Subject: The Personnel and Document Security Division (PDSD) is seeking agency comments on periodic reinvestigations (PR) for Public Trust positions.

Issues: Which Public Trust positions require a PR? What type of PR should be conducted and how frequently?

Date Issued: September 15, 2004

Effective Date: September 15, 2004

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: At the request of PDSD, the USDA Office of General Counsel (OGC) reviewed various legal authorities for conducting PR’s for federal Public Trust positions. OGC found that USDA has the authority to conduct such PR’s when authorized by the Secretary of Agriculture. PDSD would like to receive comments or concurrence from mission areas, agencies, and staff offices on the proper criteria to use when determining which Public Trust positions require a PR and the type and frequency of those PR’s.

The following is PDSD’s preliminary suggested criteria for conducting Public Trust PR’s, and the type and frequency of the PR’s.

PR Criteria: The following positions will require a PR:

- All High Risk positions, and positions having:
- Special investigative or criminal justice duties
- Positions requiring possession and use of a firearm
- Significant public health duties
- Significant public safety duties
- Access to or control of highly sensitive but unclassified information
- Access to sensitive financial records
- Potential for realizing significant personal gain
- Control of an automated monetary system (key access entry)
- Few-of-a-kind positions with special duties (Special Assistant to Agency Head)
- Positions directly involved with administering security/suitability programs
PR Type/Frequency: PR’s will require a new SF-85P, Questionnaire for Public Trust Positions, and a National Agency Check with Credit. PR’s will be conducted every 5 years. Cost will be about $100 per PR.

Agency Actions: Please submit your comments or concurrence no later than November 1, 2004, to:

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202-720-7373 (voice)
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PDSD Actions: PDSD will carefully review all input from the agencies, and issue a draft DR for comment.

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

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