



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT
Washington, DC 20415

Suitability and Credentialing Executive Agent Notice

Notice No. 25-05

July 21, 2025

Subject: Non-Sensitive Continuous Vetting Enrollment and Purged Records

I. Overview

This memorandum communicates guidance for continuous vetting enrollment of individuals in non-sensitive positions into continuous vetting when the record of the individual's investigative and adjudicative history no longer appears in the government-wide repository, the Central Verification System (CVS), or its successor system, due to exceeding records retention timelines. This guidance applies to all agencies with covered individuals, as defined by Executive Order (EO) 13467, as amended, occupying non-sensitive positions¹ and to authorized investigative service providers (ISPs).

As the implementation of continuous vetting under the Trusted Workforce (TW) 2.0 initiative progresses with the non-sensitive population, agencies and ISPs may encounter individuals whose investigative and adjudicative history no longer appears in the government-wide repository due to inactivity. This guidance establishes requirements for enrolling these individuals into continuous vetting using a risk-managed approach that provides the most effective and efficient implementation for the enterprise.

II. Enrollment Requirements for Individuals with Records Purged from the Government-wide Repository

In accordance with the Federal Personnel Vetting Management Standards, prior to enrolling an individual into continuous vetting, agencies must ensure that the individual has a favorably adjudicated investigation at a level commensurate with the position's designation. Although agencies are required to report adjudications of completed investigations to the applicable government-wide repository, it is possible an adjudication no longer appears in the system. The absence of an adjudication in the government-wide system does not prohibit continuous vetting enrollment. In these situations, ISPs may accept information provided by agencies as verification an individual has a favorably adjudicated investigation at a level commensurate with the position's designation.

- A. ISPs must develop a process to allow agencies to enroll these individuals into continuous vetting **without** requiring a new initial investigation if the agency has a record of the original investigation and adjudication, regardless of investigation completion date or adjudication date. In these instances, the agency must collect new fingerprints and an investigative form commensurate with the position's designation and submit the individual for enrollment in Rap Back and continuous vetting. ISPs may establish additional

¹ This includes non-sensitive positions designated at the low-, moderate-, and high-risk levels.

requirements to recreate the individual's record within the government-wide repository, such as requiring agencies to enter certain information related to prior credentialing determinations or other necessary information. Agencies must be prepared to provide details of the original investigation and adjudication to the ISP to facilitate re-establishing the individual's record.

- B. If the agency has no record of the original investigation and adjudication, the agency must initiate a new investigation commensurate with the position's designation and enroll the individual in continuous vetting once the investigation is adjudicated, as appropriate.

III. Acceptable Adjudication Action Codes for Continuous Vetting Enrollment

As noted, eligibility for enrollment in continuous vetting requires a favorably adjudicated investigation at a level commensurate with the position's designation. To provide clarity to the community and avoid unnecessary delays in enrollments, for the purposes of this requirement, an adjudication is considered favorable if it represents a final decision that allows an individual to be, or remain, affiliated with the agency in a non-sensitive position. The following adjudicative action codes historically recorded in CVS using the INV 79A are considered favorable for the purposes of supporting eligibility for enrollment in continuous vetting:

- A. Code 1, favorable security clearance/eligibility determination under EO 12968
- B. Code 2, favorable suitability/fitness determination under 5 CFR 731 or equivalent
- C. Code 3, favorable fitness determination; 5 CFR 731 or equivalent do not apply
- D. Code 7, counseled and/or letter of warning/advisement or reprimand issued
- E. Code 8, retained, but security clearance revoked or denied
- F. Code 9, suspended from duty (i.e. administrative personnel action)

Although Codes 7, 8, and 9 represent that the agency made an exception in the adjudicative process, the individual maintains affiliation with the agency, therefore, continuous vetting enrollment is required. Adjudication action codes 4, 5, 6, 10, and 11 are not considered favorable and/or final decisions to support enrolling individuals in non-sensitive positions into continuous vetting.

IV. Validating Alert Information – Previously Known Information

When enrolling individuals in non-sensitive positions whose investigative and adjudicative history has been purged from the government-wide repository, although the agency may have a record that verifies a prior investigation at the required level was completed and favorably adjudicated, a copy of the full investigation may not be available from the agency or ISP.

- A. If an alert is generated when enrolling these individuals in continuous vetting and Rap Back, agencies and ISPs will consider any issue information occurring prior to the investigation completion date to be previously known.

- B. If the issue(s) occurred after the investigation completion date in the agency's record, agencies and ISPs will consider the alert to be new information requiring appropriate investigation and adjudication.

Questions regarding this guidance should be directed by email to SuitEA@opm.gov.

Joe Knouff
Suitability Director
Suitability Executive Agent Programs

References:

- A. Executive Order 13467, as amended, *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information*
- B. Title 5, Code of Federal Regulations, part 731
- C. Trusted Workforce 2.0 Implementation and Operational-Level Guidance for Departments and Agencies and Authorized Investigative Service Providers – Continuous Vetting for Non-Sensitive Public Trust Positions, March 2024, revised June 2025
- D. Federal Personnel Vetting Management Standards, July 2024, revised June 2025
- E. SuitEA Notice 25-02, *Progress Reporting Requirements and Supplemental Reciprocity Guidance in Transitional States of Continuous Vetting for Non-Sensitive Public Trust Positions*, December 2024