

# **Continuous Vetting Enrollment for Non-Sensitive Public Trust (NSPT) Job Aid**

## ***Continuous Vetting for NSPT***

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Trust in public service positions requires ongoing attention, not just at the time of a background investigation. Traditionally, individuals in NSPT positions were reinvestigated every five years. Continuous Vetting (CV) changes that approach by using near real-time information to provide ongoing insight into workforce behavior and promote earlier detection and mitigation of potential risk to people, property, information, and mission.

### **Defense Counterintelligence and Security Agency (DCSA) Expands CV Enrollment to NSPT Population**

CV for the NSPT population is being implemented in phases as part of the Trusted Workforce (TW) 2.0 modernization effort. DCSA began the phased rollout in August 2024. By October 2026, all NSPT personnel must be enrolled in the TW 1.5 CV capability. The broader TW 2.0 transition is expected to be complete across the Federal workforce by Fiscal Year 2028.

### **Managing CV – Agency’s Role**

Each Agency must designate responsibility for overseeing CV activities. This ensures there is clear accountability for managing the process. Listed below are some of the key responsibilities.

#### ***Enrolling Individuals in CV***

Once an Agency makes a favorable trust determination, the individual must be enrolled in CV. Under the Federal Personnel Vetting Management Standards (PVMS), each individual is enrolled only once, with the Agency holding the primary affiliation responsible for maintaining that enrollment. Agencies must verify the individual has completed the appropriate investigative questionnaire (i.e., the 2017 or later version of the SF85P or the 2010 or later version of the SF86) within the last five years. If not, a new form is required before enrollment. Once enrolled in TW 1.25 CV, periodic reinvestigations are no longer required.

#### **Resources/Guidance**

For more detailed guidance on CV requirements for the NSPT population, refer to:

- Title 5, Code of Federal Regulations (CFR) Part 731, Suitability and Fitness
- OPM and ODNI Joint Memorandum, “Trusted Workforce 2.0 Implementation and Operational-Level Guidance for Departments and Agencies and Authorized Investigative Service Providers – Continuous Vetting for Non-Sensitive Public Trust Positions” Version 2, June 2025.

- Trusted Workforce 2.0 Implementation Strategy, Appendices, and Quarterly Reports on Max.Gov.
- Your Agency's internal policies and procedures.

### ***Reporting Requirements for Transitional States of CV for NSPT***

Under the PVMS, Agencies must maintain a CV reporting program. Until the Individual Engagement Platform (IEP) is available to support self-reporting for the NSPT population, individuals are not required to self-report beyond submitting an updated investigative form every five years.

#### **Resources/Guidance**

For additional guidance on maintaining a reporting program for CV of the trusted workforce, refer to:

- The Federal Personnel Vetting Management Standards, Appendix C: Reporting Requirements for the Continuous Vetting of the Trusted Workforce. Appendix C identifies the minimum reporting requirements for each population, based on risk level and national security sensitivity.

For NSPT specific guidance, refer to:

- Suitability Executive Agent Notice 25-02, or its successor.

### ***Reviewing, Evaluating, and Responding to CV Alerts***

Reportable information may come from external data providers or internal sources, such as self-reporting, which may result in a CV alert. Agencies must promptly review every alert to determine its impact on an individual's continued suitability or fitness, make an agency determination or referral to OPM for suitability action, and refer the individual to applicable services/resources, as needed. If additional investigation is required, the Investigation Service Provider (ISP) (e.g. DCSA Background Investigation [BI]) conducts the background investigation, and the results are sent to the adjudicative authority (e.g. DCSA Trust Decision (Adjudications) [TD(A)]) to make a trust determination.

#### **Resources/Guidance**

For additional details regarding CV alerts for the NSPT population, refer to 5 CFR Part 731 and your Agency's policies and procedures.

### ***Communicating CV to the NSPT Workforce***

Agencies should notify their workforce of CV enrollment in accordance with Agency requirements, including any notifications required for labor unions.

**Resources/Guidance**

To help explain CV to the workforce, Agencies can refer to the Continuous Vetting for Non-Sensitive Public Trust Positions Frequently Asked Questions (FAQ) available on OPM.gov. This resource includes sample language that explains what CV is, how it works, and its benefits.