

Federal Personnel Vetting Scenarios Short Student Guide

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Center for Development of Security Excellence

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Welcome

The Federal government has initiated a new approach to personnel vetting in making trust determinations for national security, suitability and fitness for employment, and credentialing for logical and physical access to federal systems and facilities. This Short will provide an overview of changes to personnel vetting, introduce the new investigative model, and outline the five personnel vetting scenarios under Trusted Workforce 2.0.

At the conclusion of this Short, you will be able to determine the applicable personnel vetting scenario and aligned investigative tier under Trusted Workforce 2.0 for a subject undergoing personnel vetting.

Learning Outcome—

- Given details of a subject of Federal Personnel Vetting, determine the applicable Personnel Vetting scenario and aligned investigative tier under Trusted Workforce 2.0

Details

- Estimated completion: 20 minutes
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Introduction

Narrator: It looks like you're getting an incoming call from your supervisor.

Supervisor: Congratulations on the promotion, and welcome to your first day as our agency's new personnel security manager! We're so glad to have you on board, with Trusted Workforce 2.0 finally arriving.

[new email chime]

I'm sending you some materials so you can get familiar with the new process. You'll find folders of some personnel vetting subjects on your desk, and at the end of the day, I'd like your help figuring out next steps for each of them.

Personnel Vetting & Trusted Workforce 2.0

Narrator: Your supervisor just sent you an email with several Trusted Workforce 2.0 Resources.

Supervisor email

From: Supervisor

To: You

Subject: Trusted Workforce 2.0 Resources

Welcome aboard! Here are some resources about Trusted Workforce 2.0. I'm counting on you to read up on it and help us figure out how to handle some personnel vetting subjects.

✓ [Video: Trusted Workforce 2.0 Overview](#)

- ✓ *Webpage: Trust Determinations*
- ✓ *Job Aid: Investigative Tiers*

Trusted Workforce 2.0 Overview

Trusted Workforce 2.0 is a comprehensive reform of personnel vetting to better support departments' and agencies' missions in order to reduce the timeframe required to onboard new hires, enable mobility of the federal workforce, and improve insight into workforce behaviors to ensure the protection of people, property, information, and mission.

Trusted Workforce 2.0 fundamentally redefines how the government evaluates trustworthiness and provides new Federal Personnel Vetting Investigative Standards. These standards are aligned with and supportive of the Federal Government's broader efforts to recruit and retain a diverse and talented workforce.

The goals of Trusted Workforce 2.0 are to modernize the vetting process to:

- improve efficiency,
- employ more advanced capabilities and technology, with better insight into behavioral modeling, throughout the vetting process, and
- provide for more effective governance.

The Vetting Process: Then & Now

Personnel vetting and trust determinations are not new, of course, and while the personnel vetting process is changing significantly under Trusted Workforce 2.0, fundamental concepts remain the same. The concepts of investigation, adjudication, continuous evaluation, and reciprocity all still exist, and as in the past, the personnel vetting process applies to three main categories of trust determinations:

- national security determinations,
- suitability and fitness determinations, and
- HSPD-12, or Common Access Card or CAC credentialing, determinations.

However, terminology and processes have been updated to enhance each stage of the personnel vetting life cycle. Notably, the investigative model has been streamlined from five to three investigative tiers; the personnel vetting life cycle has been updated to outline five vetting scenarios, following a subject entering an agency position, through various career moves and life changes, and exiting service; and there are new Federal investigative standards that define information types and attributes better aligned to the adjudicative guidelines.

Types of Trust Determinations	Definition
National Security Determinations	National security adjudication is a personnel vetting process that seeks reasonable assurance that persons granted access to classified information, or who hold sensitive positions, are loyal, trustworthy, and reliable. National security adjudications take into account a person's stability, trustworthiness, reliability, discretion, character, honesty, and judgment.
Suitability/Fitness Determinations	Suitability vetting determines whether individuals are appropriate for employment within the Federal Government, identifiable character traits and conduct that indicate ability to carry out the duties of a federal job with integrity, efficiency, and effectiveness. Fitness determinations ensure that individuals working in excepted service positions, non-appropriated fund (NAF) positions, or as defense contractors are suitable to hold those positions.
HSPD-12/CAC Credentialing/ Access Determinations	Homeland Security Presidential Directive 12 or HSPD-12 adjudications determine who may receive credentials for physical access to federal-controlled facilities or access to federal-controlled information systems, also referred to as "logical" access. The primary purpose of HSPD-12 vetting is to ensure that individuals are not known or suspected terrorists, do not provide an avenue for terrorism, and do not pose an unacceptable risk to employees or assets.

Investigative Tiers

Whereas in the past, the personnel vetting investigative model consisted of five tiers, Federal personnel vetting is now divided into three aligned investigative tiers to support trust determinations for national security, suitability and fitness, and credentialing.

Low Tier, or LT, is for low-risk, non-sensitive positions. This is the minimum investigation level for granting physical and/or logical access to facilities and making CAC credentialing determinations.

Moderate Tier, or MT, is for moderate-risk public trust and/or noncritical-sensitive positions. Eligibility and access to Confidential or Secret classified information, or L access, all align to this tier.

High Tier, or HT, is for high-risk public trust and/or critical sensitive or special sensitive positions. This tier includes eligibility and access to Top Secret classified information, Sensitive Compartmented Information, or Q access.

Each investigative tier builds upon the tier below it, with a mix of information categories and data sources that vary in complexity, coverage, and methodology commensurate with the increased risk at each investigative tier level.

Take a look at three of your subjects to see how to apply the investigative model.

Ram needs facility access to perform building maintenance and must receive an HSPD-12 credentialing determination, which requires a Low Tier investigation.

Cindy's job duties require that she have access to Secret information. She will undergo an investigation at the Moderate Tier.

Ming requires access to Top Secret information as part of her job responsibilities. She will undergo a High Tier investigation.

Review the Personnel Vetting Federal Investigative Standards Crosswalk Job Aid for a summary of how the old and new investigative tiers align.

Vetting Scenarios

There are five personnel vetting scenarios depending on the mission need, the relevant circumstances of the individual being vetted, the duties and responsibilities of the position, and the management of human risk. Let's take a look at some subjects of personnel vetting to better understand how personnel vetting scenarios apply. These subjects are all in different phases of their employment life cycle and are undergoing different personnel vetting scenarios.

One subject has just started his position and is undergoing initial vetting to establish trust with the agency. Another has a current trust determination and is subject to continuous vetting to maintain her clearance. A third has received a promotion; his new position will require an upgrade to his current trust determination. Our next subject has just been hired from a different agency and will need a transfer of trust determination. And finally, we will examine a subject who has left the agency a year ago but has just been re-hired, so will need to re-establish trust.

It is important to note that individuals moving to a position requiring a higher-tier investigation to receive an upgrade, transferring to another agency, or requiring a re-establishment of trust after a break in service only receive the required personnel vetting necessary to meet the additional needs of the new position and address any new information.

Initial Vetting

Remember Ram from our exploration of investigative tiers? We learned he will require a Low Tier investigation for an HSPD-12 credentialing. Now how do you determine which vetting scenario applies?

Ram has just started his position and has not undergone any personnel vetting in the past. As a result, he will undergo initial vetting. Initial vetting is

the collection of information needed to assess whether an individual is trusted to protect people, property, information, and mission, with the goal of

establishing trust with the agency.

Initial vetting takes place when a subject is first assigned to a position of trust, usually upon beginning employment.

The level of initial vetting is based on the investigative tier for the position designation.

This vetting scenario is commonly referred to as establishing trust.

Continuous Vetting

You met Cindy during our exploration of investigative tiers. She requires Moderate Tier vetting for access to Secret information as part of her job duties.

Cindy has a current trust determination with the agency and needs vetting that will allow her to maintain her Secret level access. She is subject to continuous vetting, which is the vetting of trusted insiders to maintain the Federal Government's confidence that the individual will continue to protect people, property, information, and mission.

Continuous vetting occurs on an on-going basis, with automated data source checks and investigative activities at intervals determined by the investigative tier for the position designation.

The level of continuous vetting will vary in terms of required coverage and periodicity for the position designation, as well as triggered events.

Implementation of continuous vetting replaces periodic reinvestigations completely; however, periodic completion of investigation forms still occurs, and additional investigations may be triggered by the results of continuous vetting.

Upgrade

José is a current agency employee with a current trust determination for a Moderate Risk public trust position, requiring Moderate Tier vetting.

José recently received a promotion to a High Risk Public Trust position, necessitating an upgrade to his trust determination. An upgrade is the additional personnel vetting required for individuals changing positions or assuming new responsibilities that require investigation at a higher tier.

Upgrades occur when a subject has undergone an initial trust determination, been enrolled in compliant continuous vetting, and moves to a new position requiring a higher-level investigation.

Remember, the level of additional personnel vetting needed is based on that required to meet the new investigative tier, not a full vetting at the new tier.

Transfer of Trust

Let's take another look at Ming, who requires access to Top Secret information as part of her job duties, has undergone a High Tier investigation, and holds a current trust determination at that level.

Ming is now moving to a position at a different agency that also requires Top Secret access. In this case, vetting is required to transfer trust from one agency to another. A transfer of trust is the acknowledgment and acceptance of a previous background investigation or continuous vetting activities by an authorized investigative service provider by the new agency.

Transfers of trust take place when an individual moves from one agency to another, with the goal of enhancing mobility of the trusted workforce.

Agencies must accept a favorable determination from another agency, if it is for the same type of trust determination, that is national security, suitability, or credentialing, and at the appropriate level for the new position.

A transfer of trust is commonly referred to as reciprocity.

Re-establishment of Trust

Let's meet Monique, a former agency employee who previously underwent vetting at the Moderate Tier.

She stopped performing work for or on behalf of the Federal Government for a year and is now returning to a new position at the same position designation as she held previously. Her return to service requires that she re-establish trust with the agency. Re-establishment of trust is the additional personnel vetting required for a former trusted insider who stops performing work for or on behalf of the Federal Government for a period of time, and then seeks to return to perform work for or on behalf of the Federal Government.

The degree of personnel vetting required should be tailored to address new position designation, length of time individual was not affiliated with the Government, and the individual's prior personnel vetting record.

The goal of re-establishment of trust is to eliminate redundant personnel vetting actions and remove impediments to the re-entry and on-boarding of former trusted insiders by only performing necessary personnel vetting.

Information Types & Categories

The Federal Personnel Vetting process employs an investigative model aligned to attributes and information types relevant to trust determinations across vetting scenarios, which guide the collection of relevant information through various information categories, as defined in the Federal Personnel Vetting Investigative Standards. These attributes and information categories are aligned with existing adjudicative guidelines for each type of trust determination.

Throughout the adjudication, the whole person concept, considering favorable and unfavorable information, from both the past and present, still applies.

Select Attributes & Information Types and Information Categories to learn more.

Attributes & Information Types

Department and agency trust determinations are based upon four categories of adjudicatively relevant attributes, including whether an individual:

- Demonstrates a regard for rules
- Appropriately engages others

- Demonstrates conduct consistent with the interests of the United States
- Demonstrates a willingness and ability to protect people, property, information, and mission

The Federal Personnel Vetting Investigative Standards further details information types, aligned with each attribute. Information types guide the collection of relevant information to provide the precision investigators need to gather information and the data and context adjudicators need to make a trust determination.

Information Categories

The information categories shown here align to one or more of the information types. Their use provides information, both positive and negative, to support a trust determination using the whole-person concept.

Information Categories:

- Citizenship/legal status
- Criminal history
- Education history
- Employment/military history
- Financial history
- Foreign activities & associations
- Handling of protected information & systems
- Identity resolution
- Interpersonal engagement
- Investigative & adjudicative records
- Non-criminal public records
- Publicly available electronic information
- Psychological considerations
- Self-provided information
- Substance misuse or abuse
- Violent extremist, terrorist & unlawful subversive activity

Review Activities

Review Activity 1a

Review this personnel file. James Smith is returning to DOD employment after working in the private sector. He will hold the same critical sensitive position he held prior to his departure. Which personnel vetting scenario applies?

Subject: James Smith

- Returning employee after separation
- Will hold same position as he did previously
- Prior favorable national security trust determination for critical sensitive position

Select the best response:

- ☐ Initial vetting
- ☐ Continuous vetting
- ☐ Upgrade
- ☐ Transfer of Trust
- ☐ Re-establishment of Trust
- ☐ None

Review Activity 1b

Now that you have determined that James Smith must Re-establish Trust with the DOD, will he need a new investigation?

Subject: James Smith

- Returning employee after separation
- Will hold same position as he did previously
- Prior favorable national security trust determination for critical sensitive position

Select the best response:

- ☐ Yes, at the Low Tier
- ☐ Yes, at the Moderate Tier
- ☐ Yes, at the High Tier
- ☐ Maybe, it depends on the length of separation
- ☐ No, because his new position has the same designation

Review Activity 2

Now let's take a look back through James's government service record to see what personnel vetting he has undergone previously. James originally filled a non-critical sensitive position at the Department of Energy (DoE). During his Initial Vetting, which level of investigation did he undergo?

Subject: James Smith

- Original position was with the Department of Energy (DoE)
- Held non-critical sensitive position

Select the best response:

- ☐ Low Tier
- ☐ Moderate Tier
- ☐ High Tier

Review Activity 3a

James received a favorable eligibility determination for his non-critical sensitive position and began his job. While James performed this job, which personnel vetting scenario was he subject to?

Subject: James Smith

- Received a favorable national security trust determination based on a Moderate Tier investigation
- Performing work at same position designation and in the same agency

Select the best response:

- ☐ Initial vetting
- ☐ Continuous vetting
- ☐ Upgrade
- ☐ Transfer of trust
- ☐ Re-establishment of trust
- ☐ None

Review Activity 3b

Did James need to undergo an investigation during the time he was in continuous vetting?

Subject: James Smith

- Received a favorable national security trust determination based on a Moderate Tier investigation
- Performing work at same position designation and in the same agency

Select the best response:

- ☐ Yes, at the Low Tier
- ☐ Yes, at the Moderate Tier
- ☐ Yes, at the High Tier
- ☐ No, an investigation is not required as part of continuous vetting
- ☐ Only if triggered by information revealed by continuous vetting

Review Activity 4a

A year into his service at the DoE, James received an offer for a similar position within the DOD. The new position was also designated as non-critical sensitive, requiring access to Secret information. Which personnel vetting scenario applied in this stage of his career?

Subject: James Smith

- Received offer from the DOD
- New position was the same non-critical sensitive position designation, requiring access to Secret information

Select the best response:

- ☐ Initial vetting
- ☐ Continuous vetting
- ☐ Upgrade
- ☐ Transfer of trust
- ☐ Re-establishment of trust

Review Activity 4b

Did James need to undergo an investigation as part of this Transfer of Trust?

Subject: James Smith

- Received offer from the DOD
- New position was the same non-critical sensitive position designation, requiring access to Secret information

Select the best response:

- ☐ Yes, at the Low Tier
- ☐ Yes, at the Moderate Tier
- ☐ Yes, at the High Tier
- ☐ No, not at this time

Review Activity 5a

Six months later, James received a promotion to a critical sensitive position within the DOD, requiring that he access Top Secret information. Which personnel vetting scenario applied in this situation?

Subject: James Smith

- Promoted to a new position within the DOD
- New position had critical sensitive position designation, requiring access to Top Secret information

Select the best response:

- ☐ Initial vetting
- ☐ Continuous vetting
- ☐ Upgrade
- ☐ Transfer of Trust
- ☐ Re-establishment of Trust
- ☐ None

Review Activity 5b

Did James need to undergo an investigation as part of this Upgrade?

Subject: James Smith

- Promoted to a new position within the DOD
- New position had critical sensitive position designation, requiring access to Top Secret information

Select the best response:

- ☐ Yes, at the Low Tier
- ☐ Yes, at the Moderate Tier
- ☐ Yes, a full investigation at the High Tier
- ☐ Yes, but only to reach the vetting required at the new tier, not a full High Tier investigation
- ☐ No, not at this time

Answer Key

Review Activity 1a

Review this personnel file. James Smith is returning to DOD employment after working in the private sector. He will hold the same critical sensitive position he held prior to his departure. Which personnel vetting scenario applies?

Subject: James Smith

- Returning employee after separation
 - Will hold same position as he did previously
 - Prior favorable national security trust determination for critical sensitive position
-
- ☐ Initial vetting
 - ☐ Continuous vetting
 - ☐ Upgrade
 - ☐ Transfer of Trust
 - ☒ Re-establishment of Trust
 - ☐ None

Feedback: *James is returning to government service after separation and must undergo personnel vetting. He has a previous trust determination, so must now Re-establish Trust with the agency.*

Because James is returning to government service after separation and has a previous trust determination, this is not his initial vetting.

Because of his break in service, James has not been subject to Continuous Vetting.

James will hold the same position as he did previously, with no change in position designation. An Upgrade is not required.

This is not a Transfer of Trust, because James is returning to the same agency as he worked previously.

Review Activity 1b

Now that you have determined that James Smith must Re-establish Trust with the DOD, will he need a new investigation?

Subject: James Smith

- Returning employee after separation
 - Will hold same position as he did previously
 - Prior favorable national security trust determination for critical sensitive position
-
- ☐ Yes, at the Low Tier

- ☐ Yes, at the Moderate Tier
- ☐ Yes, at the High Tier
- ☒ Maybe, it depends on the length of separation
- ☐ No, because his new position has the same designation

Feedback: Although James is returning to the same position he held previously, he might need a new investigation depending on the length of separation. When Re-establishing Trust, the level of personnel vetting required depends on the position designation and length of separation.

Review Activity 2

Now let's take a look back through James's government service record to see what personnel vetting he has undergone previously. James originally filled a non-critical sensitive position at the Department of Energy (DoE). During his Initial Vetting, which level of investigation did he undergo?

Subject: James Smith

- Original position was with the Department of Energy (DoE)
 - Held non-critical sensitive position
-
- ☐ Low Tier
 - ☒ Moderate Tier
 - ☐ High Tier

Feedback: James originally held a non-critical sensitive position, so he would have undergone a Moderate Tier investigation during his initial vetting. Low Tier investigations apply to non-sensitive positions and High Tier investigations apply to critical sensitive positions.

Review Activity 3a

James received a favorable eligibility determination for his non-critical sensitive position and began his job. While James performed this job, which personnel vetting scenario was he subject to?

Subject: James Smith

- Received a favorable national security trust determination based on a Moderate Tier investigation
 - Performing work at same position designation and in the same agency
-
- ☐ Initial vetting
 - ☒ Continuous vetting
 - ☐ Upgrade
 - ☐ Transfer of trust
 - ☐ Re-establishment of trust
 - ☐ None

Feedback: To maintain trust with the agency after receiving his trust determination, James was subject to Continuous Vetting.

James already went through Initial Vetting. He continued to hold a job at the same position designation as his original trust determination, so he did not need an Upgrade. This is not a Transfer of Trust, because James was still working within the same agency where he received his original trust determination. And there was no break in service at this point in time so James did not need to Re-establish Trust.

Review Activity 3b

Did James need to undergo an investigation during the time he was in continuous vetting?

Subject: James Smith

- Received a favorable national security trust determination based on a Moderate Tier investigation
 - Performing work at same position designation and in the same agency
-
- ☐ Yes, at the Low Tier
 - ☐ Yes, at the Moderate Tier
 - ☐ Yes, at the High Tier
 - ☐ No, an investigation is not required as part of continuous vetting
 - ☒ Only if triggered by information revealed by continuous vetting

Feedback: A new investigation is not required unless triggered by information revealed through Continuous Vetting. Periodic re-investigations are no longer required under Continuous Vetting.

Review Activity 4a

A year into his service at the DoE, James received an offer for a similar position within the DOD. The new position was also designated as non-critical sensitive, requiring access to Secret information. Which personnel vetting scenario applied in this stage of his career?

Subject: James Smith

- Received offer from the DOD
 - New position was the same non-critical sensitive position designation, requiring access to Secret information
-
- ☐ Initial vetting
 - ☐ Continuous vetting
 - ☐ Upgrade
 - ☒ Transfer of trust
 - ☐ Re-establishment of trust

Feedback: James is moving to a position with the same designation at a different agency. He is subject to a personnel vetting scenario because he is changing agencies. He will need a Transfer of Trust.

James already went through Initial Vetting. This is not an example of Continuous Vetting because James is changing agencies. The new position has the same designation as his original trust determination, so he does not need an Upgrade at this time. There was no break in service at this point in time so James does not need to Re-establish Trust.

Review Activity 4b

Did James need to undergo an investigation as part of this Transfer of Trust?

Subject: James Smith

- Received offer from the DOD
 - New position was the same non-critical sensitive position designation, requiring access to Secret information
- ☐ Yes, at the Low Tier
- ☐ Yes, at the Moderate Tier
- ☐ Yes, at the High Tier
- ☒ No, not at this time

Feedback: A new investigation is not required because his new position had the same designation as his original trust determination. Agencies must accept a favorable determination from another agency if it is for the same position designation.

Review Activity 5a

Six months later, James received a promotion to a critical sensitive position within the DOD, requiring that he access Top Secret information. Which personnel vetting scenario applied in this situation?

Subject: James Smith

- Promoted to a new position within the DOD
 - New position had critical sensitive position designation, requiring access to Top Secret information
- ☐ Initial vetting
- ☐ Continuous vetting
- ☒ Upgrade
- ☐ Transfer of Trust
- ☐ Re-establishment of Trust
- ☐ None

Feedback: James was promoted to a position with a higher position designation. He will need an Upgrade.

James already went through Initial Vetting. This is not an example of Continuous Vetting because James is changing position designations. The new position is within the same agency, so he did not need a Transfer of Trust at this time. There was no break in service at this point in time, so James did not need to Re-establish Trust.

Review Activity 5b

Did James need to undergo an investigation as part of this Upgrade?

Subject: James Smith

- Promoted to a new position within the DOD
 - New position had critical sensitive position designation, requiring access to Top Secret information
-
- ☐ Yes, at the Low Tier
 - ☐ Yes, at the Moderate Tier
 - ☐ Yes, a full investigation at the High Tier
 - ☒ Yes, but only to reach the vetting required at the new tier, not a full High Tier investigation
 - ☐ No, not at this time

Feedback: Although his new position is at the High Tier, he will not need a full vetting at this level. The level of additional personnel vetting needed is based on that required to meet the new investigative tier, not a full vetting at the new tier.

Conclusion

Congratulations on completing the Personnel Vetting Scenarios Short. In this Short, you received an introduction to personnel vetting under Trusted Workforce 2.0, including the new three-tier investigative model, the five personnel vetting scenarios, and the new Federal personnel vetting investigative standards that define information types and attributes aligned to the adjudicative guidelines for each type of trust determination.

You should now be able to determine the applicable personnel vetting scenario and aligned investigative tier under Trusted Workforce 2.0, given details of a subject of Federal personnel vetting.