UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Federal Investigative
Services Division

Federal Investigations Notice

Notice No. 10-04 **Date: March 18, 2010**

SUBJECT: Enhancements to the Central Verification System (CVS) for Reciprocity

Background
The Office of Personnel Management (OPM) has renamed the Clearance Verification System to the Central Verification System (CVS) to better represent the scope of information now contained in the system. CVS remains the key system supporting security clearance reciprocity throughout the Federal Government, as designated by the Intelligence Reform and Terrorism Prevention Act (IRTPA) of 2004. This Notice outlines new enhancements to CVS that further support the reciprocity of security clearances, suitability and fitness determinations.

The Central Verification System
CVS has been expanded to satisfy requirements of on-going security clearance and suitability program reform efforts. This expansion includes new data fields to support the expanding application of reciprocity rules to Federal Government vetting determinations. These new data fields are related to credentialing determinations under Homeland Security Presidential Directive 12 (HSPD 12), suitability or fitness for Federal employment, fitness for contractor employees, and eligibility for access to classified information.

Agencies that access CVS through OPM's Secure Portal will notice redesigned screens that offer greater functionality and accessibility. Federal Investigative Services (FIS) will publish a comprehensive user manual in conjunction with this release of CVS 2.0. Users should familiarize themselves with the manual to learn about the new system navigation and the features of CVS. Users can access the manual through the library on OPM's Secure Portal.

CVS and the Revised INV FORM 79A
Agencies must report their adjudicative decisions on background investigations to OPM, as required by Executive Order 10450, IRTPA implementation guidance, E.O. 13488 and its implementation guidance. To facilitate reciprocity, CVS shares adjudicative information reported to OPM. FIS recently revised the reporting template known as the INV Form 79A "Report of Agency Adjudicative Action on OPM Personnel Investigations" to capture the adjudicative criteria used to make determinations on OPM investigations. The adjudicative information reported by agencies is viewable to adjudicators on the CVS "Adjudication Detail" screen. For additional information on the revisions to the template used to report adjudications on OPM investigations, see Federal Investigations Notice (FIN) 10-03, INV FORM 79A, Report of Agency Adjudicative Action on OPM Personnel Investigations.

Check CVS When Exercising Suitability or Fitness Reciprocity
When adjudicators exercise suitability and fitness reciprocity, they should search CVS and review the "Adjudication Detail" screen. The data displayed on this screen is adjudicative information reported to OPM. The "Agency Adjudication" field reflects "Favorable" when the adjudicating agency reported a favorable determination to OPM. The "Adjudication Detail" screen also reflects a "yes" or "no" in the "Issues" field depending upon whether issues were present in OPM conducted investigations. Generally, a favorable determination on a case involving no issues can be easily and confidently accepted reciprocally, taking into consideration the adjudicative standard used to make the determination. If, however, a case closes with issues that were mitigated during adjudication to render a favorable determination, the agency interested in practicing suitability/fitness reciprocity should contact the prior adjudicative agency or review the investigative record for any conduct that is incompatible with the core duties of the new position.

If the previous adjudicative determination requires review of the investigative file prior to reciprocation, CVS will relay this information to the user. In the "Agency Adjudication" field, CVS will display this message: "Review investigative record or contact adjudicating agency." CVS users can navigate to the "Investigation" tab to initiate a file request to review the investigation. CVS users can also contact the entity that adjudicated the investigation for additional information. The contact information of the adjudicating entity is available to CVS users through the "Please Call" alert posted on the adjudication in CVS. Further discussion concerning reciprocity can be found in a forthcoming FIN, Subject: Reciprocal Recognition of Prior Favorable Suitability and Fitness Determinations.

Check CVS When Exercising Security Clearance Reciprocity
To support security clearance reciprocity, CVS includes data on existing clearances reported to OPM, the supporting investigations, related polygraph indicators and whether any clearance exceptions are reported to OPM. All of the features and applications of the Clearance Verification System remains in the Central Verification System. Consult the Office of Management and Budget (OMB) Memorandum for Reciprocal Recognition of Existing Personnel Security Clearances released December 12, 2005 for details on CVS use for security clearance reciprocity.

Agency Responsibilities
Agencies will continue to supply records to CVS in bulk via transaction files through the OPM Secure Portal, or through individual entries through the Personnel Investigations Processing System (PIPS) Agency Menu.[1] In the future, the transaction file method will also be used to submit HSPD-12 information to CVS. In support of security clearance reciprocity, agencies must submit daily updates to their information to report any changes, such as: adding new clearances, noting revocations, denials, suspensions, and those clearances which were administratively withdrawn.

[1] The OPM Secure Portal will continue to accept two types of CVS file uploads: the refresh file and the incremental file. The purpose of the refresh file is to revalidate active CVS clearances. The incremental file should be used to report any changes or updates to the record.

Agencies are required to fully refresh their CVS clearance data at least monthly. Agencies should contact the FIS IT Systems Security and Access (724) 794-5612 to establish a schedule for this process with FIS. Clearances that are not refreshed monthly will reflect a status of "unknown" and may prompt inquiries to the granting agency from CVS users seeking to apply reciprocity to the clearance. Agencies should keep their Security Office points of contact current with FIS so that the contact information shared throughout the system is current.

Agencies have the responsibility for practicing reciprocity, and will consult CVS to determine if an existing investigation or applicable adjudication exists that can be reciprocally accepted. Agencies have the responsibility of providing CVS data to enable reciprocity. This requires prompt reports of investigation and adjudication to OPM.

As stated, CVS is populated from information supplied by contributing agencies and information maintained by PIPS. The information supplied from PIPS is part of the OPM/Central-9 Privacy Act System of Records. The agency provided information is not owned by OPM and the submitting agency is responsible for the accuracy and maintenance of this information. Although authorized CVS users will have access to view both OPM data and agency furnished data, other requests for information from PIPS and CVS made under the Freedom of Information and Privacy Acts will be responded to by OPM. When the request involves information that was supplied by another agency, referrals or consultations to the Freedom of Information and/or Privacy Act Office of that agency will be made.

Access to CVS

With the changes to CVS, FIS will be contacting each agency to update the CVS Memorandum of Understanding (MOU). In the meantime, access and use of the Central Verification System will continue under the existing Clearance Verification System agreements. Agency security personnel and suitability adjudicators may continue to use CVS to verify security clearances, investigations, polygraphs, HSPD-12, suitability and fitness determinations.

Security officers and suitability adjudicators that do not have access to CVS can contact FIS's System Access Support Team (SAST) at (724) 794-5612, ext. 4600 to request access. For additional information on CVS or the OPM Secure Portal, please contact SAST.

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Inquiries: **OPM-FIS, Systems Access Support Team, (724) 794-5612 ext. 4600**
Distribution: **SOI's**
Expiration: **When superseded**