



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Federal Investigative
Services

Federal Investigations Notice

Notice No. 15-03

Date: November 4, 2014

SUBJECT: Implementation of Federal Investigative Standards for Tier 1 and Tier 2 Investigations

The 2012 Federal Investigative Standards (FIS) established requirements for conducting background investigations to determine eligibility for logical and physical access, suitability for U.S. Government employment, fitness to perform work for, or on behalf of, the U.S. Government as a contract employee, and eligibility for access to classified information or to hold a sensitive position. The standards consist of five tiers with an Expandable Focused Investigation (EFI) model at each tier.

Implementation of Tier 1 and Tier 2

For FY 2015, the Office of Personnel Management (OPM) is implementing the FIS according to the phased Federal Investigative Standards Implementation Plan issued by the Suitability and Security Executive Agents.

Tier 1 is the investigation for positions designated as low-risk, non-sensitive. It is also the minimum level of investigation for a final credentialing determination for physical and logical access. Tier 1 investigations are requested using the Standard Form (SF) 85.

Tier 2 is the investigation for non-sensitive positions designated as moderate risk public trust positions. Tier 2 investigations are requested using the SF 85P.

Consistent with the Initial Operating Capability (IOC) requirements of the FIS Implementation Plan, as of FY 2015, OPM is conducting Tier 1 investigations in lieu of the former National Agency Check and Inquiries (NACI) (SF 85) product and Tier 2 investigations in lieu of the former Moderate Risk Background Investigation (MBI) (SF 85P).

We have posted detailed information regarding the implementation of Tiers 1 and 2 and the components of each to the OPM Secure Portal for secure access by Federal agencies that request OPM investigations or conduct investigations under a delegation from OPM.

Naming Conventions for Tier 1 and Tier 2 Investigations in OPM Systems

Tier 1 and Tier 2 investigations scheduled on or after October 1, 2014, will continue to be identified as NACI and MBI investigations, respectively, in OPM's databases until OPM is able to incorporate the new naming conventions throughout its systems. OPM's Central Verification System (CVS) will display a notice which informs the users that the NACI or MBI investigations scheduled by OPM on or after October 1, 2014, are conducted as Tier 1 or 2 investigations in accordance with the FIS.

As of October 1, 2014, other investigation service providers (ISPs) may report initiation of Tier 1 and Tier 2 investigations to OPM's Security and Suitability Investigations Index (SII). The updated naming conventions for Tier 1, Tier 2, Tier 2 with Enhanced Subject Interview, Tier 2 Reinvestigation, and Tier 2 Reinvestigation with Enhanced Subject Interview have been added to the valid values listing under the "Type of Investigation." For additional information on OPM's reporting process for ISPs, please refer to FIN 13-04, *New Process for Investigation Service Providers to Report Background Investigations Data*, or visit the private library maintained for ISPs on OPM's Secure Portal. The updated transaction file layout is available on the OPM Secure Portal and includes the new naming conventions for Tier 1 and Tier 2 IOC.

Reciprocity

NACI and MBI investigations conducted before the IOC date of October 1, 2014, can be used to meet reciprocity requirements after the IOC. For example, if a NACI was conducted before October 1, 2014, and a Tier 1 investigation is required after October 1, 2014, the agency may reciprocally accept the previously completed investigation. If the gaining agency obtains new information that calls into question an individual's suitability or fitness for employment, reciprocity does not apply. In all cases, reciprocity requirements set forth in Part 731 of title 5, Code of Federal Regulations (5 CFR 731) are still applicable.

Other Changes

As noted in FIN 14-07, *Investigations Reimbursable Billing Rates Effective October 1, 2014*, OPM no longer offers the MBI on the SF 86. OPM is offering the ANACI-P as an alternative for agencies requesting investigations for non-critical sensitive positions designated as moderate risk public trust. To request an ANACI-P, request an Access National Agency Check with Inquiries (ANACI) and use the subject interview FIPC Special Code "P." This FIPC code will be available on ANACI investigations until the Tier 3 investigation is implemented.

For questions regarding this notice, please contact OPM-Federal Investigative Services External Liaison at 724-794-5612, extension 4600.



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