorized leave (pay & non-pay status) for legal matters
- parental/adoption leave
- jury duty
- any leave covered under Family and Medical Leave Act (FMLA)
- Human Resource (HR) approved reasonable accommodation
- Administrative matters beyond an employee's control (e.g., funding or scheduling issues). For service members specifically awaiting military schoolhouse training availability, Components may grant additional time.
- *Does not include regular leave or time off.*

### **DoD 8140 Waiver Tracking & Reporting**

Components will compile, adjudicate, track, and retain all supporting waiver documentation.

The DoD CIO Workforce Innovation Directorate (WID) may request waiver documentation to support program implementation and auditing efforts. DoD 8140 policy requires tracking and reporting of DCWF coded positions and the qualification status of the military and civilian incumbents of the positions.

To facilitate DoD-wide reporting, DoD CIO WID Analytics will collect waiver data for compliance purposes via an Excel file submitted from each Component cyber workforce program manager starting FY26 via "DoD SAFE" or other secure mechanism. If you are not sure who to route your waiver data to, please coordinate with your cyber workforce program manager or email DoD CIO WID Analytics at the following address:

*osd.mc-alex.dod-cio.mbx.cyberspace-workforce-tag@mail.mil*

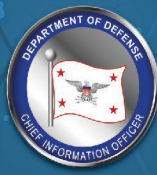
### **DoD 8140 Waiver Required Data Fields**

The following data fields *must* be included in all DoD 8140 waiver reporting activities. *No other detailed waiver information, such as Personally Identifiable Information (PII) or Protected Health Information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA), will be collected by DoD.*

- Component
- Org/Unit Identification Code
- DoD ID Number (EDIPI)
  - *The DoD identification number, formerly referred to as the Electronic Data Interchange Personal Identifier (EDIPI), is a unique 10-digit number that is associated with each person and their Common Access Card (CAC).*
- Work Role(s) & associated Proficiency Level(s) being waived (Primary & Additional)
- Revised/extended Qualification date (numeric MM-DD-YEAR)

### **Additional Notes To Remember**

- DoD 8140 waivers may be granted for any DCWF work role (i.e., primary or additional) that is assigned to the encumbered position.
- DoD 8140 waivers may be used and managed by the DoD Component for any duration, up to six (6) months.
- All DoD 8140 waivers must include an expiration date, not to extend six months.
  - This limitation does not apply to service members who are unable to satisfy the requirement due to training availability or scheduling; consecutive waivers may be granted in these cases.



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- DoD 8140 qualification timeline will commence or re-commence upon return from deployment or at the end of the “special absence” period.
  - DoD 8140 qualification timelines before and after the special absence may be considered.
- DoD 8140 waiver documentation must include new qualification compliance dates in the employee’s record.
- DoD 8140 waivers should be carefully managed for personnel in a probationary status.
- DoD 8140 Waiver Required Data Fields will be visible and tracked in DoD’s *Advana* advanced analytics and data visualization platform for reporting to DoD senior leadership, the Cyber Workforce Management Board, and Congress, when required.
- Per DoDM 8140.03, “Waivers must be a management review item in accordance with DoDI 8500.01, “Cybersecurity” (Pub. 14 March 2014). DoDI 8500.01 addresses Cybersecurity inspections, assessments, and reviews for all DoD organizations.

### Sample Scenarios

**Parental Leave/FMLA:** A civilian employee is working towards a DoD 8140 foundational qualification option through a commercial certification process and is four months into the nine-month timeline. Prior to completing certification requirements (e.g., training, examination) the employee is approved for parental leave. In this case, the qualification timeline is “paused” during the parental leave, and the employee still has five months upon return for qualification (for the nine-month timeline). Due to the timing of the leave and its effect on training and examination availability, a waiver/extension may be granted per Component approval that extends the nine-month timeline for an additional period, not to exceed six months, for obtainment of certification.

**Military Training Availability:** A service member has received orders to attend a military schoolhouse training, which begins (12) months after the service member is coded to the DCWF work role. In this case, a DoD 8140 waiver may be granted beyond six (6) months due to this training scheduling constraint, which is beyond the control of the Component. While waiting to attend the training, the twelve (12) months would not negatively count against the service member’s qualification timeline.

### DoD 8140 Helpdesk

If you have additional questions, please connect with your DoD cyber workforce supervisor, and then connect with one of the mailboxes below.

#### **Army:**

(CIO Policy) [usarmy.pentagon.hqda-cio.mbx.policy-inbox@army.mil](mailto:usarmy.pentagon.hqda-cio.mbx.policy-inbox@army.mil)  
(CIO SAIS-CSP Policy) [usarmy.pentagon.hqda-cio.mbx.sais-csp@army.mil](mailto:usarmy.pentagon.hqda-cio.mbx.sais-csp@army.mil)  
(DCS, G6) [usarmy.belvoir.hqda-cio.mbx.training-and-certification@army.mil](mailto:usarmy.belvoir.hqda-cio.mbx.training-and-certification@army.mil)

#### **Navy:**

[NavyCWF@us.navy.mil](mailto:NavyCWF@us.navy.mil)

#### **Marine Corps:**

[IDI\\_Team@usmc.mil](mailto:IDI_Team@usmc.mil)

#### **Air Force:**

(Military) [USAF\\_17X\\_Career\\_Field\\_Manager@us.af.mil](mailto:USAF_17X_Career_Field_Manager@us.af.mil)  
(Civilians) [SAF.CNSF.Workflow@us.af.mil](mailto:SAF.CNSF.Workflow@us.af.mil)

#### **4<sup>th</sup> Estate:**

[osd.mc-alex.dod-cio.mbx.cyberspace-workforce-tag@mail.mil](mailto:osd.mc-alex.dod-cio.mbx.cyberspace-workforce-tag@mail.mil)