



Federal Personnel Vetting Guidelines

I. Purpose

This document provides strategic direction for the Federal personnel vetting program to further its goal of ensuring a trusted workforce that will protect people, property, information, and mission. The Federal personnel vetting program encompasses vetting for suitability, fitness, national security (eligibility for or continued access to classified information or to hold a sensitive position), and issuing a Federal identity credential. This document describes the high-level outcomes for the Federal personnel vetting risk management framework, how an individual is assessed against the characteristics of a trusted person, the successful outcomes for five personnel vetting scenarios, and the central elements of Federal personnel vetting. The detailed components of personnel vetting are defined in the subordinate Investigative, Adjudicative, and Performance Management Standards and their corresponding Appendices. The Federal personnel vetting program is aligned with and supportive of the Federal Government's broader efforts to recruit and retain a diverse and talented workforce.

Our citizens, the Federal workforce, and our industry partners rightfully expect the vetted workforce to be trusted. The success of the Federal personnel vetting program relies on accurate, complete, logical, and supportable strategic policy, goals, and outcomes.

These Guidelines are derived from the Federal Personnel Vetting Core Doctrine (Core Doctrine), which provides the philosophy for and guides all personnel vetting policies, including all Executive Branch-wide and departments' and agencies' (D/A) specific policies and procedures. The Core Doctrine defines the Federal personnel vetting mission, its guiding principles, key supporting processes, and policy priorities for building and maintaining a trust relationship between the Federal Government and the populations covered by these Guidelines.

II. Scope, Applicability, and Review

- A. These Guidelines describe the policy requirements of the Federal personnel vetting program that are used to meet the outcomes of the Core Doctrine, and effectively and efficiently manage human risk across the personnel vetting enterprise.
- B. To the extent permitted by law, these Guidelines apply to the Executive Branch and other entities when participating in Federal personnel vetting for or on behalf of the Federal Government, including:
 1. Federal civilian, military, and contractor employee personnel working for or on behalf of the Executive Branch of the Federal Government, except as provided by law or Executive Order (EO).

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2. Authorized personnel vetting investigative service providers (ISP).
 3. Authorized adjudicative agencies.
 4. Trusted Information Providers that corroborate and/or verify data as authorized and commensurate with investigative standards established by the Security Executive Agent and the Suitability and Credentialing Executive Agent (EA).
 5. Executive Branch Shared Service Providers.
 6. Personnel vetting management practitioners such as security, human resources, industrial security, military recruiters, suitability and credentialing practitioners, and others.
 7. Personnel vetting oversight entities (e.g., those that conduct program management reviews, assessments, and audits).
 8. Any other individual subject to personnel vetting by the Executive Branch, including State, local, tribal, and private sector personnel.
- C. D/As will ensure internal-level policy documents are consistent with these Guidelines and subordinate standards absent D/A-specific legal obligations, or Security and Suitability & Credentialing EA approvals of exemptions.
- D. The EAs, or their designees, will review these Guidelines regularly, at least every five years, to ensure they are current and responsive to evolving threats, societal trends, changes to law or policy, research and innovation, or to accommodate process or technology improvements. D/As should review their internal policies and procedures periodically to ensure those policies and procedures further the principles, outcomes, and management and policy priorities set forth herein.
- E. These Guidelines remain in effect until revoked in writing by the EAs.

III. Federal Personnel Vetting Outcomes

Executive Branch shared service providers, ISPs, and authorized adjudicative personnel vetting programs are successful when they support the following personnel vetting outcomes:

- A. A trusted workforce based on an evaluation of conduct, integrity, judgment, loyalty, and reliability.
- B. Efficient, effective, and timely trust determinations, regardless of the appropriate Federal personnel vetting domain (suitability/fitness, national security, or credentialing), while complying with applicable law. "Trust determinations" are suitability, fitness, national security (eligibility for or continued access to classified information or to hold a sensitive position), and credentialing determinations that an individual can be trusted to protect people, property, information, and mission, as appropriate under relevant adjudicative standards.
- C. Greater alignment and integration across all Federal personnel vetting domains and complementary mission partners.

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- D. Enhanced risk management tailored by D/As and associated with the duties and responsibilities of the position.
- E. Transparency to the greatest extent possible and effective two-way communication between the individual and the Federal Government to maintain a shared sense of responsibility and trust.
- F. Improved mobility of the trusted workforce.

IV. Federal Personnel Vetting Components

Federal personnel vetting involves effectively managing risk to ensure a trusted workforce working for or on behalf of the Federal Government. Risk management is applied both throughout the end-to-end personnel vetting process and at all levels of personnel vetting, to reduce risk to people, property, information, and mission.

Executive Branch shared service providers, ISPs, and authorized adjudicative agencies integrate the following components into the personnel vetting programs:

A. Federal Personnel Vetting Policy Framework

1. All personnel vetting standards for rendering a trust determination for suitability, fitness, national security, or credentialing eligibility are implemented consistent with the Core Doctrine and these Guidelines.
2. The Investigative Standards define the relevant information categories and data sources that ISPs collect to assess whether an individual demonstrates the characteristics of a trusted person. ISP personnel are subject to any training and qualification requirements established by the EAs.
3. The Adjudicative Standards provide the framework through which D/As render trust determinations based on a thorough evaluation of an individual's conduct and perceived indications of vulnerabilities to determine whether the individual can be relied upon to protect people, property, information, and mission, consistent with the objectives of the Federal personnel vetting program. D/A adjudicative personnel are subject to any training and qualification requirements established by the EAs.
4. The Personnel Vetting Management Standards define the Federal personnel vetting activities that are performed throughout Federal personnel vetting and supported by complementary mission partners to recruit, manage, and maintain a workforce that is trusted to protect people, property, information, and mission.
5. The Federal personnel vetting enterprise employs the latest technology and research and innovation, adjusts to societal changes, operates within legal and regulatory parameters, and uses data-driven analytics as appropriate and performance management metrics to improve the personnel vetting process.

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6. In addition to creating policy, the EAs have oversight and compliance responsibilities for Federal personnel vetting implementation. The EAs will collect and analyze performance metrics, ensure the enterprise carries out its function effectively, efficiently, and in a timely manner, and foster a culture of compliance and accountability.

B. Federal Personnel Vetting as Part of Holistic Risk Management

1. D/As employ a risk management framework across all personnel vetting domains to evaluate risk, determine the relevant information, and consider all potential threats and vulnerabilities associated with the position and the individual when making a trust determination.
2. Holistic risk management relies on improved communication between and integration with personnel, physical, industrial, and information security offices. It also requires greater alignment and integration among multiple mission areas (e.g., agency insider threat, counterintelligence, drug-testing programs, human resources, etc.) to obtain adjudicatively relevant information only available at the D/A where the individual is working.
3. Accurate position designation is critical to ensuring proper vetting of individuals because it determines the position's potential for adverse impact to the integrity and efficiency of the service and the material adverse effect the occupant could have on national security.

C. Determining Trust

1. A trust determination is not solely based on the presence or absence of behaviors or indicators of risk, but also considers the characteristics of a trusted person—good conduct, integrity, sound judgement, loyalty and reliability—to ensure a vetted workforce is able to protect people, property, information, and mission as appropriate under the adjudicative standards applicable to the relevant personnel vetting domain.
2. Trust determinations are informed by complete and relevant data and contextual information related to the individual's behaviors and perceived vulnerabilities so that they result in a balanced and comprehensive assessment of both positive and negative information, to the extent applicable.
3. Procedures and criteria used to inform or make trust determinations are developed and implemented mindful of the need to recruit and retain a talented workforce and without unnecessarily discouraging talented individuals from joining the Federal workforce (e.g., by unnecessary requirements that may be a deterrent).

The adjudicative criteria established by the EAs take into account concerns such as the following attributes:

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- a. Whether an individual demonstrates a regard for rules.
- b. Whether an individual appropriately engages others.
- c. Whether an individual demonstrates conduct consistent with the interests of the United States.
- d. Whether an individual demonstrates a willingness and ability to protect people, property, information, and mission.

D/As must follow the applicable adjudicative criteria when determining risk to protect people, property, information, and mission.

D. Three-Tier Investigative Model

The three-tier investigative model uses information types, which align with the adjudicative attributes, to gather the adjudicatively relevant information needed to assess the characteristics of a trusted person that will protect people, property, information, and mission. Data sources and other sources of information are grouped into information categories that guide collection of the measurable evidence required at each investigative tier.

The investigative tiers are appropriately aligned to support trust determinations for suitability, fitness, national security, and/or credentialing, as appropriate, to the designations at each level of risk, and to permit mobility to the greatest extent possible. The investigation for each tier builds upon the tier below it, with the coverage and complexity of each tier commensurate with designation of the position for which the individual is being vetted.

1. **Low Tier (LT)** – Positions designated as low-risk, non-sensitive, and the minimum investigative tier for eligibility for physical and/or logical access or credentialing determinations.
2. **Moderate Tier (MT)** – Positions designated as moderate-risk public trust and/or non-critical sensitive. For non-critical sensitive positions, the level of investigation can be used to grant access to classified information at the Confidential or Secret level, or L access.
3. **High Tier (HT)** – Positions designated as high-risk public trust and/or critical sensitive or special sensitive. For critical or special sensitive positions, the level of investigation can be used to grant access to classified information at the Top Secret level, access to Sensitive Compartmented Information, or Q access.

E. Five Personnel Vetting Scenarios

All Federal personnel vetting falls within one of five 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. The business processes of all Executive Branch D/As involved with personnel vetting, ISPs, adjudicative entities,

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and other personnel vetting practitioners will adhere to the following five personnel vetting scenarios.

1. Initial Vetting

- a. The goal of initial vetting is to enable a well-informed decision about whether those who have not been previously vetted by the Federal Government (outsiders) present an acceptable level of risk to the Federal Government regarding whether the individual will protect people, property, information, and mission upon entry on duty (trusted insider).
- b. A favorable trust determination, along with a favorable employment decision, turns an outsider into a trusted insider, making the individual eligible to work for or on behalf of the Federal Government (or for other purposes for which an individual is subject to personnel vetting by the Executive Branch), and permits the individual physical and logical access to Federal Government people, property, and information at the level commensurate with the duties of the position and mission.
- c. D/As may make a preliminary determination to allow entry on duty, including temporary access to classified information, after considering the results of high-yield checks prior to completion of initial vetting based on minimum requirements outlined in applicable policy and law, as appropriate, including the Personnel Vetting Management Standards and Security Executive Agent Directive 8, *Temporary Eligibility*.
- d. Aligned investigative standards support the collection of relevant information (data sources and context) to evaluate positive and negative information against the characteristics of a trusted person.
- e. Information gathered during initial vetting provides insight and is used as a baseline for continuous vetting.

2. Continuous Vetting

- a. A trusted insider is enrolled in continuous vetting capabilities throughout the individual's Federal affiliation. Information collected by complementary mission partners and continuous vetting capabilities will be used to manage risk presented by an insider.
- b. Trusted insiders must be evaluated on a continuous basis to ensure the government and public's confidence that the individual will continue to protect people, property, information, and mission.
- c. Continuous vetting informs active and ongoing consideration of potential risk throughout the individual's Federal affiliation and whether the individual continues to demonstrate the characteristics of a trusted person.
- d. Continuous vetting promotes timely detection of behaviors of concern and potential or perceived vulnerabilities, allowing D/As to implement

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remediation activities to address potential issues or assist the individual before concerns escalate.

- e. At a minimum, D/As' continuous vetting programs and procedures integrate and align all sources of relevant information required.
- f. The level of continuous vetting, as required by the position designation, determines the specific conditions, information categories, and frequency of personnel vetting conducted to mitigate risk and ensure ongoing trust determinations.
- g. D/As must assess information about the individual obtained through continuous vetting against information gathered from initial vetting to gain insight into whether the information was previously known or warrants further personnel vetting.

3. Upgrades

- a. After an initial trust determination has been made, an individual's selection for a new position or to assume new duties within or on behalf of the same D/A may require an upgrade in the event the new position, or additional duties, requires a higher tier investigation. If the D/A determines that the new position requires a higher tier than previously vetted, additional personnel vetting is required to meet the new requirements.
- b. D/As must ensure the individual provides any additional background information necessary to meet the personnel vetting requirements for the new position or duties, and may make a preliminary determination to allow entry on duty based on risk before completion of the new investigation.
- c. Only the additional investigative items required between the current investigative tier and the newly required investigative tier will be conducted.

4. Transfer of Trust

- a. The mobility of the trusted workforce is a mission-critical imperative for the entire Government. Trust determinations must easily transfer across D/As, and across roles for individuals who work for or on behalf of the Federal Government.
- b. Transfer of trust occurs when a trusted insider moves between positions, including when a Federal employee moves to a new D/A, when a Federal employee becomes a contractor employee, and when a contractor employee moves from one contractor company to another or is sponsored by a different D/A. Contractor employees may have more than one sponsoring D/A and be on multiple contracts at the same time.

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- c. When an individual transfers, the gaining D/A must validate a prior investigation occurred at the appropriate level and the individual's enrollment in continuous vetting, identify any exceptions, and determine whether the new position has any unique requirements.
- d. If the new position requires a higher investigative tier than previously vetted, the gaining D/A must request additional investigative activity to meet the requirements of the higher tier (reference "Upgrades" section above). The gaining D/A may make a determination to on-board the individual pending the completion of the additional vetting.
- e. If the individual is not enrolled in a continuous vetting program, the gaining D/A must request additional personnel vetting to meet the minimum standards of continuous vetting at the new investigative tier prior to accepting the transfer of trust.
- f. Transfer of trust requires transparency in D/A reporting and information-sharing, and prevents D/As from conducting redundant Federal personnel vetting actions (e.g., requesting new personnel security forms or conducting duplicative investigations and adjudications) for those already vetted as a trusted insider.

5. Re-establishment of Trust

- a. Individuals who no longer work for or on behalf of the Federal Government (or are no longer in a position or have responsibilities that subject them to personnel vetting) for a time period must undergo personnel vetting necessary to re-establish trust with the individual.
- b. The degree of personnel vetting for the re-establishment of trust must be applied to address the designation of the new position.
- c. New investigative checks must be limited to those necessary to re-establish the baseline of trust commensurate to the position the individual will occupy.
- d. Following a favorable trust determination, the individual must be re-enrolled into continuous vetting at a level commensurate with the position designation.

F. Elements of Federal Personnel Vetting

These activities are performed throughout the Federal personnel vetting process by different D/A practitioners, investigators, and adjudicators, and with support from complementary mission partners. Detailed guidance for each element is set forth in the appropriate Standards document. A summary of the critical personnel vetting elements are below:

1. **Position Designation** – Position designations use standard criteria and business rules to make uniform and consistent position sensitivity and risk determinations

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to ensure that the individual holding that position undergoes an appropriate investigation commensurate with the identified risk of the position.

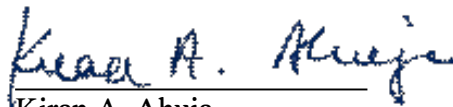
2. **Determining Previous Vetting** – D/As must review Government-wide high- and low-side record repositories to determine if an individual had been previously vetted for a trust determination. D/As must review whether the prior level of personnel vetting meets or exceeds the investigative requirements of the position and determine what, if any, additional personnel vetting is required.
3. **Vetting Questionnaire** – An initial collection of relevant background information by the individual is required, as well as an updated collection of relevant background information if necessary, together with relevant investigative information, to make a trust determination.
4. **Screening** – Screening involves review of information available to the D/A through the application, hiring, and vetting process to identify information of potential adjudicative concern. D/As may conduct screening prior to an investigation and up to the point of receiving high-yield checks through the investigative process. If through screening the D/A identifies information that may lead to the individual being unsuitable, unfit, and/or ineligible to hold a sensitive position, access classified information, or hold a personal identity credential, the D/A may act upon it in accordance with applicable laws, regulations, and policies.
5. **Preliminary Determination** – A preliminary determination is an internal D/A decision based upon the results of high-yield checks conducted during the initial vetting process. High-yield checks are a set of automated record checks, determined by the investigative tier, the results of which may lead the D/A to determine that it can accept the risk of allowing an individual to enter on duty in advance of completion of the required level of investigation. For national security sensitive positions, upon completion of the high-yield checks, D/As may approve the individual for temporary eligibility for access to classified information or to occupy the sensitive position consistent with the requirements of Security Executive Agent Directive 8, *Temporary Eligibility*.
6. **Investigation** – ISPs provide the requesting D/A the report of investigation containing both positive and negative information about the individual for an assessment against the characteristics of a trusted person to make a trust determination.
7. **Adjudication** – Adjudication employs a whole-person concept, where applicable, to make a risk-based decision regarding whether an individual demonstrates the characteristics of a trusted person to protect people, property, information, and mission for the position they occupy or seek to occupy. The adjudication process centers on identifying and evaluating an individual's behaviors and perceived vulnerabilities in accordance with the applicable personnel vetting domain(s).

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8. **Federal Personnel Vetting Record** – D/As must record personnel vetting determinations, to include investigative items and adjudicative information, in the government-wide repositories and the D/A internal systems of records for increased mobility and transparency.
9. **Continuous Vetting** – D/As must enroll each individual in the appropriate continuous vetting capability for the corresponding investigative tier based on the position designation.
10. **Personnel Vetting Engagement** – Effective personnel vetting engagement ensures two-way communication between the individual and the Government at all appropriate points in the process. This results in improved accuracy, validity, transparency, and efficiency at each step of the process.
11. **Review Proceeding** – The personnel vetting process reflects existing rights for applicants’ and employees’ review proceedings for the applicable domain(s).
12. **Information-Sharing** – Information sharing, to the extent permitted by law, in Federal personnel vetting relies on sharing of validated relevant information across and within D/As to eliminate unnecessary duplication and reduce waste. Information sharing will improve transparency of the process, ensure quality, and maximize efficiency, while ensuring proper safeguarding and handling of sources and methods, protecting privacy rights, and ensuring fair and consistent treatment to all individuals.



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February 8, 2022
Date

February 10, 2022
Date