

***Continuous Vetting for
Non-Sensitive Public Trust
Short
Student Guide***

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Introduction

Trust in public service positions matters every day, not just during your background investigation. Under the traditional model, suitability and fitness positions, also known as Non-Sensitive Public Trust, or NSPT positions, are assessed initially commensurate with the position designation, and then reassessed every five years with periodic reinvestigation, or PR. During that gap, the integrity of the workforce relied heavily on trusted insiders including the individuals, their co-workers, and supervisors.

In between PRs, an individual's circumstances could change, and this could result in conduct or behavior of concern associated with the suitability and fitness factors. For example, dishonest conduct, criminal conduct, or excessive alcohol use without evidence of rehabilitation. These potential character or conduct concerns may go unnoticed and could have an adverse impact on the integrity or efficiency of the service.

Trusted Workforce 2.0, a whole-of-Government reform for personnel vetting, uses a risk management approach to deliver a trusted workforce as quickly and efficiently as possible. Unlike the traditional five- or ten-year periodic reinvestigation model, Continuous Vetting (CV) assesses risk in near real-time to provide ongoing insight into workforce behavior and promotes earlier detection and mitigation of potential risk to people, property, information, and mission.

Understanding the shift, from the prior traditional model of periodic reinvestigations to a robust risk management CV approach under the TW 2.0 Framework, is the purpose of this Short.

Welcome

Welcome to the Continuous Vetting for Non-Sensitive Public Trust Short. In this Short, you'll get a high-level overview of the policies driving this change, understand the purpose and implementation of continuous vetting, and explore the role of agencies in managing CV for the NSPT workforce. Take a moment to review the course objective.

- Describe the purpose of continuous vetting (CV) for Non-Sensitive Public Trust (NSPT) positions, the policies driving the shift to CV, and the role agencies play in managing CV for the NSPT population.

CV and the NSPT Population

CV is defined in Executive Order (E.O) 13467, as amended, as "reviewing the background of a covered individual at any time to determine whether that individual continues to meet applicable requirements."

The NSPT population includes individuals who occupy non-sensitive positions designated as moderate or high risk, as defined by the Code of Federal Regulations (CFR) part 731.106(b). Meaning they are likely to produce a range of impacts, from a fair amount of harm or serious damage to inestimable damage or the gravest impact to the public's trust, as determined by the position's potential for adverse impact on the efficiency and integrity of the Federal service.

Public trust positions may involve: policy making, public safety and health, law enforcement duties, fiduciary responsibilities, or other duties demanding a significant degree of public trust, such as positions involving access to or control of financial records or with significant risk for causing damage or realizing personal gain.

Covered Individual - Definition

A covered individual is, with limited exceptions, “a person who performs, or who seeks to perform, work for or on behalf of the executive branch (e.g., Federal employee, military member, or contractor), or otherwise interacts with the executive branch such that the individual must undergo vetting.”

Benefits of CV

CV benefits both the Government and the trusted workforce by better protecting our nation's people, property, information, and mission. First, it helps protect the individual, the Agency, and the public's trust every day. Specifically, CV determines whether an individual remains suitable or fit for a position over time.

Second, it reduces time-intensive manual processing and investigative work by keeping an individual's vetting current, which promotes workforce mobility and reduces the time and effort required when an individual moves to a new position —also known as Transfer of Trust (ToT), formerly known as Reciprocity.

Third, CV uses ongoing, near real-time, Automated Record Checks (ARCs). These checks pull data from Government and commercial databases, as well as agency-specific information, to identify potential issues as they occur. This helps close the reporting gap, allowing for earlier awareness, faster response, and reduced risk.

At this time, CV requires Federal agencies to ensure individuals provide an updated SF-85P, or the applicable Personnel Vetting Questionnaire (PVQ) parts once implemented, every five years. This requirement will remain in place until technology can support near real-time self-reporting and annual updates through an Annual Vetting Appraisal (AVA) or a similar capability. Together, these elements ensure that vetting is no longer a point-in-time event, but a continuous, proactive process.

Transitioning From Periodic Reinvestigations to CV for NSPT

Now let's take a look at how we got to where we are today. CV was not implemented overnight. It evolved through a series of policy changes designed to modernize the Federal personnel vetting process.

In November 2011, the Office of Personnel Management (OPM) amended 5 CFR, Part 731 to implement a periodic reinvestigation requirement for public trust positions, as required by E.O. 13488. Since that time, agencies have been required to comply with the reinvestigation requirement for moderate- and high-risk public trust positions at least once every five years, as specified in 5 CFR 731.106(d) and reinforced by the 2012 Federal Investigative Standards. This approach used the traditional reinvestigation model for NSPT positions.

The next major shift occurred in January 2017. E.O. 13467 was amended by E.O. 13764. This amendment established a requirement for CV of all covered individuals. This marked a significant change—shifting the focus from periodic reinvestigations to ongoing evaluation.

In addition, E.O. 13764 designated the Office of Personnel Management (OPM) as the Suitability and Credentialing Executive Agent (EA) and expanded its responsibilities to include establishing investigative standards, risk designation procedures, and reciprocity rules for this population.

In May 2018, the Director of the OPM, and the Director of National Intelligence, serving as EAs, launched Trusted Workforce 2.0, commonly referred to as TW 2.0. TW 2.0 was designed to modernize federal workforce vetting by leveraging automation, expanding data sources, and implementing continuous updates to improve efficiency and workforce mobility. This initiative provided the framework for fully implementing CV.

Document Details

- E.O. 13488: Granting Reciprocity on Excepted Service and Federal Contractor Employee Fitness and Reinvestigating Individuals in Positions of Public Trust
- E.O. 13764: Amending the Civil Service Rules, E.O. 13488, and E.O. 13467 To Modernize the Executive Branch-Wide Governance Structure and Processes for Security Clearances, Suitability and Fitness for Employment, and Credentialing, and Related Matter

Transitional States of TW 2.0

Let's take a closer look at the transitional states of TW 2.0. TW 1.25 represents the first transitional CV state. TW 1.25 uses automated record checks and event-driven investigative activity across three foundational ARC data categories. These checks support the early identification of potentially concerning behavior. In an environment where the traditional periodic reinvestigation is required, enrollment under TW 1.25 allows agencies to defer an individual's periodic reinvestigation using a risk-managed approach, based on the routine ARCs conducted.

TW 1.5 expands CV monitoring capabilities. It includes four additional ARC data categories for a total of seven and introduces issue resolution for CV alerts, including agency-specific information. Importantly, TW 1.5 replaces the periodic reinvestigation requirement for NSPT.

TW 2.0 represents the final state for the entire Federal workforce. It includes full CV enrollment of all covered individuals in both non-sensitive and sensitive positions. It also establishes targeted completion timelines for investigations and improves the ease of transfer of trust between Federal agencies. In addition, integrated IT capabilities will be fully implemented under TW 2.0.

Together, these phases reflect the Government's transition from a periodic, point-in-time reinvestigation model to a continuous, risk management enabled vetting process.

DCSA Expands CV Enrollment to NSPT Population

In August 2024, the Defense Counterintelligence and Security Agency (DCSA) announced the beginning of phased implementation of CV services for the NSPT population. This expansion is part of the TW 2.0 personnel vetting reform effort led by the Security, Suitability, and Credentialing Performance Accountability Council.

Expanding CV to the NSPT workforce is a critical component of TW 2.0 policy. It strengthens the trustworthiness of all Federal employees, across all sensitivity levels. DCSA is conducting a phased rollout of CV for the NSPT population. The agency aims to provide full enrollment capability to NSPT customer agencies by the end of 2026. At that point, all agencies will be able to enroll their NSPT personnel into CV for alert management, near real-time threat analysis, and reporting. Agencies will enroll their employees based on internal adoption plans.

CV Timeline for NSPT

The transition to CV for the NSPT population follows a phased timeline under TW 2.0. Let's walk through the key milestones:

- In March 2024, the EAs issued formal guidance requiring the enrollment of individuals in NSPT positions into a TW 1.25 CV capability.
- In August 2024, the Defense Counterintelligence and Security Agency (DCSA) announced the beginning of phased implementation of CV services for the NSPT population.
- By September 2025, the entire NSPT population was enrolled in TW 1.25 CV services.
- In March 2026, the phased transition to TW 1.5 CV services became available for the NSPT population.
- By October 2026, the entire NSPT population is required to be enrolled in TW 1.5 CV services. This milestone completes the transition from the initial TW 1.25 capability to the expanded TW 1.5 model.
- Finally, by Fiscal Year 2028, the entire Federal workforce transitions to Trusted Workforce 2.0. This milestone represents the completion of the modernization of Federal personnel vetting moving fully to an integrated, IT capability and enhanced CV model.

Guidance Details

The formal guidance issued by the EAs is titled TW 2.0 Implementation and Operational-Level Guidance for Departments and Agencies and Authorized Investigative Service Providers-Continuous Vetting for Non-Sensitive Public Trust Positions (March 2024).

Managing CV – Agency's Role

Now that you understand how CV developed, let's look at the Agency's role in managing NSPT personnel in CV. Each Agency must designate responsibility for overseeing CV activities. This ensures there is clear accountability for managing the process.

Agency responsibilities include enrolling individuals in CV and recording all enrollments and disenrollments in the appropriate Government-wide repositories. They must also coordinate actions when an individual's primary affiliation changes.

Agencies must maintain a reporting program that requires individuals in Federal personnel vetting to self-report significant life events that change information previously provided on investigative forms. Self-reporting allows individuals to provide context for new information and enables Agencies to assess potential impacts to the efficiency and integrity of the Federal service.

In addition, agencies are responsible for promptly reviewing, evaluating, and responding to CV alerts. Just as important, they must clearly communicate CV requirements and processes to the NSPT workforce.

When an individual has multiple affiliations, the primary Agency has additional responsibilities. The primary Agency coordinates investigative activity, notifies other affiliated agencies, and ensures that any change in a trust determination—such as suitability, fitness, credentialing, or national security access—is properly documented. The content that follows provides a high-level overview of each of these responsibilities.

Enrolling Individuals in CV

Once an Agency makes and records a favorable trust determination, the individual must be enrolled in CV. Agencies are required to manage CV enrollment in a coordinated and consistent manner to ensure there is no interruption in vetting coverage.

Under the Personnel Vetting Management Standards, or PVMS, each individual requires only one CV enrollment. An Agency maintaining a primary affiliation for an individual is responsible for ensuring the individual remains enrolled in an authorized CV service for the duration of that affiliation. Agencies with additional affiliations must ensure that individuals are not enrolled again. This prevents duplicate enrollments. Agencies must enroll each individual in the appropriate CV capability aligned to the applicable investigative tier, based on the position designation.

Agencies should also verify that individuals have completed the required investigative questionnaire within the last five years. This includes the 2017 or later version of the SF 85P, or the 2010 or later version of the SF 86. If the individual has not completed the appropriate version within that timeframe, a new form must be submitted.

It is important to note that once NSPT personnel are enrolled in a TW 1.25 CV capability, periodic reinvestigations are no longer required. Agencies must discontinue the submission of reinvestigations for those individuals.

For more detailed guidance on CV requirements for the NSPT population, refer to your Agency's internal policies and procedures, as well as the March 8, 2024, memorandum titled 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.

Reporting Requirements for Transitional States of CV for NSPT

Historically, the NSPT population satisfied its continuing obligation to self-report information related to their personal history, behavior, and conduct throughout their affiliation with the Government by completing a new investigative form as a requirement of the PR process. Issued by the EAs, the PVMS established a new approach to collect information from individuals that leverages innovations in technology and better supports the CV model. Agencies must maintain a reporting program for CV consistent with the requirements established by the PVMS.

Until the deployment of the technical capability to facilitate self-reporting with the PVQ for the NSPT population via the Individual Engagement Platform (IEP), Agencies are not expected to implement any self-reporting requirements for the NSPT population beyond the five-year collection of an updated investigative form.

For additional guidance on maintaining a reporting program for CV of the trusted workforce, refer to the Federal Personnel Vetting Management Standards, Appendix C. 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.

Document Details

- Personnel Vetting Management Standards (PVMS): Appendix C, Reporting Requirements for the Continuous Vetting of the Trusted Workforce
- Suitability Executive Agent Notice 25-02: Suitability Executive Agent Notice 25-02 - Progress Reporting Requirements and Supplemental Reciprocity Guidance in Transitional States of Continuous Vetting for Non-Sensitive Public Trust Positions
- NBIS Individual Engagement Platform (IEP): The Individual Engagement Platform (IEP) is a suite of capabilities to facilitate core interactions between the Government and individuals subject to personnel vetting. These capabilities include:
 - Form collection
 - Self-reporting
 - Status tracking

- Information request

Reviewing, Evaluating, and Responding to CV Alerts

CV alerts may originate from external data providers or from internal sources, such as self-reporting. Regardless of the source, Agencies must promptly review and evaluate all alerts to determine their impact on an individual's continued suitability or fitness.

Investigative Service Providers (ISPs) are responsible for deciding whether additional investigative action is necessary. Agencies are responsible for assessing any impact on the individual's trust determination and the potential risk to people, property, information, and mission.

CV Alert Resolution

When responding to CV alerts, agencies handle issue resolution much the same way they would address derogatory information identified during a periodic reinvestigation under the traditional model. If a CV alert result meets the threshold for further investigation, the CV analyst will request that the ISP conduct the required investigative actions in accordance with the Federal Personnel Vetting Investigative Standards. Once completed, those investigative files are forwarded to the appropriate adjudicative authority, who will review the information and render a trust determination.

For additional details regarding CV alerts for the NSPT population, refer to 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. This includes any notifications that may be required for labor unions.

For guidance on explaining CV to your workforce, agencies can refer to the Continuous Vetting for Non-Sensitive Public Trust Positions Frequently Asked Questions (FAQ). This resource provides example language to help communicate what CV is, the advantages of CV, and how CV works.

Knowledge Check 1

What is the purpose of continuous vetting, and what benefits does it provide?

Select the best response; then check your answers in the Answer Key at the end of this Student Guide.

- ☐ A one-time background investigation conducted during hiring that eliminates the need for future reviews
- ☐ A periodic reinvestigation process that occurs every five to ten years and improves efficiency by reducing the need for ongoing monitoring
- ☐ An ongoing process that reviews relevant information in near real-time to identify potential risks, promote early detection and mitigation of potential risk
- ☐ A self-reporting system that improves accountability by allowing individuals to identify and resolve security concerns without adjudicative review

Knowledge Check 2

To manage continuous vetting requirements for NSPT positions, agencies must:

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

- ☐ Enroll and disenroll individuals in continuous vetting
- ☐ Conduct periodic reinvestigations every 15 years
- ☐ Review and evaluate continuous vetting alerts
- ☐ Communicate what continuous vetting is to the NSPT workforce

Conclusion

Federal agencies need to consider how they will operationalize CV for the NSPT population. After completing this Short, you should now be able to describe the purpose of CV for NSPT positions, the policies driving the shift to CV, and the role agencies play in managing CV for the NSPT population. This includes, but is not limited to: tracking the population for enrollment, managing enrollment requirements, managing CV alerts, and communicating CV to the workforce. As agencies prepare their implementation plans, they should work closely with their authorized ISP.

For additional information on CV for the NSPT population, visit the course resources. The course job aid is also available there and provides an organized summary of key content and helps reinforce learning.

Appendix A: Answer Key

Knowledge Check 1

What is the purpose of continuous vetting, and what benefits does it provide?

- ☐ A one-time background investigation conducted during hiring that eliminates the need for future reviews
- ☐ A periodic reinvestigation process that occurs every five to ten years and improves efficiency by reducing the need for ongoing monitoring
- ☒ An ongoing process that reviews relevant information in near real-time to identify potential risks, promote early detection and mitigation of potential risk (correct response)
- ☐ A self-reporting system that improves accountability by allowing individuals to identify and resolve security concerns without adjudicative review

Feedback: *Continuous Vetting is an ongoing process that reviews relevant information in near real-time to identify potential risks and promote early detection and mitigation.*

Knowledge Check 2

To manage continuous vetting requirements for NSPT positions, agencies must:

- ☒ Enroll and disenroll individuals in continuous vetting (correct response)
- ☐ Conduct periodic reinvestigations every 15 years
- ☒ Review and evaluate continuous vetting alerts (correct response)
- ☒ Communicate what continuous vetting is to the NSPT workforce (correct response)

Feedback: *To manage continuous vetting requirements for NSPT positions, agencies must enroll and disenroll individuals in continuous vetting, review and evaluate continuous vetting alerts, and communicate what continuous vetting is to the NSPT workforce.*