

# ***Federal Personnel Vetting Investigative Standards Short Student Guide***

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## ***Federal Personnel Vetting Investigative Standards Short***

### **Welcome**

To protect people, property, information, and mission, Federal personnel vetting assesses the trustworthiness of individuals based on core characteristics. It requires that anyone privileged to be employed in the departments and agencies of the Federal Government must be reliable, trustworthy, of good conduct and character, and of complete and unswerving loyalty to the United States.

Welcome to the Federal Personnel Vetting Investigative Standards Short. This short will provide an overview of the drivers behind personnel vetting reforms, highlighting Trusted Workforce 2.0 and the Federal Personnel Vetting Investigative Standards.

Learning Outcome—

- Given the position designation, you should be able to determine which tier of the Federal Personnel Vetting Investigative Standards applies.

At the conclusion of this Short, you will be able to determine which tier of the Federal Personnel Vetting Investigative Standards applies to a given position designation.

<b>Tier</b>	<b>Position Designations</b>	<b>Access Levels</b>
Low Tier	<ul style="list-style-type: none"><li>• Non-Sensitive/Low Risk</li></ul>	<ul style="list-style-type: none"><li>• Minimum investigation for physical logical access</li><li>• Access (HSPD-12) Credentialing</li></ul>
Moderate Tier	<ul style="list-style-type: none"><li>• Non-Sensitive/Moderate-Risk Public Trust</li><li>• Non-Critical Sensitive/Moderate-Risk Public Trust</li><li>• </li></ul>	<ul style="list-style-type: none"><li>• Eligibility for Access to Confidential/Secret Information</li><li>• Eligibility for “L” Access</li></ul>

High Tier	<ul style="list-style-type: none"> <li>• Non-Sensitive/High-Risk Public Trust</li> <li>• Critical-Sensitive/High-Risk Public Trust</li> <li>• Special-Sensitive/High-Risk Public Trust</li> </ul>	<ul style="list-style-type: none"> <li>• Not National Security Sensitivity</li> <li>• Eligibility for Access to Top Secret Information</li> <li>• Eligibility for Access to Sensitive Compartmented Information (SCI)</li> <li>• Eligibility for “Q” Access</li> </ul>
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## Purpose of Personnel Vetting Reforms

To ensure a reliable, trustworthy, and loyal workforce, Executive Order 13467 called for an efficient, reciprocal, and aligned system in June 2008. This system was to be used across the government to investigate and determine:

- Eligibility for logical and/or physical access;
- Suitability for federal employment and fitness to perform work on behalf of the Federal Government as a contractor employee; and
- Eligibility for access to classified information, or to hold a sensitive position.

In January 2017, Executive Order 13764 called for the modernization of these personnel vetting processes. This calls for personnel vetting reform had several drivers, including:

- Challenges that impacted the government’s ability to completed investigations within timelines;
- Overdue reinvestigations, which pose a risk to national security and to public trust;
- An urgent need to reduce the numbers of pending investigations; and
- Evolving technology.

All of these drivers contribute to the need to reimagine Federal personnel vetting.

In May 2022, the Director of National Intelligence, acting as the Security Executive Agent, and the Director of the Office of Personnel Management, acting as the Suitability and Credentialing Executive Agent, issued new Federal Personnel Vetting Investigative Standards, marking a key milestone in the transformation of the investigative process. These Standards use a risk management approach to investigations that maximizes uniformity across all Federal personnel

vetting domains and focuses on the efficient collection of information needed to make informed trust determinations, or adjudicative decisions.

Overseen by the Interagency Security, Suitability, and Credentialing Performance Accountability Council, or PAC, these reforms are collectively referred to as the Trusted Workforce 2.0, or TW 2.0, initiative.

Trusted Workforce 2.0 is a whole-of-government reform that aims to:

- Improve the timeliness of onboarding new employees;
- Increase workforce mobility;
- Provide early detection of risks and threats; and
- Apply modern investigative methods to make efficient and informed determinations in a new, agile, and secure IT system.

These standards are aligned to support the Federal Government's broader efforts to recruit and retain a diverse and talented workforce.

Implementation of the Federal Personnel Vetting Investigative Standards will occur iteratively, consistent with the PAC's Trusted Workforce 2.0 Implementation Strategy. As implementation progresses, new technology is deployed, and Investigative Service Providers, or ISPs, announce new products, the Executive Agents will issue additional operational implementation guidance to assist agencies in transitioning from the old to new Investigative Tiers to fully implement these Standards.

## Personnel Vetting Subjects

To see how Trusted Workforce 2.0's three-tiered investigative model impacts Federal personnel vetting, consider the following five employees.

Let's start with Andrew Alston. Andrew is a contract employee working at an Army installation in a Non-Sensitive/Low-Risk position. Andrew requires physical access to the installation and logical access to his government information system.

Now, consider Bridget Brown. Bridget is a DOD program analyst in a position designated as Non-Sensitive/Moderate-Risk Public Trust. Bridget does not require access to classified information.

Next, meet Carol Cruz. Carol is a federal employee with the Army. Carol was recently promoted to a position designated as Non-Critical Sensitive/Moderate-Risk Public Trust. Carol is a Program Analyst requiring regular access to Secret information.

Now consider David Dellin. David is a new federal employee with the Social Security Administration. David's position is designated as Non-Sensitive/High-Risk Public Trust, not requiring access to classified information.

And finally, meet Elise Eng. Elise is a contract employee working at an Air Force base. Elise is in a position designated as Critical-Sensitive/High-Risk Public Trust, requiring access to Top Secret information.

Although the roles held by these five employees have a range of responsibilities and requirements, all of them must undergo personnel vetting prior to working with the Federal Government.

Subject	Description
Andrew Alston	<ul style="list-style-type: none"><li>• Contract employee</li><li>• Non-Sensitive</li><li>• Low-Risk</li><li>• Requires access to facility and information system</li></ul>
Bridget Brown	<ul style="list-style-type: none"><li>• Government program analyst</li><li>• Non-Sensitive</li><li>• Moderate-Risk Public Trust</li><li>• No access to classified information</li></ul>

Carol Cruz	<ul style="list-style-type: none"><li>• Federal employee</li><li>• Non-Critical Sensitive</li><li>• Moderate-Risk Public Trust</li><li>• Requires access to Secret information</li></ul>
David Dellin	<ul style="list-style-type: none"><li>• New federal employee</li><li>• Non-Sensitive</li><li>• High-Risk Public Trust</li><li>• No access to classified information</li></ul>
Elise Eng	<ul style="list-style-type: none"><li>• Contract employee</li><li>• Critical-Sensitive</li><li>• High-Risk Public Trust</li><li>• Requires access to Top Secret information</li></ul>

## Personnel Vetting Domains

Federal personnel vetting consists of an assortment of investigations and adjudications, each of which serves a different purpose. Consider the narratives you just saw. Roles that need physical and logical access require a Homeland Security Presidential Directive 12, or HSPD-12, investigation for Common Access Card, or CAC, credentialing. Roles with an elevated degree of public trust require suitability or fitness determinations. And, of course, employees who require eligibility to access classified information or hold a sensitive position undergo the national security process.

### ***Credentialing***

Homeland Security Presidential Directive 12 (HSPD-12) adjudication determines who may receive Personal Identify Verification (PIV) credentials for physical access to Federal-controlled facilities and/or logical access to Federal-controlled information systems. The primary purpose of HSPD-12 credentialing 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. The adjudicative process culminates in a credentialing trust determination.

Andrew Alston, who requires physical and logical access only, falls under the Credentialing category.

***Suitability***

Suitability adjudication determines whether individuals are suitable for employment within the Federal Government. Suitability refers to identifiable character traits and conduct that indicate an individual's ability to carry out the duties of a federal job with integrity, efficiency, and effectiveness. The adjudicative process culminates in a suitability trust determination.

Bridget Brown, in a position designated as Non-Sensitive/Moderate-Risk Public Trust, falls under the Suitability category.

***Fitness***

Fitness adjudication determines whether an individual has the character or conduct determined necessary to perform work for or on behalf of an agency working in excepted service positions, non-appropriated fund (NAF) positions, or as defense contractors. The adjudicative process culminates in a fitness trust determination.

David Dellin, in a position designated as Non-Sensitive/High-Risk Public Trust, falls under the Fitness category.

***National Security***

National security adjudication 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, discretion, character, honesty, and judgment. The adjudicative process culminates in a national security trust determination.

Carol Cruz, in a position designated as Non-Critical Sensitive/Moderate-Risk Public Trust, requiring regular access to Secret information falls under the National Security category.

Elise Eng, in a position designated as Critical Sensitive/High-Risk Public Trust, requiring access to Top Secret information, also falls under this category.



## Transition to a Three-Tier Investigative Model

In order to streamline personnel vetting, following the 2008 Executive Order 13467, the processes for national security, suitability, fitness, and credentialing determinations were consolidated into a five-tier investigative model. While the five-tier investigative model simplified the personnel vetting process, Trusted Workforce 2.0 aims to enhance workforce mobility and alignment between personnel vetting domains, Trusted Workforce 2.0 establishes by introducing a three-tier investigative model. This three-tier model continues to align investigative requirements for national security, suitability, fitness, and credentialing trust determinations.

Five-Tier Model	TW 2.0 Federal Personnel Vetting Investigative Tiers	Position Designation or Requirement
Tier 1	Low Tier	<ul style="list-style-type: none"> <li>• Low Risk</li> <li>• Non-Sensitive</li> <li>• Physical and Logical Access (HSPD-12)</li> <li>• Credentialing</li> </ul>
Tier 2 / Tier 3	Moderate Tier	<ul style="list-style-type: none"> <li>• Moderate Risk Public Trust</li> <li>• Non-critical sensitive</li> <li>• Secret/Confidential</li> <li>• "L" Access</li> </ul>
Tier 4 / Tier 5	High Tier	<ul style="list-style-type: none"> <li>• High Risk Public Trust</li> <li>• Critical Sensitive</li> <li>• Special Sensitive</li> <li>• Top Secret</li> <li>• Sensitive Compartmented Information</li> <li>• "Q" Access</li> </ul>

Tier 1 of the five-tier model becomes Low Tier, or LT. Low Tier investigations are for positions designated as Non-Sensitive/Low-Risk. This is the minimum investigation level for the purpose of granting physical and/or logical access, or HSPD-12 credentialing trust determinations. LT investigations utilize the Standard Form 85, or SF-85. Remember Andrew? He requires physical and logical access, so under the three-tier model, he needs a Low Tier investigation.

Tiers 2 and 3 of the five-tier model become Moderate Tier, or MT. Moderate Tier investigations are for positions designated as Non-Sensitive/Moderate-Risk Public Trust or Non-Critical Sensitive/Moderate-Risk Public Trust, as well as positions that require eligibility for access to

Confidential and Secret Information, or eligibility for “L” access. These investigations utilize SF-85P or SF-86, as applicable. Both Bridget, in a Non-Sensitive/Moderate-Risk Public Trust position, and Carol, in a Non-Critical Sensitive/Moderate-Risk Public Trust position, requiring eligibility to access Secret information, would undergo Moderate Tier investigations.

Finally, Tiers 4 and 5 of the five-tier model become High Tier, or HT. High Tier investigations are for positions designated as Non-Sensitive/High-Risk Public Trust and/or Critical-Sensitive High or Special-Sensitive/High-Risk Public Trust, as well as positions that require eligibility for access to Top Secret and Sensitive Compartmented Information, also known as SCI, or eligibility for “Q” access. HT investigations also utilize SF-85P or SF-86 as applicable. David, who holds a Non-Sensitive/High-Risk Public Trust position, and Elise, who holds a Critical-Sensitive/High-Risk Public Trust position, requiring eligibility to access Top Secret information, will both undergo High Tier investigations.

Review the Federal Personnel Vetting Investigative Standards Crosswalk Job Aid for a summary of how the old and new investigative tiers align, and to see which standard form is required for each. This job aid is available in your Course Resources.

## Review Activities

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Now that you've learned about the Federal Personnel Vetting Investigative Standards, review these personnel files and determine which tiered investigation applies to each.

Check your answers in the Answer Key at the end of this Student Guide.

### Review Activity 1

Review this personnel file and determine which investigative tier applies.

**Subject: Michael Smith**

**Role: Civilian Software Engineer**

- Non-Critical Sensitive/Moderate-Risk Public Trust position
- Requires access to Confidential information

*Select the best response.*

- ☐ Low Tier (LT)
- ☐ Moderate Tier (MT)
- ☐ High Tier (HT)

### Review Activity 2

Review this personnel file and determine which investigative tier applies.

**Subject: Alexis Green**

**Role: Contractor on United States Air Force base**

- Requires physical and logical access
- Non-Sensitive/Low-Risk position
- No access to classified information

*Select the best response.*

- ☐ Low Tier (LT)
- ☐ Moderate Tier (MT)
- ☐ High Tier (HT)

**Review Activity 3**

Review this personnel file and determine which investigative tier applies.

**Subject: Mary Higgins**

**Role: Security Analyst**

- Critical-Sensitive/High-Risk Public Trust position
- Access to Top Secret information

*Select the best response.*

- ☐ Low Tier (LT)
- ☐ Moderate Tier (MT)
- ☐ High Tier (HT)

**Review Activity 4**

Review this personnel file and determine which investigative tier applies.

**Subject: Jason Cho**

**Role: Contract Specialist**

- Non-Sensitive/Moderate-Risk Public Trust position
- No access to classified information

*Select the best response.*

- ☐ Low Tier (LT)
- ☐ Moderate Tier (MT)
- ☐ High Tier (HT)

**Conclusion**

Congratulations on completing the Federal Personnel Vetting Investigative Standards Short. In this Short, you learned about Trusted Workforce 2.0 and the Federal Personnel Vetting Investigative Standards.

Now, given the position designation, you should be able to determine which tier of the Federal Personnel Vetting Investigative Standards applies. Remember that implementation of the

Federal Personnel Vetting Investigative Standards will occur iteratively, consistent with the PAC's Trusted Workforce 2.0 Implementation Strategy.

## Appendix A: Answer Key

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### Review Activity 1

Review this personnel file and determine which investigative tier applies.

**Subject: Michael Smith**

**Role: Civilian Software Engineer**

- Non-Critical Sensitive/Moderate-Risk Public Trust position
- Requires access to Confidential information
- ☐ Low Tier (LT)
- ☒ Moderate Tier (MT) (correct response)
- ☐ High Tier (HT)

**Feedback:** Michael will require access to Confidential information. That means he will require a Moderate Tier (MT) investigation.

### Review Activity 2

Review this personnel file and determine which investigative tier applies.

**Subject: Alexis Green**

**Role: Contractor on United States Air Force base**

- Requires physical and logical access
- Non-Sensitive/Low-Risk position
- No access to classified information
- ☒ Low Tier (LT) (correct response)
- ☐ Moderate Tier (MT)
- ☐ High Tier (HT)

**Feedback:** Alexis holds a Non-Sensitive/Low-Risk position that requires physical and logical access with no access to classified information. That means she will require a Low Tier (LT) investigation.

**Review Activity 3**

Review this personnel file and determine which investigative tier applies.

**Subject: Mary Higgins**

**Role: Security Analyst**

- Critical-Sensitive/High-Risk Public Trust position
- Access to Top Secret information
- ☐ Low Tier (LT)
- ☐ Moderate Tier (MT)
- ☒ High Tier (HT) (correct response)

**Feedback:** Mary holds a Critical-Sensitive/High-Risk Public Trust position and requires access to Top Secret Information. That means she will require a High Tier (HT) investigation.

**Review Activity 4**

Review this personnel file and determine which investigative tier applies.

**Subject: Jason Cho**

**Role: Contract Specialist**

- Non-Sensitive/Moderate-Risk Public Trust position
- No access to classified information
- ☐ Low Tier (LT)
- ☒ Moderate Tier (MT) (correct response)
- ☐ High Tier (HT)

**Feedback:** Jason holds a Non-Sensitive/Moderate-Risk Public Trust position. That means he will require a Moderate Tier (MT) investigation.