

CHAPTER 3
STANDARDS AND CRITERIA FOR SENSITIVE POSITIONS

3-1 Types of Investigations:

- A. National Agency Check (NAC) - A complete investigation, but an integral part of all background investigations. It includes searches of OPM's Security/Suitability Investigations Index (SII); the FBI's arrest records; and the FBI's investigation records;
- B. National Agency Check and Inquiries (NACI) - The minimum investigation required for all Federal employment, including contractors, except when employment is not to exceed 180 days in the aggregate. This type of investigation consists of a NAC and written inquiries covering specific areas of a person's background during the past five years to current, as well as queries of former employers, local law enforcement authorities, schools, and references. It is a background investigation, but is conducted only for individuals in non-sensitive positions and is referred to Government-wide as a NACI;
- C. NACI with Credit (NACIC) - This background examination consists of a NACI, plus an automated credit check covering residence and employment locations for the past five years;
- D. Access NACI (ANACI) - A NACI, with local law enforcement checks, this inquiry is primarily conducted by written inquiry, covering residence, employment, and school locations during the last five years, plus all locations of admitted arrest. It may include court records' checks and interviews of the subject and others, if necessary. Unanswered records checks inquiries are followed up by an investigator. (This is a new investigation that meets the minimum investigation requirements for access to classified information at the Confidential or Secret level.)
- E. NAC with Local Agency Check and Credit (NACLIC) - This examination is a NAC with the same scope of law enforcement coverage as the ANACI, but includes credit checks. (This is a new investigation that meets the minimum reinvestigation requirements for individuals with Confidential or Secret security clearance.);
- F. Minimum Background Investigation (MBI) - A NACIC, an interview of the subject, written inquiry of residences, and references;

- G. Limited Background Investigation (LBI) - This investigation consists of a NACI, credit search, personal subject interview, and personal interviews by an investigator of subject's background during the most recent three years;
- H. Background Investigation (BI) - This is a more in depth version of the LBI since the personal investigation coverage is the most recent five to seven years. This investigation is required of individuals going into the highest risk public trust positions (Level 6);
- I. Single-Scope Background Investigation (SSBI or SBI) - This investigation includes the BI, and requires verification of U.S. Citizenship of foreign-born subjects, as well as a personal interview of the former spouse if a divorce has occurred within the past ten years. It also requires a NAC of current spouse or cohabitant and an inquiry into the legal status of foreign-born immediate family members;
- J. SSBI-Periodic Reinvestigation (SSBI-PR) - This is the required five year update investigation for individuals who have Top Secret clearances. It consists of personal investigative coverage of employment and residences since the previous investigation, including interviews with all former spouses divorced during the coverage period;
- K. Periodic Reinvestigation (PRI) - This inquiry consists of a NAC, a subject interview, inquiries of references, and records checks of local law enforcement sources and credit history;
- L. PRI-Residence (PRIR) - This is the same type of investigation as the PRI, with the addition of three years residence coverage; and
- M. Special Access Program (SAP) - This program encompasses information which requires special handling over and above the protection afforded to classified information.

3-2 Categories of Sensitive Positions:

- A. For the purpose of conducting investigations, OPM requires that sensitive positions be designated in five categories:
 - 1. Special Sensitive (2)
 - 2. Critical-Sensitive (3)

- 3. Noncritical-Sensitive (2)

4. High Risk (6)
5. Moderate Risk (5)

B. An individual may have computer access at any sensitivity level. OPM requires that this be identified by adding a “C” to the numerical designation. The position sensitivity levels are defined below as follows:

1. Special-Sensitive (4) - Positions with access to Sensitive Compartmented Information (SCI) and Special Access Program (SAP) information, both of which require special handling in addition to the protections afforded to other classified information.
2. Critical-Sensitive (3) - Positions that have potential for exceptionally grave damage to the national security. The positions so designated at HUD are:
 - (a) Presidential appointees;
 - (b) Positions with Emergency Preparedness duties;
 - (c) Positions that require access to Top Secret information;
 - (d) Positions with access to Security or Confidential information if the position would otherwise be designated High-Risk;
 - (e) The Personnel Security Officer;
 - (f) Positions with information security duties; and
 - (g) Positions which access in safeguard employee security files, issues security clearances, and attend classified seminars and training;
3. Non-critical-Sensitive (2) - Positions that have the potential for moderate to serious damage to the national security. They require access to Secret or Confidential information, without which the designation would be either Moderate Risk or Non-sensitive.
4. High Risk (6) - Positions that have the potential for exceptionally serious impact involving duties especially critical to the Department’s mission, with broad scope of policy or program authority. They include:
 - (a) Positions in the Senior Executive Service (SES);
 - (b) Deputy Assistant Secretaries;
 - (c) Independent spokespersons;
 - (d) Non-Managers with authority for independent;

- (e) Positions with significant involvement with one or more mission-critical computer systems; and
 - (f) Positions that require the same degree of public trust.
5. Moderate Risk (5) - Positions that have the potential for moderate to serious impact, involving duties of considerable importance to the agency or program mission, with significant program responsibility and delivery of customer services to the public, such as:
- (a) Unsupervised assistance in policy development and implementation;
 - (b) Management or non-management positions with authority for independent or semi independent action; and
 - (c) Positions with substantial involvement with one or more mission-critical systems.