



**Personnel Security  
Adjudications  
Independent Study Course  
PS001.08**

**Security through Knowledge**

Defense Security Service Academy  
938 Elkridge Landing Road, Linthicum, MD 21090  
DSN 283-7295 – (410) 865-2295  
<http://www.dss.mil/training>

## LESSON 3

# Personnel Security Investigations

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**A**s an adjudicator, you will spend most of your time reviewing and adjudicating Personnel Security Investigations (PSIs). This lesson addresses some of the most important aspects of the PSI and the agencies which conduct them.

Here you will learn about DSS and OPM, the two agencies which conduct PSIs for the DoD PSP. We will discuss the major duties these agencies have under the DoD PSP, and the offices which are responsible for performing those duties. We will also discuss the jurisdictional limits under which DSS and OPM operate.

After discussing the investigative agencies, we will look at the PSIs themselves. You will learn about the types of PSIs authorized in the DoD PSP, and how each PSI is used. You will also learn the components of each PSI and the minimum investigative requirements of each.

Finally, we will look at the new investigative forms used for each PSI and discuss the major uses of each form and learn about some of the common problems with each type of PSI. We will discuss the reasons for these problems and the consequences they have for PSIs and the DoD PSP.

This information will help you to understand the investigative process, which is one of the major elements of the PSP. It will also expand your knowledge of the PSIs which play such a critical role in the adjudicative process.

At the end of this lesson you should be able to answer the following questions:

- ◆ Which investigative agencies are authorized to conduct PSIs for DoD?

Which PSI does each agency conduct?

What are the authority and responsibilities of investigative agencies for conducting investigations?

What are the jurisdictional limits of each investigative agency?

What offices within DSS are involved in the personnel security program?

What offices within OPM are involved in the personnel security program?

What are the topics about which DSS investigators may not usually inquire?

What are five investigative techniques that DSS investigators may not use?

## READING ASSIGNMENT

### **Assignment 1:**

DoD 5200.2R: Chapter 2: Section 4, Para.2-504

### **Assignment 2:**

10 Nov 98 Memo "Personnel Security Investigations and Adjudication"

### **Assignment 3:**

22 Aug 00 Memo "Personnel Security Clearance Investigations"

### **End of Lesson:**

How to Read Credit Reports

## INVESTIGATIVE AGENCIES

As you know, the DoD PSP applies to a broad range of personnel - military, civilians and contractors. Because of this varied population, DoD uses PSIs from different investigative agencies.

***“DSS and OPM are the only agencies authorized to conduct PSIs for the DoD PSP”***

**The Defense Investigative Service (DSS) and U. S. Office of Personnel Management (OPM)** are the only agencies authorized to conduct PSIs for the DoD PSP. This means that when a DoD activity requests a PSI on one of its personnel, the PSI must be requested from either DSS or OPM. (If a subject was previously investigated by another agency, the FBI for instance, that PSI may satisfy the investigative requirements for DoD. Although DSS and OPM are both authorized investigative agencies for the DoD PSP, they don't conduct the same investigations for our program. Each has its own area of responsibility in the program.

Which agency is asked to conduct the PSI depends upon which PSI is needed and the category of the individual being investigated (military; civilian; contractor). Refer to attachment 5 (Memorandum August 22, 2000 -“Personnel Security Clearance Investigations”) for further guidance.

## THE AUTHORITY, RESPONSIBILITIES AND JURISDICTION OF OPM

The first investigative agency we'll discuss is the U.S. Office of Personnel Management. We're all familiar with OPM as the government's personnel agency. You may be less familiar with its role in the federal government's personnel security program.

The PSP for the Executive Branch is authorized by Executive Order (EO) 10450, signed by President Eisenhower in 1953 and amended by EO 12968 in August 1995. EO 10450 gave primary responsibility for the PSP to the now defunct U.S. Civil Service Commission (CSC). As one of the successor agencies to CSC, OPM has

inherited these responsibilities. It is under this authority that OPM is one of the investigative agencies for the DoD PSP.

**OPM is charged with the responsibility of conducting NACIs and ANACIs on all selected civilian personnel or occupants of non-sensitive and non-critical sensitive positions.** The NACI investigation is designed to determine suitability for employment with the Federal government. Because of this, OPM is responsible for investigating all **civilians** selected for non-sensitive and for non-critical sensitive positions and Secret and Confidential clearances in the DoD. NACIs are only conducted on those individual designated to occupy Non-sensitive position within DoD. The ANACI is the minimum investigation conducted on DoD civilian personnel within the DoD PSP. The ANACI investigation serves as the basis to grant Secret and Confidential clearances to civilians within DoD. OPM has also been solicited to assist DSS with conducting various other types of PSI within the DoD PSP.

Although the Executive Order gives OPM the responsibility to investigate all competitive service employees of the Executive Branch, it also allows OPM to delegate this authority to other agencies. OPM and DSS have an agreement in which OPM delegates to DSS the authority to conduct all PSIs for the DoD except the NACI and ANACI.

OPM's jurisdiction is limited by this agreement with DSS. While OPM investigates all the personnel of some agencies, it is limited to just a small slice of the DoD population. However, OPM retains an oversight jurisdiction under its EO 10450 and EO 12968 authority, and has overall program responsibility for the Executive Branch PSP.

# ORGANIZATIONAL ELEMENTS OF OPM

**T**here are two major organizational elements of OPM which pertain to the DoD PSP. They are the **Office of Federal Investigations (OFI)** and the **Federal Investigations Processing Center (FIPC)**. Figure 3-1 shows a chart representing this organizational set-up.

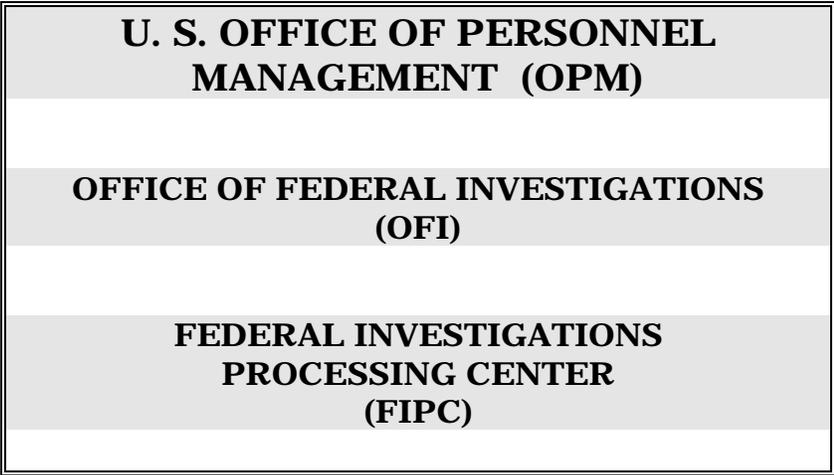


Figure 3-1

# OFFICE OF FEDERAL INVESTIGATIONS (OFI)

OFI is the section within OPM which has the responsibility for discharging OPM's security functions. OFI conducts all OPM run investigations and maintains the inter-agency agreements which allow DSS and other agencies to conduct PSIs. This office also works with other federal agencies to determine the investigative elements of the different types of PSIs.

***“OFI is responsible for discharging OPM’s security functions.”*** The OFI is responsible for making a continuing study of how the PSP is run by Executive Branch agencies, to insure that the requirements of EO 10450 and EO 12968 are being met. This is done by the Security Appraisals Branch of OFI.

The Office of Federal Investigations also maintains the Security/Suitability Investigations Index (OPM SII), which is a computer index of all PSIs conducted by all agencies under the authority of EO 10450 and EO 12968. (**Note:** Don’t confuse the OPM SII with the DSS investigation, the SII.)

## **FEDERAL INVESTIGATIONS PROCESSING CENTER (FIPC)**

FIPC is an office within the Office of Federal Investigations. It is located in Boyers, PA, and is routinely referred to as simply "Boyers" or "the NACI Center". It’s known as the NACI Center because the main function of the FIPC is running all the NACIs and ANACIs for the federal government. This office initiates the investigations, reviews the results, arranges for additional investigation, when necessary, and forwards the completed NACI/ANACI to the requesting agency. The FIPC is responsible for sending requesters, such as DSS or the CAF, copies of previously completed OPM investigations. The FIPC is the organizational element of OPM which you will have the most contact as it is the one which is the most involved in the DoD PSP.

## **THE AUTHORITY, RESPONSIBILITIES AND JURISDICTION OF DSS**

**T**he Defense Security Service (DSS) is the investigative agency with which you'll deal most often. DSS was established in 1972 to serve as a single, centralized personnel security investigative service for the DoD. Before that, each of the military departments (the Army, Navy and Air Force) conducted its own PSIs. This led to a lot of inconsistency and duplication of efforts. DSS was created to eliminate these problems.

***DSS is responsible for conducting PSIs on all DoD affiliated personnel.***

A person is considered to be affiliated with DoD if he/she is in the Armed Forces or National Guard; employed by or contracting with DoD; living or working on any DoD installation or facility; or applying for any of the above.

***“DSS jurisdiction is limited to the 50 states, the District of Columbia and Puerto Rico.”***

DSS has overall responsibility for the Defense Industrial Security Program (DISP). This includes responsibility for granting security clearances to contractors working with classified DoD information.

DSS jurisdiction is limited to the 50 states, the District of Columbia and Puerto Rico. When a PSI requires investigation in areas outside of DSS jurisdiction (for example, when investigating a military member stationed overseas), DSS requests that one of the military departments or some other federal agency conduct the necessary investigation. Even in these cases, however, DSS retains control of the PSI and is responsible for directing the investigation.

***DSS can only collect info on persons or organizations which are affiliated with DoD.***

The second major jurisdictional limit on DSS (and on all DoD components) is a requirement for DoD affiliation. DoD policy prohibits DSS from collecting, reporting, processing or storing information on persons or organizations which are not affiliated with DoD. The only exception is when such information is essential to the DSS mission. An example of such “essential” information is the phone number of the local police department or credit bureau.

***DSS must refer allegiance cases to the FBI or military CI.***

Even when an investigation falls under DSS jurisdiction in terms of geography and affiliation, there is a third limit on DSS jurisdiction which may apply. As you read in para 2-401 of the regulation, there are certain instances when DSS must refer an investigation to other investigative agencies. Generally speaking, this happens when the investigation becomes what is known as an "allegiance case." (Allegiance cases will be discussed later) These cases are the exclusive territory of the FBI and the military department counterintelligence (CI) agencies - the Army Intelligence and Security Command (INSCOM), the Naval Investigative Service (NIS), and the Air Force Office of Special Investigations (AFOSI).

## ORGANIZATIONAL ELEMENTS OF DSS

**T**he Defense Investigative Service is divided into two major sections, reflecting its two missions. The Directorate for Investigations is the section responsible for conducting all PSIs for the DoD. The Directorate for Industrial Security is responsible for managing the Defense Industrial Security Program (DISP). Both of these Directorates are further divided into offices which you'll deal with on a regular basis.

### DIRECTORATE FOR INVESTIGATIONS

The Directorate for Investigations is the section of DSS that has the greatest involvement in the DoD PSP. As an adjudicator, you see their work every day in the form of PSIs, and you interact with them daily via the DCII. Because of this, you need to know, in general terms, about their organizational structure.

### PERSONNEL INVESTIGATIONS CENTER

***PIC is the  
Personnel  
Investigations  
Center.***

When a DoD activity requests a PSI from DSS, the request is sent to the **Personnel Investigations Center (PIC)** in Linthicum, Maryland. The PIC is responsible for scheduling and controlling all PSIs conducted by DSS. The PIC conducts the National Agency Check (NAC), which is both an integral part of all other PSIs and a PSI in its own right.

Additionally, the PIC runs credit checks on all PSI submitted for clearance purposes. All other investigative elements are done by DSS investigators in the field at the direction of the PIC.

The PIC is also responsible for sending previous investigations to requesters. For instance, a CAF may need to review a PSI completed several years ago. The PIC would be requested to obtain a copy of the investigation and send it to the CAF.

***PIC also maintains the DCII.***

The final major responsibility of the PIC is maintaining the Defense Clearance and Investigations Index (DCII). The DCII, a computer listing of investigations conducted by DoD, is maintained and updated by the PIC.

Management of the this database is one of the most important PIC functions. A check of the DCII is an element of all NACs and increasingly the DCII is the central repository for adjudicative as well as investigative information.

## **DIRECTORATE FOR INDUSTRIAL SECURITY**

***DSS is in charge of the DISP.***

The Directorate for Industrial Security is the section of DSS which manages the DISP. It is responsible for all aspects of Industrial Security, including personnel security. The only program element of the Directorate for Industrial Security that has any bearing on our program is the Defense Industrial Security Clearance Office (DISCO).

## **DEFENSE INDUSTRIAL SECURITY CLEARANCE OFFICE (DISCO)**

***DISCO is responsible for granting security clearances to contractors.***

The Defense Industrial Security Clearance Office located in Columbus, OH. **DISCO** is the central adjudication facility for the Industrial Security Program and is responsible for reviewing PSI requests from contractors and for granting security clearances to defense contractors. Unlike the other CAFs, DISCO is not responsible for denying or revoking security clearances. When cases are likely to lead to denial or revocation action, DISCO refers them to the Defense Office of Hearings and Appeals (DOHA) which is part of the Defense Legal Services Agency, under the DoD Office of the General Counsel. DISCO's authority is restricted to making favorable decisions only.

## PROHIBITED INVESTIGATIVE TECHNIQUES

**W**hen conducting PSIs, DSS relies almost exclusively on personal interviews and record checks to develop information. Other investigative techniques which are freely used by CI and criminal investigators are forbidden to DSS. This is because of the balancing act between the government's need to know and the person's rights to privacy which we discussed in Lesson 1, "Overview of the Personnel Security Program."

Because of this, DSS is barred from using investigative techniques that are unnecessarily intrusive or which may violate the subject's constitutionally protected rights. DoD regulation requires that DSS "refrain from using, under any circumstances," these techniques. Figure 3-2 shows a list of prohibited techniques.

### PROHIBITED TECHNIQUES

- Using mail covers (reviewing incoming and outgoing mail)
- Conducting physical surveillance
- Conducting photographic surveillance
- Conducting physical searches
- Using voice analyzers
- Inspecting trash
- Using paid informants
- Using wiretaps (of telephones)
- Using eavesdropping devices (hidden microphones, etc.)

Figure 3-2

## PROHIBITED AREAS OF QUESTIONING

*DSS may collect only information which is both relevant and necessary.*

In addition to the prohibited investigative techniques DSS usually avoids asking questions about certain very personal areas of a subject's life. DSS may collect only information which is both relevant and necessary. The overall requirement is that an investigation should collect only as much information as is **relevant** and **necessary** to make a personnel security determination.

The critical words there are "relevant" and "necessary". If a question can't be reasonably expected to produce information that is **both** relevant and necessary to the issue at hand, there is no point in asking it. Thus a DSS agent may not ask a subject about his or her religious beliefs or political affiliation unless the question passes both tests. Of course, this will vary from case to case, but only in unusual circumstances (such as when the subject is a member of the Communist Party) would such questions be acceptable or even tolerable. Figure 3-3 shows a listing of the general areas of questioning which a DSS agent must avoid.



The DSS Manual for Personnel Security Investigations (January 1993) gives examples of questions which a DSS agent normally may not ask.

## AREAS OF QUESTIONING GENERALLY AVOIDED

Religious beliefs and affiliations

Beliefs and opinions in racial matters

Political belief and affiliations (unless  
subversive)

Opinions about legislative policies or Supreme  
Court decisions

Membership in a trade union or fraternal  
organization

Sexual Orientation

**NOTE:** This list is not all inclusive. If a line of questioning is not relevant and necessary, it should be considered prohibited.

**Figure 3-3**

These prohibitions are general in nature and are not absolute. There are instances, depending upon the information developed in a case, when such questions become appropriate and necessary.

For instance, while a subject would not normally be asked, "What is your net worth?" That question becomes both relevant and necessary if an issue of financial irresponsibility or unexplained affluence is developed. The acid test is whether the question, or line of questioning, is both relevant and necessary. If so, the question must be asked. If not, the question may not be asked.

## SUMMARY

DSS and OPM are the only agencies authorized to conduct PSIs for the DoD PSP. OPM and DSS have joint responsibility for conducting investigations on certain civilian, military, and contractor personnel with the DoD PSP

OPM draws its authority from EO 10450, as one of the successor agencies to the Civil Service Commission. In addition to conducting investigations, OPM has certain management and oversight responsibilities for the entire Executive Branch PSP.

The Federal Investigations Processing Center (FIPC) of the Office of Federal Investigations (OFI) is the OPM office responsible for conducting the NACI and ANACI.

DSS is authorized by DoD to act as the only personnel security investigating service in the DoD. By agreement with OPM, DSS has received delegated authority to conduct PSIs. DSS' jurisdiction extends to the 50 states, the District of Columbia and Puerto Rico, and is limited to DoD affiliated personnel. When an investigation becomes a loyalty case, DSS loses jurisdiction to a CI investigating agency. DSS had two major missions - Investigations and Industrial Security. DSS agents are assigned to the Investigations Directorate where they conduct PSIs under the direction of the Personnel Investigations Center. PSIs for contractors are adjudicated by DISCO, which is part of the Industrial Security Directorate. When conducting PSIs, DSS must avoid unnecessarily intrusive techniques and ask only questions which are both relevant and necessary.

## **THE PERSONNEL SECURITY INVESTIGATION**

**N**ow we will begin our discussion of the PSI. You will learn what PSIs are used in the DoD PSP and the uses of each. You will also learn the minimum investigative requirements (scope) of each PSI.

Finally, we will look at the subject interview. You will learn when the subject interview is included as part of a PSI and why so much reliance is placed on the subject interview. Since the PSI is the major tool you will use as an adjudicator, this information will prepare you to review and adjudicate investigations.

## **WHAT IS A PERSONNEL SECURITY INVESTIGATION?**

A personnel security investigation (PSI) is an inquiry into someone's background, lifestyle and personal history. PSIs are used to collect information to determine if a person can be trusted with sensitive duties or classified information. As an adjudicator, the lion's share of your time is spent reviewing PSIs and deciding whether the subject can be trusted. Because of this, you need to know as much as possible about PSIs - what they are, what they're used for, and so on. The more you know about PSIs, the more effectively and efficiently you can do your job.

# Why Do We Use PSIs?

- Means to gather information about a person
- Used to evaluate eligibility
  - ◆ Access
  - ◆ Sensitive duties
  - ◆ Suitability for service
  - ◆ Other programs



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Figure 3-4

## **PSIs AUTHORIZED IN THE DOD PSP**

Because the DoD PSP has to meet the needs of a large and diverse population (military members, civilian employees and contractors), it relies on a wide range of PSIs. Each PSI is highly specialized and differs from each other PSI. They differ in their uses and in their comprehensiveness. One is an exhaustive inquiry into the last seven (7) years of the subject's life, while another simply runs the subject's name through a few government computer systems.

**"...a PSI conducted for one purpose may not be sufficient for another..."**

These differences mean that PSIs are not interchangeable; that a PSI conducted for one purpose may not be sufficient for another purpose. As a general rule of thumb, however, a higher investigation (a more comprehensive one) will always be able to take the place of a lower investigation (a less comprehensive one); but a lower investigation can never take the place of a higher one. This means that if

a former military member with a valid SSBI on record is hired as a civilian employee, there is no need to request an NACI or ANACI. The SSBI is higher than an NACI and ANACI (that is, it's a more comprehensive investigation) and can substitute for it.

# Why Do We Use PSIs?

- Uniform collection of *important* and *relevant* information about the person
- The more sensitive the duties, the more comprehensive the PSI
- The greater the risk, the more we want to know about the person
- The *potential* for damage is greater with Top Secret than Confidential



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Figure 3-5

However, if the military member only has a valid NAC on record, an NACI or ANACI must be requested. The NAC is lower than an NACI and ANACI (that is, it's a less comprehensive investigation) and cannot substitute for it.

It is important to remember that there are only three investigations approved for the initial issuance of a security clearance eligibility. They are the SSBI, ANACI, and NACLIC.

The PSIs authorized in the DOD PSP are shown in Figure 3-6, in order of highest (or most comprehensive) to lowest (or least comprehensive), except the SII, which is shown at the end. This is because the SII, being an issue-oriented investigation, can never replace another PSI.

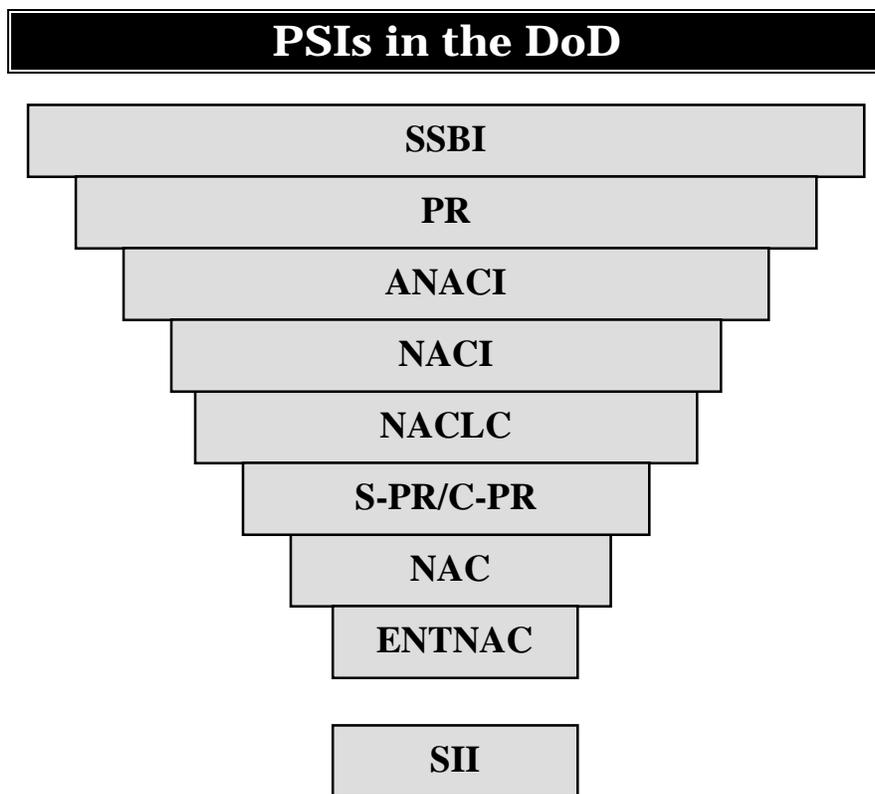


Figure 3-6

## TYPES OF PSIs AND THEIR USES

*Investigative requirements are different for each group of personnel*

As you will read in Chapter 3 of the regulation, different levels of clearances and sensitive duties have different investigative requirements. In fact, it's not enough just to know what level of clearance is needed before you decide which PSI is required. You also need to know whether the subject is a civilian employee, a military member or a contractor. The investigative requirements are different for each group of personnel, and even for different categories of people within each group. **Note: Please refer to the Nov 98 memo-Pers. Secu. Inv. & Adjud.**

For instance, first term enlistees cannot be granted a secret clearance with an ENTNAC as all military members requiring a Secret clearance must be the subject of a NACL. However, an ENTNAC is sufficient for accession in some branches of the military.

These differences are a result of the history of the PSP. EO 10450 established the PSP for civilians; EO 10865

established it for contractors; and DoD 5200.2R authorizes the PSP for military members. Each of these sources set up different investigative requirements for the personnel under its authority. The result is that although DoD has only one PSP, it's a little bit different for each category of personnel. Figure 3-7 contains a ready reference chart for the major uses of each type of PSI.

In addition, each PSI is shown in Figures 3-8 through 3-15, with a complete listing of its uses and the categories of personnel to which it applies. The information in these figures is a consolidation of material presented in Chapter 3 of the Regulation.



## **PSIs AND THEIR USES AT A GLANCE**

**ENTNAC:** Accessions for Army & Marine Corp military members not requiring access to classified and/or sensitive information

**NAC:** Contractors requiring access to restricted unclassified areas, NAF POT, Summer Hires

<b>NACLCLC:</b>	Military & Contractor personnel requiring Secret or Confidential Clearances. Accessions for Navy and Air Force military members
<b>NACI:</b>	Civilians only – Nonsensitive positions
<b>ANACI:</b>	Civilians only – Noncritical-sensitive positions Confidential and Secret Clearances
<b>SSBI:</b>	Military, Contractors, Civilians Critical-Sensitive Duties LAA Top Secret Clearance Special Access Programs Investigative Duties
<b>PR:</b>	Military, Contractors and Civilians Critical Sensitive Duties Top Secret Clearance
<b>S-PR:</b>	Military, Contractor and Civilians requiring Secret Clearances
<b>C-PR:</b>	Military, Contractor and Civilians requiring Confidential Clearances
<b>SII:</b>	Military, Contractors, Civilians – Issue Resolution

Figure 3-7

## **ENTNAC**

### **ENTRANCE NATIONAL AGENCY CHECK**

- Military Accessions (Army & Marine Corp) not requiring access to classified information
- Access to restricted areas and sensitive information or equipment
- Transportation of Category I and II Arms Ammunition and Explosives (AA&E)
- ADP III duties
- Interim Top Secret clearance if the other requirements have been satisfied

**Figure 3-8**

## **NATIONAL AGENCY CHECK (NAC)**

- ◆ Employment in a Non-Appropriated Fund Position of Trust (NAFPOT) & Summer Hire
- ◆ ADP III duties
- ◆ DoD building passes in the National Capitol Region
- ◆ Contract personnel not requiring classified access
- ◆ DoD employees serving as customs inspectors
- ◆ Red Cross/USO personnel assigned with the Armed Forces overseas
- ◆ Access to restricted areas and sensitive information or equipment
- ◆ Interim Top Secret clearance, if the other requirements have been satisfied.

**Figure 3-9**

## **NATIONAL AGENCY CHECK PLUS WRITTEN INQUIRIES**

- ◆ Conducted on civilians employees only
- ◆ Appointment to Non-sensitive positions
- ◆ ADP III positions
- ◆ Interim Top Secret Clearances, if the other requirements have been satisfied

## **ACCESS NATIONAL AGENCY CHECK PLUS WRITTEN INQUIRIES**

- ◆ Conducted on civilian employees only
- ◆ Appointment to Noncritical-Sensitive positions
- ◆ ADP II positions
- ◆ Nuclear PRP Controlled positions
- ◆ NATO Confidential and Secret
- ◆ Secret and Confidential clearances
- ◆ Interim Top Secret Clearances, if the other requirements have been satisfied

**Figure 3-11**

**NACLC  
NATIONAL AGENCY CHECK W/ LOCAL  
AGENCY & CREDIT CHECKS**

- ◆ Military & Contractor personnel for Confidential and Secret Clearances
- ◆ Military Accessions for Air Force & Navy
- ◆ Commission an Officer in the Armed Forces
- ◆ Appoint a Warrant Officer, Cadet, Midshipman or Reserve Officer Training Candidate in the Armed forces
- ◆ Nuclear PRP Controlled Positions
- ◆ NATO Confidential and Secret
- ◆ ADP II Positions
- ◆ Interim Top Secret Clearance, if the other requirements have been satisfied

**Figure 3-12**

## **SSBI SINGLE SCOPE BACKGROUND INVESTIGATION**

- ◆ Appointment to Critical Sensitive duties and Critical Sensitive positions
- ◆ Presidential Support Duties, Category I and II
- ◆ Nuclear PRP Critical positions
- ◆ ADP I positions and duties
- ◆ Limited Access Authorizations (LAAs)
- ◆ NATO Cosmic
- ◆ Access to Sensitive Compartmented Information (SCI)
- ◆ Access to Single Integrated Operational Plan - Extremely Sensitive Information (SIOP-ESI)
- ◆ Other Special Access Programs (SAPs) with DUSD(P) approval
- ◆ Top Secret clearances for military members, civilians and contractors

**Figure 3-13**

## **PR PERIODIC REINVESTIGATION**

- ◆ Conducted at 5-year intervals, except with DUSD(P) approval
- ◆ For Critical-Sensitive positions
- ◆ For Top Secret clearances
- ◆ For SCI
- ◆ For LAA
- ◆ For Presidential Support Duties
- ◆ For ADP I Positions
- ◆ For NATO Cosmic
- ◆ For some people accessing very sensitive information classified Secret

**Figure 3-14**

## SII SPECIAL INVESTIGATION INQUIRY

- ◆ To prove or disprove allegations relating to the security criteria
- ◆ To assess the current eligibility of an individual previously adjudicated unfavorably if the potential need for clearance exists and there is reason to believe that the cause of the adverse determination no longer exists

Figure 3-15

## OTHER PSIs

DSS and OPM are only two of the Federal agencies which conduct Personnel Security Investigations. Other PSI agencies include the FBI, CIA, NSA, State Department and the Coast Guard.

Generally speaking, a PSI conducted by one Federal agency may meet the requirements of any other Federal agency. All SSBIs, regardless of who conducts them, meet the same minimum requirements and therefore are reciprocal. This means that DSS will not conduct an SSBI on a DoD affiliated person if there's a current, valid SSBI conducted by another agency that meets the requirement of the position. The existing investigation may suit DoD's needs.

***An SSBI conducted by one Federal agency must be accepted by other Federal agencies.***

In addition to the SSBI, there are other investigations conducted for other Federal Agencies' PSPs. The most common of these are the Minimum Background Investigation (MBI) and Limited Background Investigation (LBI). Both of these investigations are conducted by OPM as part of the suitability and security programs of other Federal Agencies. Though these PSIs are not specifically used in the DoD PSP, sometimes they can be accepted in place of new investigations.

PSI EQUIVALENTS		
LBI	=	ENTNAC, NAC, NACI, ANACI, NACL
MBI	=	ENTNAC, NAC, ANACI NACL
BI	=	ENTNAC, NAC, ANACI NACL
SBI	=	SSBI

**Figure 3-16**

Finally, there are many PSIs on file which are still valid and current, but no longer meet the requirements of the regulation. The most common of these are the Background Investigation (BI) and Special Background Investigation (SBI). Both the BI and the SBI have been replaced by the SSBI. The SBI, which is also known as the Full Field Special Background Investigation (FF/SBI) and the BI (a.k.a. FF/BI), are no longer conducted by any Federal agency. Existing SBIs and BIs can sometimes be used instead of new investigations. Figure 3-16 shows the equivalency between these PSIs and those currently used in our program.

## THE SCOPE OF PSIs

**E**ach PSI used in the DOD PSP has certain minimum investigative requirements which must be met for the investigation to be considered complete. This is known as the "scope" of the investigation. It's critical for you to be aware of the scope of PSIs in order to properly adjudicate them. You need to know what constitutes a given type of PSI in order to know if the investigative agency has covered all the bases. Knowing the scope of an investigation also tells you what type of information you can expect from that investigation.

***If you know the scope of a PSI, you know what to expect from it.***

For instance, if you know the scope of an ANACI, you won't expect it to give you any neighborhood coverage, since that's not a part of an ANACI. On the other hand, when you review an SSBI, you know that you can expect it since it is routinely part of the SSBI.

Whenever you review a PSI, you will be "scoping" it, or making sure that it meets minimum requirements. Your CAF may require that you do it formally, with some sort of scoping aid, or you may be allowed to do it mentally as you're reviewing the case. In either case, you always scope an investigation to assure yourself that it is complete. We will only be discussing the scoping requirements of PSIs in this course. If you attend the resident phase of this course it will address how to scope out investigations, and what to do about PSIs which do not meet scope.

***Scope refers only to the minimum investigative requirements.***

The minimum investigative requirements for each type of PSI are shown in Figures 3-17 through 3-26 below. It's important to remember these represent the minimum requirements for each PSI. The investigative agency is free to obtain additional information when it chooses, and it will usually expand the investigation to resolve any issues raised.

This section contains only the major scoping elements; more detailed scoping information is found in the Nov 98 Memo (attachment 2). The scoping requirements of the

ANACI are shown in greater detail since the Nov 98 Memo does not address the ANACI scope.

## **NATIONAL AGENCY CHECK (NAC)**

A NAC is a record check of certain Federal agencies. Only those agencies which maintain records containing information relevant to making a personnel security determination are checked. A NAC is also an integral part of each SSBI, PR, ANACI and NACL. Figure 3-17 shows the investigative elements of a NAC. Whenever one of the agencies checked has information on the subject, a copy is attached to the NAC results. When necessary, DSS will conduct additional investigation to resolve issues raised by the NAC. This is known as an ENAC or Expanded NAC. The ENAC is not a separate PSI.

## **ENTRANCE NATIONAL AGENCY CHECK (ENTNAC)**

*The ENTNAC uses a name check rather than a tech check at FBI/ID.*

An ENTNAC is a variation of the NAC. The only difference is that the check at FBI/ID consists of a "name check only," rather than a detailed technical fingerprint search. This means that rather than run the subject's fingerprints through the FBI files (a "tech check"), they only run his or her name. This is done because given the typical age of first-term enlistees, a tech check is usually not productive - the subject just hasn't had much chance to be arrested. Those who have been arrested will usually be caught by the name check.

## **NATIONAL AGENCY CHECK W/LOCAL AGENCY AND CREDIT CHECKS (NACL)**

A NACL is also a variation of the NAC. The only difference is that it contains a Credit Check and a Local Agency Check as part of the investigative scope.

## **ELEMENTS OF THE NAC**

### **These agencies are always checked:**

- ◆ DCII
- ◆ FBI/HQ (Investigative files of the FBI)
- ◆ FBI/ID (The Fingerprint Check)

### **These agencies are checked when the conditions shown in App. B, 5200.2-R are met:**

- ◆ OPM SII
- ◆ INS
- ◆ State Department
- ◆ CIA
- ◆ Military Personnel Records
- ◆ Treasury Department
- ◆ The files of other agencies will be checked when pertinent.

**Figure 3-17**

# OPM PSI

## National Agency Check with Written Inquiries (NACI)

### Access National Agency Check with Written Inquiries (ANACI)



Figure 3-18

***The ANACI is conducted by written inquiry and includes no field investigation.***

The NACI/ANACI is conducted by OPM using written inquiries. The period of investigation is the last five years of the subject's life. In addition to the valid NAC, the elements shown below represent minimum investigative scope. These are summarized in Figure 3-19.

**EMPLOYMENT** OPM will verify, by written inquiry, all employment in the last five years, regardless of duration. In addition, OPM will send a written inquiry about any involuntary termination, regardless of when it occurred.

### **EMPLOYMENT REFERENCE**

**COVERAGE.** OPM will send a written inquiry to the listed supervisor of each employment for the last five years.

**EDUCATION.** All attendance at colleges and universities for the last five years will be verified by written inquiry. Additionally, OPM will verify all claimed degrees for the last 20 years.

## **LISTED CHARACTER REFERENCES.**

Written inquiries are sent to all listed references.

## **LOCAL AGENCY CHECKS (LACS).**

Written inquiries will be sent to law enforcement agencies at all places of employment, residence and education for the last five years. Additional inquiries will be sent to obtain the dispositions of all arrests developed, regardless of when they occurred.

## **CREDIT CHECKS.**

OPM will schedule checks of credit bureaus any place subject has lived, worked, or gone to school for the last five years. The ANACI will contain copies of all credit reports which were obtained.

Additional investigation will be conducted as necessary to resolve any ***employment suitability*** issues which are raised by the ANACI. **OPM will not usually resolve security issues.**

### **ELEMENTS OF THE ANACI/NACI**

- ◆ **Last Five Years**
- ◆ **NAC**
- ◆ **Employment Records**
- ◆ **Supervisors**
- ◆ **Education Records**
- ◆ **Listed Character References**
- ◆ **LACs**
- ◆ **Credit Checks**

Figure 3-19

## **SINGLE SCOPE BACKGROUND INVESTIGATION (SSBI)**

***The SSBI  
has a  
10-year scope***

The period of investigation is the last ten years of the subject's life or back to the 18th birthday whichever is shorter. In any case, the investigation will cover at least two full years of the subject's life, but no investigation will be conducted before the 16th birthday. (This means that a subject must be at least 18 years old to have an SSBI.) Figure 3-20 shows the major elements of the SSBI. In addition to those shown, DSS will conduct any investigative leads necessary to resolve issues raised by the SSBI.

### **ELEMENTS OF THE SSBI**

- ◆ Last 10 years
- ◆ NAC
- ◆ Spouse NAC
- ◆ Subject Interview
- ◆ Employment Records
- ◆ Employment Interviews
- ◆ Military Service and Discharge Verified
- ◆ Developed Character References
- ◆ Listed Character Reference
- ◆ Neighborhood Interviews
- ◆ Local Agency Checks
- ◆ Credit Checks
- ◆ Ex-Spouse Interview

**Figure 3-20**

## PERIODIC REINVESTIGATION (PR)

The purpose of the PR is to up-date the SSBI. Its period of investigation is the last five years of subject's life. Figure 3-21 shows the major elements of the PR. In addition, the PR will be expanded to explore all leads necessary to resolve any issues raised in the course of the PR.

### ELEMENTS OF THE PR

- ◆ Last 5 years
- ◆ NAC
- ◆ Spouse NAC (if we don't have on file)
- ◆ Subject Interview
- ◆ Employment Records
- ◆ Employment Interviews
- ◆ Developed Character References
- ◆ Neighborhood Inquiries
- ◆ Local Agency Checks
- ◆ Credit Checks

Figure 3-21

## SECRET PRs

**S**ecret PRs are conducted for personnel who have Secret level access, not just a Secret clearance with Confidential or no classified access.

### Secret PRs

- \* Secret level SAPS
- \* Secret clearance/access
- \* Due every ten years
- \* Exceptions
  - Current derogatory information
  - Saps



Checking on my clearance?

04/02/96 45

Figure 3-23

### Confidential PRs

- \* Confidential clearance/access
- \* Due every fifteen years
- \* Exceptions
  - Current derogatory information



Checking on my clearance?

## **SPECIAL INVESTIGATIVE INQUIRY(SII)**

The SII is an issue-resolution investigation. That means there are no minimum investigative requirements for an SII. The SII is scoped to cover all leads necessary to resolve the outstanding issues after the initial Personnel Security Investigations has been conducted and adjudicated.

## **OTHER PSIs**

***A PSI from a non-DoD agency is acceptable if meets scope***

In addition to the PSIs conducted as part of the DoD PSP, investigations are conducted for other federal agency PSPs. These investigations "shall be mutually and reciprocally accepted by all agencies", IAW EO 12968, Sec.2.4, as meeting the requirements of the DoD PSP, unless an agency has substantial information indicating that an employee may not satisfy the standards in Section 3.1 of the EO.

An SSBI conducted by any Federal agency will meet the same scope as a DSS SSBI and shall be accepted by DoD agencies.

The MBI (Minimum Background Investigation) and the LBI (Limited Background Investigation) are conducted by OPM and have no counterparts in the DoD PSP. They can be considered the equivalent of the ANACI, NACLIC, NAC and ENTNAC, and can take the place of any one of them. The investigative elements of the MBI and the LBI are shown below in Figures 3-24 and 3-25, respectively.

## ELEMENTS OF THE MBI

- ◆ NACI
- ◆ Credit check
- ◆ Telephone follow-up on written inquiries not returned.

**Figure 3-24**

## ELEMENTS OF THE LBI

- ◆ NAC
- ◆ Subject interview
- ◆ Interviews of selected sources for the last 1-3 years
- ◆ Written inquiries and record searches for the last 5 years
- ◆ Credit Checks

**Figure 3-25**

Besides these investigations, there are two others you're likely to run across. These are the Special Background Investigation (SBI) and the Background Investigation (BI). Although these PSIs are no longer conducted by any Federal agency, there are still many valid BIs and SBIs on file.

The SBI is the equivalent of the SSBI. Although there are a number of differences between them (for instance the SBI covered 15 years rather than 7), a current, valid SBI will meet the scoping requirements of the SSBI (see Figure 3-20) and can take its place.

The old BI used to be the standard PSI used to grant Top Secret clearances and eligibility to perform critical sensitive duties. Figure 3-26 shows the scoping elements of the BI.

## **ELEMENTS OF THE BI**

- ◆ Last five years
- ◆ NAC
- ◆ Subject Interview
- ◆ Employment Records
- ◆ Employment Interviews
- ◆ Developed Character References
- ◆ Local Agency Checks
- ◆ Credit Checks
- ◆ Subject Interviews

**Figure 3-26**

## THE SUBJECT INTERVIEW

As you saw in the section on the scope of PSIs, the subject interview is an integral part of some PSIs and is occasionally found in most of the other PSIs. The SSBI and PR routinely contain subject interviews and the NACLC, NAC and SII contain them whenever there are issues to be resolved. In fact, the only PSI you'll deal with that never contains a subject interview is the ANACI. Even the ENTNAC may contain one if the subject is being submitted for a clearance and unresolved issues are present.

So why is the subject interview so important? The main reason is that the subject is the most knowledgeable source available. Nobody knows as much about the subject as the subject him/herself.

***The subject knows more about himself than anyone else.***

All other sources are secondary to the subject in terms of how much they know, so it only makes sense to use the subject as a source. (Of course, we can't consider him/her to be a *disinterested* source of information, so the investigation will always include other sources - just to make sure that the subject told "the truth, the whole truth and nothing but the truth"). This approach is also in keeping with the Privacy Act of 1974 which provides that, to the extent possible, information should be obtained directly from the individual concerned rather than from other sources.

When the subject interview is a routine part of the investigation, as in the SSBI and PR, it's called the SSBI SI. It is a wide ranging interview covering a number of topics. The subject is asked to verify the information on the SSBI.

When the subject interview is used to resolve issues which are developed in the course of the investigation, it's called the Issue SI. This latter function of the subject interview, issue resolution, is the reason subject interviews are conducted in the SII, NACLIC and NAC and sometimes the ENTNAC. The subject interview in these cases is always issue-oriented and answers questions which the investigation has raised. This sort of subject interview may deal with any of the security criteria and adjudication guidelines which will be discussed later in this lesson.

## MID-WAY SUMMARY

**W**e have begun our discussion of PSIs. We have looked at the types of PSIs used in the DoD PSP. You have learned that each PSI is different from each other PSI, and is used for different personnel categories. In addition, you have learned the clearance and sensitive duty levels authorized by each PSI.

We have also looked at the minimum investigative requirements (scope) of each PSI. You have learned that PSIs range from the NAC, which is just a computer check, to the SSBI, which is an extensive seven-year check of subject's background. You have learned some general scoping rules for DSS PSIs, as well as the specific requirements for each PSI.

Finally, you have learned about the two types of subject interviews, those routinely conducted to meet scope (the SSBI SI) and those conducted for issue resolution (the Issue SI). Now we will look at the investigative forms used with each PSI.

## INVESTIGATIVE FORMS

*"An investigative form is any official form or document which reports investigative information or results."*

Besides the PSI request forms we discussed earlier, there are a number of other investigative forms with which you must be familiar. Just as each type of PSI has its own request forms, so also each has its own investigative forms. For our purposes, an investigative form is any official form or document which reports investigative information or investigative results. Investigative forms include the PSI request forms because they contain so much information about the subject. They also include the various forms used by DSS and OPM to report the results of their investigations. Samples of the most common investigative forms are included in the Investigative Forms packet.

Now, we will only look at the different types of forms, their uses, and how to review these forms. The PSIs of which they are part will be taught in the resident phase of this course.

## NATIONAL AGENCY CHECK (NAC)

**B**esides the SF 86, the primary form used in reporting NAC results is the DSS Form 1. (These forms are listed in Figure 3-27.) The DSS Form 1 is the standard form used by DSS when reporting the results of an investigation. When used for a NAC, it is known as a Report of NAC, or RON.

A sample of a DSS Form 1 completed with favorable NAC results is shown in the reading packet. As you can see, DSS reports the agencies contacted and the results of the contact. When there is information reported by one of the agencies contacted, it is attached to the RON. Such information could include prior investigations, an FBI arrest record (a "rap sheet") or information from subject's military record.

## NAC FORMS

- ◆ SF-86 (Questionnaire for National Security Positions)
- ◆ DSS Form 1 (Report of NAC)
- ◆ Additional information may be attached

Figure 3-27

## ACCESS NATIONAL AGENCY CHECK WITH WRITTEN INQUIRIES (ANACI)

**B**ecause it is conducted by written inquiry, the ANACI has a wide range of forms which are routinely used to report investigative information, as stated in Figure 3-28. The SF 171 or equivalent, the SF 85, SF 85P, SF85-PS, and SF 86 all contain a great deal of information provided by subject and are used by OPM as source material for sending written inquiries (known as "vouchers") to the subject's former employers, etc.

You're familiar with the old SF 171, the Application for Federal Employment. The most important information on this form is on the last page. Pay close attention to Subject's responses to those questions.

The SF 85 is the Questionnaire for Non-Sensitive Positions. This is the form used when the Subject has no clearance and performs only non-sensitive duties.

If Subject is assigned to a Non-DoD agency performing duties in a Non-Critical Sensitive duties, but has no access to classified information, the SF 85P (Questionnaire for Public

Trust Positions) is used. Questions 15 through 21 are especially important.

The application form you'll see most often is the Questionnaire for National Security Positions, the SF 86. DoD agencies use this form to request ANACIs for Secret and Confidential clearances and assignment to Non-Critical Sensitive positions.

***The OFI prefix on vouchers stands for the Office of Federal Investigations.***

When reviewing this form pay close attention to Part 2 of the source's answers to specific questions. Each form also includes a "Remarks" section for the source to say whatever he or she wants.

<b>NACI/ANACI FORMS</b>	
<b>SF 171</b>	<b>Application for Federal Employment</b>
<b>SF 85</b>	<b>Questionnaire for Non-Sensitive Positions</b>
<b>SF 85P</b>	<b>Questionnaire for Public Trust Positions</b>
<b>SF 85PS</b>	<b>Supplemental Questionnaire for Selected Positions</b>
<b>SF 86</b>	<b>Questionnaire for Sensitive Positions</b>
<b>OFI 41</b>	<b>Investigative Request for employment Data and Supervisory Information</b>
<b>OFI 42</b>	<b>Investigative Request for Personal Information</b>
<b>OFI 43</b>	<b>Investigative Request for Educational Registrar and Dean of Students Record Data</b>
<b>OFI 44</b>	<b>Investigative Request for Law Enforcement Data</b>
<b>1-4e</b>	<b>FBI ID Division Rap Sheet</b>

Figure 3-28

**OFI 40**

The OFI 40 is known as the General Request for Investigative Information. It is the only non-specific voucher used by OPM. Because of this, it's used in a variety of situations whenever one of the specific vouchers isn't suitable. Probably its most common uses are to verify military service and to get Immigration and Naturalization Service (INS) records.

**OFI 41**

The OFI 41 is the Investigative Request for Employment Data and Supervisor Information. An OFI 41 is sent to the personnel office of every employer listed on the SF 171 and SF 86, 85P or 85 for the last five years. In addition, one is also sent to every listed supervisor for the same period.

**OFI 42**

The OFI 42 is the Investigative Request for Personal Information. It is sent to each reference listed on the investigative forms.

**OFI 43**

The OFI 43 is the Investigative Request for Educational Registrar and Dean of Students Record Data. This form is sent to each college or university subject has attended within the period of investigation (POI). It is also used to verify any claimed degrees regardless of whether they were earned in the POI.

**OFI 44**

The last voucher is the OFI 44, the Investigative Request for Law Enforcement Data. This form is sent to the Police Department or Sheriff's Office wherever subject has lived, worked or gone to school within the POI. It may also be sent to courts to obtain the disposition of an arrest.

Finally, the 44 is used to **verify** any arrest or conviction listed on the investigative forms regardless of when it occurred.

**The 1-4e is the FBI rap sheet.**

The next most common form used in ANACIs/NACIs is the 1-4e - the FBI "rap sheet". The rap sheet records the results of the FBI/ID "tech check" - the fingerprint check. The rap sheet is a listing of all arrests recorded under subject's fingerprints, as shown in the National Crime Information Center (NCIC), which is maintained by the FBI. The date and place of arrest are shown and, when

available, the disposition (conviction, etc.) is listed.

It's important to realize that the only arrests shown on the rap sheet are those reported to the FBI. The subject may have dozens of other arrests which, for one reason or another, aren't reported to the NCIC. With luck, the LACs will catch those.

***When fingerprints are unclassifiable, the tech check is done by name check only.***

Occasionally the subject's fingerprints are unclassifiable which means they can't be "read" and matched with prints on file. In this case, the FBI does a name check and makes up a rap sheet of all arrests listed under the subject's name - even if they aren't the subject's arrests. This means that frequently arrests are incorrectly ascribed to the subject because of his/her name - you can imagine the problem someone named "John Smith" might have. Clearly these records need to be checked closely to be sure that you don't hold the subject responsible for someone else's actions. When

the tech check is done by name, the top of the rap sheet will say "Name Check Only."

In addition to these standard or routine forms, any number of other forms may be sent in by sources. These include employment forms, state and local police rap sheets and general correspondence. It is impossible to predict when any of these other forms may appear in a NACI, but they all require close attention when they do.

## **SSBI, NACLCL, NAC, ENTNAC, PR AND SII**

The SSBI, NACLCL, NAC, ENTNAC, PR and SII all use the same forms (see Figure 3-29). The SSBI, NACLCL, ENTNAC, PR and SII contain a SF 86 on the subject and certain relatives of the subject (see "Scope of PSIs", page 30 of this lesson). The SF 86 is a rich sources of information on the subject. The NAC contain the SF-85P. In addition to these forms, DSS uses a number of others to report investigative results in these PSIs.

***The DSS Form 1 is the major form used in the SSBI, NAC, NACLCL, ENTNAC, PR and SII.***

The most common form used in these investigations is the DSS Form 1, the Report of Investigation (ROI). The DSS Form 1 is used to report the vast majority of investigative results, including the results of interviews and record checks. A copy of an ROI reporting results is shown in the Investigation Forms Packet.

Whenever subject provides a signed statement, DSS uses two forms - the DSS Form 23a and the DSS Form 24. The 23a is used as the first page of the subject statement. It contains the Privacy Act.

## SSBI, PR AND SII

DD Form 1879	Request for Personnel Security Investigation
SF 86	Questionnaire for National Security Positions
DSS Form 1	Report of Investigation) (ROI)
DSS Form 23a	Statement (first page)
DSS Form 23a	Statement of Subject (first page)
DSS Form 24	Statement Continuation Sheet (signature page)
Credit Report	CBM standard credit reporting form
PIC Form 13	Notice from PIC

**Figure 3-29**

***A signed statement from a subject is given on DSS Forms 23a and 24.***

Advisement and a notice that the statement is voluntary. The final page of the statement is the DSS Form 24, which has places for the subject, the Special Agent and two witnesses to sign their names (you'll almost never see witness signatures). If additional pages are required,

regular typing paper is used and inserted between the 23a and the 24.

***A signed statement from a source goes on DSS Forms 23 and 24.***

When DSS obtains a signed sworn statement from a source other than subject, the DSS Form 23 is used. This form differs from the Form 23a in that it lacks the Privacy Act Advisement. Otherwise, a source statement is reported in the same way as a subject statement (that is with the Form 24 and typing paper).

***The DSS Form 154  
is used when the  
subject has  
financial  
problems.***

When DSS interviews the subject about his/her financial situation, the Special Agent will often have the subject provide a Personal Financial Statement, DSS Form 154. The 154, which can run to more than one page if necessary, lists the subject's monthly income, monthly expenses, debts, monthly debt payments and assets. It contains a great deal of information and requires close review. The 154 will always be accompanied by a Subject's statement (on DSS Forms 23a and 24).

When the DSS investigation includes a credit report, it is reported in one of two ways. A favorable report is reported on the DSS Form 1 with the following statement: "A review of credit bureau records at the following locations disclosed no unfavorable information."

Unfavorable or negative credit information is reported by the DSS vendor using a common report format. This form contains Subject's name, address and other personal identification data (PID). It also lists the subject's creditors and the status of each account. The back of the form contains a key to any codes used in the credit report. (This subject will be discussed later in this lesson under the block entitled, "The Credit Report".)

***The PIC Form 13  
provides  
information about  
the investigative  
process.***

The final form regularly found in these investigations is the PIC Form 13. This form is used by the Personnel Investigations Center (PIC) to communicate with the CAF or the requester of the investigation. The PIC may notify you that investigative coverage of a particular activity was not possible and why. Or the PIC may include a microfiche copy of a prior investigation which was conducted on the subject. Any information conveyed by the PIC Form 13 will refer to the investigative process rather than the investigative results, but nevertheless can be very important in reaching an adjudicative determination.

## COMMON PROBLEMS WITH PSIs

Now we'll conclude our discussion of PSIs. We just finished looking at the types, uses, scope of PSIs and the investigative forms found in each PSI. Now you'll learn about some of the most common errors and problems found in completed PSIs.

You need to be aware of these problems when you review PSIs. We will only introduce you to the problems and errors, and help you to identify them. Resolution of these issues will be taught in the resident phase of this course.

One of the major problems with conducting and reviewing PSIs is the number of errors found in PSI request packages. These errors range from incomplete information on the request forms to deliberate attempts by the subject to deceive. Figure 3-30 shows the most common errors.

### COMMON ERRORS

- **Incomplete Information**
- **Discrepant Information**
- **Deliberate Falsification**

Figure 3-30

***The most common error in PSIs is incomplete info from the subject.***

The most common error is incomplete information on the personnel security questionnaires - the SF 85, 85P and 86. The subject frequently provides only partial information when answering the questions on these forms. For instance,, Question 21 of the SF 86 asks, **"In the last 7 years, have you consulted with a mental health professional (psychiatrist, psychologist, counselor, etc.), or have you consulted with another health care provider about**

**a mental health related condition?" A "yes" answer must be explained.** If the subject answers "yes" but fails to fully explain his/her answer, it could cause DSS to reject the investigation request.

***You must be aware of incomplete info and decide how to resolve it.***

There's also the possibility that the investigative agency won't reject the case, but won't resolve the issue either. It's your responsibility as an adjudicator to be aware of the incomplete information and determine if additional investigation is needed to resolve the issue.

Such mistakes can be accidental (due to carelessness) or deliberate (due to an attempt to deceive). It's not unusual for the subject to provide partial information on purpose, hoping that no one will notice. When the investigator comes knocking on the door for more information, the subject can simply plead that it was an oversight or that he/she misunderstood the question.

It may also be due to the subject's belief that the information asked for is none of the government's business. Given the personal nature of many of the questions we ask, this isn't really a surprising reaction. Regardless of the cause, the result is the same: you must be thorough in your review of investigative forms to make sure that you have all the information you need to make a decision.

Another common error in PSI packages is contradictory information provided by the subject. This is most common in ANACIs/NACIs because they always have two forms giving similar information - both the 171 and the 85, 85P or 86.

You'll find that it's not uncommon for the subject to list a different employment history on the 171 and the 85, 85P or 86. This also may be deliberate or accidental. Frequently, the subject fills out the forms at different times without any reference material (such as a resume). In such a case, discrepancies are almost unavoidable.

***Request forms frequently contain***

It's important that you be aware of any discrepancies because of what they may conceal, such as a firing or even imprisonment. Though this problem is more common with the NACI, you'll also find it with other PSIs. For instance on the 86, the subject may show that he/she was

***discrepant info.***

simultaneously living and working in geographically remote areas. Although this may have a simple explanation, it may also conceal something pertinent to your adjudication.

The final common "error" in PSI packages is the deliberate lie. Sometimes this will seem like the most common error of all, and it does happen frequently. The subject seems to have the theory that "What I don't say can't hurt me" and lies about his/her arrest record, drug and alcohol history, credit status, etc.

***Subjects may lie on their forms.***

A deliberate lie on one of the investigative forms will only be revealed, if at all, by the investigation - when the rap sheet, credit report, etc., come in. There is no way of telling how often deliberate lies go undiscovered. This situation shows that while the subject may be the most knowledgeable source, he/she isn't necessarily the most reliable.

All of these errors require close review of the PSI packages, both to prevent rejection by the investigative agency and to ensure proper adjudication. Although you can't prevent these errors, by careful review you can reduce their damage.

**COMMON PROBLEMS WITH PSIs**

Besides the errors that the subject makes when filling out the investigative forms, there are a number of other problems with the various PSIs used in the DoD PSP. Understanding these problems will help you to make better informed decisions when adjudicating PSIs.

## THE NAC & ENTNAC

*The NAC doesn't develop new information.*

**T**he NAC and ENTNAC are the PSIs with the most severe problems. The major problem is with the scope of these investigations. They are not designed to develop information, but rather to consolidate existing information. It only taps existing federal record banks and consolidates the information found into a single report. Many of the richest sources of information about the subject (e.g. LACs, employment and reference checks, credit reports) are never checked or reported. Although the subject is asked to provide a great deal of information, there is no way of verifying the information or determining the truthfulness of the subject without any field investigation. As a part of another investigation, like the SSBI, ANACI, NACI or NACLCL, the NAC and ENTNAC are enormously useful. As a stand alone investigation, their utility is severely limited

## THE NACLCL

**T**he NACLCL, although a broader investigation than the NAC or the ENTNAC, it too has a few problems. Although the NACLCL includes a check of the Local Agencies and Credit Bureau, it lacks sources of information about the subject (e.g. employment and reference checks. As in the case of the NAC and ENTNAC, subject is asked to provide a great deal of information; however, there is no way of verifying the information or determining the truthfulness of the subject without any field investigation. However, if those checks covered in the NACLCL disclose questionable or derogatory information, the investigation will be expanded in attempts to resolve such information.

## THE ANACI

The ANACI and NACI is a vastly better investigation than the NAC, ENTNAC or NACLC, but it has a number of severe problems. These problems are shown in Figure 3-31 and discussed below.

### PROBLEMS WITH ANACI AND NACI

- ◆ Primarily an employment investigation (NACI only)
- ◆ No field investigation conducted
- ◆ No context for sources' comments
- ◆ Failure to resolve issues
- ◆ The subject "controls" the investigation

Figure 3-31

Although DoD uses the ANACI as an investigation for determining eligibility for a security clearance and/or eligibility to perform sensitive duties, the ANACI also is designed to be an employment suitability investigation for assignment to non-critical sensitive positions. The NACI is used within DoD as an employment suitability investigation for assignment to non-sensitive positions.

As a matter of fact, non-DoD Federal agencies don't even use the ANACI. They use the NACI only for employment considerations.

The ANACI and NACI focus places limits on the amount and type of information you have to adjudicate. It also means that the ANACI and NACI are better at raising questions than answering them. When reviewing

***The ANACI & NACI are better at raising questions than answering them.***

A derogatory ANACI or NACI, you'll frequently find that you have questions about the subject's security suitability, but no answers.

The reason that there are no answers is that OPM will not expand an ANACI or a NACI to resolve security questions, only employment suitability issues. If there are security suitability issues to resolve, the requester must either pay OPM to re-open the case or turn to another agency, such as DSS to conduct a SII.

***The NACI & ANACI are conducted thru the mail.***

The second major problem with the ANACI and NACI are the way they are conducted. They involve no field investigation: no investigator interviews the sources or checks the records involved. OPM sends vouchers by mail to the various sources. From the point of view of a source, these vouchers are unsolicited mail, sometimes "junk mail".

You can guess at the fate of a voucher viewed as junk mail - all too often it ends up in the wastebasket. Even when that doesn't happen, it may be weeks or months before the source gets around to filling out the voucher, which may be a low priority item from his or her point of view. To further complicate matters, the vouchers have to be filled out with a #2 pencil, since they're machine readable. If the source doesn't happen to have any #2 pencils, he may decide to just throw the voucher away.

If the vouchers aren't returned, OPM will usually simply close the ANACI or NACI, calling it a completed investigation. This is true even when the majority of the vouchers aren't returned. When that happens, you must simply adjudicate what you have. You would not normally re-open or expand the case unless you had a specific reason to do so.

When the vouchers are filled out and returned, there are still problems. Because there is no field investigation, there's no opportunity to have the sources explain their comments, to provide background and context for their replies. For instance, when a source says: "The only problem with Joe is that he drinks too much", the statement is almost meaningless without further

information.

In fact, it may say more about the source than about the Subject. "Too much" is a relative term which can mean significantly different things depending on whether the source is a tee-toteler, a social drinker, or an alcohol abuser. The point is, such a statement raises questions but fails to answer them. If the ANACI or NACI too often fails to answer questions, at least it does ask them. As long as an issue is raised, you can get additional investigation to resolve it and answer the questions. An SII from DSS is often needed to resolve issues raised in an ANACI or NACI before you can make a final adjudication. So although issue resolution is a major weakness of these investigations, issue identification is one of its major strengths.

The next problem with the ANACI and NACI is related to those already mentioned. Because no field work is conducted, the subject controls the investigation. That is, he or she provides the only lead information. Vouchers are only sent to those employers, schools, reference and police departments that the subject shows on the SF 171 and SF86. As you've already learned, it's not unusual for a subject to lie on these forms. This is a serious problem because the ANACI and NACI provide no opportunity for the investigation beyond the subject's control, to inquire about those areas of life that the subject may choose to conceal.

For instance, if the subject was terminated from an employment because of embezzlement, you probably won't know about it if he/she fails to list that employment on the SF 171 or 86. If, however, an investigator was in the field, asking questions and reviewing records, the information would probably be developed.

## THE SSBI AND PR

**T**he answer to the NAC, ENTNAC, NACL, ANACI and NACI problems we've discussed is the SSBI and PR. All of the problems brought up in the other investigations are solved here. SSBIs and PRs, being field investigations, are able to develop new sources of information about the subject (such as employment and neighborhood references), as well as tap existing sources (such as national agencies and credit bureaus). These investigations are designed to determine security suitability, although they are also used for employment suitability. All in all, these investigations are the most complete and the most satisfying to deal with. They are not, however, perfect. A number of problems are shown in Figure 3-32, and discussed below.

### COMMON PROBLEMS WITH SSBIs AND PRs

- **Sometimes fail to resolve issues**
- **Abbreviated Report Format**

**Figure 3-32**

It's a truism, but one worth keeping in mind: An investigation is only as good as the investigator who runs it. This is especially true in the SSBI and PR.

***"An investigation is only as good as the investigator who runs it."***

While these investigations usually resolve all issues Raised, they occasionally leave unanswered questions. Sometimes a Special Agent will fail to resolve an issue or fail to pursue logical areas of follow-up. When that happens, you may need to re-open the case to get additional information.

It's also a truism that adjudicators always want more information, regardless of how much they already have. These investigations wet this appetite for more information, but don't satisfy it.

***"Abbreviated Report Format" shows contact but not substance of comments.***

They are usually reported in the "Abbreviated Report Format". In this format the contact with a source is reported, but the substance of the source's comments are only reported if there is something discrepant or derogatory. As an adjudicator, you have to take it on faith that the investigator covered all of the necessary bases. Figure 3-33 shows the general areas of questioning which are *always* covered in each of these contacts.

## **GENERAL AREAS OF QUESTIONING IN A DSS INTERVIEW**

Nature, Period & Frequency of Association of Source & Subject

Subject's Reliability & Trustworthiness

Subject's Criminal Conduct & Moral Conduct

Subject's Use of Alcohol and Drugs (include. Marijuana)

Financial Responsibility

Any Foreign Travel & Connections

General Reputation of Subject, Family & Associates

Subject's Loyalty to the United States

Does Source Recommend Subject for a Clearance /Sensitive Duties

Any Collateral Verification of Activities

**Figure 3-33**

## **THE SPECIAL INVESTIGATIVE INQUIRY (SII)**

**I**t isn't really possible to discuss the SII in terms of common problems. The SII, being such a tightly focused, issue oriented investigation, can't be discussed in any meaningful way. Problems with SIIs tend to be individual rather than generic, as the problems are with an individual SII rather than with all SIIs.

## **THE CREDIT REPORT**

Now we'll discuss the credit report, and the role it plays in adjudication. You'll learn when DSS and OPM obtain credit reports and when and why they provide them to you to adjudicate.

This information will help you to understand why the credit report is such a valuable tool and why it plays such a big role in adjudication.

## **ORIGIN OF CREDIT REPORTS**

If you go to buy a car, rent an apartment, apply for a charge card, you expect to be the subject of a credit check - it's a routine part of doing business in this day and age.

Increasingly, it's also a routine part of the business of personnel security. All applicants for security clearances or sensitive duties will also be the subject of credit checks.

This hasn't always been the case. Credit reports are a relatively recent invention in the business world, and even more of a newcomer to the world of personnel security.

The first credit bureau wasn't established until 19th century London tailors, fed up with being paid when and

if their customers saw fit, got together and pooled information on their customers' payment habits. Now they could be fairly confident about who would pay a bill promptly (a "good credit risk") and who should be asked to pay in advance (a "bad credit risk").

Needless to say, an idea that's good is going to catch on, and the growth of the credit reporting industry has been nothing short of explosive. In this country alone, there are about 1,400 different credit bureaus, all dedicated to separating the good credit risks from the bad. It's estimated that these bureaus maintain information on 80% of all American households.

Credit reports have only been part of the investigative and adjudicative process since about 1980. Since that time they've become an increasingly important part of the PSI, until now they're recognized as one of the most valuable tools available to us in personnel security.

## **WHY HAS THE CREDIT REPORT BECOME SO VALUABLE?**

The main reason is the changing nature of the American spy. At one time, Americans became involved in espionage because of a variety of reasons - ideology, blackmail, etc. Now we do it for the money!

*Americans spy  
because of  
money.*

The sad truth is that most Americans who sell out their country, do it to make a buck.

This means that any source of information which tells us about a subject's financial habits (about how well the subject lives and how much he/she owes) is valuable. Anything which shows us a subject who is deeply in debt, or one who is living beyond his or her known means, may be showing us a subject who is a potential spy.

## **WHEN WILL YOU RECEIVE CREDIT REPORTS?**

The credit report is such a valuable tool that it is part of every PSI conducted to determine eligibility for a security clearance and/or assignment to a sensitive position for the DoD PSP. In fact, all PSIs don't include a credit report. Figure 3-34 shows those which do.

### **PSIs CONTAINING CREDIT REPORTS**

**Credit Reports are routinely part of the:**

- \* **SSBI**
- \* **PR (TS, S, and C)**
- \* **ANACI**
- \* **NACI**
- \* **NACLC**

**Credit Reports may be part of the:**

- \* **SII**

**Figure 3-34**

## HOW DOES DSS CONDUCT CREDIT CHECKS?

**W**hen the PIC receives a DD 1879 and a SF-86 requesting an investigation, the first thing the case controller does is review them to decide what investigation needs to be done. This is called "scoping" the investigative leads. Also, the case controllers scope the credit leads.

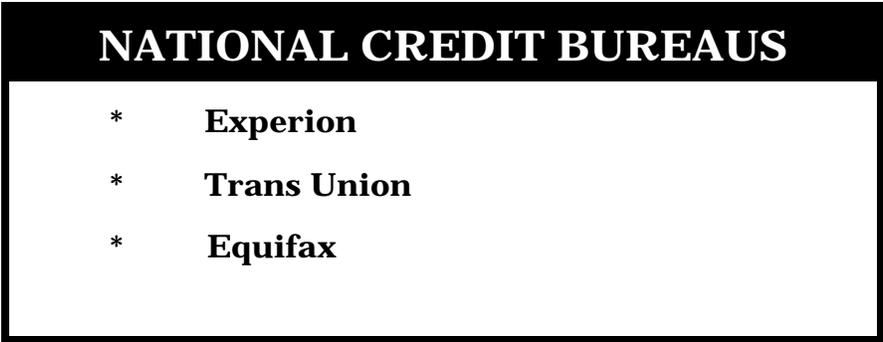
The case controller marks each address where the subject has lived, worked, or gone to school for a total of six months or more (cumulatively) during the last seven years for an SSBI or the last five years for a NACLIC and PR. In addition, each name that subject has used, including maiden names, former married names and aliases, is also marked by the case controller. These are the credit leads. DSS will obtain credit checks at each place marked, under each name marked. So if six places are marked, and subject has a married and a maiden name, up to 12 (6 x 2) credit reports could be obtained.

## THE CREDIT VENDOR

DSS doesn't actually go out and conduct the credit leads itself. It would be an enormous investigative burden, and a contractor can do the job more easily. Because of this, DSS has a contract with a national credit vendor, who conducts all the credit checks for DSS PSIs.

This vendor is not an actual credit bureau itself. Instead, it acts as the middleman between DSS and the national credit bureau systems from whom it gets credit reports. The vendor doesn't deal with all of the 1,400 credit bureaus in the U.S., because most of them are small, local operations, known as "mom and pop" credit bureaus.

Instead, the vendor deals only with three national credit bureau systems - the super powers in the world of credit reporting. Figure 3-35 shows the national credit bureaus.



**Figure 3-35**

Each of these credit bureaus provides coverage for the entire United States. However, each bureau is not equally strong in each area. For instance, TRW might be strong in Washington, DC, but much less strong in El Paso, TX. CBI, on the other hand, may be strong in El Paso, but weak in DC. These various strengths and weaknesses of the different credit bureaus are recorded in what's called the

***DSS uses the best credit bureau for each locale.***

Customer Table. This is a listing, by zip code, of each locale in the United States, and the major credit bureau which provides the best coverage in that area. The credit vendor uses the Customer Table to decide which credit bureau to use.

That means that when DSS runs an SSBI on a subject, the credit vendor compares the credit leads to the Customer Table, and requests credit reports from the strongest credit bureau in each place subject has lived, worked or gone to school in the last seven years. For instance, a subject currently works in Washington, DC, but graduated from El Paso State College last year. The vendor will get a credit report from Experion for DC and one from Equifax for El Paso. This ensures that the best information is obtained at each place. OPM gets credit reports for the ANACI in essentially the same way.

## HOW DOES DSS REPORT CREDIT INFORMATION?

**W**hen the vendor gets all the credit reports, it translates them into a common reporting format and forwards them to the PIC. The PIC case analyst reviews the credit reports and decides if they're derogatory or not (that is, if the bad debts total more than \$2000.00) or if further expansion is necessary. A detailed report describing the credit history is provided in all PSI's containing a credit check.

When the credit check contained unfavorable credit information, the case will contain a statement that the credit check disclosed unfavorable information as shown in Figure 3-36. This statement will appear prior to the credit report itself.

### **CREDIT**

REVIEW OF CREDIT BUREAU RECORDS COVERING THE FOLLOWING LOCATIONS DISCLOSED UNFAVORABLE INFORMATION -

RICHMOND, VA  
FOSTER, VA

**Figure 3-36**

When there are several credit checks in a case, it isn't unusual for some of them to be favorable, while others contain derogatory information. When that happens, the results are reported as shown in figure 3-37, with some of the credit reports provided to you and the others destroyed.

**CREDIT**

REVIEW OF CREDIT BUREAU RECORDS COVERING THE FOLLOWING LOCATIONS DISCLOSED NO UNFAVORABLE INFORMATION -

RICHMOND, VA  
FOSTER, VA

**CREDIT**

REVIEW OF CREDIT BUREAU RECORDS COVERING THE FOLLOWING LOCATIONS DISCLOSED UNFAVORABLE INFORMATION - SEE ATTACHED

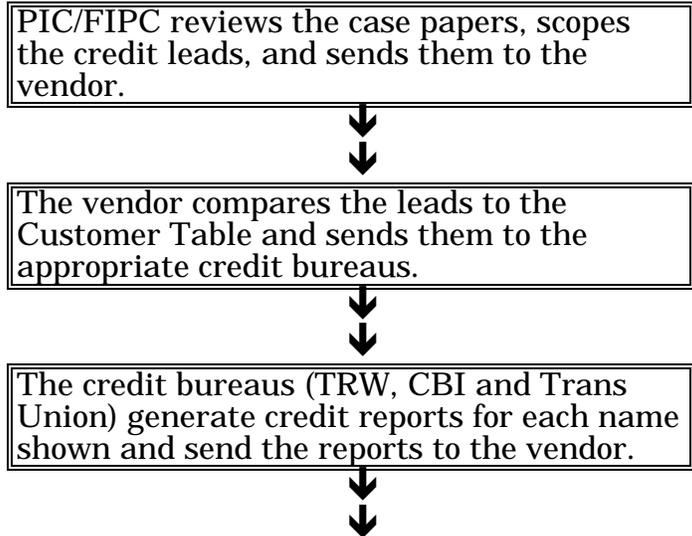
BOSTON, MA  
MILTON, MA

**Figure 3-37**

In addition to preparing the ROI, the case analyst decides if the information needs to be resolved by a field investigation. If so, the case analyst scopes the necessary leads to the field, and an agent resolves any issues. Needless to say, your PSI will include the results of this investigation as well as the credit report.

The PSI, with the credit reports and/or the ROIs is then sent to the CAF by the PIC. Figure 3-38 shows this whole process.

**FLOW OF CREDIT REPORTS**



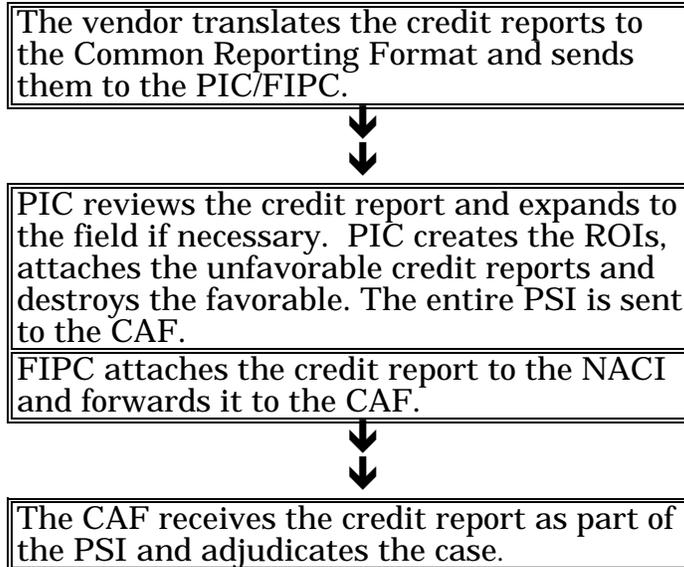


Figure 3-38

## HOW DOES OPM REPORT CREDIT INFORMATION?

Unlike DSS, OPM always provides a copy of any credit reports it obtains. The credit report is attached after the NAC results and before any voucher responses. When the credit report contains derogatory information, OPM uses the same standard reporting format as DSS (see the "How to Read Credit Reports" booklet). Completely favorable reports use a different, more easily read format. A copy is at the end of the "How to Read Credit Reports" booklet.

OPM lists the results of the credit report check on the Case Closing Transmittal, which is the cover sheet for a complete ANACI. Figure 3-39 shows how the Case Closing Transmittal lists the results of three credit checks. The first one is a favorable credit report; the second is an unfavorable credit report; and the third one contained no pertinent information on the subject.

ITM ***	TYPEITEM IDENTIFICATION *****	CM **	RESULTS *****
E01	CREDEL PASO, TX	I	ATTACHED
E02	CREDBOSTON, MA	I	ISSUE
E03	CREDWASHINGTON, DC	I	NPI

Figure 3-39

## WHAT INFORMATION IS IN THE CREDIT REPORT?

**T**he credit report can be a rich source of useful information, if you keep a couple of things in mind.

**The first is that the credit report was not designed with you, the adjudicator, in mind.** It was designed to help creditors decide if someone is a good credit risk. It can help you decide if subject is a good security risk, but remember that's not what it's for. There's a world of difference between a *good credit risk* and a *good security risk*. Because of this, you'll find the credit report is full of information that seems useless to you but which is vital to credit grantors. On the other hand, it won't have some pretty obvious things that you need and think it should contain, but which creditors don't need or want.

**The second thing to remember is that the credit report is not infallible.** That old saying about computers - "garbage in, garbage out" - is even more true of credit reports. It's not unusual for a credit report to be full of bad (incorrect) information. If the creditors report something to the credit bureau, the credit bureau will presume it's accurate and repeat it to you. Only on closer examination will it be clear that it's all a mistake, misunderstanding, etc. All of this means that you have to be careful not to take the credit report at face value. In other words, treat it like any other source of information - hopefully, but not necessarily, accurate.

With this in mind, there's a lot you can get from a credit

***Credit reports often contain incorrect information.***

report. It can verify subject's residential and employment history. More than once a credit report has revealed a previously undisclosed spouse. Most of the time though, a credit report will reveal two types of information.

***Delinquent debts may indicate trouble.***

**The first type deals with bad debts.** A credit report will tell you when your subject is teetering on the edge of financial disaster. The credit report will identify the subject who's being dunned by bill collectors, or ending up in court for non-payment of debts. This information is critically important because a subject in financial trouble may turn to espionage to raise money. Clearly, we have to prevent that if we can, and the best way is to keep that person from having a security clearance.

***Unexplained affluence is also a major concern.***

**The second type of information deals with what's called "unexplained affluence."** Simply put, unexplained affluence means living better than you should, given your known means. For example, a GS-5 who owns a yacht is a case of unexplained affluence. The credit report can reveal unexplained affluence by reporting that subject has monthly credit card payments of \$2,000.00, and is meeting them. You know that the subject is single and makes \$18,000.00 a year. Clearly, there's an issue here that needs to be resolved. Probably, the subject has an inheritance or won the lottery or something. Possibly, though, he/she has become involved in espionage or drug dealing, or some other situation which makes his/her loyalty, reliability and trustworthiness questionable.

Most of the information in most credit reports will be of no adjudicative interest at all. Remember, though, we're looking for that 5% or so of people who shouldn't and won't get clearances, and the credit report will help us find them.

The credit report is one of the most important tools available to you as an adjudicator. The typical American who becomes involved in espionage does it for the money. It can help identify people whose financial situation is such that they might be motivated to sell out their country.

**You can expect to see credit reports in the SSBI, PR, ANACI and NACLCL.** Occasionally, they're also in SIIs. Currently, the NAC doesn't contain a credit report.

DSS and OPM obtain credit reports through a credit vendor, who provides national credit coverage through the major credit bureaus. This ensures that the best available information is provided to you.

**DSS will provide the actual credit report in all PSI containing a credit check.** Otherwise, the credit report is destroyed and you are notified of a favorable result.

**OPM will always provide a copy of the credit report, even if it's favorable.**

The credit report is a prime source of information on both bad debts and unexplained affluence, two of the most important considerations in security eligibility.

# Review Exercise

1. Which agencies are authorized to conduct PSIs for the DoD PSP?

\_\_\_\_\_

2. DSS jurisdiction is limited to DoD affiliated personnel in the 50 states, the District of Columbia, and Puerto Rico.

- a. True
- b. False

3. Questions asked in the course of a PSI must be reasonably expected to develop information which is \_\_\_\_\_ and \_\_\_\_\_ to making a personnel security determination.

4. List five of the nine investigative techniques DSS must avoid using.

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_
- 4. \_\_\_\_\_
- 5. \_\_\_\_\_

**5. Beside each situation shown below, write the necessary PSI:**

- a. Secret clearance for a contractor: \_\_\_\_\_
- b. Civilian employee in a critical-sensitive position: \_\_\_\_\_
- c. Military member with Secret clearance requirement: \_\_\_\_\_
- d. To resolve issues raised about a subject's security eligibility: \_\_\_\_\_

**6. The Subject Interview is routinely a part of which two PSIs?**

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_

**7. Identify the PSIs whose scope and period of coverage are shown below:**

- a. Last Five Years  
NAC  
Employment Records  
Supervisors  
Education Records  
Listed Character References  
LACs  
Credit Checks

**Answer:** \_\_\_\_\_

- b. Last Five Years  
NAC  
Spouse NAC (if we don't have on file)  
Subject interview  
Employment Records

Employment Interviews  
Developed Character References  
Neighborhood Inquiries  
LACs  
Credit Checks

**Answer:** \_\_\_\_\_

**8. What are the three most common errors found in PSI requests?**

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

**9. What is the major problem with the NAC?**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**10. What two types of information will a credit report usually reveal?**

1. \_\_\_\_\_
2. \_\_\_\_\_

**11. What are three of the five major problems with the ANACI & NACI?**

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_

**12. OPM will resolve only employment suitability issues raised in an ANACI or NACI.**

- a. True
- b. False

**13. List the three agencies always checked in a NAC.**

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_

**14. Which agency was established as DoD's single centrally directed personnel security investigative service by the 5200.2-R?**

\_\_\_\_\_

**15. OPM will expand the ANACI to resolve any security related issues.**

- a. True
- b. False

**16. Which PSIs are conducted on civilians only?**

\_\_\_\_\_

**17. Which PSIs routinely contain credit reports?**

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**18. What are the three national credit bureaus checked by the DSS credit vendor?**

1. 

---
2. 

---
3. 

---

**19. A Personnel Security Investigation is an inquiry into someone's:**

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**20. What are the three investigations authorized for the initial issuance of a security clearance eligibility?**

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---

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# Solutions & References

1. DSS and OPM (Lesson 3, page 3-3)
2. a. True (Lesson 3, page 3-7)
3. relevant and necessary (Lesson 3, page 3-14)
4. (Lesson 3, page 3-11)
  1. Using mail covers(reviewing incoming & outgoing mail)
  2. Conducting physical surveillance
  3. Conducting photographic surveillance
  4. Conducting physical searches
  5. Using voice analyzers
  6. Inspecting trash
  7. Using paid informants
  8. Using wiretaps
  9. Using eavesdropping devices
5. (Lesson 3, page 3-19)
  - a. NACLC
  - b. SSBI
  - c. NACLC
  - d. SII
6. (Lesson 3, page 3-36)
  1. SSBI
  2. PR

7.
  - a. ANACI (Lesson 3, page 3-30)
  - b. NACI (Lesson 3, page 3-30)
  - c. PR (Lesson 3, page 3-32)
  
8. (Lesson 3, page 3-45)
  1. Incomplete Information
  2. Discrepant Information
  3. Deliberate Falsification
  
9. The Scope. A NAC is not designed to develop information, but rather to consolidate existing information. It only taps existing federal record banks and consolidates the information found into a single report. (Lesson 3, page 3-48)
  
10. (Lesson 3, page 3-62)
  1. Bad Debts
  2. Unexplained Affluence
  
11. (Lesson 3, page 3-49)
  1. Primarily an employment investigation (NACI only)
  2. No field investigation conducted
  3. No context for sources' comments
  4. Failure to resolve issues
  5. The Subject "controls" the investigation.
  
12. a. True (Lesson 3, page 3-49)
  
13. (Lesson 3, page 3-28)
  1. DCII
  2. FBI/HQ
  3. FBI/ID
  
14. The Defense Security Service (DSS) (Lesson 3, page 3-7)
  
15. False (Lesson 3, page 49)
  
16. NACI & ANACI (Lesson 3, page 3-21)

17. SSBI, ANACI, NACI, NACLIC (Lesson 3, page 3-56)
18. TRANS UNION, Experion, Equifax (Lesson 3, page 3-57)
19. Background, Lifestyle, Personal History (Lesson 3, page 3-14)
20. SSBI, ANACI, NACI (Lesson 3, page 3-16)