



United States Department of Agriculture

United States
Department of
Agriculture

PDSB Bulletin #20-03

Office of the Assistant
Secretary for
Administration

Subject: Suitability Adjudicator Requirements

Office of Homeland
Security

Issue: To ensure the position designation, investigation, and minimum training requirements for suitability adjudicators is consistent across the Department.

Personnel and
Document Security
Division

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Effective Date: February 14, 2020

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Scope and Effect: This is an internal advisory document for use by USDA agencies and offices involved in personnel security services.

Supersession: None

Procedure: [Investigation Requirements for Adjudicators](#)
Part 1400 of Title 5 in the Code of Federal Regulations (CFR), *Designation of National Security Positions*, includes the following duties as being designated as a national security position:

“Exercising investigative or adjudicative duties related to national security, suitability, fitness or identity credentialing...”

As a result of 5 CFR 1400, the Position Designation Tool (PDT) was updated to reflect adjudication responsibilities falling under the National Security Position requirements and the following investigation requirements:

For adjudicating Tier 1 and Tier 2 cases, a minimum Tier 3 investigation is required.

For adjudicating Tier 3, Tier 4, or Tier 5 cases, a Tier 5 investigation is required.

If you have adjudicators who have not been investigated at the appropriate level, please initiate them this calendar year.

Inherently Government Function

Determining individuals’ suitability for employment or eligibility for a security clearance has been deemed to be an “inherently governmental function” and therefore is required to be performed by government personnel.

Contractor personnel may be part of your personnel security team, and they may review background investigations to make recommendations on fitness and suitability eligibility, but they may not make final determinations. Final fitness and suitability determinations can only be made by a federal employee adjudicator.

Minimum Training Requirements

Information on the National Training Standards (NTS) for suitability adjudicators can be found in NP2 under the Public Library.

The following courses meet the Curriculum Training Objectives of the NTS for suitability adjudicators:

- ✓ **Introduction to Suitability Adjudication**
- ✓ **Fundamentals of Suitability Review and Adjudication for Suitability and Fitness Adjudicators**
- ✓ **Suitability Action Procedures for Suitability Adjudicators** (formerly Advanced Suitability)

NOTE: The Suitability Action Procedures course is only required for adjudicator's who will be handling complex suitability cases.

The "Introduction to Suitability Adjudication" course is emailed to students after they register for the Fundamentals class. There is no cost for the Intro course.

The location for these classes in FY20 is at the Theodore Roosevelt Building, 1900 E Street NW, Room 1350, Washington, DC 20415.

For more information on these courses, [click here](#).

Supplemental Training Courses

There are several other outlets that offer personnel security related training; however, those courses can only be used to supplement, not replace, the required courses above UNLESS:

- (1) The course has been deemed to meet the NTS by the SuitEA; or
- (2) The employee's job experience and any formal training they had prior to the release of the National Training Standards in 2014 adequately trained them to the standards.

Many of us are aware of the courses offered by the Graduate School USA. The Suitability Executive Agent (SuitEA) has confirmed that the personnel security related courses at the Graduate School USA have not been deemed to meet the NTS for Suitability Adjudicators.

With that said, Agencies have some flexibility when it comes to determining how to train their adjudications staff to the NTS. If a course is completed that was not deemed to meet NTS, that Agency must identify any training gaps in accordance with the Curriculum Training Objectives and find a way to fill those particular gaps (an additional course, on-the-job training with a subject matter expert, etc.) and document it.

If you have an adjudicator who needs to register for the “Suitability Action Procedures for Suitability Adjudicators” course, but they did not take the Intro or Fundamentals course due to, for example, pre-2014 job experience and formal training, they must mark “other” on the registration form in section B and include an explanation to that effect. If SuitEA has any questions upon receiving the registration form, they will reach out for more information.

Inquiries: For further information on this bulletin, contact the PerSec Chief or the PerSec inbox at PerSec@usda.gov.