United States Department of the Interior

OFFICE OF THE SECRETARY
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September 3, 2020

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PERSONNEL BULLETIN (PB) NUMBER: 20-12

SUBJECT: Strengthening Departmental Hiring and Vetting Practices

1. **Purpose.** This Personnel and Security Bulletin establishes Department-wide interim guidance for strengthening Human Resources (HR) and Personnel Security (PerSec) activities related to hiring and vetting of employees and applicants for employment. This bulletin was developed and is issued jointly by the Office Human Capital (OHC) and the Office of Law Enforcement and Security (OLES), and includes guidance and requirements on:

   - Management oversight and accountability;
   - Clear and separated HR and PerSec officer roles;
   - Standardized HR and PerSec-related tools and processes across employees and organizations within the Bureau or Office;
   - Implementing HR and PerSec quality assurance measures; and
   - Prohibiting the development and/or procurement of new technology solutions for managing HR and PerSec activities.

2. **Effective Date.** This policy is effective September 3, 2020.

3. **Authorities.**

   - Executive Order (EO) 10450, Security Requirements for Government Employment, Apr. 27, 1953
   - 5 Code of Federal Regulations (CFR) 731, *Suitability*
   - 5 CFR 1400.201, *Sensitivity Level Designations and Investigative Requirements*
   - Intelligence Reform and Terrorism Prevention Act of 2004 (IRPTA), Public Law 108-458
   - 205 Departmental Manual (DM) Chapter 8.1, *Personnel Management; General Delegations*
   - 441 DM Chapter 2, *Personnel Security and Suitability Program*

4. **Coverage.** This policy applies to all HR and PerSec managers and employees within all Bureaus and Offices of the Department and supersedes any other Departmental or Bureau or Office policies or procedures that conflict with this policy. Bureaus and Offices may issue implementing procedures consistent with this policy. Prior to implementation, all Bureau and Office implementing procedures must be reviewed and approved by the Directors of OHC and OLES.

5. **Policy.**

HR and PerSec practices are vital to ensuring that the activities and assets of the Department are protected from threat. HR and PerSec managers in Bureaus and Offices that conduct hiring and vetting activities will assess the maturity of their HR and PerSec operations each quarter. As necessary, managers will develop and implement corrective actions to strengthen operations, quality control, and governance processes. Maturity assessments and corrective action plans should address the following principles.

A. <u>Management oversight and accountability.</u> Integrity in hiring and vetting processes are essential in protecting DOI assets and operations. Managers and supervisors must support and prioritize the proper conduct of these activities and ensure that both organization and employees have the resources and training to be effective.

  1. Bureaus and Offices will review and revise/update HR and PerSec management employee performance standards, to ensure they:
     a. Reflect commitment to achieving confidence and rigor in the administration and performance of HR and PerSec activities;
     b. Establish accountability for adhering to Federal standards for making position designations and suitability/security determinations;
     c. Promote regular and effective collaboration between HR and PerSec offices and with hiring managers; and
     d. Establish training and/or certification requirements, as appropriate.

  2. HR and PerSec managers at Bureaus and Offices will also ensure:
     a. Employees receive on-the-job and refresher training in areas related to position designation, reciprocity, suitability and security adjudication, changing Federal requirements, and the use of new and/or revised materials.
     b. Position designation and suitability/security processes are supported and prioritized through the hiring and vetting operations;
     c. HR and PerSec processes are not inappropriately waived or otherwise compromised for expediency in hiring and vetting;
     d. Supervisors and officers have authority and means to proactively identify and resolve delays and/or other conflicts that may arise during HR and PerSec operations;
     e. Duties are performed at staffing/personnel ratios appropriate for the organization;
     f. Training funds are prioritized to meet required needs and certifications; and
     g. Organizations conduct HR and PerSec awareness events and activities for employees, hiring managers, and other stakeholders.

B. <u>Clear and separated HR and PerSec officer roles</u>. Bureaus and Offices will take steps to reduce risk and increase reliability of HR and PerSec information and activities by:
  1. Clearly delineating the responsibilities of HR and PerSec officials in the time-to-hire process:

      a. HR staff are responsible for activities related to "routine" hiring process functions (e.g., job analysis, position designation, announcements, candidate assessments);

      b. PerSec staff are responsible for candidate pre-screening, initiating investigations, suitability and security adjudication, and related activities; and

      c. PerSec functions should be conducted by trained PerSec staff, even if residing within an HR organization.

2. Where duties appear to overlap, managers will consult with OHC and OLES for clarification and/or resolution leading to separation; and

3. Ensure that HR and PerSec activities/work are not conducted as a collateral duty.

C. <u>Standardized HR and PerSec-related tools and processes across employees and organizations within the Bureau and Office.</u> HR and PerSec managers within each Bureau and Office will demonstrate or initiate efforts to standardize operations. Such improvements will include:

1. Documenting standard processes, developing job aids, and using common forms;

2. Improving the shared use of case management systems and other communication tools by identifying routine touchpoints and setting expectations on how and when tools are used and updated;

3. Establishing and adhering to timeliness standards and processes for updating Federal Personnel Payroll System (FPPS) and Central Verification System (CVS);

4. Identifying and documenting processes for addressing non-standard situations and unique requirements (i.e., based on location, type of customers served, etc.), to include processes for communicating and resolving processing delays and extensions.

D. <u>Implementing HR and PerSec quality assurance measures.</u> HR and PerSec managers will strengthen information reliability and validity by establishing and implementing audits, reviews, and performance assessments. Managers will review findings annually, at a minimum, and implement improvements based on findings. Methodologies may vary but generally should include elements of the following:

1. Use performance standards and quantifiable measures to assess performance or progress. Timeliness in completing HR and PerSec activities helps support DOI's goals of reducing time-to-hire. Measures must include those established within CFR and IRPTA guidance, but may also include assessing customer satisfaction, having a low number of errors identified through audits, and others.

2. Assess the effectiveness of standardized tools and processes and implement improvements as necessary.

3. Develop and implement audits to ensure position designation and suitability/security determinations are appropriate for the type of work being performed. This applies to both new hires and incumbents.

4. HR employees will update and keep current position designations in FPPS. PerSec employees will update suitability/security data in FPPS and CVS.

E. <u>Prohibiting the development and/or procurement of new technology solutions for managing HR and PerSec activities.</u>

OHC, OLES, and the Office of the Chief Information Officer (OCIO) are considering a Department-wide HR and PerSec technology tracker/solution. To mitigate redundancies and improve efficiency, Bureaus and Offices are to cease development and/procurement of new HR and PerSec case management systems. Bureaus and Offices do have latitude to work within or leverage existing systems and platforms to pursue regular software updates, develop new forms, spreadsheets, activity logs, etc. If in doubt as to restriction on acquisition or development of IT products and tools, HR and PerSec managers may contact OHC and OLES for guidance and clarification.

6. Responsibilities.

A. The Deputy Assistant Secretary (DAS) for Human Capital and Diversity (HCD) is responsible for ensuring that all DOI HR managers and employees adhere to the guidance set forth in this Personnel and Security Bulletin. The DAS-HCD will regularly collect information on implementation and provide updates to the Assistant Secretary for Policy, Management, and Budget (AS-PMB). To ensure confidence in HR processes and practices, the DAS-HCD is also responsible for assessing the quality assurance improvements resulting from the direction set forth in this bulletin. The DAS-HCD will report quarterly to the AS-PMB on the overall integrity of hiring activities and the resulting data processed and maintained by DOI.

B. The Deputy Assistant Secretary for Public Safety, Resource Protection and Emergency Services (DAS-PRE) is responsible for ensuring that all DOI PerSec managers and employees adhere to the guidance set forth in this Personnel and Security Bulletin. The DAS-PRE will regularly collect information on implementation and provide status updates to the AS-PMB. To ensure confidence in PerSec processes and practices, the DAS-PRE is also responsible for assessing the quality assurance improvements resulting from the direction set forth in this bulletin. The DAS-PRE will report quarterly to the AS-PMB on the overall integrity of vetting activities and the resulting data processed and maintained by DOI.

C. Bureau and Office Directors are responsible for ensuring that Bureau and Office HR and PerSec managers follow the direction set forth by OHC and OLES, the DOI oversight authorities for these activities.

D. Bureau-level HR and PerSec managers are responsible for implementing their respective requirements set forth in this bulletin. Each quarter, HR and PerSec leaders for each Bureau and Office will provide a joint report on the status of the actions and improvements described above. Managers will provide the report to both the Director, Office of Human Capital and the Director, Office of Law Enforcement and Security. Managers will provide reports to Bureau and Office Directors for awareness.

7. **Information Sensitivity and Maintaining Confidentiality.**

Direction provided in this Bulletin is in accordance with Federal law and regulations governing the data security and the protection of individual personally identifiable information. Applicable laws and regulations include:

- 5 U.S.C. § 552a, *The Privacy Act of 1974, as amended*
- 44 U.S.C.§ 101, *The E-Government Act of 2002*
- 5 C.F.R. 297, *Privacy Procedures for Personnel Records*
- OMB Directive M-03-22; *Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*

8. **Additional Resources.**

N/A

9. **Inquires.**

Inquiries on directives contained in this bulletin can be directed to:

Office of Human Capital
Jennifer Ackerman, Director

Office of Law Enforcement and Security
Robert MacLean, Director

10. **Distribution.**

This policy will be distributed to all Bureau and Office Directors, Bureau and Office HR and PerSec managers and employees. This policy also will be posted to the OHC and OLES websites.

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Jennifer Ackerman   Robert MacLean
Director, Office of Human Capital   Director, Office of Law Enforcement
Deputy Chief Human Capital Officer   and Security