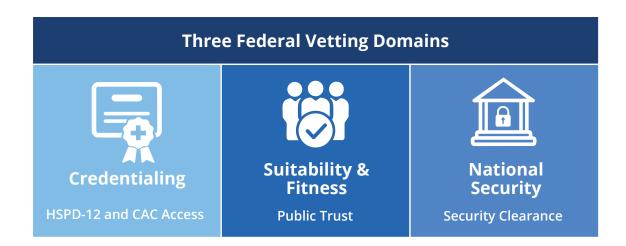


# PUBLIC TRUST



The public trust personnel vetting process is a cornerstone of federal employment and contracting. This process determines an individual's suitability to hold positions that, while not requiring security clearances, are critical to the effective functioning of government agencies and their ability to maintain public confidence.

Public trust as a term is often confused with a security clearance, but it actually applies to suitability and fitness. A suitability and fitness determination doesn't grant access to classified information but determines if a worker should be trusted to perform the work required of the position. An individual may be granted or denied suitability and denied clearance eligibility, and vice versa.



With the implementation of Trusted Workforce 2.0 (TW 2.0), the federal government is modernizing and streamlining the vetting process, creating a more dynamic, efficient, and responsive system. As the vetting process becomes more streamlined, understanding the scope of each role remains important for those both pursuing work supporting the federal government and those already in it.



#### UNDERSTANDING PUBLIC TRUST POSITIONS

#### **Defining Public Trust**

Public trust positions differ from national security positions. While a suitability or fitness determination does not grant access to classified information, those positions do involve duties that could significantly affect public confidence in government operations. Examples of contract and government roles that may be designated as positions of public trust include:

- Access to sensitive but unclassified data (e.g., personally identifiable information or health records).
- Decision-making authority over government funds or programs.
- Roles involving law enforcement or regulatory oversight.

#### **Categories of Public Trust**

Public trust positions are generally classified into two levels:

- 1. Moderate Risk (Tier 2): Involves moderate impact on public trust or operational integrity.
- 2. High Risk (Tier 4): Involves substantial impact, such as roles with significant fiduciary responsibilities or oversight of critical infrastructure.

These roles span a wide array of federal agencies and contractor positions, emphasizing the breadth of tasks that may be designated as public trust positions.

#### **Common Public Trust Positions**



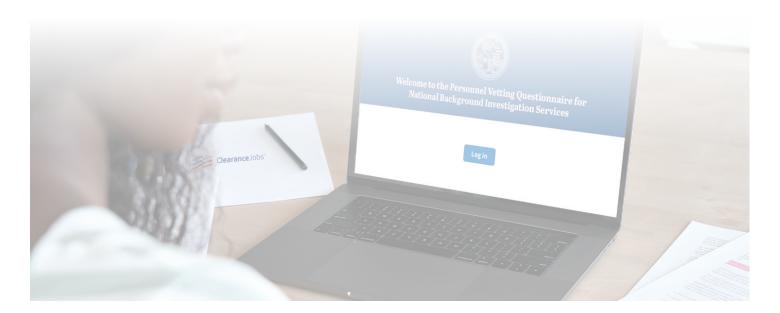


The public trust vetting process is similar in many ways to the security clearance process. The SF-85 and SF85P, both forms used for making public trust suitability determinations, and are very similar to the SF-86 form used for security clearance determinations.

The application grows even more streamlined with the implementation of the Personnel Vetting Questionnaire (PVQ). The PVQ will consist of Parts A through D. A public trust position will require completion of Parts A and B. Part D may be required for some law enforcement positions as required by the agency.

#### **Understanding the Personnel Vetting Questionnaire**

Position Designation	Current Form	PVQ Part
Non-Sensitive Low Risk	SF 85	Part A
Non-Sensitive Moderate Risk Public Trust	SF 85P	Part A & Part B
Non-Sensitive High Risk Public Trust	SF 85P	Part A & Part B
Non-Critical Sensitive Moderate Risk Public Trust	SF 86	Part A, Part B & Part C
Critical-Sensitive High Risk Public Trust	SF 86	Part A, Part B & Part C
Special-Sensitive High Risk Public Trust	SF 86	Part A, Part B & Part C
Non-Sensitive Moderate Risk or High Risk Law Enforcement Position as specified by an agency	SF 85P & SF 85P-S	Part A, Part B & Part D





#### **Public Trust Problems and Challenges**

- Lengthy Timelines: Many people assume a public trust determination will be made more quickly than a security clearance determination. This is a false assumption. Public trust determinations are largely made based on automated checks, so the process can be faster but other investigations can linger for months, and delays can happen if adverse information is discovered.
- Inconsistent Application of Standards: Suitability and fitness determination standardization is difficult to accomplish as agencies adjudicate eligibility based on their own emphasis on specific criteria. The Adjudicative Guidelines remain the same for both public trust and security clearance positions, but agencies apply them based on their own specific needs. Due process for public trust can be more limited, and applicants are not always made fully aware of the reasons for suitability denials, particularly for contractor applicants. This contributes to confusion.

#### Similarities and Differences Between a Public Trust and a Security Clearance

While a public trust and a security clearance are distinct, the suitability/fitness and security clearance processes share some similar challenges and pain points

Public Trust (Suitability)	Aspect	Security Clearance (National Security)	
Ensure integrity for roles impacting public trust	Purpose	Protect classified information and national security	
Covers positions that involve significant public interaction or influence	Scope	Covers positions requiring access to classified materials	
Moderate to high risk (non-sensitive positions)	Risk Level	High to critical risk (sensitive or national security positions)	
Suitability Determination (e.g., SF-85P)	Types of Investigations	National Security Background Investigations (e.g., SF-86)	
Has begun for the non-sensitive public trust population and will eventually roll out to all positions	Continuous Vetting	Required for all clearance holders	
Does not involve classified information	Access to Classified Information	Involves access to classified information	
Governed by Title 5 CFR Part 731 (OPM guidance)	Governing Authority	Governed by EO 12968 and Title 32 CFR Part 147	



#### **TRUSTED WORKFORCE 2.0: REVOLUTIONIZING THE VETTING LANDSCAPE**

Trusted Workforce 2.0 represents the most significant transformation of the federal personnel vetting system in decades. It replaces a rigid, episodic process with a more dynamic, continuous vetting model. And while Trusted Workforce 2.0 is often seen as associated with the security clearance process, its improvements to public trust positions and in streamlining the security clearance process is even more revolutionary.

#### 1. Continuous Vetting (CV):

Under TW 2.0, continuous vetting is being rolled out to help identify and mitigate risk for the public trust population, not just security clearance holders. CV leverages automated systems to monitor personnel for potential risks in real time. Key data sources include:





(e.g., bankruptcies, delinquent debts)



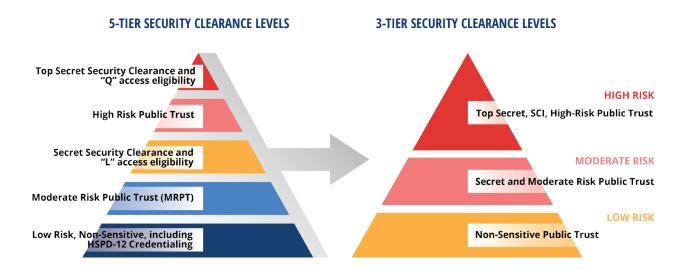
**Criminal Records** 



Other Public Records

#### 2. Streamlined Tiers:

The legacy tiered system has been simplified to align with the revised Federal Investigative Standards (FIS). This ensures consistency across agencies and improves clarity regarding risk levels.





#### 3. Reciprocity:

TW 2.0 strengthens reciprocity—the mutual recognition of investigations and adjudications across agencies. This eliminates redundant vetting processes when personnel move between agencies or roles. Enrollment of the public trust population into CV helps enable better reciprocity for not just security clearance holders, but also for public trust positions.

#### 4. Digital Modernization:

TW 2.0 integrates digital tools, such as the National Background Investigation Services (NBIS) system, to centralize data and improve process efficiency. This system provides:





Enhanced data analytics to support adjudicators



Greater transparency for applicants

The public trust personnel vetting process is vital to ensuring the integrity of the federal workforce and the safety and security of sensitive information. While challenges remain, the modernization efforts began under Trusted Workforce 2.0 offer a promising path toward a more agile and effective federal workforce. One trusted worker at a time.

For further updates and insights on TW 2.0 and federal personnel vetting, visit ClearanceJobs.com.

### About Us

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