



U.S. Department of Agriculture Personnel Security Bulletin #11-03 Subject: Discontinuance of FIPC 391

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Agriculture

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Scope and Effect: This is an internal advisory document for use by USDA personnel involved in implementing USDA's personnel security program.

Supersession: Personnel Security Bulletin #09-02, dated December 16, 2008

Background: The FIPC 391, *Certification of Amended Investigation Form*, has been used by the Submitting Office Number (SON) to amend certain areas of the hard-copy questionnaires with the applicant's intent and approval if the applicant was unable to personally make the necessary changes. It has also been used for date changes on the signature pages of the Electronic Questionnaires for Investigations Processing (e-QIP) forms, in many cases, to meet the overall 14-day processing time set by the Intelligence Reform and Terrorism Prevention Act (IRTPA) of 2004 for national security positions.

New Procedure: USDA is submitting 100% of all background investigation requests to the Office of Personnel Management (OPM) via e-QIP. In e-QIP, any corrections that are needed on questionnaires must be completed by the subject and therefore, the FIPC 391 is not a factor.

In regards to form timeliness, OPM tracks the initiation timeframe from the date the subject certifies their form in e-QIP (see the date/time shown on the CER Signature Form page) to the date they receive all of the necessary information to schedule the investigation. NOTE: The date the employee signs this release form or the date the Agency POC writes in an updated date using the FIPC 391 has no impact on the timeliness calculation. Therefore, using the FIPC 391 for the sole purpose of re-dating release pages is irrelevant.

Therefore, effective immediately, the FIPC 391 form should no longer be utilized. This is effective immediately for all types of submissions.

PDSD must submit all National Security requests to OPM within 14 calendar days; therefore, PDSD requests all agencies to submit their National Security requests to us in approximately 7 days to allow for processing time on our end. We recommend each agency prioritize their workload by processing all National Security requests in e-QIP first and utilize electronic fingerprint methods when possible (attaching the results to the submission package). IRTPA does not apply to Public Trust positions.

Further Information: Please contact the Personnel and Document Security Division at (202) 720-7373.
