DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
MANPOWER AND RESERVE AFFAIRS
111 ARMY PENTAGON
WASHINGTON, DC 20310-0111

SAMR

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Army Federal Investigative Standards (FIS) Implementation

1. References:

a. Memorandum, Performance Accountability Council, 30 Apr 14, subject: Implementation of the Revised Federal Investigative Standards.

b. Memorandum, Director of National Intelligence and the Office of Personnel Management, 14 Dec 12, subject: Approval of the Revised Federal Investigative Standards.

2. The Federal Investigative Standards establish requirements for the conduct of background investigations to determine eligibility for logical and physical access, suitability or fitness for U.S. Government employment, eligibility for access to classified information or to hold a sensitive position, and fitness to perform work for or on behalf of the U.S. Government as a contractor employee. The FIS use a flagging strategy to expand background investigations and align investigative elements at each Tier to promote standardization, efficiency, and reciprocity of background investigations.

3. The FIS Implementation Plan (Reference 1a) implements a new naming convention for background investigations and outlines the phased implementation of the FIS with full operating capability by October 2017 (Enclosure 1).

a. On 1 Oct 14, the Office of Personnel Management (OPM) implemented Tier 1 (T1) and Tier 2 (T2) background investigations. The OPM discontinued the National Agency Check and Inquiries (NACI) and Moderate Background Investigation (MBI) investigation types.

b. On 1 Oct 15, the OPM implemented Tier 3 (T3) of the FIS. The OPM discontinued the Access National Agency Check and Inquiries (ANACI) and the National Agency Check with Law and Credit (NACLC) investigations and began conducting T3 investigations and Tier 3 Reinvestigations (T3R).

c. Tiers 4 and 5 are scheduled to be implemented on 1 Oct 16, pending additional guidance from the Director of National Intelligence and the OPM.

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4. Effective immediately, all Army Commands, Army Service Component Commands, Direct Reporting Units and Army Agency Heads will follow the Army Tier 3 Implementation Guidelines when processing T3 and T3R background investigations for individuals occupying non-critical sensitive positions or requiring access to Confidential or Secret information and for Soldiers accessing into the Army (Enclosure 2). An ANACI or NACLC that closed over 10 years ago will require a T3R.

5. The Assistant Secretary of the Army for Manpower and Reserve Affairs point of contact is COL Jennifer A. Collins, (571) 256-4366. The Office of the Deputy Chief of Staff, G1 point of contact is Mr. Paul Aswell, (703) 695-7693. Office of the Deputy Chief of Staff, G-2 points of contact are Ms. Teane Smith, (703) 695-2629, teane.r.smith.civ@mail.mil and Ms. Olga Delgado, (703) 695-3060, olga.n.delgado.civ@mail.mil.

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(Manpower and Reserve Affairs)

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Federal Investigative Standards (FIS) Implementation Plan Overview

The FIS changed the name of each background investigation to Tier 1, 2, 3, 4, or 5. The Tiers represent the type of background investigation that is conducted. Each Tier has different requirements and is designed to build upon the lower Tiers. The chart (Attachment 1) provides a crosswalk of the new and former investigation names.

Tier 1 (T1) and Tier 2 (T2)*

- T1 (formerly National Agency Checks with Inquiries), T2 Enhanced Subject Interview (T2S) (formerly Moderate Background Investigation) and T2S Reinvestigation (T2RS) were implemented on 1 Oct 14. The new investigation name will be updated in security systems in April 2016.
- All investigations conducted in support of low risk positions, non-sensitive positions, or for physical/logical access are conducted as T1 background investigations.
- All investigations in support of moderate risk public trust positions are conducted as T2S background investigations.
- Reinvestigations for T1 are not authorized.
- Army policy requires T2S reinvestigations for Sexual Assault Response Coordinators and Sexual Harassment/Assault Response and Prevention Victim Advocates.[1] All other T2S reinvestigations will be implemented under separate guidance.

Tier 3 (T3)

- T3 investigations began on 1 Oct 15.
- All investigations scheduled at this level by OPM prior to 1 Oct 15 are either an Access National Agency Check and Inquiries (ANACI) or the National Agency Check with Law and Credit (NACLC). All investigations scheduled at the Tier 3 level on or after 1 Oct 15 are conducted using T3 background investigation standards. Refer to Enclosure 2 for T3 implementation guidelines.
- Once an individual has a T3 investigation conducted, a new Tier 3 investigation is not required as individuals move between Military, Civilian and Contractor employment.
- An ANACI or NACLC that closed over 10 years ago will require a T3R.

Tiers 4 (T4) and Tier 5 (T5) will be implemented on 1 Oct 16 in accordance with guidance provided by the Director of National Intelligence and/or the OPM.

[1] ASA(M&RA) memorandum, subject: Guidance for Civilian Sexual Harassment/Assault Response and Prevention (SHARP) Program Positions, dated 27 Sep 13.

Tier Levels and Naming Conventions

Tier	IOC	FOC	Position Designation/Access	Former Name	New Name
Tier 1	10/2014	9/2017	Low Risk, Non-Sensitive, Physical/Logical Access	*NACI*	T1
Tier 2*	10/2014	9/2017	Moderate Risk Public Trust	*MBI*	T2 T2R T2S T2RS
Tier 3	10/2015	9/2017	Non-Critical Sensitive, L, Confidential and Secret Information	*ANACI* *NACLC*	T3 T3R
Tier 4	10/2016	9/2017	High Risk Public Trust	*BI*	T4 T4R
Tier 5	10/2016	9/2017	Critical Sensitive, Special Sensitive, Top Secret, Sensitive Compartmented Information, Q	*SSBI* *SSBI PR* *PPR*	T5 T5R T5C**
Legend: R= Reinvestigation S= Enhanced Subject Interview (ESI) C= Continuous Evaluation (CE)					
*Until notified by OPM, T2S and T2RS will be submitted in lieu of T2 and T2R. ** Additional guidance will be provided prior to implementation of T5C on 1 Oct 16					

Army Tier 3 Implementation Guidelines

Tier 3 (T3) Investigation Crosswalk

Effective, 1 Oct 15, all individuals occupying non-critical sensitive positions or requiring access to Confidential or Secret information will receive a T3 investigation or a Tier 3 Reinvestigation (T3R). T3/T3R background investigations will be submitted in accordance with Figure 1.

Figure 1. Conversion of Accesses and Investigations[1]

Status	Current Access Level and Investigation Type	Level of Access Required	New Investigation Type Required	Form Requirements
Current Civilian	Secret granted as a civilian based on a ANACI, DNACI, NACLC (PR), NACI or similar investigation that closed more than 10 years ago; no 24 month break in service	Secret	T3R[2]	SF86
Current Civilian	NACI with no access	Secret	T3	SF86, OF306, SF87
Current Civilian	Secret based on NACLC	Secret	T3	SF86, OF306, SF87
Civilian New Hire-Former Military or Contractor	Secret- NACLC as military/contractor	Secret	T3	SF86, Resume, OF306, SF87
Civilian New Hire-Former Military or Contractor	SSBI	Secret or higher	None	N/A
Military	ENTNAC/ENAC	Secret	T3	SF86, SF87 or FD258
Military	NACLC that closed more than 10 years ago	Secret	T3R[2]	SF 86
New Hire Dual Position- NG & Civilian (US Code Title 5 & 10 only)	ENTNAC, ENAC, NACLC	Secret	T3	SF86, Resume, OF306, SF87

[1] In 1997, ANACI became the national standard of investigation for initial Secret eligibility for civilian personnel. Prior to 1997, DNACI (DSS) and NACI (OPM) were the standard investigations for access to classified information by federal government civilians.

[2] Reinvestigations for access to Confidential or Secret information will be submitted 10 years from the previous investigation closed date.

T3R Federal Bureau of Investigation (FBI) Fingerprint (FP) Checks

The Federal Investigative Standards (FIS) requires an FBI FP check for all T3R investigations if the previous investigation (s) contained unclassifiable fingerprints.

1. Requester

a. Commands may issue internal guidance on whether or not Requesters will be required to search the Office of Personnel Management's (OPM's) Central Verification System (CVS) or call OPM referencing their Security Office Identifier (SOI) to determine if any of the previous investigations contained fingerprint results.

b. If the previous FPs were unclassifiable or there are no FP results in CVS, new FPs are required.

2. Personnel Security Investigation Center of Excellence (PSI-CoE)

a. If a Special Agreement Check (SAC) is not documented in the Joint Personnel Adjudication System (JPAS), the PSI-CoE will view CVS to validate if previous FP results are on record.

b. If the previous FPs were unclassifiable or there are no FP results in CVS, the PSI-CoE will send an e-mail to the Subject and Requester informing them of the requirement to capture fingerprints.

c. The PSI-CoE will initiate the investigation request but the request will not be released to OPM until a FP SAC is displayed in the JPAS. If FPs are not submitted within 7 days of receiving the completed Standard Form 86, the investigation request will be terminated.