



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Federal Investigative
Services

Federal Investigations Notice

Notice No. 11-04

Date: August 29, 2011

Subject: Continuous Efforts to Align with Reciprocity Goals and Timeliness Standards

In the August 2010 memorandum, "Aligning OPM Investigative Levels with Reform Concepts," Office of Personnel Management (OPM) and Office of the Director of National Intelligence officials advised Agency Heads to work during fiscal year (FY) 2011 to establish policies and procedures to support standardization of the investigation request process and further reciprocity. Since that time, OPM and our Executive Branch customers have made significant progress toward full alignment of investigation requests. This notice advises OPM customers of the conclusion of the transition process and announces full implementation of the aligned investigative levels, as defined in August 2010.

- Effective October 1, 2011, OPM will no longer accept investigation requests that do not align with the standards provided in August 2010 and as highlighted in Attachment 1. Beginning October 1, requests for investigations received electronically or via mail that are not in compliance will be returned as unacceptable.
- Agencies must request the appropriate investigation, based on the position requirements, using the appropriate standard form questionnaire.
- Effective October 1, electronic Questionnaires for Investigations Processing (e-QIP) will not permit investigation requests that are not in compliance with Attachment 1. Agencies are strongly encouraged to begin now to ensure that all requests for investigations are in compliance.

The following specific agency support is required to satisfy Intelligence Reform and Terrorism Prevention Act timeliness mandates for investigative processes:

- Agency partnership in permitting OPM investigators access to employees and associated record information is essential to meeting investigation timeliness goals. The investigation process may require a subject interview with the subject of investigation. We assume that when an investigation is requested, the requesting agency has provided the subject of the investigation direction to cooperate with OPM in its request for a subject interview and understands the investigation may be discontinued if the interview is not conducted.
- Agency action to instruct the subject of investigation to unfreeze credit reports **prior** to initiating a request for investigation is essential to successful investigative processes. The credit check is a critical element in most investigations and may direct other investigative leads. When the credit report is frozen, it greatly delays or prevents OPM from completing the investigation. OPM analysis has shown that direct communication with the applicant regarding frozen credit is effective; agencies must take this step prior to submitting the investigation request.

- Agency action to review investigation requests for accuracy and completeness prior to submission to OPM is key to process efficiency and timeliness. OPM will make a phone call or send an email to the requesting agency if the investigation request does not contain all required forms and information. The agency will be afforded one calendar week to provide the missing material to OPM. If the information is not received, OPM will return the investigative request to the originator as unacceptable. Be advised that this now applies to all agencies.
- Agency verification of the accuracy and completeness of document numbers to validate birth, citizenship, naturalization, etc., when required on investigative forms, is critical to efficient and timely investigative processing. For example, the Standard Form 86, *Questionnaire for National Security Positions*, requires specific details regarding applicants and/or family members born outside the United States. (This includes applicants and family members who are naturalized U.S. citizens, non-U.S. citizens living in the United States, and those that may have been born abroad to U.S. parents.) Without correct document numbers, the investigation may be delayed or incomplete, adversely impacting an agency's ability to make timely hiring and/or security clearance determinations.
- Finally, we are asking agencies to review any outdated Memorandums of Understanding (MOUs) or Memorandums of Agreement (MOAs) for Federal Investigative Services (FIS) products and services. Effective October 1, 2012, MOUs or MOAs that permit exceptions to investigative standards will be considered invalid unless there has been a written renewal or updated request to OPM within the last year or one is pending as of October 1, 2012. OPM will continue its efforts to eliminate all MOUs and MOAs made obsolete by recent reform activities. If an MOU or MOA with your agency requires renewal and/or revision, please contact your OPM agency liaison as soon as possible to begin the process.

By working together we have achieved much to align investigations with reciprocity goals and timeliness standards. These activities to further standardize and streamline processes will continue our forward progress. For further information or assistance, contact your OPM Agency Liaison at 724-794-5612.

Reference:

http://www.opm.gov/investigate/fins/2010/Aligning_OPM_Investigative_Levels.pdf



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Federal Investigative Services

Attachment: FY 2012 Requests for Investigation Requirements

Inquiries: OPM-FIS, Agency Liaison, 724-794-5612
Code: 736, Personnel Investigations
Distribution: SOIs/SONs
Notice Expires: Until superseded

FY 2012 Requests for Investigation Requirements

Requests for investigations are based on the position risk level (for suitability and public trust purposes) and/or the sensitivity designation (for national security and access purposes). Agencies use the position designation process to determine the level of risk and sensitivity, and request the appropriate investigation as follows:

For this Position Designation:	You will use this request format:	To request this investigation:
Risk/Sensitivity Level	Standard Form	FY 2012 OPM Investigative Product Codes
Low Risk/HSPD-12 Credential Non-Sensitive Position	SF 85 (Questionnaire for Non Sensitive Positions)	National Agency Check and Inquiries (NACI) (02B)
Moderate Risk Public Trust Position No national security sensitivity	SF 85P (Questionnaire for Public Trust Positions)	Moderate Risk Background Investigation (MBI) (15)
High Risk Public Trust Position No national security sensitivity	SF 85P (Questionnaire for Public Trust Positions)	Background Investigation (BI) (25)
Secret/Confidential (Undesignated –e.g. Military/Contractor)	SF 86 (Questionnaire for National Security Positions)	National Agency Check with Law and Credit (NACLC) (08B)
Low Risk Noncritical Sensitive Position and/or Secret/Confidential Security Clearance	SF 86 (Questionnaire for National Security Positions)	Access National Agency Check and Inquiries (ANACI) (09B)
Moderate Risk Noncritical Sensitive Position and/or Secret/Confidential Security Clearance	SF 86 (Questionnaire for National Security Positions)	Moderate Risk Background Investigation (MBI) (15)
Any level of risk Critical Sensitive Position and/or Top Secret (TS) Security Clearance	SF 86 (Questionnaire for National Security Positions)	Single Scope Background Investigation (SSBI) (30)
Any level of risk Special Sensitive Position and/or TS Security Clearance with Sensitive Compartmented Information (SCI)	SF 86 (Questionnaire for National Security Positions)	Single Scope Background Investigation (SSBI) (30)
High Risk Public Trust Position Any level Sensitivity	SF 86 (Questionnaire for National Security Positions)	Single Scope Background Investigation (SSBI) (30)

Attachment 1:

“Continuous Efforts to Align with Reciprocity Goals and Timeliness Standards” FIN of August 2011