

Elements of Federal Personnel Vetting Short Student Guide

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Introduction

The Federal Personnel Vetting Guidelines issued by the Office of Personnel Management (OPM) and the Office of the Director of National Intelligence (ODNI) as the Executive Agents, describe 12 elements that comprise the Federal personnel vetting journey. These elements serve as activities performed throughout the Federal personnel vetting process for each scenario. Along the way, several security practitioners participate in legs of the journey to perform activities.

This Short will take you through the elements of the Federal personnel vetting journey and introduce you to the roles involved with each element.

Roles

This personnel vetting journey is the process by which individuals who perform work for or on behalf of the Federal Government undergo investigation, evaluation, and adjudication to ensure a trusted workforce that protects people, property, information, and mission.

In addition to the individual undergoing personnel vetting, you will meet several security practitioners along the journey. Depending on the organization or agency, these may include, but are not limited to, the:

- Human Resource (HR) Specialist or Hiring Manager
- Security Manager
- Investigative Service Provider (ISP)
- Adjudicator or Personnel Security Specialist
- Continuous Vetting (CV) Analyst
- Insider Threat or Counterintelligence (CI) Officer
- Appeal Board authorities

Appeal Board Authorities

In the event of an unfavorable trust determination, individuals may have the option to appeal. The relevant appeal authority will depend on the nature of the individual's role. Appeal Board authorities may include:

- Merit Systems Protection Board (MSPB)
- Defense Office of Hearings and Appeals (DOHA)
- Personnel Security Appeals Board (PSAB)
- The agency with which the individual is affiliated

Element: Personnel Vetting Engagement

The Personnel Vetting Engagement element requires two-way communication between the individual and the Government at all appropriate points along the journey. This results in improved accuracy, validity, transparency, and efficiency at each step of the process.

Element: Position Designation

Welcome to the Pre-investigation Parkway.

The Position Designation element requires the use of standard criteria and business rules to make uniform and consistent position sensitivity and risk determinations. This ensures that the individual holding that position undergoes an appropriate investigation commensurate with the identified sensitivity and risk of the position. Once determined, agencies must keep a record of the position designation.

In the Position Designation element, the HR Specialist or Hiring Manager or Security Manager uses the position designation system (PDS)—jointly issued by OPM and ODNI—or associated position designation tool (PDT) to designate position sensitivity and risk for all positions. These include military service members, Federal civilian employees, and contractors.

The final approval of a position's designation is an inherently Governmental function and must be performed by a Federal employee.

Sensitivity

The position's potential for material adverse impact to the national security.
Expressed as:

- Noncritical-Sensitive – national security positions which have the potential to cause significant or serious damage to the national security.
- Critical-Sensitive – national security positions which have the potential to cause exceptionally grave damage to the national security.
- Special-Sensitive – national security positions which have the potential to cause inestimable damage to the national security.

Note: Non-Sensitive positions do not involve the performance of sensitive duties and have no material adverse effect on national security.

Risk

The position's potential for adverse impact to the efficiency or integrity of the service. Expressed as:

- Low Risk – positions that have no public trust duties or have limited impact to the efficiency or integrity of the service.
- Moderate Risk – public trust positions that have the potential for moderate or serious impact on an agency program or mission and may cause serious damage to the integrity or efficiency of the service.
- High Risk – public trust positions that have the potential for grave impact on an agency program or mission and may cause inestimable damage to the integrity or efficiency of the service.

Element: Determining Previous Vetting

To eliminate unnecessary duplication and reduce waste, security practitioners must determine if an individual has been previously vetted for a trust determination. This is also supported by the Federal Personnel Vetting Record and Information-Sharing elements that you will learn more about later in this Short.

In the Determining Previous Vetting element, the HR Specialist or Hiring Manager, Security Manager, or Adjudicator or Personnel Security Specialist reviews Government-wide high- and low-side record repositories for previous vetting of the individual. If the individual has been previously vetted, the security practitioner will determine whether the prior level of vetting meets or exceeds the investigative requirements of the current position designation. The security practitioner will then determine what, if any, additional personnel vetting is required.

Element: Vetting Questionnaire

A trust determination requires relevant background and investigative information about the individual.

In the Vetting Questionnaire element, the individual initially provides relevant background information or updates their previously provided information. This information is part of the Federal Personnel Vetting Record. Under Trusted Workforce 2.0, this form is known as the Personnel Vetting Questionnaire (PVQ).

The HR Specialist or Hiring Manager or Security Manager initiates the appropriate vetting questionnaire, commensurate with the position designation and required

investigation type. The individual then completes the questionnaire and certifies the accuracy of the information provided.

Element: Screening

Following the collection of information about the individual through the application, hiring, and vetting process, the Screening element focuses on identifying potential adjudicative concerns in that information. Screening may occur prior to an investigation and up to the point of receiving high-yield checks (HYCs) through the investigative process. HYCs are a set of automated record checks determined by the investigative tier.

In this element, the HR Specialist or Hiring Manager or Security Manager screens the individual's available information for potential adjudicative concerns relevant to the applicable personnel vetting domain. This may lead to the individual being unsuitable, unfit, and/or ineligible to hold a sensitive position, access classified information, or receive a personal identity verification (PIV) credential. Agencies may act upon this information in accordance with applicable laws, regulations, and policies.

Personnel Vetting Domains

Personnel vetting domains include:

- Suitability – a determination of whether the character or conduct of an individual in a competitive service position, excepted service position that can non-competitively convert to the competitive service, or a career appointment to the Senior Executive Service may have an adverse impact on the integrity or the efficiency of the service.
- Fitness – a determination of whether an individual has the character or conduct determined necessary to perform work for or on behalf of an agency, as an excepted service employee, as a contractor employee, or as a non-appropriated fund employee.
- National Security – a determination of whether an individual's eligibility for access to classified information or eligibility to hold a sensitive position is clearly consistent with the national security interests of the United States. Any doubt must be resolved in favor of national security.
- Credentialing – a determination of whether an individual's eligibility to obtain a Homeland Security Presidential Directive 12 compliant personal

identity verification credential is consistent with protecting the life, safety, property, or health of people with access to Federal facilities and with protecting the Government's physical assets or information systems.

Element: Preliminary Determination

Following screening, the agency internally makes a preliminary determination about the individual based on the results of HYCs conducted during the initial vetting process.

In this element, the Security Manager will determine whether the agency can accept the risk of allowing an individual to enter on duty in advance of the completed investigation. For contractor personnel, the adjudicative authority will make the preliminary determinations. For national security sensitive positions, when consistent with Security Executive Agent Directive (SEAD) 8, the Security Manager, or Adjudicator or Personnel Security Specialist as applicable, will approve the individual for temporary eligibility or access to classified information or to occupy the sensitive position.

Note that concurrence and approval of a preliminary determination is an inherently Governmental function and must be performed by a Federal employee.

Activity 1

Match each description to an element. Then check your answers in the Answer Key at the end of this Student Guide.

Element	Description
	Ensures two-way communication between the individual and the Government throughout the personnel vetting process
	Agencies apply standard criteria and business rules to determine sensitivity and risk for a position
	Agencies review Government-wide record repositories to identify the individual vetting history
	Individuals provide relevant background information
	Agencies review available information through the application, hiring, and vetting process to identify potential adjudicative concerns prior to an investigation
	Agencies determine whether they can accept the risk of allowing an individual to enter on duty based upon the results of HYCs in advance of the investigation

Elements:

- Determining Previous Vetting
- Personnel Vetting Engagement
- Position Designation
- Preliminary Determination
- Screening
- Vetting Questionnaire

Element: Investigation

Welcome to the Investigation Interchange, connecting to Adjudication Avenue.

In the Investigation element, contract investigators or Federal special agents—commonly referred to as background investigators—assigned to an ISP conduct the background investigation. They then submit a report of investigation (ROI) to the adjudicative authority that contains both positive and negative information about the individual for an assessment against the characteristics of a trusted person to make a trust determination or adjudicative decision.

In this element, the ISP conducts the investigation at the required level, as determined by the position designation. If necessary, the ISP may request additional information from the individual. When complete, the ISP prepares and submits the ROI to the adjudicative authority.

Element: Adjudication

Welcome to Adjudication Avenue.

Adjudication employs a whole-person concept, where applicable, to make a risk-based decision that culminates in a trust determination. It considers whether the individual demonstrates the characteristics of a trusted person to protect people, property, information, and mission for the position they occupy or seek to occupy.

In this element, the adjudicator reviews the ROI to identify and evaluate the individual's behaviors and perceived vulnerabilities in accordance with the applicable personnel vetting domains. As needed, the adjudicator may request further analysis support or additional information from the individual, Insider Threat or Counterintelligence Officer, or ISP. The adjudicator will then render favorable or unfavorable trust determination(s) using the order of operations and adjudicative criteria for each applicable personnel vetting domain. When appropriate, the adjudicator will also initiate review proceedings.

Note that concurrence and approval of a trust determination in any personnel vetting scenario is an inherently Governmental function and must be performed by a Federal employee.

Activity 2

Which describes the activities of the Investigation and Adjudication elements of Federal personnel vetting?

Select the best response. Check your answer in the Answer Key at the end of this Student Guide.

- ☐ Collection and evaluation of positive and negative information about a person against the characteristics of a trusted person to render a favorable or unfavorable trust determination
- ☐ Collection of negative information about a person's job position to determine the risk level of the position
- ☐ Collection of positive and negative information about a person by an agency for evaluation against their organization's criteria
- ☐ Collection of information about a person's qualifications for evaluation against the job criteria for the position sensitivity

Element: Federal Personnel Vetting Record

Welcome to the Post-adjudication Pass.

As you have learned, the Federal Personnel Vetting Record is referenced throughout the Federal personnel vetting journey. To promote transparency, enhance mobility, and facilitate information-sharing, it is essential to accurately record personnel vetting actions and determinations, unless law or regulation authorizes withholding it.

In this element, Adjudicators or Personnel Security Specialists, Security Managers, Appeal Board authorities, ISPs, CV Analysts, and Insider Threat or CI Officers record personnel vetting actions and determinations in the Government-wide repositories and the agency's internal systems of records as appropriate. This includes investigative items, adjudicative information, and eligibility and access determinations.

Element: Information-Sharing

Similar to the Federal Personnel Vetting Record element, the Information-Sharing element helps to eliminate unnecessary duplication and reduce waste. Sharing validated, relevant information across and within agencies throughout the personnel vetting journey improves transparency, ensures quality, and maximizes efficiency. It also

ensures proper safeguarding and handling of sources and methods, protects privacy rights, and ensures fair and consistent treatment of all individuals.

Security practitioners including the HR Specialist or Hiring Manager, Security Manager, Adjudicator or Personnel Security Specialist, ISP, CV Analyst, and Insider Threat or CI Officer must establish controls to ensure personnel vetting data is safeguarded and that records are maintained. They must ensure that information related to personnel vetting developed from internal sources is added to the Federal personnel vetting record. They must also notify any other agencies affiliated with an individual when the individual's primary affiliation with an agency ends. Finally, they must share derogatory information as appropriate within and between agencies, industry, and stakeholders for effective risk management.

Element: Continuous Vetting

Following a favorable trust determination, the individual must be enrolled into a CV compliant capability for their corresponding investigative tier based on the position designation. When the individual certifies the vetting questionnaire, it includes consent to CV. If an activity is triggered in CV, it may require further investigation and re-adjudication.

The HR Specialist or Hiring Manager or Security Manager must enroll the individual into a compliant CV program, manage enrollments, and inform the individual of their reporting obligations and responsibilities. Individuals are required to report concerning behaviors or activities. Their peers, supervisors, and Commanders also have third-party reporting responsibilities. CV Analysts conduct automated record checks and validate CV alerts. Where derogatory information is present, they will also develop issue resolution. This may require support or additional information from the individual, the ISP, or the Insider Threat or CI Officer. Finally, Adjudicators will adjudicate CV alerts as needed.

Element: Review Proceedings

In the event of an unfavorable trust determination, the personnel vetting journey reflects existing rights for applicants' and employees' review proceedings for the applicable domains. In the Department of War, this is known as Security Review Proceedings, formerly referred to as Due Process and Appeals. This process will vary depending on whether the individual is a Federal employee or contractor and on the applicable personnel vetting domain(s).

First, the Adjudicator communicates the intention to make an unfavorable trust determination and provides the appropriate written documentation for the personnel vetting domain(s). Then, the Security Manager informs the individual of their

responsibilities and appeal rights. The individual may then provide additional mitigating information and documentation and request a personal appearance, if applicable. If warranted, the relevant Appeal Board authorities review the case file and determine whether the unfavorable trust determination is sustained or overturned. Finally, the Security Manager coordinates with appropriate complementary mission partners, as necessary.

Note that Commanders, supervisors, and managers may have additional responsibilities for training, directing, reporting, and referral.

Activity 3

After a favorable trust determination is made, which of the following occur?

Select all that apply. Then check your answers in the Answer Key at the end of this Student Guide.

- ☐ Agencies update the individual's Federal personnel vetting record.
- ☐ Agencies share information about changes in the individual's status with other agencies as needed.
- ☐ Agencies disenroll the individual from continuous vetting.
- ☐ Agencies review the ROI with the individual.

Summary

Congratulations. You have completed the *Elements of Federal Personnel Vetting* Short. In this Short, you learned about the 12 elements that comprise the personnel vetting journey, as well as the security practitioners involved along the way.

You should now be able to describe these elements and the role of the security practitioners responsible in each.

Visit the [Resources](#) to access a downloadable job aid.

Appendix A: Answer Key

Activity 1

Element	Description
Personnel Vetting Engagement	Ensures two-way communication between the individual and the Government throughout the personnel vetting process
Position Designation	Agencies apply standard criteria and business rules to determine sensitivity and risk for a position
Determining Previous Vetting	Agencies review Government-wide record repositories to identify the individual vetting history
Vetting Questionnaire	Individuals provide relevant background information
Screening	Agencies review available information through the application, hiring, and vetting process to identify potential adjudicative concerns prior to an investigation
Preliminary Determination	Agencies determine whether they can accept the risk of allowing an individual to enter on duty based upon the results of HYCs in advance of the investigation

Activity 2

Which describes the activities of the Investigation and Adjudication elements of Federal personnel vetting?

- ☒ Collection and evaluation of positive and negative information about a person against the characteristics of a trusted person to render a favorable or unfavorable trust determination [correct response]
- ☐ Collection of negative information about a person's job position to determine the risk level of the position
- ☐ Collection of positive and negative information about a person by an agency for evaluation against their organization's criteria
- ☐ Collection of information about a person's qualifications for evaluation against the job criteria for the position sensitivity

Feedback: *The Investigation and Adjudication elements collect and evaluate positive and negative information about a person against the characteristics of a trusted person to render a favorable or unfavorable trust determination.*

Activity 3

After a favorable trust determination is made, which of the following occur?

- ☒ Agencies update the individual's Federal personnel vetting record. [correct response]
- ☒ Agencies share information about changes in the individual's status with other agencies as needed. [correct response]
- ☐ Agencies disenroll the individual from continuous vetting.
- ☐ Agencies review the ROI with the individual.

Feedback: *After a favorable trust determination is made, agencies update the individual's Federal personnel vetting record and share information with other agencies as needed.*