



## Office of Personnel Management

### **Suitability Executive Agent Programs (SuitEA)**

## **ADDENDUM TO SUITABILITY AND FITNESS PROCESSING MANUAL**

**Original Document Date:** June 22, 2026

**Addendum Date:** June 22, 2026

**Subject/Purpose:** This addendum supplements the existing Agency Referral Guidance in the Suitability and Fitness Processing Manual (SFPM) by providing updated instructions on how agencies should submit referrals, including new information on referrals involving post-appointment conduct. Unless specifically modified by this addendum, all other provisions of the original guidance remain in effect.



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## **Addendum: Roadmap to Agency Referrals to OPM**

### **Purpose**

This addendum provides agencies with a clear, end-to-end view of their responsibilities from the moment a matter is identified through final submission to OPM Suitability Executive Agent's (SuitEA) - Suitability Adjudications office. This roadmap brings together all components of the process— from completion of the Suitability Referral Package Cover Sheet to selection of the appropriate checklist (either Initial Vetting or Post-appointment conduct), to ensure agencies understand what to look for, what information to gather, and how to document it consistently. Each resource is designed to build on the previous step: identifying potential concerns, confirming appropriate jurisdiction and whether a referral to OPM is appropriate, assembling a complete and supportable packet, and applying the correct standards. Collectively, these documents guide agencies in making timely, accurate, curated, and well supported referrals that align with federal suitability expectations and streamline adjudicative review.

The Roadmap helps agencies:

- Determine whether the matter meets SuitEA referral criteria
- Identify relevant documentation and evidence
- Complete the required Suitability Referral Package Cover Sheet
- Select the correct referral checklist (initial vetting or post-appointment)
- Submit a complete, supportable, and timely referral package

Agencies should begin each referral by completing the Suitability Referral Package Cover Sheet and using the accompanying Guide for Referring to OPM to gather all relevant information and documents required to support a strong referral package. As part of this process, officials should first confirm the individual's status and that the matter aligns with SuitEA's referral criteria. Once confirmed, agencies should select the appropriate checklist—initial vetting or post-appointment conduct—to ensure all required elements are addressed. For any questions, uncertainties, or "gray areas," agencies are encouraged to consult Frequently Asked Questions (FAQ) which offer additional clarity and reinforce consistent, well-supported referrals.

As a reminder, agencies may always seek additional support and guidance by contacting SuitEA's Suitability Adjudications helpline at 202-599-0090.

### **Effect on Manual**

This addendum supplements the Manual's existing suitability and fitness adjudication procedures. Except as stated in this addendum, all other provisions of the Manual remain unchanged.



## Guide for Referring to OPM

This guide provides agencies with clear, step-by-step instructions for preparing a suitability referral package. It walks submitting officials through determining appropriate jurisdiction (SuitEA vs. Personnel Security vs. Human Resources (HR), etc.), completing the Suitability Referral Package Cover Sheet, assembling required documentation and completing accompanying checklist, and understanding what constitutes a strong, well supported referral.

Using a structured package can improve clarity, consistency, and reduce follow-up requests.

### When to Submit a Suitability Referral

Agencies should submit a suitability referral to OPM when there is credible, substantiated evidence of conduct that may meet a suitability factor or factors under 5 CFR 731.

Do not refer cases based solely on unverified, anonymous, or unsupported allegations. This information in limited instances may be included only as *context*, not justification.

Agencies may wait to submit a referral when:

- A formal investigation is still pending
- Allegations remain uncorroborated
- Progressive discipline is more appropriate
- Additional evidence is needed to establish seriousness and credibility of conduct

### Determining the Correct Jurisdiction

*(See supplemental Suitability Referral Decision Guide in the Suitability Fitness Processing Manual)*

For positions in the competitive service, positions in the excepted service where the incumbent can be noncompetitively converted to the competitive service, and a career appointment to positions in the career Senior Executive Service (hereinafter referred to as competitive service and career Senior Executive Service), OPM is responsible for making suitability determinations and taking suitability actions, except to the extent the authority has been delegated to agencies. OPM retains exclusive authority to make suitability determinations and take suitability actions in certain categories of cases, even when agencies



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otherwise exercise delegated authority under 5 C.F.R. part 731. OPM retains jurisdiction in the following situations:

- Material, intentional false statement, or deception or fraud in examination or appointment for competitive service or career Senior Executive Service positions.
- Knowing and willful engagement in acts or activities designed to overthrow the U.S. Government by force.
- Post-appointment conduct involving an individual who has obtained “employee” status as defined in 5 C.F.R. part 731.
- Conduct that may warrant a government-wide debarment (once sufficient information exists to support that such a determination may be appropriate).
- In addition, OPM may assume jurisdiction in any case where doing so is necessary to ensure consistency with law, regulation, Executive Agent issuances, or to safeguard the integrity and efficiency of the service.

Refer to the [Suitability Fitness Processing Manual](#) for a detailed breakdown of the delegation to agency heads for making suitability determinations OPM-retained authority.

Use the additional guidance below to determine whether issues should go to OPM - SuitEA, Office of the Inspector General (OIG), Department of Justice (DOJ), Security, or internal agency HR/Employee Relations (ER).

**Refer to SuitEA when:**

- There is substantiated conduct implicating suitability factors
- Evidence is credible, documented, and tied to behavior affecting federal employment
- Conduct occurred during initial vetting or after appointment, depending on referral type

**Refer to OIG or DOJ when:**

- Criminal activity is involved
- Fraud, waste, abuse, or misuse of government systems or property is alleged
- There are potential violations requiring independent investigation



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**Refer to Security when:**

- There are issues involving classified access, mishandling of sensitive information, or clearance/trust concerns
- A Continuous Vetting (CV) alert identifies new information requiring review

**Refer to HR/ER when:**

- Misconduct is more appropriate for progressive discipline
- Performance issues or routine administrative matters are involved
- The conduct does not rise to the level of potential removal

## **Types of Suitability Referrals**

### ***Initial Vetting Referral***

An Initial Vetting Referral is used when suitability issues arise in connection with an individual's application, tentative selection, or appointment to a position. This category includes:

- Applicants and tentative selectees, whose issues surface during the hiring or pre-appointment process; and
- Current Federal appointees and employees, when the vetting pertains to their movement into a new position, such as a competitive service appointment, a noncompetitive conversion, a career SES appointment, or another action requiring suitability review.

Issues appropriate for an Initial Vetting Referral typically emerge prior to or at the time of appointment and involve conduct or disclosures that bear on the individual's eligibility for the position being filled. Conduct must be credible, documented, and tied to the suitability factors outlined in 5 CFR 731.

### ***Post-Appointment Conduct Referral***

A Post-Appointment Conduct Referral is used when conduct or issues arise that fall within the suitability factors and occur after an individual has entered on duty in a covered competitive service or career SES position, and that conduct may warrant an unfavorable suitability determination under 5 CFR 731.



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This referral type applies only when the individual has already been appointed, meaning the conduct is not tied to their application or appointment process but instead arises during their period of Federal employment. Post-appointment cases involve behavior that is credible, documented, and relevant to the efficiency or integrity of the service.

## Overview of the Referral Package

A complete referral package includes:

1. Suitability Referral Package Cover Sheet (with summary of issues and evidence)
2. Checklist Confirming Completeness
3. Evidence Packet (organized logically)
4. Required Forms
5. Points of Contact
6. Signed Permission to Use and Release Records
7. Submission through approved secure channels (e.g., NP2)

## How to Complete the Referral Package Cover Sheet

*(Step-by-Step Instructions)*

**Step 1:** Identify the Submitting Official and Agency Information

Include name, title, email, and phone. Do not include mailing addresses.

**Step 2:** Select the Referral Type

Choose "Initial Vetting" or "Post-Appointment Conduct."

**Step 3:** Provide a Clear Summary of the Issue

- Write a concise narrative describing:
- Key facts
- Dates involved
- Supporting evidence relied upon
- Why the issue meets suitability criteria



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- Avoid including unsupported allegations.

**Step 4:** Complete the Documentation Checklist

On the checklist, indicate which required and optional materials are attached. As applicable, agencies are encouraged to include supporting documentation that may assist in providing a complete and well-supported referral package. Below, we break out specific types of [Required and Optional Supporting Document](#) and materials based upon the type of referral you may submit. This list is not all inclusive. Not all items in this checklist will apply to every referral. Omit irrelevant or duplicative materials. Agencies should provide only the items that are relevant to the issue, to establish and understand the conduct, and that were relied upon to support the referral. Items labeled 'Required' must be included.

**Step 5:** Provide Agency Points of Contact

List POCs for:

- Personnel Security
- Human Resources
- Supervisor/Manager
- Agency Counsel (recommended for post-appointment referrals)

**Step 6:** Attach Permission to Use and Release Records

Provide a signed letter on agency letterhead authorizing OPM to use and release records as needed.

**Step 7:** Verify Package Completeness

Use the checklist to ensure all sections and documents are included before submission.

**Required and Optional Supporting Documentation**

Not all items will apply to every referral. Provide only documentation relevant to the issue and relied upon by the agency.



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## Initial Vetting Referrals

Common Materials Include:

- **Application and hiring materials** (e.g., resume, application package, agency-specific forms)
- **SF50** (initial appointment confirming jurisdiction, most recent to establish status)
- **OF-306 forms** (applicant and appointee versions, with instructions)
- **Position Description** (PD) for the appointed position
- **Vacancy announcement** used during recruitment
- **Agency-specific pre-employment forms** containing relevant disclosures or acknowledgements (e.g., Bureau of Prisons Pre-Employment Inquiry)
- **Evidence supporting referral issues** (e.g., background investigation materials, police or court records, other documentation directly tied to the conduct)
- **Letters of Inquiry (LOIs) or interrogatory interviews** and responses

## Post-Appointment Conduct Referrals

Common Materials Include:

- **Position Description** (PD) for the appointed position
- **SF50** ((initial appointment confirming jurisdiction, most recent to establish status) **and other relevant appointment documents**
- **Disciplinary or performance records** (e.g., written reprimands, counselings, suspensions, PIPs)
- **Investigative reports** (OIG, internal investigations, fact-finding summaries)
- **Evidence supporting referral issues**
- Witness statements, supervisory statements, emails, memos relied upon
- Access-related records (e.g., Time and Attendance records, telework validation evidence detailing no network activity on claimed telework days)
- Agency policy violation documentation (e.g., evidence of improper access to personnel systems)
- Financial integrity documentation (records of suspended or revoked privileges, bank or credit statements, government travel card delinquency reports, etc.)
- System audit or access logs (e.g., system access records/network login logs showing misuse, unauthorized access, or discrepancies)



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- **Letters of Inquiry (LOIs) or interrogatory interviews** and responses
- **Continuous Vetting-related materials** when applicable (e.g., Reimbursable Suitability Investigation (RSI) or follow-on investigative items)

## Structuring the Submission Package

### Organize materials in the following order:

1. Suitability Referral Package Cover Sheet
2. Referral Checklist
3. Evidence Packet (grouped logically)
4. Required Forms
5. Agency Points of Contact
6. Permission Letter

This order helps OPM conduct a sufficiency review and reduces follow-up requests. OPM will acknowledge receipt, conduct a sufficiency review, request additional information from listed POCs if needed, coordinate a decision to maintain or not maintain the case for potential suitability determination, and provide the final determination when complete.

## Interim Actions

OPM does not direct interim measures during review.

Agencies must determine appropriate actions (duty status, details, leave, risk mitigation) through internal HR/ER, security, or legal processes. OPM liaisons may be consulted for suitability-specific questions.

## Questions, Assistance, and Support

For questions about preparing a referral, documentation requirements, or case status, contact OPM liaisons or your assigned Personnel Security representative at 202-599-0090.



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## One-Page Quick Start Guide

- Step 1:** Determine if the conduct meets suitability criteria.
- Step 2:** Determining the correct jurisdiction
- Step 3:** Select Initial Vetting or Post-Appointment referral type.
- Step 4:** Complete the Suitability Referral Package Cover Sheet.
- Step 5:** Gather required and relevant supporting documentation and complete Checklist
- Step 6:** Attach the permission letter and POC information.
- Step 7:** Verify completeness using the checklist.
- Step 8:** Submission to OPM-SuitEA via the NP2 portal.
- Step 9:** Manage interim actions internally.



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## Suitability Referral Package Cover Sheet

**U.S. Office of Personnel Management**

### Referral Package Cover Sheet *(To be completed for every referral)*

#### Agency Information

- Agency Name: Click or tap here to enter text.
- Submitting Official: Click or tap here to enter text.
- Title/Office: Click or tap here to enter text.
- Email: Click or tap here to enter text.    Phone: Click or tap here to enter text.

#### Individual Being Referred

- Full Name: Click or tap here to enter text.
- DOB: Click or tap here to enter text.    SSN: Click or tap here to enter text.
- Position Title / Series / Grade: Click or tap here to enter text.
- Appointment Type (Competitive/Senior Executive Service): Click or tap here to enter text.
- EOD / Appointment Date: Click or tap to enter a date.
- Employment Status: Choose an item.
- Home address & contact information (telephone number and email address)

Click or tap here to enter text.

#### Referral Type

- ☐ *Initial Vetting Referral* (Applicant, Tentative Selectee, Appointed)
- ☐ *Post-Appointment Conduct Referral* (Onboard Employee)

#### Summary of Issues or Concerns

(Provide a concise, factual summary of the conduct, including key dates or sequence of events, the applicable suitability factors, and any material details that form the basis for the referral.)

Click or tap here to enter text.



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## Initial Vetting Referral Package Checklist

### Individual Information

#### Required

- ☐ Full name, DOB, SSN
- ☐ Address, contact information
- ☐ Referral justification
- ☐ Position information (title, series/grade, hiring authority, competitive/Senior Executive Service status)
- ☐ Employment status & EOD date
- ☐ Appointment SF-50 (if applicable, to confirm OPM jurisdiction)

#### Required, if Applicable

- ☐ Additional phone number(s)
- ☐ Any updated applicant information (e.g., amendments to forms, corrected documents)

### Forms & Supporting Documentation

#### Required

- ☐ Resume & date resume was submitted
- ☐ OF 306 (applicant)
- ☐ OF 306 (appointee)
- ☐ Position Description (PD)
- ☐ Vacancy Announcement (if used for hiring)
- ☐ Agency-specific pre-employment forms relied upon for the hiring decision

#### Required, if Applicable

- ☐ Amendments to OF 306 or application materials
- ☐ Court records, transcripts, investigative notes
- ☐ Merit staffing documentation (rating/ranking results, interviews notes, questionnaires, etc.)
- ☐ LOIs and responses
- ☐ Any supplemental evidence or collateral documents that provide useful context supporting issue(s) that were relied upon by the agency

### Required Agency Points of Contact (Provide name, email, and phone number for):

- ☐ Personnel Security POC
- ☐ Human Resources POC
- ☐ Supervisor/Manager
- ☐ Optional – Agency Counsel POC

### Permission to Use and Release Agency Records

Provide a signed letter on agency letterhead authorizing OPM to use, confront with, and release records as required.



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## Post-appointment Conduct Referral Package Checklist

### Individual & Position Information

#### Required

- ☐ Full name, DOB, SSN
- ☐ Position title/series/grade
- ☐ Competitive/Senior Executive Service status)
- ☐ Appointment date (SF 50s recommended – to confirm jurisdiction, most recent status)
- ☐ Employment status (active, leave, suspension, etc.)
- ☐ Referral Justification / Summary of conduct/issues & timeline
- ☐ Supervisor contact information

#### If Applicable

- ☐ Home address & contact information (if needed for notices)

#### Optional

- ☐ Any internal notes that provide context but are not part of the support evidence

### Required Forms & Employment Records

#### Required

- ☐ Position Description
- ☐ Most recent OF 306
- ☐ Relevant HR/adjudication forms relied upon to assess the conduct

#### If Applicable

- ☐ Disciplinary actions (reprimands, suspensions, removals)
- ☐ Performance records
- ☐ OIG or agency investigation documents
- ☐ Emails, memos, or witness statements used to substantiate conduct
- ☐ Time and attendance records; IT records or badge records
- ☐ Court or criminal case documents
- ☐ Letters of Interrogatory (LOI) and employee responses
- ☐ Continuous Vetting (CV) / RSI documentation (only when the issue stems from a CV alert)
- ☐ Drug/Alcohol treatment documentation (only if directly relevant and relied upon)

### Agency Points of Contact - Provide name, phone number, and email address for:

#### Required

- ☐ Personnel Security POC
- ☐ Human Resources POC
- ☐ Supervisor/Manager POC

#### Optional

- ☐ Agency Counsel (recommended for post-appointment conduct cases)

### Permission to Use and Release Agency Records

Signed letter on agency letterhead granting OPM authority to use, confront with, and release records.



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## Guidance for Reporting Agency Actions to SuitEA

### Background

Agencies must notify OPM when they take certain actions under their own authority. This obligation appears in the revisions to 5 CFR 731.103, 731.105, and 731.206, which collectively require agencies to report:

- Final agency actions taken under *independent agency authority*
- Actions involving conduct that fit the suitability factors described in proposed 5 CFR 731.202
- Cases where conduct implicates suitability factors, but the agency chooses *not* to take suitability action or *not* to refer the case

Reporting supports OPM's government-wide oversight role. Required by 5 CFR 731.105 (oversight), agencies must provide OPM sufficient information to ensure:

- Consistent application of suitability standards
- Appropriate tracking of disqualifying conduct
- Monitoring of agency adjudicative quality

Agencies must report agency actions even when a suitability action is *not* taken. The rule clarifies that reporting is required when:

- Conduct implicates suitability factors, *regardless of the authority used*
- The agency opts for an independent-authority action (removal, debarment, clearance revocation, etc.) instead of a suitability action

### Section-by-Section Instructions for Completing the Form

Below is each section of the form with instructions and the applicable 5 CFR citations.

**Date of Notification** - Enter the date the agency is formally submitting the notification to OPM. 5 CFR 731.206 requires timely reporting of agency actions.

**Individual Information** -

- Provide complete identifying information for the individual subject to the action



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- Appointment type and entrance on duty (EOD) to help OPM determine whether the case falls under suitability jurisdiction, consistent with 5 CFR 731.101–731.102

**Type of Agency Action Taken** - Describe the agency's final action taken under its independent authority. Reportable actions under 5 CFR 731.103(a)(3) include *any* final agency action based on conduct that aligns with suitability factors—even when not taken under OPM's delegated authority.

Examples:

- Removal under agency authority
- Agency debarment
- Final security clearance revocation
- Non-suitability disciplinary action

**Effective Date of Agency Action** - Enter the date the agency action became effective. This supports OPM recordkeeping required under 5 CFR 731.105.

**Authority Used (Regulatory/Statutory Citation)** - Indicate the authority under which the agency acted (e.g., agency conduct regulations, Title 5 authorities, security authorities, ethics statutes). 5 CFR 731.103 requires reporting regardless of the authority used if the *conduct* aligns with suitability factors.

**Basis for the Agency Action:**

- Write a factual, non-conclusory summary
- Include evidence sources and relevant dates
- Ensure alignment with suitability factors listed in 5 CFR 731.202 (e.g., misconduct, criminal conduct, falsification, alcohol/drug use, refusal to undergo investigation)

**Primary Sources of Evidence Relied Upon** - Check the box for all applicable sources of information the agency relied upon to form the basis of their agency action.

**Suitability Factor Determination**

- If yes, describe which factors apply and note applicable additional considerations. Suitability factors are defined in proposed 5 CFR 731.202. Additional considerations appear in proposed 5 CFR 731.203.



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- If suitability factors existed but no suitability action or referral was made, please explain the reason why no suitability action or referral was made.

Reporting obligations appear in 5 CFR 731.103 and 731.206. Even if the agency elects *not* to take a suitability action, 5 CFR 731.206 still requires submission of this form when suitability conduct is involved.

**Pending Internal or External Actions** - Provide brief descriptions of ongoing or pending actions (e.g., Security reviews, EEO matters, grievances, MSPB appeals, and criminal matters).

**How the Conduct Was Initially Identified** - This helps OPM assess systemic issues, as contemplated under 5 CFR 731.105.

**Agency Information (POC Information)** - Provide contact information for whoever can answer OPM's follow-up questions, if needed.

### When Agencies Must Use This Form

Under part 731 of title 5 of the CFR, to improve efficiency, rigor and timeliness by which OPM and agencies vet individuals for risk to the integrity and efficiency of the service, agencies must submit this form when:

1. **The agency takes a final action under independent authority**, and
2. **The underlying conduct matches a suitability factor**, even if the agency did not:
  - Take a suitability action, or
  - Refer the case to OPM during adjudication

Common Scenarios that Require Reporting:

- Removal for conduct that aligns with suitability factors
- Agency debarment involving misconduct
- Clearance revocation where misconduct relates to suitability
- Misconduct found through OIG or internal investigations
- Cases originally reviewed as potential suitability matters but adjudicated under agency authority



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## Agency Action Notification Form

**Date of Notification:** Click or tap to enter a date.

### Individual Information

- Full Name: Click or tap here to enter text.
- DOB: Click or tap here to enter text.      SSN: Click or tap here to enter text.
- Position Title / Series / Grade: Click or tap here to enter text.
- Appointment Type (Competitive/Senior Executive Service): Click or tap here to enter text.
- EOD / Appointment Date: Click or tap to enter a date.
- Employment Status: Click or tap here to enter text.

**Type of Agency Action Taken** *Describe the agency's final action taken under its independent authority (e.g., removal under agency authority, agency debarment, final security clearance revocation, etc.)*

Click or tap here to enter text.

**Effective Date of Agency Action:** Click or tap to enter a date.

**Authority Used** *(regulatory/statutory citation):* Click or tap here to enter text.

**Basis for the Agency Action** (Provide a concise and factual summary consisting of 2-4 sentences of the conduct that forms the basis for the agency action including relevant details, timeline, and how the conduct was established.)

Click or tap here to enter text.

### Primary Source(s) of Evidence Relied Upon:

- |                                                                |                                                                  |
|----------------------------------------------------------------|------------------------------------------------------------------|
| <input type="checkbox"/> OIG investigation report              | <input type="checkbox"/> Emails, memos, or witness statements    |
| <input type="checkbox"/> Internal administrative investigation | <input type="checkbox"/> LOI and employee response               |
| <input type="checkbox"/> Security or CV-related findings       | <input type="checkbox"/> Completed background investigation      |
| <input type="checkbox"/> Court/criminal documents              | <input type="checkbox"/> Other: Click or tap here to enter text. |
| <input type="checkbox"/> Access or System Discrepancies        |                                                                  |

**Does the Conduct Involve Any Suitability Factors (5 CFR 731)?** *If yes, please describe the suitability factors that are implicated. As applicable, please also describe relevant additional considerations.*

Click or tap here to enter text.

- If the conduct involved suitability factor, but a suitability action was not taken and/or a referral to OPM was not made, please explain why.

Click or tap here to enter text.

- Are there any pending internal or external actions related to this conduct (e.g., security review, EEO case, grievance, MSPB appeal, criminal matter)? If yes, briefly describe.

Click or tap here to enter text.

- How was the conduct initially identified (e.g., supervisor report, CV alert, complaint, internal review, automated system, etc.)?

Click or tap here to enter text.

### **Agency Information**

Agency Name: Click or tap here to enter text.

Point of Contact Name (e.g., Security Office, Human Resource, etc.): Click or tap here to enter text.

Title/Office: Click or tap here to enter text.

Email: Click or tap here to enter text.    Phone: Click or tap here to enter text.

*Submit the completed form via the NP2 to the Suitability Referrals email box.*

*For questions or assistance completing this notification form, please contact SuitEA at 202-599-0090.*