

OPM is requesting to remove the following information from the Standard Form (SF) 85, Questionnaire for Non-Sensitive Positions, and SF 86, Questionnaire for National Security Positions:

- Under the *Investigative Process* section of the SF 85 instructions – “If you have a security freeze on your consumer or credit report file and a credit report is required by the agency requesting your investigation, then we may not be able to complete your investigation, which can adversely affect your eligibility for positions, physical and /or logical access required to perform duties, or your ability to obtain Federal or contract employment. To avoid such delays, you must request that the consumer reporting agencies lift the freeze in these instances.”
- On the SF 85 accompanying *Credit Release* – “Note: If you have a security freeze on your consumer or credit report file, we will not be able to access the information necessary to complete your investigation, which can adversely affect your eligibility for a non-sensitive position. To avoid such delays, you should expeditiously respond to any request made to release the credit freeze for the purposes as described above.”
- Under the *Investigative Process* section of the SF 86 instructions – “If you have a security freeze on your consumer or credit report file, then we may not be able to complete your investigation, which can adversely affect your eligibility for a national security position. To avoid such delays, you should request that the consumer reporting agencies lift the freeze in these instances.”
- On the SF 86 accompanying *Credit Release* – “Note: If you have a security freeze on your consumer or credit report file, we will not be able to access the information necessary to complete your investigation, which can adversely affect your eligibility for a national security position. To avoid such delays, you should expeditiously respond to any requests made to release the credit freeze for the purposes as described above.”

The reason for the request is that it is no longer necessary for respondents to remove a security freeze from their consumer or credit report file. With the passage of [The Economic Growth, Regulatory Relief, and Consumer Protection Act](#), signed into law in May 2018, the law allows access to frozen credit reports as part of the background investigation process. Since, background investigation agencies have been able to obtain credit bureau reports even if there is a credit freeze. Upon passage of the Act, the OPM National Background Investigations Bureau issued guidance to agencies about the change. Via [Federal Investigations Notice 19-01, Frozen Credit Instruction for Personnel Background Investigations](#), agencies were advised that it was no longer necessary to instruct individuals to unfreeze their credit. Additionally, in January 2024, OPM issued a [Reminder to Agencies on Instructions for Frozen Credit](#). However, the instructions for the SF 85 and SF 86 and language on the accompanying Credit Release forms were not removed in subsequent renewals.

This change is non-substantive and will not impact the burden by respondents. By removing this language, it avoids respondents taking the unnecessary step of removing a security freeze on their consumer or credit report file for the purpose of a background investigation.