Reporting Requirements for the Continuous Vetting of the Trusted Workforce Short

Student Guide

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Center for Development of Security Excellence

Contents

Background

Traditionally, the national security sensitive population has been required to self-report information in accordance with SEAD-3. TW 2.0 introduces self-reporting requirements for the entire trusted workforce, as described in the Federal Personnel Vetting Management Standards (PVMS).

DCSA and ODNI will provide capabilities on the low- and high-side domain that will allow individuals to self-report information into a system one time while providing transparency to those agencies with the need-to-know. Under the TW 2.0 Personnel Vetting Shared Services Catalog, this mandatory system – referred to as an information technology (IT) shared service – is known as the Individual Engagement Platform (IEP).

Implementation of these reporting requirements and the IT shared service will occur iteratively, consistent with the Performance Accountability Council's (PAC) TW 2.0 Implementation Strategy. As implementation progresses and new technology is deployed, the Executive Agents will issue additional operational guidance to assist agencies in transitioning to the Reporting Requirements for the Continuous Vetting of the Trusted Workforce.

Welcome

Marriage and a name change…

An arrest for driving under the influence…

The trip of a lifetime, to far-flung countries…

A debt collection notification…

A coworker's sudden and unexplained affluence…

We all lead complex and ever-changing lives, and the information captured on an investigative form or personnel vetting questionnaire shows a snapshot in time and may not truly represent who we are today. All of these are examples of life changes that may require reporting, depending on the individual's position designation.

In this Short you will learn about reporting requirements for the continuous vetting of the trusted workforce, including both self- and third-party reporting requirements. Take a moment to review the learning objectives.

- Describe the minimum reporting requirements for the continuous vetting of the trusted workforce, including third-party reporting requirements
- Recognize how the minimum reporting requirements vary with position designation

Continuous Vetting and Reporting

Consistent with requirements from The Privacy Act of 1974, as amended, Federal personnel vetting attempts to gather information directly from individuals, where possible. Individuals are required to self-report information related to their personal history, past behaviors, and conduct during initial vetting when completing investigative forms, like the Personnel Vetting Questionnaire (PVQ). Individuals may also be required to provide additional follow-up information during the course of the investigation.

Continuous Vetting (CV), as defined in 2017 by Executive Order 13764, is the process of reviewing the background of covered individuals in near real-time during their Government affiliation to determine whether they continue to meet applicable trust determination requirements. Under Trusted Workforce 2.0 all trusted individuals are subject to continuous vetting throughout their time working for or on behalf of the Government.

Reporting is a key part of CV. Individuals have a continuing obligation to report when a life event changes information previously reported on their investigative form or PVQ.

General Reporting Requirements

As you just learned, individuals are required to report when a life event changes previously reported information. These changes could be related to the individual’s personal history, activities, conduct, or behavior.

The requirements for when to report updated information vary, depending on the nature of the life event. Some information must be updated promptly – that is, within three business days of the life event unless prevented from doing so by exceptional circumstances. Some information must be updated in response to ad hoc information requests from Agencies. And finally, some information is updated on a routine, periodic basis.

Benefits of Self-Reporting

Self-reporting by the individual is important and benefits both individuals and Agencies. Not only does self-reporting protect individuals’ privacy, it provides individuals with the opportunity to disclose information and provide any relevant context or explanation. Self-reporting also gives Agencies the opportunity to provide the individual assistance, where appropriate. And, of course, it allows Agencies to determine the impact of new information on the individual’s eligibility and access, as well as the impact on the integrity and efficiency of the Federal service.

Position Designation and Reporting

Federal Personnel Vetting Management Standards Appendix C: Reporting Requirements for the Continuous Vetting of the Trusted Workforce establishes minimum reporting requirements and identifies the specific types of information individuals must promptly report to Agencies.

The specific reporting requirements for individuals depend on position designation, with requirements for each level adding to those at the previous level.

- Individuals in non-sensitive low risk positions have fewer reporting requirements than those in moderate and high risk positions.
- Individuals in moderate and high risk – non-sensitive positions are responsible for all low risk reporting requirements and have additional required reporting obligations.
- Individuals who hold moderate and high risk – sensitive positions are responsible for all minimum reporting requirements listed in Appendix C.

Personnel Vetting Reporting Requirements for Low Risk Positions

Individuals in low risk positions must update changes to the following previously answered PVQ sections promptly – that is, within three business days:

- PVQ Section 01: General Information, which includes basic demographic information like names and social security numbers
- PVQ Section 11: Police Record, which includes any arrest, charge, conviction, or sentencing for a crime, or any domestic-violence-related orders
- PVQ Section 18: Associations, which includes membership in or engagement with organizations or activities dedicated to terrorism or the use of violence to overthrow the United States Government

PVQ Section 01: General Information

- Full name
- U.S. Social Security Number
- Additional names

PVQ Section 11: Police Record

- Arrest, charge, conviction, or sentencing for a crime
- Domestic violence, restraining, protective, stay-away, no-contact, anti-harassment, or other similar order

PVQ Section 18: Associations

- Membership in an organization that, at the time of membership, was both (i) dedicated to the use of violence or force to overthrow the United States Government or a State or tribal Government of the United States, and (ii) engaged in activities to that end
- Knowing engagement in activities designed to overthrow the United States Government, or a State or tribal Government of the United States, by violence or force
- Planning, contributing to, attempting, or carrying out an unlawful act of force or violence targeted at a person, group of people, or property
- Membership in an organization dedicated to domestic or international terrorism
- Knowing engagement in any acts of domestic or international terrorism
- Knowing association with anyone involved in activities to further domestic or international terrorism
- Advocacy for any acts of domestic or international terrorism

Personnel Vetting Reporting Requirements for Moderate and High Risk – Non-Sensitive Positions

Individuals in moderate and high risk – non-sensitive positions must promptly update changes to the PVQ sections just discussed for low risk positions and also, the following:

- PVQ Section 12: Drug Activity
- PVQ Section 13: Marijuana and Cannabis Derivative Use
- PVQ Section 15: Federal Debt
- PVQ Section 17: Handling Protected Information
- PVQ Section 19: Use of Alcohol and Rehabilitative Actions

- PVQ Section 23: Financial Record
- PVQ Section 28: Psychological and Emotional Health

Note that for non-sensitive positions, the Psychological and Emotional Health section only applies to individuals in certain select non-sensitive public trust law enforcement positions, as specified by Agency policy.

PVQ Section 12: Drug Activity

- Illegal drug use or misuse of a controlled substance (excluding marijuana or cannabis derivatives)
- Intentional misuse of prescription drugs
- Illegal possession, purchase, manufacture, cultivation, trafficking, production, transferring, shipping, receiving, handling, or sale of any drug or controlled substance (excluding marijuana or cannabis derivatives)
- Use of an illegal drug or misuse of a controlled substance while in a national security position (excluding marijuana or cannabis derivatives)
- Use of an illegal drug or controlled substance (excluding marijuana or cannabis derivatives) while employed in a criminal justice or public safety position
- Ordered to get counseling or treatment as a result of illegal use of drugs or controlled substances (excluding marijuana or cannabis derivatives)
- Voluntary counseling or treatment as a result of illegal use of drugs or controlled substances (excluding marijuana or cannabis derivatives)

PVQ Section 13: Marijuana and Cannabis Derivative Use

- Use of marijuana or a cannabis derivative
- Use of marijuana or a cannabis derivative while in a national security position
- Use of marijuana or a cannabis derivative while employed in a criminal justice or public safety position
- Illegal manufacture, cultivation, trafficking, production, transferring, shipping, receiving, handling, or sale of marijuana or a cannabis derivative

PVQ Section 15: Federal Debt

- Failure to file a Federal tax return or to pay Federal taxes
- Currently past due on any Federal non-tax debt

PVQ Section 17: Handling Protected Information

- Illegal or unauthorized access/attempted access of any protected information
- Deliberate non-compliance with rules or regulations for safeguarding protected information

PVQ Section 19: Use of Alcohol and Rehabilitative Actions

- Use of alcohol negatively impacts life
- Order to get counseling or treatment as a result of alcohol use
- Voluntarily went to counseling or treatment as a result of alcohol use

PVQ Section 23: Financial Record

- Bankruptcy filing
- Delinquencies greater than 120 days on alimony or child support payments
- Delinquencies greater than 120 days on any debts

PVQ Section 28: Psychological and Emotional Health

- Court or administrative agency order declaring the individual mentally incompetent
- Court or administrative agency order to consult with a mental health professional
  - Note: An order to a military member by a superior officer is not within the scope of this requirement and therefore would not require reporting.
  - An order by a military court would be within the scope of the question and would require reporting.

- Hospital admission, or required hospital evaluation, for any mental health condition or behavioral emergency
    - Note: Requirement to report includes any inpatient hospitalizations, partial hospitalizations, and emergency room visits for a mental health condition(s) or behavioral emergency.
- Diagnosis by a physician or other health professional with psychotic disorder, schizophrenia, schizoaffective disorder, delusional disorder, bipolar mood disorder, borderline personality disorder, or antisocial personality disorder

Note: Psychological and Emotional Health information category applies only to individuals in certain select Non-Sensitive Public Trust Law Enforcement Positions, as specified by Agency policy AND to all individuals in Sensitive Positions

Personnel Vetting Reporting Requirements for Moderate and High Risk – Sensitive Positions

Individuals in moderate and high risk – sensitive positions must promptly update changes to the PVQ sections just discussed for both low risk positions and moderate and high risk – non-sensitive positions and also, the following:

- PVQ Section 03: U.S. Citizenship
- PVQ Section 04: Additional Citizenships
- PVQ Section 05: Residences
- PVQ Section 07: Employment
- PVQ Section 16: Information Technology Systems
- PVQ Section 18: Associations
- PVQ Section 20: Relationship Status
- PVQ Section 22: Foreign Travel
- PVQ Section 25: Foreign Contacts
- PVQ Section 26: Foreign Financial Interests
- PVQ Section 27: Foreign Business Affairs and Foreign Government Activities
- PVQ Section 28, Psychological and Emotional Health, which we discussed previously, also applies to all sensitive positions

PVQ Section 03: U.S. Citizenship

- Citizenship status

PVQ Section 04: Additional Citizenships

- Citizenship of another country
- Foreign passport, identity card, or other similar document for international travel

PVQ Section 05: Residences

- Current residence

PVQ Section 07: Employment

- Service in a foreign Government

PVQ Section 16: Information Technology Systems

- Illegally or without proper authorization accessed or tried to access any information technology (IT) system
- Illegally or without proper authorization tried to and/or did modify, destroy, or manipulate information from an IT system or tried to
- Illegally or without proper authorization denied or tried to deny others access to information on an IT system
- Illegally or without proper authorization tried to and/or did introduce, use, or remove hardware, software or media from an IT system

PVQ Section 18: Associations

The 5 additional associations/behaviors that must be reported for Moderate and High Risk – Sensitive Positions are:

- Advocacy for any acts or activities designed to overthrow the United States Government or a State or tribal Government of the United States, by violence or force
- Membership in an organization that, at the time of membership:

    - Advocated for acts of force or violence to discourage others from exercising their rights under the United States Constitution or the constitution of any State of the United States
    - Engaged in acts of force or violence to discourage others from exercising their rights under the United States Constitution or the constitution of any State of the United States
    - Used unlawful force or violence
- Advocacy for unlawful acts of violence against individuals based on their race, color, religion, sex, national origin, age, disability, or genetic information

PVQ Section 20: Relationship Status

- Current relationship status

PVQ Section 22: Foreign Travel

- Travel to a foreign country
  Note: Individuals must submit an itinerary for unofficial foreign travel according to Agency policy and must receive approval prior to the foreign travel.
    - All deviations from approved itineraries must be reported within five business days of return.
    - When emergency circumstances preclude full compliance with pre-travel reporting requirements, individuals, at a minimum, must verbally advise their supervisor/management chain of the emergency foreign travel with all pertinent specifics requested according to Agency policy, prior to departure, and must fully report the travel within five business days of return.
    - Consistent with national security, Agencies may identify conditions under which prior reporting and approval of unofficial foreign travel is not required.

PVQ Section 25: Foreign Contacts

- Contact with a foreign national
- Contact with a foreign national by spouse, legally-recognized partner from a civil union, domestic partnership, common law marriage, or the person with whom the individual is in a committed, spouse-like relationship

Note: Contact is not reportable for foreign nationals with whom the contact was only while on official business for the U.S. Government. Contact is defined as communication that is in person; by written correspondence, telephone, electronic media (e.g., email, text, social media, internet, etc.); or other method.

PVQ Section 26: Foreign Financial Interests

- Ownership of a foreign financial interest by individual; or spouse or legally recognized partner from a civil marriage, civil union, domestic partnership, or common law marriage; or person with whom the individual is in a committed, spouse-like relationship; or a dependent child
- Control (not ownership) of a foreign financial interest on someone else's behalf
- Receipt of any educational, medical, retirement, social welfare, or other such benefits from a foreign country by individual; or spouse or legally recognized partner from a civil marriage, civil union, domestic partnership, or common law marriage; or person with whom the individual is in a committed, spouse-like relationship; or a dependent child
- Eligibility to receive benefits from a foreign country in the future by individual; or spouse or legally recognized partner from a civil marriage, civil union, domestic partnership, or common law marriage; or person with whom the individual is in a committed, spouse-like relationship; or a dependent child
- Provide financial support to a foreign national

PVQ Section 27: Foreign Business Affairs and Foreign Government Activities

- Advised, supported, or consulted for any foreign-owned business or foreign organization

- Request by a foreign government official for advice or to be a consultant made to individual; or spouse or legally recognized partner from a civil marriage, civil union, domestic partnership, or common law marriage; or person with whom the individual is in a committed, spouse-like relationship; or a dependent child
- Foreign national offered a job, asked to consider working for them, or asked to be a business consultant
- Business venture with a foreign national
- Contact with a foreign government agency or its representative by individual or any immediate family members
- Sponsorship of a foreign national to the U.S.
- Hold political office in a foreign country
- Vote in a foreign election

PVQ Section 28: Psychological and Emotional Health

- Court or administrative agency order declaring the individual mentally incompetent
- Court or administrative agency order to consult with a mental health professional
    - Note: An order to a military member by a superior officer is not within the scope of this requirement and therefore would not require reporting.
    - An order by a military court would be within the scope of the question and would require reporting.
- Hospital admission, or required hospital evaluation, for any mental health condition or behavioral emergency
    - Note: Requirement to report includes any inpatient hospitalizations, partial hospitalizations, and emergency room visits for a mental health condition(s) or behavioral emergency.
- Diagnosis by a physician or other health professional with psychotic disorder, schizophrenia, schizoaffective disorder, delusional disorder,

bipolar mood disorder, borderline personality disorder, or antisocial personality disorder

Note: Remember that the Psychological and Emotional Health information category applies to ALL individuals in Sensitive Positions.

Third-Party Reporting

As a member of the trusted workforce, you have an obligation to ensure the protection of people, property, information, and mission. As you have learned, this means self-reporting life events and other changes to information from your initial vetting questionnaires, but it also means that you are responsible for reporting behaviors or activities of other trusted individuals.

If you observe any of the following, you must report it as soon as practical to the appropriate Agency officials:

- An unwillingness to comply with rules and regulations, or a refusal to cooperate with security requirements
- Unexplained affluence or excessive indebtedness
- Alcohol abuse
- The illegal use or misuse of drugs or drug activity
- Apparent or suspected mental health issues or concerning behaviors or conduct that could impact the individual’s ability to protect classified information or other information specifically prohibited by law from disclosure, or behavior or conduct that may endanger the safety or security of others
- Criminal conduct
- Misuse of U.S. Government property or information systems
- The loss, compromise, or suspected compromise of classified or controlled unclassified information, or any evidence of tampering with a container used for storage of classified or controlled unclassified information

With prompt reporting, together we can ensure the protection of people, property, information, and mission.

Knowledge Check 1

Hannah is a civilian employee in a low risk position. She was recently married and decided to take her new husband's last name. Does Hannah need to report this information?

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

- ○ Yes, Hannah must report both her change in relationship status and name change.
- ○ Yes, Hannah must report her new full name. She does not need to report the change in relationship status, however.
- ○ No, Hannah does not have any reporting obligation.

Knowledge Check 2

José holds a moderate risk – sensitive position as a Federal systems engineer. He is planning a dream vacation with his family, which will include several stops in countries across Asia. Does José need to report his foreign travel?

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

- ○ Yes, José must submit an itinerary in advance, receive approval prior to the foreign travel, and report deviations within 5 business days of his return.
- ○ Yes, José must report travel as promptly as possible, preferably within 3 business days of the trip.
- ○ No, because the travel is unofficial, José does not have any reporting obligation.

Knowledge Check 3

Barbara is an accounts specialist in a high risk – non-sensitive position. She began to notice a sudden and striking change in her coworker's lifestyle. The coworker very abruptly started taking lavish vacations to exclusive destinations and arriving at work dressed in high-end expensive designer clothing. Recently the coworker bragged about purchasing a brand-new luxury vehicle, all cash. Barbara is not aware of any change in this coworker's finances that would facilitate this new spending. What should Barbara do?

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

- ○ Barbara should report these observations to appropriate Agency officials.
- ○ Barbara does not need to do anything, as her coworker's spending does not impact her.

Conclusion

Congratulations. You have completed the Reporting Requirements for the Continuous Vetting of the Trusted Workforce Short. In this Short, you learned that self-reporting of life events is a key element of CV, and third-party reporting is also key to maintaining the trusted workforce.

You should now be able to describe the minimum reporting requirements for the continuous vetting of the trusted workforce, including third-party reporting requirements, and recognize how the minimum reporting requirements vary with position designation.

Remember that implementation of the Reporting Requirements for the Continuous Vetting of the Trusted Workforce will occur iteratively, consistent with the PAC's Trusted Workforce 2.0 Implementation Strategy and Executive Agents operational guidance.

Appendix A: Answer Key

Knowledge Check 1

Hannah is a civilian employee in a low risk position. She was recently married and decided to take her new husband's last name. Does Hannah need to report this information?

- ○ Yes, Hannah must report both her change in relationship status and name change.
- ⦿ Yes, Hannah must report her new full name. She does not need to report the change in relationship status, however. (correct response)
- ○ No, Hannah does not have any reporting obligation.

***Feedback**: Hannah must report her new full name under PVQ section 01- General Information. As an employee in a low risk position, she is not obligated to report the change in relationship status.*

Knowledge Check 2

José holds a moderate risk – sensitive position as a Federal systems engineer. He is planning a dream vacation with his family, which will include several stops in countries across Asia. Does José need to report his foreign travel?

- ⦿ Yes, José must submit an itinerary in advance, receive approval prior to the foreign travel, and report deviations within 5 business days of his return. (correct response)
- ○ Yes, José must report travel as promptly as possible, preferably within 3 business days of the trip.
- ○ No, because the travel is unofficial, José does not have any reporting obligation.

***Feedback**: José must submit an itinerary in advance, receive approval prior to the foreign travel, and report deviations within 5 business days of his return.*

Knowledge Check 3

Barbara is an accounts specialist in a high risk – non-sensitive position. She began to notice a sudden and striking change in her coworker's lifestyle. The coworker very abruptly started taking lavish vacations to exclusive destinations and arriving at work dressed in high-end expensive designer clothing. Recently the coworker bragged about purchasing a brand-new luxury vehicle, all cash. Barbara is not aware of any change in this coworker's finances that would facilitate this new spending. What should Barbara do?

- ⦿ Barbara should report these observations to appropriate Agency officials. (correct response)
- ○ Barbara does not need to do anything, as her coworker's spending does not impact her.

***Feedback**: Barbara should report these observations of unexplained affluence to appropriate Agency officials in accordance with third-party reporting requirements.*