



Continuous Vetting for Non-Sensitive Public Trust Positions

Overview and Frequently Asked Questions (FAQs)

Full enrollment of the non-sensitive public trust population into continuous vetting (CV) is planned to begin in Fiscal Year (FY) 2024. At this time, Federal agencies should begin considering how they will operationalize CV for this population, which would include, but is not limited to, tracking the population for enrollment, managing enrollment requirements, and managing CV alerts. Agencies should work closely with their authorized investigative service provider (ISP) as they prepare implementation plans. Enrollment will proceed iteratively, with a goal of enrolling 100% of this population into an initial capability in FY 2024.

Which individuals in the non-sensitive public trust population are covered by the requirements for CV enrollment, i.e., Federal employees, contractors, etc.?

In accordance with Executive Order (E.O.) 13467, as amended, continuous vetting will apply to all individuals who perform work for or on behalf of the Executive Branch, with few exceptions. This means for individuals in non-sensitive positions with risk designations of either moderate- or high-risk, the requirement to enroll individuals in CV will apply not only to Federal employees in the competitive service, but also to those in the excepted service, contractor employees, Department of Defense non-appropriated fund employees, and other individuals covered by the E.O. This is reinforced by the 2012 Federal Investigative Standards, which already also require reinvestigations for individuals in the excepted service and contractor employees.

How will enrollment in CV impact requirements for periodic reinvestigations for the non-sensitive public trust population?

Enrollment in CV will replace the requirement for periodic reinvestigations for this population. Once an individual is enrolled in CV, there will be no further requirement for a periodic reinvestigation.

What form will be required to support enrollment for the non-sensitive public trust population?

To be eligible for enrollment in CV, individuals will need a Standard Form 85P (SF-85P) 2017 version or later. The SF-85P must be completed within the last five years. For individuals who may have come onboard in a non-sensitive public trust position based on the reciprocal acceptance of a prior investigation and adjudication completed with a Standard Form 86 (SF-86), if the SF-86 completed is the 2010 version or later and was completed within the last 5 years, that form may be used for enrollment.

Do individuals with an older version of the SF-85P need to complete an entirely new form, or will a newer version of the release suffice?

Individuals who have not completed the 2017 or later version of the SF 85P, or 2010 or later version of the SF 86, within the last five years must complete a new form.

Should Agencies begin collecting any required updated forms now, or should they wait until they are ready to begin enrollment?

Agencies should delay collecting new SF-85P forms for those needing to be updated as necessary to ensure the form submission does not time-out while waiting for CV enrollment. Agencies should work with their ISP on collection of the new form.

Once an individual is enrolled in CV, how often do they need to complete a new form or personnel vetting questionnaire (PVQ)?

Until technology can support near real-time self-reporting data and annual updates such as through an Annual Vetting Appraisal (AVA) or other capability, agencies will ensure individuals provide an updated SF-85P or applicable PVQ parts, once implemented, every five years.

What should agencies do if they discover derogatory information when collecting an updated form for CV enrollment?

If an individual's SF-85P includes derogatory or adjudicatively relevant information, the agency will coordinate with their ISP on the appropriate issue resolution, as addressed in the Federal Investigative Standards or Federal Personnel Vetting Investigative Standards, as pertinent, and enroll the individual into CV.

Will there be an agency-managed option for enrollment of the non-sensitive public trust population?

No, agencies must use a capability authorized by the Suitability, Credentialing, and Security Executive Agents and provided by an authorized ISP. Agencies that are authorized ISPs are permitted to obtain capabilities from another authorized ISP as an alternative to building their own capabilities.

How should agencies handle issue resolution for CV alerts?

Agencies will handle issue resolution in response to CV alerts much the same way as derogatory information discovered during a periodic reinvestigation is handled today. Any result from a continuous vetting alert that meets the requirement for expansion in Appendix I of the Federal Personnel Vetting Investigative Standards (or 2012 Federal Investigative Standards until the new standards are implemented) will require the agency to request their ISP to conduct the required investigative actions. The agency will review the investigative results and make a suitability determination in accordance with title 5, Code of Federal Regulations part 731 (5 CFR 731). When the agency is not able to make a favorable trust determination, it will consider the appropriate next steps (i.e., suitability action, adverse actions, etc.) and update the appropriate government-wide

repositories, as applicable. If information is developed that an individual may present a risk or imminent threat to people, property, information, or mission, the ISP or agency must immediately notify the appropriate authorities of the relevant concerns, in accordance with Privacy Act requirements. Agencies must also consider any impact the information may have on the individual's eligibility for a personal identity verification (PIV) credential in accordance with the [Credentialing Standards Procedures for Issuing Personal Identity Verification Cards under HSPD-12 and New Suspension Requirement for Suspension or Revocation of Eligibility for Personal Identity Verification Credentials](#).

What should agencies tell their non-sensitive public trust workforce about CV enrollment?

Agencies should notify their workforce of CV enrollment in accordance with D/A requirements, to include any required notifications to labor unions. D/As may use the following language as examples for responding to questions from their workforce:

What is continuous vetting?

The term "continuous vetting" means reviewing the background of an individual at any time during their affiliation with the Government to determine whether they continue to meet applicable trust determination requirements. In 2017, the President issued Executive Order 13764 directing reforms of the Executive Branch personnel vetting program, including mandating the use of continuous vetting for anyone working for or on behalf of the Government.

What are the advantages of continuous vetting?

The implementation of continuous vetting benefits both the Government and the trusted workforce. Specifically, continuous vetting:

- Reduces the amount of work and time needed when an individual moves to a new position that requires a higher level of trust, transfers to a new organization, or returns to Government work after being away.
- May provide the opportunity to offer support to an individual who is experiencing a problem through early detection and proactive support before the problem escalates.
- Better protects our Nation's people, property, information, and mission by proactively identifying and managing risk.

How does continuous vetting work?

Through continuous vetting, agencies gather information from a number of information sources including:

- Automated record checks of government and commercial databases.
- Information maintained locally by the individual's agency such as Human Resources reports, Insider Threat program data, security violations, and information of concern reported to the agency directly by the individual.

- Investigative work is conducted at certain time intervals or in response to certain life events. Such work might include interviews of work or personal references, interviews with the individual being vetted, or other investigative work depending on the circumstances.
- If concerning information is found, that information is assessed to determine if it is accurate, relevant, timely, and adjudicated. The near real-time identification of potential concerns will often allow the agency to work with the individual to address the issue, as appropriate, (e.g., Employee Assistance Programs, if applicable) and reduce the risk to the people, property, information, and mission.