

SF 86 Comments Received From 60 Day FRN (Published 3-12-2013) Adjudication

Agency/ Public	Name, Email, Telephone	Section	Original Text	Recommended Change	Rationale or Comment	Accept/Reject Comment
USAF	Susan Wilkerson, PhD; Susan.Wilkerson.ctr@wpafb.af.mil; 937-522-6829			CHANGING INSTRUCTIONS TO AGREE WITH REALITY: If it requires separate forms for collateral only and collateral + SCI then make it so.	The SF-86 always says "last 7 years" even though, for SCI access, I am instructed to go back 15 years. How about making the form agree with what we are instructed to do? Is that so hard?	REJECT
Family Equality Council	Heron Greenesmith			Have explicit and clear guidelines in place for investigators about how to safeguard information about an applicant's sexual orientation and gender identity during the background investigation, and to have investigative agencies (including, but not limited to, OPM) conduct regular trainings for investigators on the subject.		NOTED
Public	msamp08@icloud		The first thing that should be changed is to recognize and allow the user to continue without producing an error which it states must be corrected)		Just one month ago, I came up for a periodic reinvestigation and was introduced to eQIP. This form was actually more difficult and confusing than the first SF86 I filled out in 1974.	REJECT

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Family Equality Council	Heron Greensmith	Investigative Process	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used.	Federal agency records checks may be conducted on your spouse, legally recognized civil union/domestic partner , cohabitant(s), and immediate family members.	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used. After collecting information on an applicant's legally recognized relationships, it is crucial that the form continue to reflect that data throughout the information collection. Without the addition of "legally recognized civil union/domestic partner" where spouse appears, applicants might be confused as to whether a certain section applies to other legally recognized relationships. To that end, we recommend edits to the following sections. Edits are reflected in bold and underline.	ACCEPT
Public- Associates.HQ- DHS	Elizabeth Withnell; Elizabeth.Withnell@associates.hq.dhs.gov			First, Executive Order 9397, which is cited under Authority to Request this Information, has been updated by Executive Order 13478 (signed November 2008). I would suggest that you note this change in the Authority section.	I am writing in response to OPM's notice and request for comments on the SF-86. In addition to the changes you propose in the notice, I would like to make the following suggestions. These suggestions are based on my familiarity with the use of this form as a retired member of an intelligence community agency but are attributable to me alone and not to any of my employers past or present.	ACCEPT

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Public- Associates.HQ- DHS	Elizabeth Withnell; Elizabeth.Withn ell@associates.h q.dhs.gov			To address this, I believe OPM should encourage SF-86 applicants to advise anyone whom they list on the form that their name is being offered up as part of the security investigation process so that those individuals can object, if they wish, to being listed on the form. While I appreciate that objecting may not be feasible for spouses, cohabitants and immediate family members -- at least if the process is to be carried out for the applicant -- other individuals may object and should be notified of the use of their information. In conjunction with this suggestion that applicants provide notice to individuals whose names they list, I believe the instructions in the Investigative Process section should be amended to indicate that any individual who is listed on the form may be the subject of a records check,	More importantly, I believe that the narrative in The Investigative Process needs to be revised to make more transparent how national security agencies use the information provided on the SF-86. In addition to conducting agency records checks on the applicant, spouse, cohabitants and immediate family members, at least some agencies also conduct records checks on references (acquaintances) and other individuals listed in the form and may also conduct further checks on any individual who is associated with applicants, spouses, cohabitants, immediate family members and neighbors and acquaintances. And these records checks may be conducted on a continuous basis.	REJECT

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Public- Associates.HQ- DHS	Elizabeth Withnell; Elizabeth.Withnell@associates.hq.dhs.gov			not only at the time of the initial investigation of the applicant, but also in any continuous evaluation that may be conducted by the hiring agency. Currently, for example, the instructions say that "After an eligibility determination has been completed, you also may be subject to continuous evaluation, which may include periodic reinvestigations" This sentence could be amended to state that "After an eligibility determination has been completed, you also may be subject to continuous evaluation, which may include periodic reinvestigations of you as well as of your spouse, cohabitant, immediate family members, and acquaintances." In my experience, this is closer to the truth of what occurs in a continuous evaluation.	Aside from being good privacy policy, making these modifications would be consistent with agency requirements under the Privacy Act, particularly subsection (e) and would foster OPM's compliance with fair information practice principles.	REJECT

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USAF	Elana North; elana.north@us.af.mil; 907-377-4760	Middle Names		Provide clarification for using (IO) and (NMN).	I understand if the person has a middle name, they have to provide the full middle name; however many applicants interpret it as their option to use (IO) and (NMN) if they don't know the middle name instead of contacting the person and verifying. On NUMEROUS occasions, I have rejected and explained to "Use (IO) or (NMN), if in fact, the middle name is only an initial or there is no middle name."	REJECT
US Air Force-Civilian	Donalene Knowley; Donalene.Knowley@hill.af.mil; 801-586-6447	Section 4, SSN		remove "Not applicable" for SSN	Here are some of the issues that I have seen during my review of package for personnel assigned to our organization.	REJECT
USAF	Elana North; elana.north@us.af.mil; 907-377-4760	Telephone Numbers		For contact numbers, make a SEPARATE entry for "commercial" contact numbers before the DSN option or remove the option "International or DSN"	because most of our OPM investigators are contracted and do not have access to DSN lines. I get a lot of heartache because applicants aren't allowed to use the DSN option.	REJECT
USAF	Cheri LeBlanc; cheryl.leblanc@us.af.mil; 660-687-5892			Phone number - remove requirement to list three possible numbers. Change question to: List the best telephone number that you can be contacted through....	Duty/work phone is required in Section 13A so why enter here.	ACCEPT part of the recommendation

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USAF	Cheri LeBlanc; cheryl.leblanc@ us.af.mil; 660- 687-5892	Section 7- Your Contact Information		Delete home and work email address	Unless the investigator/agency it serves no purpose. Investigators don't contact members for an interview through an email. Maintain the option to enter email address at the end of the questionnaire.	REJECT
Public	msamp08@icloud	Section 8- Passport		Section 8 asks for U.S. Passport information. If I said that I have one and provide the information, why would it even take me to Section 9- Citizenship? Does not a valid U.S. passport prove that I am an U.S. citizen? My situation might be unique because none of the choices in Section 9 applied to me even though its been verified since 1974 that I am in fact, a U.S. citizen.		REJECT
Public-Federal Clearance Assistance Service	William H. Henderson; whenderson@fe dcas.com;	Section 9- Citizenship		Add a field for "Other" to accommodate people who received US citizenship through adoption by US citizens (i.e. Child Citizenship Act of 2000), people who received US citizenship derivatively due to a parent becoming a Naturalized US citizen, and people who received US citizenship through a "Private Bill."		REJECT

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		Section 9- Citizenship		<p>Replace the words "Provide the name of the court" and "Provide the address of the court" with "Provide the name of the court or agency" and "Provide the address of the court or agency" Since about 2003 naturalization certificates and citizenship certificates have been issued by US Citizenship and Immigration Services (USCIS), rather than a US District Court.</p>		REJECT

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Public	msamp08@icloud.com	Section 9- Citizenship		<p>If I said that I have one and provide the information, why would it even take me to Section 9-Citizenship?</p> <p>Does not a valid U.S. passport prove that I am an U.S. citizen? My situation might be unique because none of the choices in Section 9 applied to me even though its been verified since 1974 that I am in fact, a U.S. citizen. Back in those days, there was a thing called Derivative Citizenship (or something similar).</p> <p>Since I was a minor at the time my parents became naturalized citizens, I was included and granted citizenship, but not given any document. The SF-86 I first filed out in 1974 recognized this situation and up until my last periodic reinvestigation 10 years ago, all I needed to provide was the naturalization certificate information for my parents and that was it. The current form forced me to "lie"because I had to make a selection in Section 9 even though none of the choices was true in my case.</p>		ACCEPT

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USAF	Elana North; elana.north@us.af.mil; 907-377-4760	Addresses		When requesting addresses for references, list specific desired question: "Physical Street Address" vs "Street Address".	In regards to the Federal Register, Vol 78 No. 48, Office of Personnel Management, I am submitting comments on improving SF86 (or at least cause less frustration). The question "Physical Street Address" pops up only when an APO/FPO address is listed. On several occasions, I've rejected PSQs for providing their APO/FPO in this section.	REJECT
USAF	Carl Virost; carl.virost@wpafb.af.mil; 937-522-4848	Addresses		Something I would change about the SF-86 form would be to list addresses in chronological order, as opposed to the reverse chronological order they are in now.	When we update our SF-86's, we have to add any new addresses at the top and shift every other address down. What should happen is we list the address furthest back first, and the most recent address last. This was when updating the SF-86, we just enter any new addresses at the end. This should also apply to anything that is currently asked for in reverse chronological order.	REJECT
HHS-CMS	Amy Jones; amy.jones@cms.hhs.gov; 410-786-2277	Section 11- Where You Have Lived		There should be an option for someone to include " other periods of activity" instead of having someone input an address multiple times within the 10 year required time frame	You are able to do this for employment, but not residences. This really comes into play when you have college students that stay on campus part of the year and live at home during the summers and winter breaks.	REJECT
USAF	Elana North; elana.north@us.af.mil; 907-377-4760	Section 11- Where You Have Lived and Section 13a- Employment Activities		Add in Sections 11 and 13A, that date must match with each other with the exception of multiple addresses in one state, (then only start and end dates should match Sec 13A).		REJECT'

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US Air Force- Civilian	Donalene Knowley; Donalene.Know ley@hill.af.mil; 801-586-6447	Section 11, Where You Have Lived		Add: Do not list the same person more than one-time as a reference.	For the people who knew you at this address	REJECT
Family Equality Council	Heron Greensmith	Where you have lived	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used.	Do not list people who knew you for residences completely outside this 3 year period, and do not list your spouse, legally recognized civil union/domestic partner, cohabitant or other relatives as the verifier for periods of residence.	We encourage OPM to add "legally recognized civil union/domestic partner "throughout the form where the word "spouse" is used. After collecting information on an applicant's legally recognized relationships, it is crucial that the form continue to reflect that data throughout the information collection. Without the addition of "legally recognized civil union/domestic partner" where spouse appears, applicants might be confused as to whether a certain section applies to other legally recognized	ACCEPT
US Air Force	Paul Burger	Section 11, Where You Have Lived		Do not list TDYs and deployments over 90 days. Members are technically still assigned to home station. Document the travel in the foreign travel section.		REJECT
US Air Force	TSgt Paul Burger; Paul.Burger@hi ll.af.mil	Section 12, Where You Went to School	"Have you received a degree or diploma more than 10 years ago?"	Change the second question to read "Have you received degrees or diplomas more than 10 years ago."		REJECT

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Public	Mike Yared; mike_yared@ho tmail.com	Section 12- Where You Went to School		Propose to add a field/box in Section 12- Where You Went to School of SF 86, that anyone who has a PHD (doctorate) include the title of the dissertation.	This can be further checked with http://dissexpress.umi.com/dxweb and/or www.worldcat.org	REJECT
US Air Force- Civilian	Donalene Knowley; Donalene.Know ley@hill.af.mil; 801-586-6447	Section 12- Where You Went to School		Add: High School Diploma's must be included.	The instructions states: "Do not list education before your 18 th birthday, unless to provide a minimum of two years of education history." Then (b) says: Have you received a degree or diploma more than 10 years ago? Everyone must list their High School Diploma, and may have happened at age 17, so this is confusing to some people.	REJECT
USAF	Cheri LeBlanc; cheryl.leblanc@ us.af.mil; 660- 687-5892	Section 12- Where You Went to School	Do not list education before your 18th birthday, unless to provide a minimum of two years of education history.	Change to: List ALL schools to include high school that a degree/diploma was received regardless of age. List all schools attended within the last 10 years but do not list schools attended before high school.		REJECT

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USAF	ELANA North; elana.north@usaf.mil; 907-377-4760	Section 12- Where You Went to School	Provide the name of person who knows/knew you at school (for correspondence/distance/extension/online schools, list someone who knew you while you received this education)	Reword the question to say, "Name of person who can verify/validate your attendance while at school?"	On many instances, I have people list their neighbors/friends/supervisors as the reference because they knew of person taking classes (but cannot actually verify they attended). What is your intent--validation or knowledge of attendance? One of the OPM investigators I deal with informed me of the requirement of providing a good source who can validate attendance.	REJECT
Public	Rolly Neve; nitemask@yahoo.com	Section12- Where You Went to School			Please verify whether or not we have to list high school outside of 10 years if we already have college degrees listed?	REJECT

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Sandia National Laboratories	Berlinda Sanchez; bmsanc@sandia.gov	Section 13a- Employment Activities- Employment & Unemploye nt Record		It might be helpful to say how many maximum characters will fit in a field.	When trying to research information and continue to additional sections, it would be helpful if there was a way to save partial data. It seems that if you do not complete a given field, all that information would be lost. When trying to update my employment, the system eroded, because I tried to adjust my "present" employment and supervisor information to close out the time period from my initial investigation. Maybe I overlooked it, but there didn't seem to be a clear way to enter information for my previous manager and create a new "profile" for my current position. Some of the information regarding past supervisors is so out of date, it would be helpful to add a field that says something like "no longer works there". I would hate for the investigators to waste their time trying to track down people who have retired. Some of the fields are very small to type in, and it is not clear how much information would fit.	REJECT
US Air Force- Civilian	Donalene Knowley; Donalene.Knowley@hill.af.mil; 801-586-6447	Section 13b, Employment Activities- Former Federal Service		Add: Employment must be broken out for all positions held, even if on the same location.	Under the instructions, ADD: to include current federal employment. People don't understand that this section is for current federal employees.	REJECT

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USAF	Cheri LeBlanc; cheryl.leblanc@ us.af.mil; 660- 687-5892	Section 15- Military History		Delete block for Service Number or define what needs to go in this block. (i.e. SSAN)		REJECT
Family Equality Council	Heron Greenesmith	People Who Know you Well	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used.	Do not list your spouse, former spouse (s), legally recognized civil union/domestic partner(s), other relatives, or anyone listed elsewhere on this form.	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used. After collecting information on an applicant's legally recognized relationships, it is crucial that the form continue to reflect that data throughout the information collection. Without the addition of "legally recognized civil union/domestic partner" where spouse appears, applicants might be confused as to whether a certain section applies to other legally recognized relationships. To that end, we recommend edits to the following sections. Edits are reflected in bold and underline.	ACCEPT

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Sandia National Laboratories	Berlinda Sanchez; bmsanc@sandia.gov	Section 16- People Who Know You Well		When trying to research information and continue to additional sections, it would be helpful if there was a way to save partial data. It seems that if you do not complete a given field, all that information would be lost.	I am writing to provide you feedback on the process for my reinvestigation. When completing the "people who know me" section, the system only kept the time period that I've known the person and their home address. Their name was no longer listed, so I had to figure out who my previous references were. Throughout the system, none of the zip codes were retained. I had to re-enter zip codes whenever they were needed. Whenever the system would "error", there was no clear direction that it was because I didn't click "edit" to verify or add information. In fact, the system would not always provide an opportunity to enter the information—that I didn't always know was required—until after I tried to save and continue.	REJECT
US Air Force-Civilian	Donalene Knowley; Donalene.Knowley@hill.af.mil; 801-586-6447	Section 16, People Who Know You Well		Can the instructions state something like: "All three references must add up to at least 7 years." Add: Do not use a reference here that you have already used as a reference somewhere else in this package.	We have people that think that all three references must go back the 7 years.	REJECT

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OPM-FIS	Aaron Wilson	Section 16, People Who Know You Well		People who know you well: The instructions should reflect that, if possible, the listed references should be people with whom the Subject has had social contact in the last 7 years.	In order to ensure that Subject are providing FIS staff with the best leads possible on the SF86, I propose that the instructions be amended for some of the sections that ask for verifiers	REJECT
US Air Force- Civilian	Donalene Knowley; Donalene.Knowley@hill.af.mil; 801-586-6447	Section 17, Marital/Relationship Status		Remove "not applicable" for spouse's SSN.		REJECT
DOE-Idaho National Laboratory (INL)	Kathryn Kain; kathryn.kain@inl.gov	SF 86 and Section 17, Marital/Relationship Status		The form should deliver an error for the time drop down menu attached to phone numbers not having an entry if a phone number is entered. Also, the county field for spouse's place of birth and where married should be required. There needs to be a requirement that at least one entry be made in the education section. Having to reject a form back to applicants to make these simple corrections, which could easily be caught by the form, is inefficient.	Why do fields that are needed by the investigator's not required fields?	REJECT
ICE-DHS	Shanti Conners-McPherson; Shanti.Conners-McPherson@ice.dhs.gov; 972-455-5005	Section 17- Marital/Relationship Status		On the legalized union/partnership issue-again I believe instructions are the key. Leave the question the same, just explain that the response to married now includes these other terms.	Investigators can assist with this by ensuring that when they go over the forms they clarify what a cohabitant is defined as, if a Subject checks that particular answer.	REJECT

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DOE	Tom Hanlon; hanlonte@y12.doe.gov	Section 18- Relatives		Suggest that in Section 18 when a relative is identified as being both deceased and a Foreign National that certain of the "Foreign Relative Information" questions become unneeded, such as (but not limited to) "Approximate date of last contact" "Methods of contact" and "Approximate frequency of contact" etc.	My relative, while having held non-US citizenship is none-the-less deceased and such questions provide no value-added to the investigative process.	REJECT
US Air Force	TSgt Paul Burger; Paul.Burger@hill.af.mil	Section 18, Relatives		Add a note to insure individuals list step in-laws as well.		REJECT
US Air Force-Civilian	Donalene Knowley; Donalene.Knowley@hill.af.mil; 801-586-6447	Section 18, Relatives		Could you add after Child (no matter the age) (living at home or not).	People think that is their children are under 18 they do not have to list them, and if they are not living with them they don't have to list them.	REJECT

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Public	msamp08@icloud.com	Section 18- Relatives			Why the need now to provide citizenship information for siblings? Up until my last periodic reinvestigation, that information was not needed. In may case it caused problems because we were all born in a different country. Although the family has lived here since the 1960s, trying to obtain naturalization documents proved to be a challenge, especially since I never needed that information until now. I've already mentioned what happens when the form detects an "error" and it happened often. Perhaps it was due to my situation but it was very frustrating entering information in e-QIP.	REJECT
Family Equality Council	Heron Greenesmith	Section 18- Relatives	If mother, provide your mother's maiden name.	We recommend that the "mother's maiden name" field be removed.	The field for "mother's maiden name" was retained i the updated form. The form requires that applicants list previous names for anyone in their family, including any name changes after marriage. Asking applicants explicitly to list their mothers' maiden names is duplicative and unnecessary, especially given the sensitivity of the rest of the form to a broad range of family constructions.	REJECT

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Family Equality Council	Heron Greenesmith	Foreign Contacts	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used.	Do you have, or have you had, close and/or continuing contact with a foreign national within the last seven (7) years with whom you, or your spouse, legally recognized civil union/domestic partner, or cohabitant are bound by affection, influence, common interests, and/or obligation?	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used. After collecting information on an applicant's legally recognized relationships, it is crucial that the form continue to reflect that data throughout the information collection. Without the addition of "legally recognized civil union/domestic partner" where spouse appears, applicants might be confused as to whether a certain section applies to other legally recognized relationships. To that end, we recommend edits to the following sections. Edits are reflected in bold and underline.	ACCEPT

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Family Equality Council	Heron Greenesmith	Foreign Activities Section 20a	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used.	<p>Have you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children EVER had any foreign financial interest . . .</p> <p>You responded 'Yes' to you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children having EVER had any foreign financial interests . . .</p> <p>Specify: (check all that apply) <input type="checkbox"/> Yourself <input type="checkbox"/> Spouse <input type="checkbox"/> Legally recognized civil union/domestic partner <input type="checkbox"/> Cohabitant <input type="checkbox"/> Dependent children</p> <p>Do you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children have any additional foreign financial interests?</p> <p>Have you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children EVER had any foreign financial interests that someone controlled on your behalf?</p> <p>You responded 'Yes' to you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children having EVER had any foreign financial interests that</p>	<p>We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used. After collecting information on an applicant's legally recognized relationships, it is crucial that the form continue to reflect that data throughout the information collection.</p> <p>Without the addition of "legally recognized civil union/domestic partner" where spouse appears, applicants might be confused as to whether a certain section applies to other legally recognized relationships. To that end, we recommend edits to the following sections. Edits are reflected in bold and underline.</p>	ACCEPT

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Family Equality Council	Heron Greenesmith	Foreign Activities Section 20a	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used.	Do you have an additional instance of you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children EVER having owned, or anticipate owning, or planning to purchase real estate in a foreign country? As a U.S. citizen, have you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children received in the past seven (7) years, or are eligible to receive in the future, any educational, medical, retirement, social welfare, or other such benefit from a foreign country? You responded 'Yes' that as a U.S. citizen, have you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children received in the past seven (7) years . . . Do you, your spouse, legally recognized civil union/domestic partner, cohabitant, or dependent children receive any additional benefits from a foreign country?		ACCEPT

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Family Equality Council	Heron Greenesmith	Foreign Activities Section 20b	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used.	For this question, "Immediate Family" means your spouse, legally recognized civil union/domestic partner, parents, step-parents, siblings, half and step-siblings, children, stepchildren, and cohabitant. Have you, your spouse, legally recognized civil union/domestic partner, cohabitant, or any member of your immediate family in the past seven (7) years been asked to provide advice or serve as a consultant, even informally, by any foreign government official or agency? You responded 'Yes' to you, your spouse, legally recognized civil union/domestic partner, cohabitant, or any member of your immediate family having in the past seven (7) years been asked to provide advice or serve as a consultant, even informally, by any foreign government official or agency? Have you, your spouse, legally recognized civil union/domestic partner, cohabitant, or any member of your immediate family in the past seven (7) years been asked to provide advice or serve as a consultant, even informally, by any other foreign government official or agency?	We encourage OPM to add "legally recognized civil union/domestic partner" throughout the form where the word "spouse" is used. After collecting information on an applicant's legally recognized relationships, it is crucial that the form continue to reflect that data throughout the information collection. Without the addition of "legally recognized civil union/domestic partner" where spouse appears, applicants might be confused as to whether a certain section applies to other legally recognized relationships. To that end, we recommend edits to the following sections. Edits are reflected in bold and underline.	ACCEPT

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Agency/ Public	Name, Email, Telephone	Section	Original Text	Recommended Change	Rationale or Comment	Accept/Reject Comment
USAF	Elana North; elana.north@us- af.mil; 907-377- 4760	Section 20b- Foreign Business, Professional Activities, and Foreign Government Contacts			In regards, to Sec 20B, Foreign Government Contact is not required to report foreign contacts if related to official government travel. I question this decision; especially in light of the recent arrest of a civilian defense contractor & Lt Col in the Army Reserves who allegedly pass secrets to a Chinese foreign national he meet at an International military convention in 2011. See attached news link: http://www.dailymail.co.uk/news/article-2297933/He-says-love-Lawyer-defense-contractor-says-client-besotted-Chinese-woman-hes-accused-giving-secrets-to.html	REJECT
US Air Force	TSgt Paul Burger; Paul.Burger@hi ll.af.mil	Section 20c, Foreign Countries You Have Visited		Allow for official travel to be listed in this section. Allow for day/month/year format. Allow for city and country to be entered.		REJECT

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Agency/ Public	Name, Email, Telephone	Section	Original Text	Recommended Change	Rationale or Comment	Accept/Reject Comment
Bazelon Center for Mental Health Law, National Disability Rights Network, Epilepsy Foundation, American Foundation for the Blind	Jennifer Mathis, Curt Decker, Sandy Finucane, Mark Richert	Section 21- Psychological and Emotional Health		Eliminate language suggesting that mental health treatment is relevant to a person's suitability for a security clearance.	Section 21 states three times that mental health treatment does not "in and of itself" (or "standing alone") adversely impact a person's suitability for a security clearance. This qualification incorrectly implies that a person's receipt of mental health treatment is a factor that is relevant to suitability for a security clearance, though now dispositive by itself. In fact, there is nothing about treatment for mental health needs that would affect a person's suitability for a security clearance. Indeed, the former top psychiatrist for the U.S. Army questioned the need to ask about mental health treatment at all on the security clearance form, citing a lack of evidence that it has any relevance.	REJECT

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Bazelon Center for Mental Health Law, National Disability Rights Network, Epilepsy Foundation, American Foundation for the Blind	Jennifer Mathis, Curt Decker, Sandy Finucane, Mark Richert	Section 21- Psychological and Emotional Health		Eliminate the inquiry about failure to follow treatment advice related to a mental health condition	The proposed modifications to Section 21 state that failure to follow treatment advice related to a diagnosed emotional, mental, or personality condition (including failure to take prescribed medication) constitutes evidence of a mental health condition that would cause concern about judgment, reliability, or trustworthiness. We strongly object to this statement and urge you to omit it, as it is based on incorrect assumptions that an individual's decision not to follow treatment advice for a mental disability indicates that the individual has poor judgment or is unreliable or untrustworthy.	REJECT
Bazelon Center for Mental Health Law, National Disability Rights Network, Epilepsy Foundation, American Foundation for the Blind	Jennifer Mathis, Curt Decker, Sandy Finucane, Mark Richert	Section 21- Psychological and Emotional Health		Modify the inquiry about mental health conditions to inquire instead about concerning behaviors.	Section 21 should focus on conduct that causes concern about a person's judgment, reliability or trustworthiness rather than on whether the person has a mental health condition. It is irrelevant whether the cause of conduct reflecting poor judgment or lack of reliability or trustworthiness is a mental health condition or some other cause.	REJECT

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Bazelon Center for Mental Health Law, National Disability Rights Network, Epilepsy Foundation, American Foundation for the Blind	Jennifer Mathis, Curt Decker, Sandy Finucane, Mark Richert	Section 21- Psychological and Emotional Health		Modify the following question as indicated: In the last seven years, have you [had a mental health condition] ENGAGED IN BEHAVIOR that would cause an objective observer to have concern about your judgment, reliability, or trustworthiness, or trustworthiness in relation to your work?		REJECT
OSD-CPMS	Star Anderson; starlisha.anderson@cpms.osd.mil	Section 21- Psychological and Emotional Health			OPM is proposing to make changes to Question 21, "Psychological and Emotional Health," in connection with a comprehensive review being conducted by the Director of National Intelligence, in his role as Security Executive Agent, with the Department of Defense, OPM, and other Federal agencies, for the purpose of clarifying support for mental health treatment and encouraging pro-active management of mental health conditions to support wellness and recovery. This is somewhat vague; therefore, in regards to Question 21 on the SF-86, Questionnaire for National Security Positions, what are the specific changes? I recall the change released in 2011; Question 21 related to 'counseling' was updated to address concerns related to military service.	NOTED

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Agency/ Public	Name, Email, Telephone	Section	Original Text	Recommended Change	Rationale or Comment	Accept/Reject Comment
Veterans Affairs	Al Robinson; Keith.Robinson 7@va.gov	Section 21- Psychological and Emotional Health		I do believe to a certain degree a person's Psychological and/or Emotional State Should be Asked; especially if it is deemed that the person is unstable and could be considered a possible harm to them self or public in general, but not to pose a question that would be too intrusive in nature.	The question should be handled very delicately, stated clearly. They should also know that their answer would not necessarily have an impact on their suitability for employment unless they have been deem a possible threat to them self or the public, which may lead to other matters and or liabilities. Most people have manageable situations, and this should not impact negatively just because they are seeing a counselor or seeking treatment. One must walk a very fine line on this one. Just my opinion.	NOTED

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Agency/ Public	Name, Email, Telephone	Section	Original Text	Recommended Change	Rationale or Comment	Accept/Reject Comment
FAA	Susan Langosch; Susan.Langosch@faa.gov; 847-294-7701	Section 22- Police Record		May I suggest that OPM revise the SF-86 questionnaire to include the word arrested in the "Have you ever" questions. I think this would help clarify that all arrests should be indicated on the questionnaire.	Changes in the phrasing of certain questions involving Section 22, Police Records leaves room for interpretation. A recent example in our agency, OPM conducted an SPIN/ESI on a reinvestigation on an employee who answered "no" to the "Have your ever" questions. He had a 1998 consumption by a minor arrest which was dismissed through the courts and a 2005 public intoxication arrest that never went to the court system. On the public intoxication arrest, the employee was brought to the jail, allowed to sleep it off, and released the following morning. His interpretation of the "have you ever" question was that since he was not "charged" by the courts with either of these offenses, his answer to "Have you ever been charged with an offense involving alcohol or drugs"? would be "no". The questionnaire differentiates (see below) between "charged" and "arrested" under Section 22, Police Record, under the "In the past seven years" questions; so when answering the "have you ever" question the interpretation	REJECT
					was that "charged" is different than "arrested".	

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DHS-ICE	Shanti Conners-McPherson; Shanti.Conners-McPherson@ice.dhs.gov; 972-455-5005	Section 23- Illegal Use of Drugs and Drug Activity		I agree that clarification is needed on the drug use questions in light of the legalization in several states, however I think the clarification is best served in the instructions.	People need to be aware that although legal by state law, and although you listed it-you can still be held accountable for the activity as criminal and/or illegal use because Federal law supersedes state law. We see many people who are under the impression that listing their transgressions on the forms gives them a free pass towards the accountability of that conduct.	REJECT
Public	Marion Bowman; spikebowman@verizon.net				I've taken a brief look at this form and find that it may be useful for an entry-level person, but not for most. I've had a security clearance since 1968. I don't remember all the places I've been. I have no idea how many passports I've had or which ones were used to travel to foreign countries. I was a naval intelligence officer, senior executive service of the FBI, Deputy National Counterintelligence Executive - I have no idea how many foreign intelligence officers I've been in contact with. The simple fact is that the U.S. Government knows more about me than I can remember about myself. I can't believe that for someone with a prior clearance 127 pages are needed to re-capture all the information already on file. In an age of total computer dependence, this form is, in my opinion, simply ridiculous.	REJECT

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DOE-Idaho National Laboratory (INL)	Kathryn Kain; kathryn.kain@i nl.gov	SF 86		The system should allow a reviewer to determine if the yes/no questions need reanswered.	Individuals who have an SF 86 rejected back for corrections should not be reanswering yes/no questions. The need to reanswer all of these questions creates significant frustration for the applicant and wastes the applicant's time. This is biggest complaint applicants have about the process.	REJECT
DOE-Idaho National Laboratory (INL)	Kathryn Kain; kathryn.kain@i nl.gov	SF 86		The rejection process is not efficient. The e-QIP system should allow reviewers to make comments with links and references to sections such as what the review process finds before applicants submit.	If applicants only had to deal with the needed corrections, the percentage of those needed to be rejected an additional time would be dramatically decreased. The time it would take to make corrections would also be decreased.	REJECT
US Air Force- Civilian	Donalene Knowley; Donalene.Know ley@hill.af.mil; 801-586-6447	Section 25, Investigation and Clearance Record		Add: Contact your local security manager/officer if you have questions concerning this information. Add: A comment section at the end of this section, because they have to put in a statement that says why they are requesting this investigation.		REJECT
Public	msamp08@icloud			The first thing that should be changed is to recognize and allow the user to continue without producing an error (which it states MUST be corrected) for at least the following:	Just one month ago, I came up for a periodic reinvestigation and was introduced to e-QIP. This form was actually more difficult and confusing than the first SF-86 I filled out in 1974.	REJECT

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USAF	Susan Wilkerson, PhD; Susan.Wilkerson.ctr@wpafb.af.mil; 937-522-6829	e-QIP Printing		There should be a “print form” function that allows the SF-86 to be printed out compactly in something approximating the pre-eQIP format, i.e., general subject areas with mostly my information filled out in that area. There should also be a function to make the SF-86 into a PDF for digital storage.	IMPROVED PRINTING OPTION: The e-QIP does not allow one to print a copy in a compact and easily read form. One should <u>always</u> have a copy of the last SF-86 in order to fill out the next SF-86! When I print mine out in the e-QIP system it is approx. 50 pages long! Most pages have very little information on them. And, ideally, when I log on to update my SF-86, it will have my old information already filled in so I just have to make any changes or additions from the past 5 years.	REJECT

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Agency/ Public	Name, Email, Telephone	Section	Original Text	Recommended Change	Rationale or Comment	Accept/Reject Comment
USAF	Vicky Stouch; Vicky.Stouch@wpafb.af.mil;937-522-3213				I've worked on reviewing SF86's for a little while in the Security Office. I feel if nothing has changed, in the past 5 years of a person's life, you really don't need the last 7 years of a 5-yr update. I truly believe if someone was truly untrustworthy, it would come out by court records, police records, or a person forthcoming of someone's wrong doing. I would like to raise the question, out of how many investigations that have been done over the years, how often did you really find someone unfit for a clearance, and if they got a slap on the hand for wrongdoing? I'm just seriously asking these questions, since you've opened up an ability to ask. I also think if I remember correctly, if someone is within one year of retiring, they do not have to do an SF86 update. Is this correct?	REJECT

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U.S. Air Force	Elizabeth Stewart, elizabeth.stewart.5@us.af.mil; 937-257-9829			<p>RECOMMENDATION 1: Incorporate in the SF-86 process a form similar to the Department of State's DS-7601, AUTHORIZATION TO CONDUCT CRIMINAL HISTORY INQUIRY FOR SPOUSE OR COHABITANT, and require it be submitted with the SF-86 package-OR-do not request the Privacy Act information of spouses and cohabitants unless/until those persons are interviewed and given an opportunity to sign their consent.</p> <p>1a. Inform the spouses and cohabitants that have already had their PA rights violated that this issue is being addressed and remedied for the future, and how they can obtain further information about where their information was stored and how it was utilized.</p>	<p>In 2011 I was required to submit an SF -86 for a five year undated to my Security Clearance. This was for the second renewal of my current Security Clearance, but it was the first time I was coerced into providing the privacy Act protected information of a third party--without their written consent as is required by the Privacy Act and 5 USC 9109. I have attempted to have this issue addressed via multiple avenues (my security office, my management, the Privacy Act manager and the Inspector General) for over a year and a half. The current SF-86 process requires the applicant to obtain and disclose Privacy Act (PA) protected information about their spouses and cohabitants, but provides no mechanism for the spouse or cohabitant to authorize the release of their PA information. Further, the PA protected information of the spouses and cohabitants are used without their consent to run criminal background (National Agency) checks. Spouses and cohabitants are not afforded an opportunity to consent or decline the providing their</p>	REJECT

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U.S. Air Force	Elizabeth Stewart, elizabeth.stewart.5@us.af.mil; 937-257-9829			RECOMMENDATION 2: Define and publish the process for third parties to obtain information pertaining to the use and handling of their Privacy Act information.	PA information, nor the use of their PA information for investigation, and they are not provided any guidance on how to obtain the results of their investigation or track the usage of their information. During my five year update process, I initially refused to submit the PA information of a third party, and my application was placed on hold. I was told that if I did not submit the PA information of the third party I would lose my security clearance and consequently my employment. I raised the PA violation issue via multiple avenue, -nearly all agreed that my contentions were correct, but none could or would address the issue further. A copy of my SF-86 was given to my military supervisor-without my consent-to inform him that I was at risk of losing my security clearance for refusing to provide the PA information of my cohabitant,-not because I had any issues of trust. Several Security personnel and my military commander threatened me with the loss of my security clearance and my position if I did not comply in providing the third party	REJECT

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U.S. Air Force	Elizabeth Stewart, elizabeth.stewart.5@us.af.mil; 937-257-9829			RECOMMENDATION 3: Define and publish policy that strictly prohibits the use of SF-86 applications and information for any purpose outside the official security clearance investigation process. -Do not allow employing agencies to review, request, or keep copies of these forms for their own in-house purposes. -During my re-investigation and compartmented clearance application processes, I learned that my SF-86 is maintained, copied, passed around to various unidentified and unauthorized personnel, and used for further inquiry without my written consent or notice. These parties did not have the consent of the third parties whose information is included there either. The government routinely commits Privacy Act violations with the SF-86 because this form contains a substantial amount of personal information on their employees. Security personnel and Military	Privacy Act information. I repeatedly requested to allow my cohabitant sign and submit a consent form such as the Department of State's Form DS-7601, but I was denied and not allowed to include it in my eQIP package. The Department of States requires spouses and cohabitants of security clearance applicants sign form DS-7601, AUTHORIZATION TO CONDUCT CRIMINAL HISTORY INQUIRY FOR SPOUSE OR COHABITANT, before their agents will even look at the applicant's SF -86 information. Form DS-7601 form is available at this URS: http://www.state.gov/documents/organization/122044.pdf -It was only with the personal approval of my cohabitant that I reluctantly submitted their PA protected information for my five year update. We felt this was the only option at that time that would not jeopardize my employment. The government was never authorized to obtain that PA information with the required written consent of my cohabitant, nor was it authorized to conduct a National	REJECT

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U.S. Air Force	Elizabeth Stewart, elizabeth.stewart.5@us.af.mil; 937-257-9829			supervisors claim to have a sort of eminent domain over this information and utilize it as they see fit. I have seen job applicants lose their job offers because the applicant's SF-86 was reviewed BEFORE it was submitted to OPM for investigation, this too is in violation of law. This use of the SF-86 for alternative purposes also increases the PA violations for the third party information the form contains.	Agency Check, which I have confirmed occurred. Under the FOIA I asked for the records of my re-investigation and was provided the information about myself, and an ironic statement that said due to the Privacy Act, information obtained about my cohabitant was not releasable without their written consent. -Their information on my cohabitant was obtained without written consent, but I was vindicated in that they do know how to follow the law, if not when. This is an issue which puts the government in jeopardy with potentially thousands of violations of the Privacy Act. The government is extremely fortunate that spouses and cohabitants of security clearance applicants either tacitly approve or are unaware their Privacy Act rights have been violated. I raise no objection to the inquiry into the close associates of the applicants, but surely the government should not violate the Privacy Act in order to do so.	

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U.S. Air Force	Elizabeth Stewart, elizabeth.stewart.5@us.af.mil; 937-257-9829			<p>RECOMMENDATION 4: Clarify, define and publish the roles and responsibilities of Military authorities of the PA protected information of Civilian personnel. -Civilian personnel do not relinquish their Privacy Act rights to military authorities via the SF-86 process. When these violations occur, there should be a mechanism for redress. As it stands now, civilian employees of military agencies are treated similar to uniformed military personnel, as if they have voluntarily given up certain civil rights and this is not true.</p>		REJECT
U.S. Air Force	Elizabeth Stewart, elizabeth.stewart.5@us.af.mil; 937-257-9829			<p>RECOMMENDATION 5: Utilize the eQIP, or other electronic SF-86 software, such that this repository is the one and only containing this information. Record the identity of any person who accesses this information, for what purpose, date, and who this information was provided to, and make these records available to the owners of the data upon request.</p>		REJECT

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Public-Federal Clearance Assistance Service	William H. Henderson; whenderson@fe dcas.com;			Replace the words "Provide the name of the court" and "Provide the address of the court" with "Provide the name of the court or agency" and "Provide the address of the court or agency	Since about 2003 naturalization certificates and citizenship certificates have been issued by US Citizenship and Immigration Services (USCIS), rather than a US District Court.	REJECT
USAF	Cheri LeBlanc; cheryl.leblanc@ us.af.mil; 660- 687-5892	Signature release pages		Allow digitally signing signature release forms		REJECT

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Public	Eric Lee; Caddiedvl@aol. com; 623-523- 7087				<p>I have been an investigator doing OPM background investigations for 15 years using the SF-86.</p> <p>The 2010 version in a very difficult document to use both for the applicant filling it out and the investigators using it in the field. The visual format of the form is confusing and difficult to locate specifics like resident and employments. (this is all in comparison to the 2008 version) The 2010 form looks like it was designed by computer geeks and not end users. There are actually too many follow-up questions that allow applicants to make many more errors while completing the form. Directions on what information is required is often confusing. The biggest difference between the 2008 version is that the 2008 version was formatted in a bullet style for the questions with boxes lined up to answer the questions. The 2010 format is scrambles to one has to search for the answers to the question</p>	REJECT

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					<p>in different locations for each question. This causes the ESI to be much more complicated as well as time consuming. An investigator can only complete a certain amount of work in a given work day. My experience indicates that I can only complete between one half and three quarters of work in the same time compared to using the 2008 version. I am certain if you check OPM's statistics on the above it will show my opinion to be accurate.</p>	
OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	Section 5- Other Names Used			Subjects do not list nicknames to include shortened version of names like Dave for David.	REJECT
OPM-FIS	Deborah Calimer; DoCalimer@gmail.com	Section5- Other Names Used		Include in instructions to list shortened versions of their first name.		REJECT

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OPM-FIS	Carrie Wagner; carrie.wagner@ opm.gov; 724- 764-5612 x 7570	Section 8- U.S. Passport Information	Do you possess a U.S Passport number? if yes: Provide your US passport number. Provide the issue date of passport. Provide the expiration date of passport.	Stop allowing the US Travel passport document number to be used as a proof of Naturalization, Alien, or NON-immigrate status. This number cannot be searched in DHS's system.	The questions need to be answered; however, this information should NOT trigger the birth abroad or immigration item as part of the investigation. U.S. passports can be issued to U.S. Nationals who are not U.S. citizens, to include children who are eligible for Derived Citizenship through their parent's naturalization. Additionally, OPM's agreement with DoS allows only for verification of Birth Abroad.	REJECT
OPM-FIS	Carrie Wagner; carrie.wagner@ opm.gov; 724- 764-5612 x 7570	Section 9- Citizenship and Section 18-Relatives		There is a difference between a Naturalization Document and Certificate of Citizenship Document. a. Naturalization is a foreign born person who has to obtain Citizenship. These are the people who have to take the test and the oath. b. Certificate of Citizenship are people who obtain derived Citizenship through a parent.	c. In order to do an accurate check of the SAVE system, we need to know which document they hold to check the appropriate database within the SAVE system. There is a Naturalization database and a Certificate of Citizenship database. d. The Alien number will appear on these documents – it may say that it's the USCIS, CIS or Registration number	ACCEPT

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OPM-FIS	Carrie Wagner; carrie.wagner@ opm.gov; 724- 764-5612 x 7570			If a subject is claiming to be an Alien, then OPM needs to know what type of Alien or Immigrant status subject/spouse/family member holds.	<p>a. by Narrowing this down, our Contractors will know which database within SAVE to check.</p> <p>b. Aliens:</p> <p>i. Permanent Resident card or I-551 (Green Card)</p> <p>1. Card numbers – these have three Alpha characters and then 10 digits.</p> <p>ii. Employment Authorized or I-766.</p> <p>1. If they hold Employment status, then we will need to know when this card expires.</p> <p>iii. Alien numbers can be 8 to 9 digits long (A00-000-000 or A000-000-000)</p> <p>c. NON-Immigrants:</p> <p>i. VISA number or W20</p> <p>1. the Red Foil number and not the VISA control number</p> <p>2. SERVIS number – Start with a N</p> <p>ii. I-94 – are 11 digits long</p> <p>iii. Unexpired foreign passport</p> <p>1. will also need to have the date this passport expires.</p>	ACCEPT

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OPM-FIS	Michael Barkett; Michael.Barkett@opm.gov; 724-794-5612 ext. 5121	Section 10- Dual/Multiple Citizenship & Foreign Passport Information		If there is any way to modify the language in the screenshot below when the subject selects the United States, I think that would eliminate some confusion.	I recently helped an OPM customer with the dual citizenship section for the SF 86 in e-QIP. The subject has dual citizenship in Nigeria and the United States. At first, the subject marked that he is a naturalized US citizen and only listed Nigeria in section 10. The validation error in e-QIP required the subject to enter at least two countries. Thus, I instructed the agency to have him enter the United States. In the screenshot below, it gets a little confusing for the applicant after entering the date range because the questions talk about non- US citizenship and foreign citizenship information. This language stumped the applicant, and the agency, which lead to the agency calling me for assistance in getting past this section.	ACCEPT
OPM-FIS	Deborah Calimer; DoCalimer@gmail.com	Section11- Where You Have Lived		If rental, list landlord or location of records...name/address/phone.		REJECT

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OPM-FIS	Deborah Calimer; DoCalimer@gmail.com			Delete instruction that states there's no requirement to list temporary locations of 90 days or less. This also applies to overseas activity such as military deployment....we have to get personal sources to corroborate overseas duty and often Subject does not list a military deployment to an overseas location under Employment so again delays the completion time when it is found out at the ESI. Keep the requirement to list someone who knows you there or in this case can corroborate.	The OPM Investigators Handbook requires agents to obtain a rental records ad (1) personal source or corroboration of any residence of 90 days or less. The sf86 instructs Subject's NOT to list these addresses so when they are developed during the interview, it adds more time to the completion of the investigation.	REJECT
OPM-FIS	Aaron Wilson; Aaron.Wilson@opm.gov; 702-612-9623	Section 11- Where You Have Lived		RESIDENCE: The instructions should reflect that, if possible, the listed verifier should be a neighbor, landlord, or roommate.	In order to ensure that Subjects are providing FIS staff with the best leads possible on the SF86, I propose that the instructions be amended for some of the sections that ask for verifiers.	REJECT
OPM-FIS	Kenneth Ay; Kenneth.Ay@opm.gov; 562-435-3802 ext. 220	Section 11- Where You Have Lived		I was just thinking it seems like a good suggestion/idea for the next iteration of the security forms to ask for the Subject's landlord/property management company for each residence in scope.	I know it would save me and many others a lot of time when trying to determine that and then the contact information would also be there for us hopefully. Just a thought I had today, but maybe someone has already suggested it or began implementing it.	REJECT

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Agency/ Public	Name, Email, Telephone	Section	Original Text	Recommended Change	Rationale or Comment	Accept/Reject Comment
OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	Section 12- Where You Went to School			Subjects do not list all degrees no matter what the dates. The way I read the guidance is that they should be listing all degrees. Yet the majority of the time I'm writing up degrees they don't list because they think they only have to list degrees obtained within the last 10 years.	REJECT
OPM-FIS	Aaron Wilson; Aaron.Wilson@opm.gov; 702-612-9623	Section 12- Where You Went to School		EDUCATION: The instructions should reflect that, if possible, the listed verifier should be a teacher, staff member, or classmate.	In order to ensure that Subjects are providing FIS staff with the best leads possible on the SF86, I propose that the instructions be amended for some of the sections that ask for verifiers.	REJECT
OPM-FIS	Barbara Webb; Barbara.Webb@opm.gov; 520-631-8872	Section 12- Where You Went to School		Verbiage for subjects to include all degrees or diplomas should include the words (including high school) because it seems most people who have been out of high school for 10 years assume they don't need to list a high school diploma.		REJECT
OPM-FIS	Stephanie Adams; Stephanie.Adams@opm.gov; 703-861-2607	Section 12- Where You Went to School			Making the wording clearer for Education. Many subjects fail to list the HIGHEST DEGREE received...especially if it's just a high school diploma.	REJECT

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OPM-FIS	Monica Lee; Monica.Lee@opm.gov; 602-296-8389	Section 12- Where You Went to School		Perhaps this section could be reworded so it is clear that all degrees or diplomas received beyond 10 years must be provided.	Through conversations with personal acquaintances in customer agencies, it has been made known to me that section #12 is confusing to some. "Have you received a degree or diploma more than 10 years ago?" Because of the word "a", some are of the belief that only the most recent degree or diploma needs to be provided.	REJECT
OPM-FIS	Donna K. Plummer; donna.plummer@opm.gov; 540-295-1322			I would appreciate it if Subject's would list their references day time address (their employment location) vice their home address unless they don't work.		REJECT
OPM-FIS	Stephanie Adams; Stephanie.Adams@opm.gov; 703-861-2607				Providing an option in the Equip for "classified location" for employment. Many items are assigned incorrectly b/c the subject has to list something so they choose to list their employer's headquarters.	REJECT
OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	Section 13- Employment Activities-- Employment and Unemployment Record			Not listing their actual employer if they were a contractor. Example: they are a contractor at Boeing and list Boeing as the employer when they actually work for Q Data or maybe they are self-employed working as a contractor at Boeing. They should have only listed Boeing as the job location.	REJECT

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OPM-FIS	Monica Lee; Monica.Lee@opm.gov; 602-296-8389	Section 13a- Employment Activities- Employment and Unemployment Record		Code 1 for Active Duty Military, Code 2 for National Guard/Reserve, etc.	It would be helpful if the code numbers were still provided on the form next to each type of employment.	REJECT
OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	Section 14- Selective Service Record			Subjects listing SSN as Selective Service Number.	REJECT
OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	Section 15- Military Service			Not listing each active duty/reserve/guard duty stations in the last ten years to include unit designation/address. Subjects instead list their most current duty station and provide dates for their whole military career. Example: they'll list Reno National Guard, 112th Intelligence Unit, from Mar 2003 to Present. In actuality, they were in 4 different units in the last 10 years and we end up spending time scheduling these additional employments and providing leads which delays the case.	REJECT
OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	References/ Verifiers		There should also be guidance telling Subjects to notify their references and verifiers that they may be contacted for an interview and to please return calls right away.	Notifying References/Verifiers: Many times we don't get call-backs because they don't know what is going on. .	REJECT

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OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	References/ Verifiers		Also, they need to qualify their references	Only list ones that they actually socialize with at least twice a month. If they list a residential verifier, then it should be someone that is actually a neighbor and not a friend who has never been there.	REJECT
OPM-FIS	Stephanie Adams; Stephanie.Adams@opm.gov; 703-861-2607	Section 16- People Who Know You Well		Making a point to specify for the listed character references to list someone that they have SOCIAL contact with (or knows them outside of work) and that they CANNOT BE MENTIONED ANYWHERE ELSE IN THE REPORT.	Since we can no longer "double dip" (use 1 source for 2 items), the subject needs to be sure to list different people not mentioned elsewhere (which they frequently do).	REJECT
OPM-FIS	Erich Lehmann; Erich.Lehmann@opm.gov; 703-231-1498			My suggestion to update the form is to have people list the address for where people are during the business day for references.		REJECT
OPM-FIS	Deborah Calimer; DoCalimer@gmail.com	Section 16- People Who Know You Well		Do not let equip automatically repopulate the Listed Reference section when Subject's go back in five years to fill out a updated sf86 for their reinvestigation. Often Subject's have little to no continued contact with the same references but do not provide current ones.	I am an OPM Investigator and use the current SF86 on a daily basis. I conduct Subject interviews on a daily basis and find the following suggestions would clarify and streamline the completion of the form by Subjects and the reliability of the responses.	REJECT
OPM-FIS	Barbara Webb; Barbara.Webb@opm.gov; 520-631-8872	Section 17- Marital/Relati onship Status		FORMER SPOUSE: Needs a field for a phone number.		ACCEPT

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OPM-FIS	Julia Carter; Julia.Carter@op m.gov; 858- 967-2947	Section17- Marital/ Relationship Status		I think we should leave marital status as it is and not get into all these relationships which boils down to who you are sleeping with now (we really shouldn't care).	I can even put my own personal belief aside that a marriage should be between a man and a woman. If two men or two women get married, then that is a marital relationship. If they are just living together, then they are cohabitants. If they care enough about each other and want to get married, then go to one of the states that recognizes same sex marriage and get married and live happily ever after. Please lets not get into these so called relationships because I have seen them change way to fast. We will be wasting way to much time during interviews talking about how many sex partner they've had.	REJECT
OPM-FIS	Deborah Calimer; DoCalimer@gm ail.com	Section 17- Marital/Relati onship Status		Maiden name should appear first after current name, then dates used, then other names used and dates	Switch order of questions so Subject's do not forget to list maiden names and dates used.	REJECT

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OPM-FIS	Carrie Wagner; carrie.wagner@ opm.gov; 724- 764-5612 x 7570	Section 17- Marital/Relati onship Status		Stop allowing the US Travel passport document number to be used as a proof of Naturalization, Alien, or NON-immigrate status. This number cannot be searched in DHS's system. The immigration sections for subject/spouse and family members need to be adjusted in order for OPM to do a more accurate DHS-SAVE check.	The question needs to be answered for those born abroad of US parents, but this information should NOT trigger the birth abroad or immigration item as part of the investigation for naturalized or alien verification. U.S. passports can be issued to U.S. Nationals who are not U.S. citizens, to include children who are eligible for Derived Citizenship through their parent's naturalization. Additionally, OPM's agreement with DoS allows only for verification of Birth Abroad.	ACCEPT
OPM-FIS	Monica Lee; Monica.Lee@o pm.gov; 602- 296-8389	Section 17- Marital/Relati onship Status and Section 18-Relatives		Due to verification of citizenship being conducted through the SAVE Program, it would be very helpful if "U.S. Passport" was removed from the U.S. Citizenship Documentation options in section #17 and #18.	While this may be a recognizable way to prove citizenship, it cannot be checked via the SAVE Program since SAVE checks DHS databases and not the Department of State databases.	ACCEPT

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OPM-FIS	Monica Lee; Monica.Lee@opm.gov; 602-296-8389	Section 17- Marital/Relationship Status and Section 18-Relatives		In section #17 and 18, it would be extremely helpful if these sections asked for the name of the spouse/family member at the time the citizenship documentation was obtained	Section #9 asks Subject to "Provide the name in which document was issued" but the same is not done for foreign born family members. Obtaining this information could potentially save time and money by improving the percentage of positive SAVE Program search results. Although the form asks the subject if the relative has used any other names, it is likely that this additional question may net different information when included specifically in the segment about citizenship documentation.	ACCEPT
OPM-FIS	Carrie Wagner; carrie.wagner@opm.gov; 724-764-5612 x 7570	Section 18- Relatives		Stop allowing the US Travel passport document number to be used as a proof of Naturalization, Alien, or NON-immigrate status. This number cannot be searched in DHS's system. The immigration sections for subject/spouse and family members need to be adjusted in order for OPM to do a more accurate DHS-SAVE check.	The questions need to be answered; however, this information should NOT trigger the birth abroad or immigration item as part of the investigation. U.S. passports can be issued to U.S. Nationals who are not U.S. citizens, to include children who are eligible for Derived Citizenship through their parent's naturalization. Additionally, OPM's agreement with DoS allows only for verification of Birth Abroad.	ACCEPT
OPM-FIS	Monica Lee; Monica.Lee@opm.gov; 602-296-8389	Section 18- Relatives			I believe there is a line missing from the last branch option. "Or---Relative POB is Foreign AND Relative is U.S. Citizen" Doesn't there need to be something here about the residence location?	ACCEPT

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OPM-FIS	Stephanie Adams; Stephanie.Adams@opm.gov; 703-861-2607			There should be a disclaimer telling the subject that if they don't know the information already, NOT to contact the foreign national to get it. Many subjects tell me that the F/N would have no knowledge of them holding a clearance if the SF86 form didn't ask for this information.	There is no guidance on "close and continuing contact" with Foreign Nationals. Many subjects fail to list them b/c they don't know what we are looking for specifically. Also, asking them to list details such as DOB, occupation, etc. causes the subject to contact the foreign national to ask them. With the SF86 form asking them to answer these questions, they are essentially being instructed to contact the foreign national and tell them they are undergoing a BI for a clearance.	REJECT
OPM-FIS	Deborah Calimer; DoCalimer@gmail.com	Section 19- Foreign Contacts		Split each condition under its own question....have close contact...have continuing contact (this needs to be a separate question to highlight nature of relationship). Possibly make separate question for each condition...bonds of affection.....next common interests...etc.		REJECT

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OPM-FIS	Deborah Calimer; DoCalimer@gmail.com	Section 19- Foreign Contacts		Question to list occupation not just employer; question to provide approximate age is no DOB is known. Maybe add a male or female question given the spelling and nature of foreign names being unfamiliar to investigators. Also instruct Subject not to contact foreign connections for personal info to fill out form if not already known by Subject.		REJECT
OPM-FIS	Monica Lee; Monica.Lee@opm.gov; 602-296-8389	Section 20- Foreign Activities			Some written clarification as to what constitutes U.S. Government Business could potentially save time and money by eliminating confusion. This is particularly confusing for subjects working for companies on contract with the Federal government.	REJECT
OPM-FIS	Deborah Calimer; DoCalimer@gmail.com	Section 20c- Foreign Countries You Have Visited		Add a question if Subject made any lasting contacts with foreign nationals as a result of the trip other than those listed.	Currently the policy states we do not have to address Foreign Travel if no issues, however, we still need to add this disclaimer.	REJECT
OPM-FIS	Julia Carter; Julia.Carter@opm.gov; 858-967-2947	Section 21- Psychological and Emotional Health			With all the gun violence we have had lately, a few more mental health questions would be nice, not looking down on seeking professional help but encouraging it	NOTED

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OPM-FIS	Deborah Calimer; DoCalimer@gmail.com	Section 25- Investigations and Clearance Record		Split first question into two and do not use and/or.	Question of list ALL BI and Clearances EVER including reinvestigations! Subject's usually never list prior investigations assuming the initial covers the entire time because it is understood that they get reinvestigated every 5 years.	REJECT
OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	Section 25- Investigations and Clearance Record		The requirement to list all Investigations and Clearance Records should be changed to list only ones within the last 10 years.	There are many individuals that have had clearances 30+ years. There is no way people can remember all that information and what is the information used for? OPM does a search for prior investigations anyway. I don't see the value of this.	REJECT
OPM-FIS	Scott Gilpin; Scott.Gilpin@opm.gov; 602-258-2240	Section 26- Financial Record			the case papers say bankruptcies should only be listed if within the last 7 years. The actual requirement is the last 10 years.	REJECT
OPM-FIS	Deborah Calimer; DoCalimer@gmail.com	Section 29- Association Record			Reduce number of questions, some are redundant and in 15 years I have never seen a positive answer to any such questions on any sf86	REJECT

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OPM-FIS	Damon Deter; Damon.Deter@ opm.gov; 505- 908-1750	Investigation Process			My concern is not with the SF-86 form, as it does gather enough information for the opportunity to conduct a strong background investigation. My concern is with the processes of the investigation itself. The SF 86 gathers much more information than a typical employment application. The main concern I have is the type of investigation conducted on the individuals. For example: 1. A person who has never had access to classified information, has never been to foreign country, has no foreign national connections, and no issues are present in the SF-86, this person is required to submit to an SSBI. 2. A person who has 20 years of service with a security clearance, having access to some of the nation's most sensitive information, and has traveled to numerous foreign countries all under U.S. government orders, may only be required to submit to a Phased PR. Which requires only two coworkers to be interviewed and their employment record is obtained for each employment.	REJECT
OPM-FIS	Scott Gilpin; Scott.Gilpin@o pm.gov; 602- 258-2240			If there is any way that you can reword questions to emphasize the correct way to answer questions and/or provide clarifications/examples. Maybe even a guide they can access that shows examples.	As a background investigator, I spend a lot of time typing in reports because the Subjects don't know how to fill out the questionnaire properly. Listed below are the most common errors I see:	REJECT

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OPM-FIS	Damon Deter; Damon.Deter@ opm.gov; 505- 908-1750				Every time a news report comes out about a person who has been engaging in espionage, it has been a person with numerous years of service and has held a clearance their entire career; most recently Mr. Bishop reported this week. Bishop's neighbor reported to the news that he had a wife from a foreign country and one person reported he saw Mr. Bishop at a college with several Chinese national women. Bishop told the person he was studying Chinese. If Mr. Bishop's last investigation was a Phased PR, these people would have never been interviewed during his clearance investigation. If these people would have told a news reporter this derogatory information about Bishop, they may have also reported the information during the investigation process. In my humble opinion, the form is not necessarily the area of weakness in regards to security clearance investigations.	REJECT
OPM-FIS	Deborah Calimer; DoCalimer@gm ail.com				Under each section, group the questions that ask for ""EVER" together	REJECT
OPM-FIS	Deborah Calimer; DoCalimer@gm ail.com			For questions with a 10 years span, put the clause including "10 years" at the very beginning of the instructions/question	Subject's always claim they did not realize the question was for 10 years and assumed its 7 years like all others.	REJECT

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OPM-FIS	Monica Lee; Monica.Lee@o pm.gov; 602- 296-8389			With regard to the current 2010 SF 86, it would be quite helpful if a future version contained links to words that subjects may not know or understand. Ex: the word "default" could be a link that when clicked, will provide subject with a recognized definition of the word.	Having worked as an agent for 20 years, I have come to realize that subjects often provide more or less information than necessary and sometimes incorrect information because they do not understand the meaning of critical words in the question. Providing this type of assistance could assist the subject in providing a more complete and accurate form. This suggestion could also potentially save time and money for both FIS and the American taxpayers.	REJECT