Subject: Request for an emergency extension for use of the SF 85P, and SF 85PS

From: Lisa M. Loss, Deputy Associate Director, External Affairs

Office of Personnel Management- Federal Investigative Services

Date: March 30, 2016

Request submitted for emergency extension for continued use of the SF 85P and SF 85PS. Both forms are due to expire on March 31, 2016. Emergency extension requested for several reasons.

Several years ago OPM requested that OMB unbundle the SF 85, SF 85P, SF 85PS, and the SF 86 into separate clearance packages. This change was made to allow greater flexibility when making required changes that may impact a particular form. Since that time several policy changes have occurred which no longer supports this need. Through government reform, standards used to conduct background investigations changed to the Federal Investigative Standards (FIS), which applies a tiered approach to investigations. With this approach there is a clear alignment of investigation requirements for suitability and national security investigation. OPM is working to develop a tiered questionnaire that will apply the same basic principles identified with the FIS.

With the tiered questionnaire model, all questions identified from all forms will be housed in a centralized database. Questions will be presented to the applicant based on the required investigation level. For example, an individual requiring an investigation to support Homeland Security Presidential Directive-12 will only be presented questions normally collected on the SF 85. The same will hold true for other levels of investigations. Questions that are the same between all forms will be standardized within the database.

In addition to moving forward with the tiered questionnaire, approval is still pending final changes associated with the SF 86. Once changes are approved for the SF 86, where appropriate, similar questions will be modified on the SF 85P and the SF 85PS. OPM has been tracking the clearance of the formulation of question 21 on the SF 86 and intended to model the SF 85PS mental health question using the same formulation. The delay in arriving at an agreed upon formulation for question 21 of the SF 86 caused OPM to revise the package internally several times.

The 60 day Federal Register notice published Vol. 81/No. 58/Friday, March 25, 2016, Page 16224. The emergency extension will provide additional time for OPM to incorporate changes identified with the SF 86, and allow time for continued work on the tiered questionnaire.

Requested expiration date: 6 months from approved.