



VRO Vetting Risk
Operations

8 August 2022

The Vetting Risk Operations (VRO) continues to lead the effort to ensure the National Industrial Security Program (NISP) contractor national security population is enrolled into a compliant Continuous Vetting (CV) program.

The purpose of this document is to provide supplemental guidance to Industry based upon the 27 June 2022, Office of the Under Secretary of Defense (OSD) memorandum, "Department of Defense Guidance on Continuous Vetting and Other Measures to Expedite Reform and Transition to Trusted Workforce 2.0".

There are three key points to highlight:

- Periodic reinvestigations will not be conducted for the NISP contractor national security population.
- An updated SF-86 (e-QIP and releases) will need to be submitted every 5 years, regardless of level of eligibility.
- An individual enrolled in CV, regardless of reason (Other/Deferred) are compliant with the Continuous Vetting requirements.

In order to identify individuals that require an SF-86 update, please use your organization's DISS Subject Report and submit to VRO.

Frequently Asked Questions for DoD Guidance on Continuous Vetting and Other Measures to Expedite Reform and Transition to Trusted Workforce 2.0

- 1. Collection of the SF-86 and releases at a five-year periodicity is more frequent than this information has been collected historically, why is this necessary and has the impact to mission performance been considered?**

Collection of the SF-86 at five-year periodicity is required by the Security and Suitability Executive Agents under Executive Correspondence for Transforming Federal Personnel Vetting: Continuous Vetting and Other Measures to Expedite Reform and Transition to Trusted Workforce 2.0.

While the frequency in which a subject must update their information within their SF-86 may be increasing, the deferment of periodic reinvestigations has meant far fewer subject and employment interviews being conducted by the Investigative Service Provider, significantly reducing the time spent supporting the personnel vetting activities at all levels within the mission.

The updated information, directly from the subject is a critical part of Trusted Workforce and enhances the efficacy of both automated records checks and time-based checks. The

more up-to-date the subject information, the less investigative resources to locate the subject when necessary, reducing the cost of investigation for the federal government.

2. What are the steps for the SF-86 update process?



3. How can I determine the periodicity for collection of the SF-86 and signed release pages?

Use the most recent date of the following to determine the five-year periodicity:

- i. CV enrollment date, regardless of reason (Other/Deferred).
- ii. Date of last investigation.

Note: If a Subject is coming from another company or as part of a Reciprocity/Transfer of Trust you will need to follow the above criteria to determine if an SF-86 and releases are needed.

4. What should I put in the contract number in DISS when the SF-86 update is submitted?

Please enter the following in the contract number: CVUpdate.

5. Will DCSA provide a report which displays the five-year requirement for providing an SF-86 and releases? Is this recurring or one-time only? When will the report with the 5-year requirements and certification be made available?

The report requirements submitted for DISS include on-demand reporting and requested a determination on adding data elements into the DISS Subject report. A change request has been submitted but implementation will depend on the information technology governance process, level of effort for development and other priorities. Timeline for the report to be available is yet to be determined. Until then, please use your DISS Subject Report and use the above criteria to help identify those individuals that will be due.

6. What if my Intelligence Community (IC) and/or Special Access Program (SAP) customer requests an additional SF-86 outside of the 5 year update?

Cleared contractors should continue to follow their GCA's guidance on submission of an SF-86.