



U.S. Department of Agriculture

Personnel Security Bulletin #09-05,

Subject: Retention Standards for Personnel Security Records

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Agriculture

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Issue: This Bulletin announces retention standards for personnel security questionnaires, reports of investigation, and related hard-copy and scanned images.

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Effective Date: May 8, 2009

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

Supersession: None.

Background: General Records Schedules (GRS) are issued by the Archivist of the United States to provide disposition authorization for records common to several or all agencies of the Federal Government. In 1978, use of the GRS was made legally mandatory. The disposal authorizations must be used by a Federal agency to the greatest extent possible. For more information, see the National Archives and Records Administration (NARA) website at <http://www.archives.gov/>.

Procedure: Personnel Security Files: PDSO Personnel Security Files include, but is not limited to, copies of the Certificate of Clearance or Suitability; Classified Information Non-Disclosure Agreement (SF-312); Certificate of Investigation (COI); Report of Agency Adjudicative Action on OPM Personnel Investigations (79A); Case Closing Transmittal (CCT); questionnaires (SF85, SF85P, SF86) and release pages; credit report release; Request for Personnel Security Services (AD-1187); Justification for Requested Security Clearance (AD-1188); and supporting documentation used to reach the adjudication determination.

Agencies who initiate and adjudicate new hire investigations, such as a National Agency Check with Inquiries (NACI), must also maintain Personnel Security Files on their federal employees and contractor staff. Contractor files may be held by the Contracting Officer's Technical Representative (COTR). These files should mirror the related content in the PDSO Personnel Security Files, excluding the documentation that is required to be maintained in the Official Personnel Folder (OPF) for federal employees.

NARA, GRS 18, Security and Protective Services Records, which includes the various files created by agencies to determine loyalty and fitness of individuals employed by, or seeking employment from the Government, states "Destroy upon **notification of death or not later than 5 years after separation** or transfer of employee or no later than 5 years after contract relationship expires, whichever is applicable."

PDSO will maintain Personnel Security Files for 2 years after the

separation from USDA unless the investigation contains seriously derogatory information resulting in a recommendation of denial of clearance or suitability. **Denial cases will be held for the full 5 year period after separation from USDA.**

OPM maintains a copy of the form submission in their imaging system outside of e-QIP. This data is moved from e-QIP to their investigations processing system, and to OPM's imaging system (OPIS) for archival. OPM retains copies of their investigations for 15 years after the last investigative activity, except investigations involving adverse information will be maintained for 25 years.

Personnel Security Records at the Agency: Each agency must hold copies of paperwork they have submitted to PDSD to initiate an investigation (copy of the Request for Services, Justification form, etc.). In regards to personnel security paperwork held at the agency level for submissions to OPM by PDSD, the following retention guidance should be followed:

“Destroy any hard copies of the personnel security questionnaire and related documents as soon as a final determination of the employee’s eligibility for access to classified information or suitability has been made (upon Certificate receipt). Documents should be destroyed following the same method that is employed for other material in possession that contains sensitive, personal identifying information (PII), such as shredding.”

Scanned PII Information: Every time a user scans in a document onto their computer for uploading into the Electronic Questionnaires for Investigations Processing (e-QIP) system, they are storing PII information on their PC. In regards to scanning documents relating to personnel security requests for e-QIP, the following retention guidance should be followed:

“Delete scanned images from the computer after they have been uploaded to and verified in the Electronic Questionnaires for Investigations Processing (e-QIP) system. Please remember to empty your Recycling Bin on your desktop.”

Retention of Employment Documents in the OPF: For general retention standards for the OF-612, OF-306, etc., refer to your Human Resource Office or OPM's Guide to Personnel Recordkeeping at <http://www.opm.gov/feddata/recguide.pdf> that outlines what is maintained in the OPF and for how long.

Specifically, Section 3-A. Applications for Federal Employment states that the OF-612, Resume, SF-171, OF-306, etc. are maintained in the Official Personnel Folder (OPF) on the right side ONLY if they were used as the basis for Federal Employment (some exceptions apply).

Specifically, Section 3-E: Investigative Process states the COI is filed in the OPF on the right side. Investigation reports, questionnaires (SF 85, SF-85P, or SF-86), and Fingerprint chart **ARE NOT** maintained in the OPF. They are maintained in the Personnel Security folder with the Personnel Security Branch.

EXCEPTION: A Standard Form 85 completed prior to 4/1/1990 which also has an annotation "Stamped EO 10450" may be filed in the folder. These are the only copies of Standard Form 85 included in the Official Personnel Folder.

Further Information: For further information, please contact the Personnel and Document Security Division at (202) 720-7373.