



**U.S. DEPARTMENT OF COMMERCE
MANUAL OF SECURITY
POLICIES AND PROCEDURES**

Appendix C

Minimum Requirements for Personnel Investigations

C.1 INVESTIGATIVE REQUIREMENTS

A. Investigations are conducted to develop information on the background of employees, appointees, applicants, and non-employees associated with the Department. Suitability investigations provide an assessment of an individual's potential to promote the efficiency and integrity of the Department's operations when filling a particular position. Security investigations are conducted to determine if an individual's employment or retention in employment is consistent with the national security. The findings or facts obtained through security investigations are used to determine eligibility for access to national security information (covered in Chapter 12) or to special access programs (covered in Chapter 15). Investigations on non-employees are used to determine the potential impact or risk the non-employee's association would have with the Department. General guidance on the minimum type of investigation for each sensitivity or risk level is indicated in the table on page C.5.

B. Non-employees working under non-IT contracts that do not require access to classified information are generally considered Low Risk; however, due to the impact on Departmental programs, contracts deemed to be of a higher risk require more extensive investigations of individuals performing under that contract. At a minimum, a Minimum Background Investigations (MBI) will be required for persons performing work under a contract designated Moderate Risk and a Background Investigation (BI) will be required for persons performing work under a contract designated High Risk. When required, the Background Investigation must be completed prior to performance on the contract. The National Agency Check and Inquiries will be conducted after an individual begins work under the contract. Investigations must be initiated no later than three days after the start of the subject's performance under the contract at the facility.

C. Background checks are required for non-employees such as guest workers, research associates, and trainees who will be associated with the Department for a limited amount of time. For U.S. citizens a Special Agreement Check (SAC) is required if they are associated with the Department more than 30 days during a one-year period. A National Agency Check and Inquiries (NACI) investigation will be required if they will be associated with the Department for more than one year. For non-U.S. citizens, a SAC is required if they are associated with the Department more than 10 days during a one-year period. A NACI will be required if the duration of the association is more than one year. For non-employees, the SAC and the NACI must



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be initiated no later than three days after starting work at the facility or association on a specific project.

C.2 EMPLOYEES (Including Experts and Consultants)

A. Sensitive Positions. For general guidance, see the table on page C.5., Minimum Requirements for Personnel Investigations.

1. **Special-Sensitive.** The Single Scope Background Investigation (SSBI) must be completed prior to appointment.
2. **Critical-Sensitive.** The SSBI must be completed prior to appointment; however, a waiver of this requirement may be requested in an emergency situation.
3. **Noncritical-Sensitive.** The Access National Agency Check and Inquiries (ANACI) must be initiated no later than 14 days after the subject's entrance-on-duty.

B. Non-Sensitive Positions. For general guidance, see the table on page C.5., Minimum Requirements for Personnel Investigations.

1. **High Risk.** The Background Investigation (BI) must be initiated upon receipt of a favorable pre-appointment check. Subjects can enter on duty after pre-appointment checks are favorably completed.
2. **Moderate Risk.** The Moderate Background Investigation (MBI) must be initiated no later than 14 days after the subject's entrance-on-duty date.
3. **Low Risk.** The NACI must be initiated no later than 14 days after the subject's entrance-on-duty date.

C.3 NON-EMPLOYEES

A. Contractors

1. **Classified Contracts.**
 - a. **Critical-Sensitive.** The BI must be completed prior to performance on the contract.



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b. **Noncritical-Sensitive.** The National Agency Check with Law and Credits (NACLC) must be completed prior to performance on the contract.

2. **Unclassified Contracts.**

a. **High Risk contract.** A BI is required for individuals performing work under a High Risk contract of any duration. The BI must be initiated upon receipt of a favorable pre-appointment check. Subjects can enter on duty (EOD) after pre-appointment checks are favorably completed.

b. **Moderate Risk contracts.** A MBI is required for individuals performing work under a Moderate Risk contract of any duration. The MBI must be initiated no later than three days after the subject's beginning association.

c. **Low Risk contracts that exceeds one year.** A NACI is required for individuals performing work under a non-IT, Low Risk contract for more than 365 days. The NACI must be initiated no later than three days after the subject's beginning association.

d. **Low Risk contract less than one year.** A SAC is required for individuals performing work under a Low Risk contract over 180 days but less than 365 days. The SAC must be initiated no later than three days after the subject's beginning association.

B. **Guest Workers, Research Associates, Trainees, and Long-term Visitors**

1. Guest workers, research associates, trainees, long-term visitors, and other non-employees associated with the Department shall obtain a Security Assurance. For general guidance, see the table on page C.5., "Minimum Requirements for Personnel Investigations."

2. **U.S. Citizen.**

a. **More than One Year.** A NACI is required for U.S. citizens associated with the Department for more than one-year. The NACI must be initiated within three days of the individual's beginning association with the Department.

b. **180 to 365 Days.** A SAC is required for U.S. citizens associated with the Department for more than 180 days but less than 365 days. The SAC must be requested prior to the 180th day of the individual's association with the Department.



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c. **30 to 180 Days.** A SAC may be requested for U.S. citizens associated with the Department from 30 to 180 days when there is a potential for increased risk.

3. Non-U.S. Citizen.

a. **More than One Year.** A NACI is required for non-U.S. citizens associated with the Department for more than one-year. The NACI must be initiated within three days of the individual's beginning association with the Department.

C.4 PROCESSING INVESTIGATIONS

Guidance for both human resources managers and security contacts to initiate requests for investigations for national security positions is located at Appendix D, Processing Personnel Security and Suitability Investigations. Guidance for processing suitability investigations is provided in DAO 202-731, Suitability Handbook.



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MINIMUM REQUIREMENTS FOR PERSONNEL INVESTIGATIONS

	SAC	NACI	ANACI	NACLC	CNACI	MBI	BI	SSBI	RI	Appendix D
Special-Sensitive								M	*	D.3 A.1 & 10
Critical-Sensitive, Top Secret								M	*	D.3 A.1 & 10
Critical-Sensitive, Secret							M		*	D.3 A.1 & 9
Noncritical-Sensitive			M						*	D.3 A.1 & 5
High Risk							M		*	D.3 A.1 & 9
Moderate Risk						M				D.3 A.8
Low Risk		M								D.3 A.4
Child Care Provider					M				*	D.3 A.7
Contract: Critical-Sensitive/ High Risk							M			D.3 A.9
Contract: Noncritical-Sensitive				M						D.3 A.5
Contract: Moderate Risk						M				D.3 A.8
Contract: Nonsensitive More than 180 days		M								D.3 A.4
Contract: Nonsensitive Less than 180 Days	M									D.3 A.3
Non-Employee: U.S. Citizen More than One Year		M								D.3 A.4
Non-Employee: U.S. Citizen 180-365 Days	M									D.3 A.3
Non-Employee: U.S. Citizen 30-180 Days	O									D.3 A.3
Non-U.S. Citizen: More than One Year		M								D.3 A.4
Non-U.S. Citizen: 10-365 Days	M									D.3 A.3
Non-U.S. Citizen: Less than 10 Days	O									D.3 A.3

M = Mandatory O = Optional

*** RI = Reinvestigation of subject required at 5 or 10 year interval depending on level of security clearance.**