



DoD 8140

Module 4: DoD 8140 Personnel Qualification Waiver Supplemental Information



Figure 1: DoD 8140 Seal

Module 4 Overview: This module describes supplemental guidance regarding Department of Defense (DoD) 8140 personnel qualification waiver eligibility in accordance with DoD Manual (DoDM) 8140.03, “Cyberspace Workforce Qualification and Management Program” (February 15, 2023) for military and civilian personnel in positions that are assigned DoD Cyber Workforce Framework (DCWF) work role codes. DoW Components may further promulgate guidance to support DoD 8140 waiver implementation and guidelines provided by the Department of War (DoW) Chief Information Officer (CIO).

DoDM 8140.03 Policy Waiver Language: DoDM 8140.03 Section 4, paragraphs 4.2c. and 4.2d. on page 20, 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.



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(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, “Cybersecurity” (Incorporating Change 1, October 7, 2019).

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” (December 21, 2021) and this issuance.*

(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 DoW CIO: DoW military and civilian employment are governed by differing laws and regulations, including human resources policies codified by the U.S. Office of Personnel Management for DoW civilians. The following guidance considers typical absences by military and civilian personnel that would warrant DoD 8140 waiver eligibility to ensure that DoW 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; DoW Components should develop supplemental guidance and procedures in alignment with DoD 8140 policy and provide oversight of the waiver process to promote consistent application and guidance across the organization.

DoW 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:

- ✓ Administrative matters beyond an employee’s control (e.g., technical, funding or scheduling issues)
- ✓ 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 prevents the employee from performing work at the approved location due to unexpected or severe weather conditions or an emergency condition.



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- ✓ A special detail directed by the DoW Component's commanding officer or official less than 120 days
 - Examples: A short-term, temporary assignment or detail of an employee to a different position or DCWF work role within or outside the DoW Component, to support a specific, assignment, project or task. A short-term, temporary assignment or detail's purpose may 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 DoW Component's structure.
- ✓ Deployment to a combat environment
- ✓ Long-term temporary duty (TDY) over 30 days

Personnel Constraints:

- ✓ Extended special leave and absences generally exceeding one month
 - Examples: Sick/convalescent leave; authorized leave (pay & non-pay status) for legal matters; parental/adoption leave; jury duty; any leave covered under the Family and Medical Leave Act (FMLA); human resource approved reasonable accommodation.
- ✓ For military personnel awaiting military schoolhouse training availability, DoW Components may grant additional time.

DoD 8140 Waiver Tracking & Reporting: DoW Components will compile, adjudicate, track, and retain all supporting waiver documentation. The DoW CIO may request waiver documentation to support DoD 8140 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 DoW-wide reporting, DoW CIO WID Analytics will collect waiver data for compliance purposes via an Excel file submitted from each DoW Component cyber workforce program manager starting fiscal year 2026 (FY26) via "DoD SAFE" or other secure mechanism. If you are not sure who to route your waiver data to, please coordinate with your DoW cyber workforce program manager or email DoW CIO WID Analytics at the following address: osd.mc-alex.dod-cio.mbx.cyberspace-workforce-tag@mail.mil



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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 the DoW.

- ✓ Component
- ✓ Org/Unit Identification Code
- ✓ DoW ID Number (EDIPI); the DoW 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).
- ✓ DCWF work role(s) & associated proficiency level(s) being waived (i.e., primary & additional)
- ✓ Revised/extended qualification date (numeric MM-DD-YEAR)

Additional Notes To Remember:

- If the constraints listed above affect groups of personnel, then all personnel in the group may be eligible for a DoD 8140 waiver.
- Regularly scheduled or routine leave or time off is **not** included as DoD 8140 waiver eligibility criteria.
- DoD 8140 waivers may be granted for any DCWF work role (i.e., primary or additional) at any proficiency level (i.e., basic, intermediate, or advanced) that is assigned to the encumbered position.
- DoD 8140 waivers may be used and managed by the DoW Component for any duration, up to six months.
- All DoD 8140 waivers must include an expiration date, not to extend six months. This limitation does not apply to military personnel who are unable to satisfy the requirement due to training availability or scheduling; consecutive waivers may be granted in these cases.
- DoD 8140 qualification timelines 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 DoW’s Advana advanced analytics and data visualization platform for reporting to DoW senior leadership, the DoW Cyber Workforce Management Board (CWMB), and Congress, when required.



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Sample Scenarios:

Parental Leave/FMLA: A civilian employee is working towards a DoD 8140 foundational qualification option through a commercial certification process and is eight months into the nine-month timeline. Prior to completing the 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 one month upon return to complete DoD 8140 foundational qualification requirements. Towards the end of the initial nine-month qualification timeline after the employee has returned, the employee experiences an unforeseen certification assessment scheduling issue, and the employee is unable to reserve the certification assessment until twelve months into initial DCWF work role assignment. In this case, a DoD 8140 waiver may be introduced by the DoW Component to provide the employee up to an additional six months to schedule and complete the certification assessment.

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