

Six Essential Questions for VHA Tier 1 Background Investigation/Foreign National Vetting

What is changing?

The background screening conducted by the Defense Counterintelligence & Security Agency will be required for all United States citizens and non-United States citizens living in the U.S. for more than three years who will have access to VA information technology systems and physical sites.

An alternate vetting system will be applied for non-United States citizens living in the U.S. for less than three years who will have access to VA information technology systems and physical sites.

Why is it changing?

The upcoming updates reflect a broader commitment to universal federal information security best practices and ensure compliance with legal requirements mandated by the [Federal Information Systems Modernization Act \(FISMA\)](#). VA is proud to be in step with these important guidelines.

To align with the [Federal Zero Trust Architecture \(ZTA\) strategy](#) for security and compliance, it is necessary to meet the USAccess Personal Identity Verification (PIV) system requirements, as well as the VA's transition to Trusted Workforce 2.0 and Continuous Vetting, as outlined in VA directives and policy.

VHA is committed to remaining proactive in reducing risk to Veterans, visitors, employees, and any other person in the VA system. This proactive approach is a key part of our commitment to safety and security.

Who is it impacting?

The changes to the background investigation process will impact all employees newly engaged with VA, existing individuals not meeting revised screening requirements, and individuals in paid, non-paid, or without compensation status. This change is driven by required enhancements to the suitability checks of health professions trainees and other affiliates to be consistent with the requirements in place for employees and contractors. Policies are still being established, and those who require additional action will be notified.

Individuals who will be engaged with VA for less than 180 days may require a different level of investigation.

What is not changing?

VA remains committed to providing timely and appropriate access to those who need it. There will be no additional actions for those who already have the required level of background screening. The expectation is that anyone completing a Background Investigation will be completely honest about their background, reinforcing our commitment to transparency and trust.

What are the risks of not changing?

Inadequate screening creates an increased potential for inappropriate access to VA information systems and physical sites, including all VA-protected information, Veteran health records, and employee records, along with insufficient screening for access to secure areas, materials, or physical resources.

What are the benefits of the change?

These enhancements will align with government-wide standards and significantly reduce risks to VA's systems, facilities, and stakeholders, including Veterans, employees, health professions trainees, volunteers, visitors, and contractors. Additionally, for those transitioning to full-time roles, the streamlined process will facilitate a smoother transition from trainee to staff and between different sites or agencies, fostering increased confidence and trust in VA.

COMMON eAPP ERROR AND MISTAKES

This guide provides recommendations and tips for areas of the eAPP that are often misunderstood, overlooked, and/or filled out incorrectly.

TIPS FOR A MORE EFFICIENT
BACKGROUND INVESTIGATION

Video Resource: [Click here](#)

eAPP Section	Topic	Recommendation
Intro	General Questions	If you have previously completed a background investigation questionnaire, ensure the information in the system is updated by deleting any old or irrelevant entries. This includes removing residences and employments over five (5) years and fixing any mistakes from previous investigations. Remember to update the addresses and phone numbers of relatives and “people who know you well.”
1-7	Identifying and Contact Information	Include all full names, aliases, and nicknames you have ever gone by and the period of time you used them. This includes your maiden name, and name(s) in a former marriage, etc.
8-10	Passport and Citizenship	List passport information, even if expired. For naturalized citizens and legal aliens, you’ll need your naturalization/immigration paperwork
11	Residential History	List the places where you have lived, beginning with your present residence, working back five (5) years. Do not list residences before your 18th birthday, unless to provide a minimum of two (2) years of residence history. Residences for the entire period must be accounted for without breaks. This means that if you split your time between multiple locations during a period, you should list all residences. Note: List the addresses of your physical location, not home of record: <ul style="list-style-type: none"> • Stationed on a ship? List the ship home port address. • Deployed overseas? Provide the country and FPO/APO address • Away at college? List the dorm, apartment, or relative’s address where you lived during the semesters. <p>You are not required to list temporary locations of less than 90 days that did not serve as your permanent or mailing address. For any address in the last three (3) years, a verifier must have been to the residence to verify it. The best verifiers are neighbors, roommates, and landlords — spouses do not count.</p>
12	Education	List any school attendances in the last five (5) years (except for certificate programs) regardless of whether you earned a diploma/degree or not. Indicate if the school was attended online. List any degrees/diplomas earned more than five (5) years ago. <ul style="list-style-type: none"> • Do not list education before your 18th birthday unless to provide a minimum of two (2) years of education history. • Do not list military training, including MOS school, basic training, Navy “A” school, etc.

eAPP Section	Topic	Recommendation
13	Employment	<p>List all employment in full, without ANY breaks for the last five (5) years:</p> <ul style="list-style-type: none"> • Do not stretch employment dates to fill gaps when you were unemployed. • No job is too short or insignificant to list. • Include unpaid internships, summer work, and “under the table” jobs. • Do not list tentative or future employments. • Military Service: For service members, do not list military services as one entry: <ul style="list-style-type: none"> ○ List each military duty station as separate entries. Be sure to include the physical address, to include if you were stationed or deployed overseas. ○ Reserve/National Guard Service should be listed in the employment section. • Avoid the use of acronyms/abbreviations. • Terminations: Whether or not you agree, if the employer would say that you were fired, terminated, or left under unfavorable circumstances, list and explain. This includes any disciplines, warnings, reprimands, etc.
14	Selective Service Record	<p>If you are a male born after December 31, 1959, you are required to register with the Selective Service on your 18th birthday.</p> <p>If you are already in the military and did not register, list the Selective Service Number you have been issued.</p> <p>Note: Selective Service Number is not your Social Security Number.</p>
15	Military History	The only question in this section is have you served in the military. It is a yes/no question.
16	Police Records	<p>For this section, report information regardless of whether the record in your case has been sealed, expunged, or otherwise stricken from the court record, or the charge was dismissed.</p> <ul style="list-style-type: none"> • Note the difference in time frames. Make sure you know when it’s asking you to self-report offenses from seven years ago to present. • Traffic violations resulting in fines of less than \$300 do not need to be listed unless related to another case.
17	Drug Activity	<p>In the last seven (7) years, have you illegally used drugs and/or controlled substances, or misused prescription drugs? Report it. Even if marijuana is “legal” where you live or where you have traveled or visited to, Federal employment follows Federal law, meaning that the possession or use of marijuana is a criminal offense.</p> <ul style="list-style-type: none"> • Counseling: Any counseling for drug use, whether illegal, prescription, over the counter, etc., needs to be listed.
18	Investigations / Clearances	<p>ALL prior investigations and clearances must be listed, not just the most recent one.</p> <ul style="list-style-type: none"> • Any denied, suspended, or revoked clearances or access authorizations must be listed — even if you do not agree with it, if it was a mistake, or it was mitigated and reinstated.
19	Finances	SF85 will ask in the last five (5) years have you failed to file or pay taxes delinquent Federal debt.

Information for Academic Affiliates: *VA Enhanced Security Posture*

VA



U.S. Department of Veterans Affairs
Veterans Health Administration
Office of Academic Affiliations

Policy Changes

The following key changes are being implemented across VA:

- Federal Name Check, utilizing a non-U.S. citizen vetting system, for non-U.S. national personnel who have been in the country less than three years.
- At least a Tier 1 federal background investigation for all eligible VA personnel (VA appointment over 180 days, non-U.S. citizen in the country over three years) requiring access to VA facilities and/or information systems.
- PIV-Interoperability (PIV-I) cards will be issued for a period of time not to exceed 180 days, or for the length of the appointment (whichever is less). PIV-I cards can be renewed every 180 days.



For more detailed info on policy changes, please see attached "6 Essential Questions."

What does this mean for Health Professions Trainees?

Immediate Change: Health Professions Trainees (HPTs), non-U.S. citizens in the country less than three years (foreign born and NOT issued a U.S. passport or have any legal residency status) are required to provide the following information so that a Federal Name Check can be conducted as part of the onboarding process.

- | | | |
|-------------------------------|----------------------------|----------------------------|
| ● Name | ● Appointment type (in VA) | ● Passport issue date |
| ● Other last names used | ● Citizenship | ● Passport expiration date |
| ● Email address | ● Country of citizenship | ● Date of entry to U.S. |
| ● Date of birth | ● Country of birth | ● Visa number |
| ● Birth sex | ● Passport number | ● Visa expiration |
| ● U.S. social security number | ● Passport issue country | |



For more detailed info on the Federal Name Check, please see attached "Non-U.S. Citizen Resource Guide."

Future Changes: HPTs in existing programs that are non-U.S. citizens will also need to provide the information above so that a Federal Name Check can be conducted. Additionally, U.S. citizen HPTs who are appointed for greater than 180 days will be required to complete an additional application (eAPP) so that a Tier 1 background investigation can be completed.



For more info on the data collected in the eAPP, please see attached "eAPP Section Guide."

How you can help

Please provide VA the requested information in a timely manner during onboarding. The sooner onboarding information is gathered, the less likely there will be a delay in HPT participation in Veteran care on day one of their rotation.

Update on VA Health Professions Trainee Background Checks and Security Vetting

Presenter: xxxxxx

Audience: Academic Affiliate Organizations

Date: xxxxxx



VA Goals for Health Professions Trainee (HPT) Onboarding

Day One Readiness

Every Health Professions Trainee

- Fully onboarded
- Trained and provisioned
- Ready to care for Veterans on **day one** of their VA experience

Integrated Onboarding Process

Streamlined onboarding for HPTs

- Process is being augmented for security purposes
- Continuous improvements to ensure ease/efficiency
- Future enhancements to integrate systems



VA's Commitment

To protect the security of Veterans, visitors, employees, and any other person in the VA system. By upholding our core values, we emphasize the importance of support and the intrinsic value of every person we serve.

Why are there changes to security vetting?



- Federal information security best practices and compliance with legal requirements mandated by the Federal Information Systems Modernization Act (FISMA). VA is proud to be in step with these important guidelines.
- Alignment with government-wide standards to reduce risks to VA's systems, facilities, and stakeholders, including Veterans, employees, health professions trainees, volunteers, visitors, and contractors.
- For those transitioning to full-time roles, the streamlined process will facilitate a smoother transition from trainee to staff and between different sites or agencies, fostering increased confidence and trust in VA.



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U.S. Department
of Veterans Affairs

Changes in Requirements for Screening HPTs

Previous Requirements	Changes to Requirements
<p>Special Agreement Check (SAC)</p> <ul style="list-style-type: none"> Majority of Health Professions Trainees were exempt from a Tier 1 and therefore in this category Fingerprint check, FBI database check, no special form needed Approximately 48 hours turnaround time Trainees were issued a PIV-I card for three years 	<p>US Citizens and lawful permanent residents in the country for > 3 years</p> <ul style="list-style-type: none"> Tier 1 Background Check 3-year PIV card
<p>Tier 1 Background Check</p> <ul style="list-style-type: none"> Very limited number of HPTs (>180 aggregate days or >1 year of continuous service), i.e. medical students on longitudinal integrated clerkships of over 6 months duration, VA-based chief residents SAC plus FBI investigation (interviews, etc.), requires trainees to fill out a form to list their relatives, residences, etc. (estimated time 2 hours) Highly variable, weeks to months, must be completed within the first year of service Trainees were issued a PIV card for three years 	<p>Non-US Citizens</p> <ul style="list-style-type: none"> Foreign National Federal Records Check PIV-I card with six-month certificates

US Citizen Security Vetting

- **Tier-1 Background Check**
 - Requires fingerprints and Special Agreement Check
 - Online SF-85 Questionnaire for Non-Sensitive Positions
 - Sent by electronic invitation
- **Record of Arrest and Prosecution Back (RAP BACK)**
 - Component of Trusted Workforce 2.0
 - Continuous FBI database check

For Reference Only											
Section 1 – Full Name											
Provide your full name. If you have only initials in your name, provide them and indicate "Initial only". If you do not have a middle name, indicate "No Middle Name". If you are a "Jr.," "Sr.," etc. enter this under Suffix.								Last	First	Middle	Suffix
Section 2 – Date of Birth											
Provide your date of birth.		Date	-	-	Est.	<input type="checkbox"/>					
Section 3 – Place of Birth											
Provide your Place of birth.		City	County			State		Country			
Section 4 – SSN											
Provide your U.S. Social Security Number.		<input type="checkbox"/> Not applicable - -									
Section 5 – Other Names Used											
Provide your other names used and the period of time you used them (for example: your maiden name, name(s) by a former marriage (s), former name(s), alias (es), or nickname(s)).											
Have you used any other names?								YES	NO		
Branch If Yes to "Other Names" (Multiple Entries Allowed)	Provide your other name used and the period of time you used it [for example: your maiden name, name by a former marriage, former name, alias, or nickname]. If you have only initials in your name, provide them and indicate "Initial only." If you do not have a middle name, indicate "No Middle Name" (NMN). If you are a "Jr.," "Sr.," etc. enter this under Suffix.										
	Provide other name used.	Last	First	Middle	Suffix	Maiden name?	Yes	No			
	Provide dates used.			From Date (Estimated)		To Date (Estimated/Present)					
	Provide the reason(s) why the name changed.					Reason: (Free Text)					
	Do you have additional names to enter?					Yes (Yes adds another entry)		No (Required to pass validation)			
Section 6 – Your Identifying Information											
Provide your Identifying Information		Height	(feet)	(inches)	Weight (in pounds)	Hair Color	Eye Color	Sex (M/F)			
Section 7 – Your Contact Information											
Provide three contact numbers. At least one telephone number is required. Additional numbers provided may assist in the completion of your background investigation.											
Provide your contact information. Email addresses may be used as a		Home email address		Email (Free Text)		Work email address		Email (Free Text)			

Non-US Citizen Security Vetting

- **Foreign National Federal Records Check**
 - Managed by VA Counterintelligence
 - Personally identifiable information
 - Passport information
 - Visa information
 - SAC check and fingerprints can be scheduled

Note: The Intake Form will be used until updates are made that allow submission electronically through the existing Account Provisioning/Deprovisioning System.

VHA Personnel Security Intake Form



Fields in **Red** are Required

Name	
Other Last Names Used	
E-Mail Address	
Date of Birth	
Birth Sex	
SSN	
Appointment Type	
Citizenship	

EXAMPLE

Smith, John, Craig
N/A
John.Smith@gmail.com
1/1/1980
Male
123-45-6789
HPT
Non-US Citizen

US Citizens or Green Card Holders do not complete the section below

Country of Citizenship	
Country of Birth	
Passport Number	
Passport Issue Country	
Passport Issue Date	
Passport Expiration Date	
Date of Entry to USA	
Visa Number	
Visa Expiration Date	

England
England
987654321
England
1/1/2020
1/1/2028
1/1/2028
8675309
1/1/2028

Non-US Citizen Security Vetting

Required Data

- Name
- Other Last Names Used
- Email Address
- Date of Birth
- Birth Sex
- US Social Security Number
- Appointment Type (in VA)
- Citizenship
- Country of Citizenship
- Country of Birth
- Passport Number
- Passport Issue Country
- Passport Issue Date
- Passport Expiration Date
- Date of Entry to USA
- Visa Number
- Visa Expiration Date

Passport



Visa

Types of US Work Visas



Permanent Resident



Security Vetting Updates

A project team is working to implement all enhanced security vetting updates across VA. Phases 1, 2, and 3 will have an impact on HPT onboarding.

1

- All Education Personnel Security Offices are being trained in processing Non-US Citizen checks

2

- All new Non-US Citizens will be processed through the Federal Name Check while onboarding
- Previously onboarded Non-US Citizens will be processed through the Federal Name Check

3

- All Education and Personnel Security Offices will be trained in processing Tier 1 Background Investigations for HPTs
- Requirements for Tier 1 Background Investigations will be Implemented for new and onboard HPTs



Project Timeline

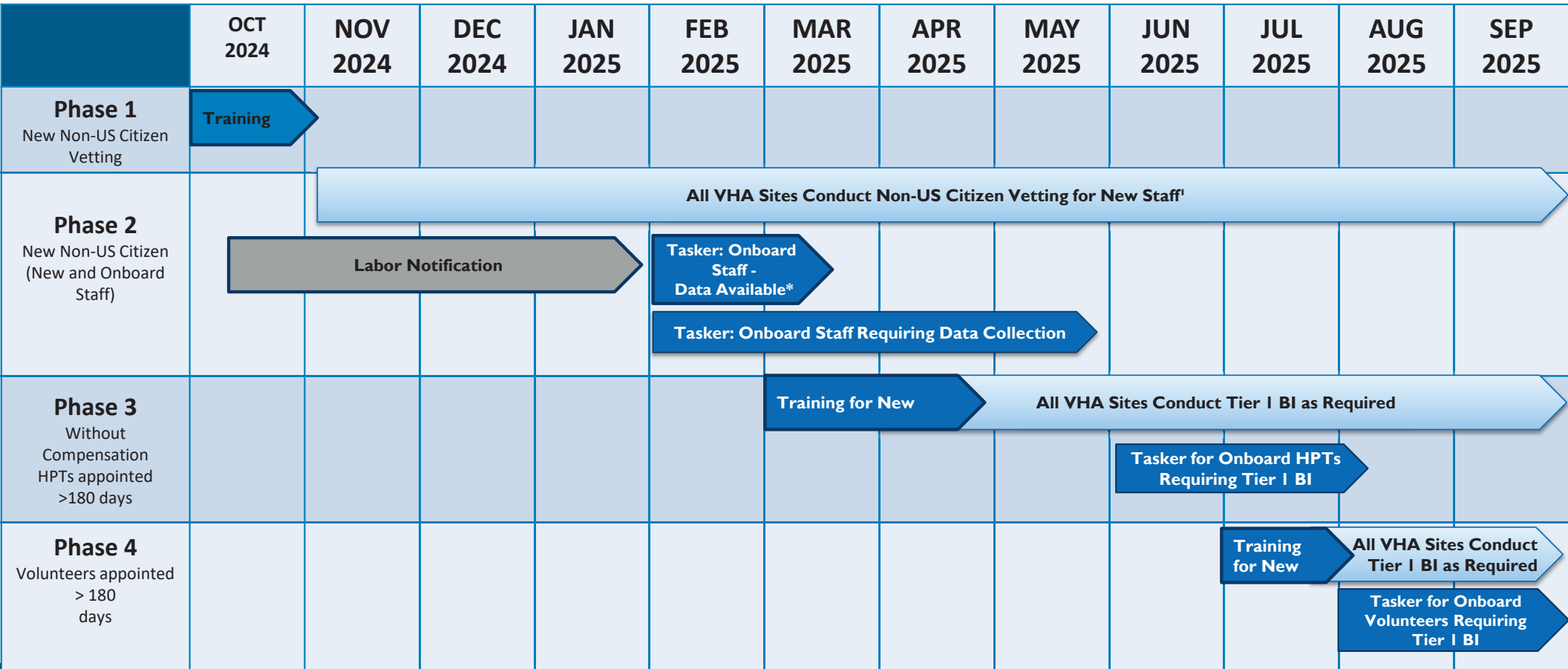
Key:

Training / Implementation

Sustainment

*Initiate within 5 days of labor notification completion

¹Staff – includes employees, HPTs, Volunteers, and Contractors



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Questions



Previous Requirements for Screening HPTs

Special Agreement Check (SAC)

- Majority of Health Professions Trainees were exempt from a Tier 1 and therefore in this category
- Fingerprint check, FBI database check, no special form needed
- Approximately 48 hours turnaround time
- Trainees were issued a PIV-I card for three years

Tier 1 Background Check

- Very limited number of HPTs (>180 aggregate days or >1 year of continuous service), i.e. medical students on longitudinal integrated clerkships of over 6 months duration, VA-based chief residents
- SAC plus FBI investigation (interviews, etc.), requires trainees to fill out a form to list their relatives, residences, etc. (estimated time 2 hours)
- Highly variable, weeks to months, must be completed within the first year of service
- Trainees were issued a PIV card for three years

New Requirements for Screening HPTs

- **US Citizens and lawful permanent residents in the country for > 3 years**
 - Tier 1 Background Check
 - 3-year PIV card
- **Non-US Citizens**
 - Foreign National Federal Records Check
 - PIV-I card with six-month certificates



When to Conduct a Non-US Citizen Check

<h2>Non-US Citizen</h2> <p><i>Non-US Citizens are required to have a non-US Citizen Check</i></p>	<h2>US Citizen/Lawful Permanent Resident</h2> <p><i>US Citizens/Lawful Permanent Residents are NOT required to have a non-US Citizen Check</i></p>
<p>Definition:</p> <ul style="list-style-type: none"> Foreign born and NOT issued a US Passport and do not have any legal residency status (i.e. individual is not a green card holder, individual does not have alien registration numbers, individual is not a DACA recipient) 	<p>Definition:</p> <ul style="list-style-type: none"> US Citizen or National by birth in the US or US territory/commonwealth or born to US parent(s) in a foreign country Naturalized or Derived US citizen Lawful Permanent Resident: A person lawfully authorized to live permanently within the United States, i.e issued a "green card" <p>Ensure the citizenship data in VA-CABs profile is updated correctly to allow a pre-screening decision without the non-US Citizen Case requirement.</p>

INFORMATION REQUIRED FOR NON-US CITIZEN CHECK

- | | | |
|---|--|--|
| <ul style="list-style-type: none"> Name Other Last Names Used Email Address Date of Birth Birth Sex US Social Security Number | <ul style="list-style-type: none"> Appointment Type (in VA) Citizenship Country of Citizenship Country of Birth Passport Number Passport Issue Country | <ul style="list-style-type: none"> Passport Issue Date Passport Expiration Date Date of Entry to USA Visa Number Visa Expiration Date |
|---|--|--|

WHERE TO FIND INFORMATION

Passport



Visa

[Types of US Work Visas](#)



Permanent Resident

