

**Department of  
Veterans Affairs**

# Memorandum

Date: APR 19 2002

From: Deputy Assistant Secretary for Security and Law Enforcement (07)

Subj: Psychological Assessment of Applicants for Police Officer Positions

To: Facility Directors  
Employee Health Physicians  
Mental Health Services  
Police Services  
Human Resources Management Service

1. Purpose. This memorandum provides updated guidance in methods of accomplishing psychological assessments for Department police officer applicants.

2. Applicability. The updated guidance regarding psychological screening contained in this memorandum applies to *police officer applicants only*. It does not apply to incumbent police officers.

3. Background:

a. Appendix A of VA Handbook 0730 provides the specific medical standards for VA police officer applicants and incumbents. Included in these standards are requirements for an initial psychological assessment for applicants and an annual psychological assessment for incumbents. Based upon past instructions from the Office of Personnel Management (OPM), both the initial and annual psychological assessments have been limited to an interview by a psychologist or psychiatrist covering only job related factors. Psychological testing has been permitted only if reason to question the applicant/incumbent's suitability has arisen. That is, the psychologist/psychiatrist would recommend psychological testing if an articulable reason to question the officer's capability of performing the duties of a police officer developed during the psychological assessment interview or during medical evaluation. In such situations the Employee Health Physician may approve such a recommendation and direct appropriate psychological testing.

b. Periodically, VA has requested that OPM revisit its admonition against routine psychological testing. As a result of one such request, OPM recently advised that VA was authorized to develop written assessment procedures under existing delegated examining authority. As a part of this authorization, VA is responsible to assure that all assessments are valid predictors of success on the job. Accordingly, a working group was established consisting of representatives of the Office of Security and Law Enforcement, VHA's Office of Public Health and Environmental Hazards and the Mental Health Strategic Health Care Group to develop new procedures. This memorandum is a product of that working group. Input and review were also received

from the Office of Human Resources Management and the Office of Labor-Management Relations.

c. The guidance contained in this memorandum will be included as Departmental policy and procedure in a future issuance of VA Directive and Handbook 0730. In the interim, this guidance is provided (in accordance with Paragraph 6 of Appendix A of VA Handbook 0730) to be utilized during the pre-employment screening process of prospective VA police officers, before a final offer of employment is made.

d. The same future issuance of VA Directive and Handbook 0730 will also address any changes in the appropriate manner to accomplish annual psychological assessments of incumbent police officers. In the interim, the policies and procedures contained in VA Directive and Handbook 0730, dated August 11, 2000, for the accomplishment of psychological assessment of incumbent police officers are still in effect. It is emphasized that routine psychological testing of incumbent police officers is not authorized. As previously, if concerns arise during the psychological or medical evaluation, the psychologist may use written tests.

4. Department medical care facilities are protected by police officers who have arrest authority, as defined by 38 USC Chapter 9. Department police officers protect life and property on VA owned or operated lands and buildings. VA police officers must regularly make decisions on the appropriate application of force in the course of their duties. This may include potentially lethal force, through the use of a firearm or the police baton. Candidates for police officer positions must meet certain functional requirements prior to a job offer being made. Written psychological testing, as defined by this memorandum, is used to determine whether or not a candidate is able to meet those specific functional requirements. In order to meet the specific behavioral functional requirements for the successful police officer the applicant must:

- a. Possess a high level of personal integrity
- b. Be able to maintain control of anger and emotionality
- c. Be compassionate towards others, especially those who cannot care for themselves
- d. Be willing and able to quickly respond to emergency situations
- e. Have respect for authority and the rule of law
- f. Be emotionally able to apply physical and possibly lethal force as needed, and to recognize when such force is necessary, but in strict accordance with training and policy requirements.
- g. Be able to often work independently, but within a regimented group structure.

#### 5. The Use of Psychological Screening:

a. The primary objectives of psychological screening for Department police officer applicants are to screen out emotionally unstable and/or unsuitable applicants, and to identify positive psychological characteristics associated with successful job performance. Emotional instability, in this context, refers to symptomatology of such

severity that the individual's ability to meet the functional requirements of the position, including the carrying and use of firearms, would be impaired. A mental health diagnosis, on its own, cannot be used as a basis for a determination of instability. Suitability, in the psychological screening context, refers to personality characteristics pertinent to an individual's performance in the job and includes interpersonal skills, judgment, decision-making and integrity. Each evaluating psychologist will determine, based on his/her clinical judgment, the exact subset of dimensions to be assessed while adhering to the police officer functional requirements as outlined in paragraph 4 of this letter.

b. This memo does not mandate the use of any specific structured interview questions or specific psychological testing instruments. The information contained here does define criteria that should be applied in the selection of both types of assessment instruments. In addition, a sample of available instruments currently being used to assess law enforcement applicants is provided.

c. At a minimum the psychological evaluation should consist of a structured interview and standardized, objective psychological testing. Additional test instruments, available information, and interview questions should be used as deemed appropriate by the evaluating psychologist. All interview questions and testing instruments should be chosen based upon their relevance to job performance and not subject to selective cultural, gender or racial bias. If the examiner cannot demonstrate a job-related basis for the use of a particular test instrument, historical information, or interview question, it should not be used.

d. A sample format for the structured interview is attached (Attachment 1). This interview, titled "Human Reliability Structured Interview", has been developed and used by Dr. Neil Hibler, Director, Special Psychological Services Group. This private practitioner has many years of experience conducting psychological assessments of law enforcement officers. He has developed the attached interview format to meet all necessary legal requirements while eliciting pertinent information. Dr. Hibler has generously provided VA with a release to use his materials exclusively for VA purposes. Although Dr. Hibler's interview is available for VA use and/or adaptation, other, similar, equally valid, effective and appropriate structured interview formats are available (see Attachment 2 for other examples).

e. Typically, at least two objective psychological tests will be administered, one normed against healthy individuals drawn from the general population to assess suitability for work as a police officer and a second measure normed against a clinical population to evaluate significant psychological dysfunction (i.e., emotional stability). The choice of how many and which objective measures to employ are the responsibility of the evaluating psychologist. However, both suitability and stability must both be assessed. Attachment 2 provides examples of test instruments that are currently available.

f. Each applicant will be given an informed consent sheet to review, sign and date. A sample document, currently used in VISN 5, is provided as Attachment 3 of this memo. The form is used for new applicants. Important components of the consent include: the nature and purpose of the evaluation, the lack of confidentiality, identifying the client as the Department of Veterans Affairs (not the applicant), intended use of the information including program evaluation and/or validation purposes, etc.

g. It is essential that the assessment process be standardized. At a minimum, standardization should occur at the facility level although VISN level standardization may be implemented if desired. The same set of interview questions should be used for all applicants at a facility. Similarly, the same test battery should be administered to all candidates at a particular facility. In order to standardize procedures as much as possible, it is recommended that a limited number of psychologists be delegated the responsibility to conduct these evaluations at each site. Methods to ensure continued standardization and uniformity of procedure should also be incorporated into the process.

h. According to current guidance from the Office of Personnel Management, the results of psychological screening and assessment cannot be used as evidence of medical disqualification for a position. The exception is in the case where a clinical diagnosis, as defined by the **Diagnostic and Statistical Manual of Mental Disorders – Fourth Edition (DSM-IV)** is made and certain other factors exist, as discussed in the attached OPM guidance (OPM Memorandum for Directors of Personnel, from Mary Lou Lindholm, re: OPM adjudication of Medical disqualifications for Preference Eligibles, (April 19, 1999)). Pre-employment psychological assessment and screening is therefore used to determine if the candidate clearly has met all of the aforementioned functional requirements. Further, under OPM regulations VA could not use medical history as the sole basis for disqualifying an officer applicant from his position. Any history of a medical problem revealed by a psychological testing process could only result in medical disqualification if the condition at issue is itself disqualifying, recurrence cannot be medically ruled out, and the duties of the police officer are such that a recurrence would pose a reasonable probability of substantial harm. (5 CFR 339.206)

i. On the other hand, candidates must meet the characteristics defined in paragraph 4 a-g above to be able to work successfully as an officer. The absence of some or presence of other personal characteristics may make an individual unsuitable for work as a police officer.

j. The raw test material, interview notes and other material developed by the psychological evaluation is to be maintained by the psychologist. This information is subject to the customary safeguards and protections afforded to all psychological test material. The raw test material and notes and other data will be stored in accordance with VA Records Control Schedule RCS-10, Item 116-3, Psychology Test Data and Worksheets.

6. The pre-employment assessment process:

a. Pre-employment screening, assessment and evaluation for VA police officer positions consist of several discrete steps. These are described in Paragraph 3.a. of VA Handbook 0730. They include an evaluation of job qualifications by the local Human Resources Service and the completion of VA Form 0120, which is used for pre-offer evaluation of prior employment and criminal history. The information gathered during this process is given to HR and the selecting official. If all the qualification requirements are met, a conditional offer of employment is given. The candidate then undergoes a medical examination and the psychological testing and interview.

b. Following the completion of the psychological evaluation, the evaluating psychologist will provide a summary report of findings and recommendations to the Employee Health Physician. This report will be based on all the information available to the psychologist. As there are no absolute cut off scores to determine suitability and emotional stability for law enforcement officials, a rating system is recommended to summarize the findings and recommendations. Two examples of rating systems are included with the Human Reliability Structured Interview form in Attachment 1.

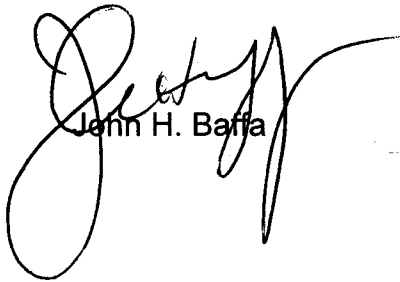
c. The Employee Health Physician, the evaluating psychologist, and a representative from Human Resources and/or VA police who have knowledge of the information developed during the pre-employment screening process, may elect to review their findings in a joint meeting. This type of review process may help to identify critical discrepancies or inconsistencies in their respective data sources. If such a meeting is chosen, the final recommendation should result from it.

7. Other professional considerations:

a. Each facility should ensure that individuals conducting these evaluations are qualified to do so. In some cases, existing staff will have the necessary training and experience to conduct these examinations. If appropriately qualified staff is not available on site, experienced VA psychologists may be available within the VISN or at other accessible VA locations. Accessing and utilizing those psychologists to provide the assessments and/or training or consultation may be useful. It may be necessary to provide training opportunities for those psychologists who will conduct the evaluations prior to the implementation of this policy. Psychologists conducting these evaluations should also have consultation services available. This will be especially important for those psychologists without prior experience. Finally, it may be determined that contracting out direct service delivery or on-site consultation is the most cost effective strategy. The same procedures and standards must be maintained regardless of which provider option is selected. When contracting out psychological screening services, a condition of that contract must be that the contracted psychologist has, at minimum, the same professional credentials as that required of Department employees.

b. In addition to conducting the evaluations, processes should be in place to maintain standardization of procedures and the reliability/validity of the results. Peer review processes should include the review of psychological assessment of police officers. Peer consultation should also be available as needed to review assessment findings and recommendations.

c. Questions can be addressed to Keith Frost, Office of Security and Law Enforcement (202) 273-5544, Michael Hodgson, MD, MPH, Office of Public Health and Environmental Hazards, (202) 273-8353 or Robert Gresen, Ph.D., Mental Health Strategic Health Care Group, (414) 384-2000, Ext. 41652.



John H. Baffa

## Attachment 1

### HUMAN RELIABILITY STRUCTURED INTERVIEW

Neil S. Hibler, Ph.D., FAClinP

Examinee's Name: \_\_\_\_\_

Examinee for (Requesting Department/Agency/Firm): \_\_\_\_\_

Position Sought: \_\_\_\_\_

Date of Interview: \_\_\_\_\_ Date of Testing: \_\_\_\_\_ Interviewer: \_\_\_\_\_

### EDUCATION

Highest grade completed: (circle) 8 9 10 11 12 (HS/GED) 13 14 (Associate's) 15 16  
(Bachelor's) 17 (Master's) 18 19 (Doctorate)

Highest Degree (AA, BA, etc.): \_\_\_\_\_ Major: \_\_\_\_\_ Grad. Date: \_\_\_\_\_ Grades/GPA: \_\_\_\_\_

Source (Institution): \_\_\_\_\_

(Other) Degree: \_\_\_\_\_ Major: \_\_\_\_\_ Grad. Date: \_\_\_\_\_ Grades/GPA: \_\_\_\_\_

Technical training Certifications Military - Branch and Specialty Foreign Language

Proficiency (note type/source/date): \_\_\_\_\_

### EMPLOYMENT HISTORY

*Cover the past 10 years or 5 jobs, whichever comes first. If law enforcement/security, state if armed and/or sworn. If military service, list highest paygrade and specialty.*

Current Most recent job

Position Title (description): \_\_\_\_\_ (circle): Full-time Part-time

Employer (name of firm): \_\_\_\_\_ (location): \_\_\_\_\_

Dates of employment (month and year began): \_\_\_\_\_ (month and year ended): \_\_\_\_\_

Reason for leaving (if applicable): \_\_\_\_\_

Eligible for rehire (if applicable) yes no (if no, explain): \_\_\_\_\_

Remarks \_\_\_\_\_  
\_\_\_\_\_

(2) Next most recent job

Position Title (*description*): \_\_\_\_\_ (*circle*): Full time Part  
time

Employer (*name of firm*): \_\_\_\_\_ (*location*): \_\_\_\_\_

Dates of employment (*month and year began*): \_\_\_\_\_ (*month and year ended*): \_\_\_\_\_

Reason for leaving (*if applicable*): \_\_\_\_\_

Eligible for rehire (*if applicable*) yes no (*if no, explain*): \_\_\_\_\_

Remarks: \_\_\_\_\_  
\_\_\_\_\_

(3) Next most recent job

Position Title (*description*): \_\_\_\_\_ (*circle*): Full time Part  
time

Employer (*name of firm*): \_\_\_\_\_ (*location*): \_\_\_\_\_

Dates of employment (*month and year began*): \_\_\_\_\_ (*month and year ended*): \_\_\_\_\_

Reason for leaving (*if applicable*): \_\_\_\_\_

Eligible for rehire (*if applicable*) yes no (*if no, explain*): \_\_\_\_\_

Remarks: \_\_\_\_\_  
\_\_\_\_\_



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(4) Next most recent job

Position Title (*description*): \_\_\_\_\_ (*circle*): Full time Part  
time

Employer (*name of firm*): \_\_\_\_\_ (*location*): \_\_\_\_\_

Dates of employment (*month and year began*): \_\_\_\_\_ (*month and year ended*): \_\_\_\_\_

Reason for leaving (*if applicable*): \_\_\_\_\_

Eligible for rehire (*if applicable*) yes no (*if no, explain*): \_\_\_\_\_

Remarks: \_\_\_\_\_

(5) Next most recent job

Position Title (*description*): \_\_\_\_\_ (*circle*): Full time Part  
time

Employer (*name of firm*): \_\_\_\_\_ (*location*): \_\_\_\_\_

Dates of employment (*month and year began*): \_\_\_\_\_ (*month and year ended*): \_\_\_\_\_

Reason for leaving (*if applicable*): \_\_\_\_\_

Eligible for rehire (*if applicable*) yes no (*if no, explain*): \_\_\_\_\_

Remarks: \_\_\_\_\_

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Describe best job you've held? (*why*): \_\_\_\_\_

Describe the best supervisor you've had? (*why*): \_\_\_\_\_

Have you ever been fired from any job? no yes (*explain*): \_\_\_\_\_

Would you be eligible for re-hire in every job you have ever had? yes no (*explain*): \_\_\_\_\_

## PERSONAL/SOCIAL HISTORY

Age\_\_ Date of Birth: Month\_\_ Day\_\_ Year\_\_ Sex: M\_\_ F\_\_

Siblings (sex and age, note applicant's position in birth order): \_\_\_\_\_

Spent childhood with parents/other: \_\_\_\_\_ Location: \_\_\_\_\_

How are things going with your family now? \_\_\_\_\_

### Significant others

Describe the person who has been the greatest influence on your life? (*why*) \_\_\_\_\_

What has been the hardest time in your life? \_\_\_\_\_

What did you do/How did you handle that? \_\_\_\_\_

How are things in your personal life now? \_\_\_\_\_

3

The closest relationship you have with anyone *right now*? \_\_\_\_\_

The closest relationship you have *ever* had? \_\_\_\_\_

### **Marital Status:** (*Circle all that apply*):

Single - never married / Engaged (*date set*) \_\_\_\_\_ Married 1st 2nd 3rd, (\_\_\_\_ *years in current marriage*)

Divorced (\_\_\_\_ *times*) / Widow or Widower / Separated (*how long*?) \_\_\_\_\_

Children (*age, sex, who has custody*): \_\_\_\_\_

## HEALTH HISTORY

How is your health? \_\_\_\_\_

Hospitalizations? (admitted overnight to a medical facility) no yes (*if yes, explain*) \_\_\_\_\_

Serious injuries? no yes (*if yes, explain*) \_\_\_\_\_

Serious illnesses? no yes (*if yes, explain*) \_\_\_\_\_

Currently under a physician's care? no yes (if yes, explain): \_\_\_\_\_

Number (and reason) of absences from school (work) for any reason, during past year: \_

What care have you had with mental health professionals? (marital/family counselors, social workers, psychologists, psychiatrists and/or testing or evaluation for any purpose). \_\_\_\_\_

Have you ever experienced circumstances for which most people would seek mental health care (e.g. uncontrolled anxiety, depression or suicidal thoughts/acts or attempts to harm self or anyone else?) \_\_\_\_\_

What do you do to maintain your health? (e.g. diet, exercise-what kind, how much, how often) \_\_\_\_\_

What do you do for fun? \_\_\_\_\_

What alcoholic beverages do you drink? (e.g., beer, mixed drinks, etc.) \_\_\_\_\_

How often? (e.g., once a day, twice a week, etc.) \_\_\_\_ How much? (report a number, e.g., 1,2, 2 to 4, etc.) \_\_\_\_\_

(If "none") When was your last drink? (if there has been a recent drink, repeat the last two drinking questions) \_\_\_\_\_

When were you last drunk? (The interviewee's definition of "drunk" applies): \_\_\_\_\_

How often does that occur? (explain - e.g., once a week, month, etc.) \_\_\_\_\_

Ever in trouble while drinking? no yes (explain) \_\_\_\_\_

Is there any reason to believe there is a problem with your drinking behavior? No yes (explain) \_\_\_\_\_

What is your experience with...	No	Yes	Year of 1 <sup>st</sup> Use	Year of Last Use	Total number of uses
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Marijuana					
Hashish					
Cocaine					
Heroin					
Hallucinogens (LSD, Peyote, etc.)					
Inhalants (sniffing glue, nitrous oxide, etc.)					
Methamphetamine (Dexedrine, speed, etc.)					
Other peoples' prescription medications					
ANY other drugs of any kind					

Have you ever held drugs for others? (kept their stash) no yes (*explain*) \_\_\_\_\_

Have you ever sold drugs? No yes (*explain*) \_\_\_\_\_

### **SOCIAL INTERACTION AND RESPONSIBILITY**

Tell me about any automobile accidents you have had in which you were at fault (*give date/explain each, indicate if ticketed and/or sued or disciplined, begin with the most recent*): \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Tell me about any traffic tickets/citations you have ever had (*give date/type of citation1 speed involved if speeding, begin with the most recent*): \_\_\_\_\_

Concerning your credit history, have you...

had a debt sought by a collection agency? no yes (*explain – when, the amount, what the debt was for, why not paid*): \_\_\_\_\_

had purchases repossessed? no yes (*explain - when, what, why*): \_\_\_\_\_

declared bankruptcy? No yes (*explain - when, how much liquidated, what the debt was for, why*):

\_\_\_\_\_

Tell me about any lawsuits that have been made against you: no yes (*explain*) \_\_\_\_\_

When was your last fight (physical altercation, not argument that was NOT a line of duty incident)?

no yes (*explain any injury, disciplinary action, etc.*) \_\_\_\_\_

Have you ever been convicted of domestic violence (child/spouse abuse)? no yes (*explain*): \_\_\_\_\_

*Ask the next 3 questions only if law enforcement/security/military experience (circle "N/A " if applicant has never been eligible for arming on the job)*

**N/A**

Has the authority to be armed ever been denied/withdrawn? no yes (*explain when, why*):

\_\_\_\_\_

Have you received complaints for using excessive force (civil rights/brutality charges)? no yes (*explain when, why*): \_\_\_\_\_

Have you ever used deadly force? no yes (*explain when and state if reviewed/investigated and outcome of review*): \_\_\_\_\_

*Ask the remaining questions of all candidates*

Tell me about any disciplinary actions you have had:

in school: \_\_\_\_\_

at work: \_\_\_\_\_

Military (*if applicable*): Tell me about any administrative/nonjudicial actions you have had while in service (*includes Article 15's, going before the mast, courts martial and less than honorable discharge*): n/a no yes (*explain*): \_\_\_\_\_

Tell me about any arrests you have ever had: no yes (*give date/explain charge and outcome*): \_\_\_\_\_

### **SELF PERCEPTION**

What are your strengths?

What are your weaknesses? \_\_\_\_\_

Why do you want to be a *Police Officer*: \_\_\_\_\_

Why do you want to join (*name of department*) you have applied to? N/A \_\_\_\_\_

### **SPECIAL DUTY EVALUATIONS (ONLY)**

Why do you want to become (*special duty assignment*)? N/A \_\_\_\_\_

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INTERVIEWER'S SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

**FOR ALL EXAMINEES:**

***Review psychological test materials for completion and clarity***

***complete the final page at the time of the interview (summarizing findings and recording the initial recommendations).***

**SUMMARY REMARKS BY INTERVIEWER (FIVE RATING, A-F, FORMAT)**

GENERAL IMPRESSION: \_\_\_\_\_

Strengths: \_\_\_\_\_

Weaknesses: \_\_\_\_\_

INITIAL RECOMMENDATION OF PSYCHOLOGICAL SUITABILITY (*circle one*)

Highly Recommended (A) \_\_\_\_\_ Well Recommended (B) \_\_\_\_\_ Recommended (C) \_\_\_\_\_

Recommended with Reservation (D) (*explain*) \_\_\_\_\_

Not Recommended (F) (*explain*) \_\_\_\_\_

COMMENTS regarding training and on-the-job considerations:

Training: \_\_\_\_\_

Supervision: \_\_\_\_\_

OTHER REMARKS (*if any*): \_\_\_\_\_

**QUALITY ASSURANCE REVIEW (FILLED IN BY QUALITY ASSURANCE REVIEWER)**

Reviewer: \_\_\_\_\_

Concur in findings and recommendations: Yes No (*as amended*): \_\_\_\_\_

Reviewer Comments: \_\_\_\_\_

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Reviewer's signature: \_\_\_\_\_ Date: \_\_\_\_\_

**SUMMARY REMARKS BY INTERVIEWER (THREE RATING FORMAT)**

GENERAL IMPRESSION: \_\_\_\_\_

Strengths: \_\_\_\_\_

Weaknesses: \_\_\_\_\_

**INITIAL RECOMMENDATION OF PSYCHOLOGICAL SUITABILITY (*Check One*)**

Recommended

Recommended With Reservation (*explain all areas for the Department to consider further*)

NOT Recommended (*explain*) \_\_\_\_\_

COMMENTS regarding training and on-the-job considerations:

Training: \_\_\_\_\_

Supervision: \_\_\_\_\_

OTHER REMARKS (*if any*): \_\_\_\_\_

**QUALITY ASSURANCE REVIEW (FILL IN BY QUALITY ASSURANCE REVIEWER)**

Reviewer: \_\_\_\_\_

Concur in findings and recommendations: Yes No (as amended): \_\_\_\_\_

Reviewer Comments:

Reviewer's signature: \_\_\_\_\_ Date: \_\_\_\_\_



## Attachment 2

### Psychological Tests, Questionnaires and Structured Interviews

1. Tests, questionnaires and structured interviews described in this appendix have demonstrated utility in the assessment of law enforcement officials. As stated in the attached memorandum, the psychological assessment of VA police officers must evaluate both suitability and stability. In other words, objective assessments need to be made of both a) personality characteristics pertinent to the job requirements and b) psychological symptoms that could interfere with job performance. The following composite list was supplied by the Police Section of Division 18 (Psychologists in Public Service) of the American Psychological Association and/or by expert psychologists in the field and/or sold by the publisher as an instrument specifically developed for law enforcement officer screening. The listing is neither exhaustive nor prescriptive, but merely a listing of known measures that can be considered for use at individual sites. All listed tests have the option of computer scoring with a computer generated interpretative report. The ultimate choice of measures needs to be made locally based on appropriateness/relevance and compliance with criteria mandated within this policy.

#### 2. Recommended tests:

a. The California Psychological Inventory-434 (CPI) is one of the most frequently chosen psychological tests for entry level screening of police officers. It consists of 20 scales anchored in normal-range human behavior. The CPI is the basis for a special "Police and Public Safety Selection Report" authored by Dr. Michael Roberts and marketed by Consulting Psychologists Press. This report is based on normative data from over 50,000 public safety applicants (including over 5,000 women, and 5,000 each of African Americans and Hispanics); and over 10,000 incumbent officers. In addition, validation data summarized in each report indicates when an applicant's test data is similar to officers who have exhibited performance problems. A special section of the report lists items endorsed by the applicant that are both rarely endorsed, and significant in content that may be reviewed with the applicant in the interview.

b. The Clinical Analysis Questionnaire (CAQ) was developed to measure normal and pathological personality trait levels to provide a full, multidimensional profile of an individual. The test has 28 scales, 16 of which are the normal personality traits of the Sixteen Personality Factor Questionnaire (16PF). Seven scales measure various manifestations of depression and the remaining five scales reflect additional clinical manifestations identified through factor analysis. A Law Enforcement and Development Report (LEADR) is available as a separate entity through the Institute for Personality and Ability Testing, Inc.

c. The Hilson Public Safety Personal History Questionnaire is available from Hilson Research, Inc., which also holds the copyright for the Inwald Personality Inventory. This questionnaire was designed specifically for public safety/security officer applicants and provides information for follow-up. This brief questionnaire can be used in advance of the structured psychological interview, which is also provided by Hilson.

d. The Inwald Personality Inventory (IPI) has been utilized for over 20 years to screen applicants for high-risk occupations including law enforcement officers. This 310 item multi-faceted test measures five major factors covering both stability and suitability domains (Guardedness, Acting-Out Behavior Measures, Attitudes and Temperament, Internalized Conflict Measures and Interpersonal Conflict Measures. The publisher also offers two separate six test battery packages, one for applicants and the other for current officers.

e. The Minnesota Multiphasic Personality Inventory-2 (MMPI-2) is the 1989 revised version of the original MMPI. This 567-item personality inventory has been the most widely utilized instrument in clinical settings within VHA for many years. The instrument consists of three validity scales, nine clinical scales and numerous ancillary scales that have been empirically derived over many years of usage and study. The use of the MMPI for the screening of police officers is well documented in the literature (Graham, 1993). Virtually all of the research has shown the MMPI to be most effective through the identification of persons with elevated clinical scores. This measure would appear to be best suited as a measure of stability.

f. The Personality Assessment Inventory (PAI) consists of 22 scales and is intended to be an objective measure of important clinical variables. In this context, then, the test would be most likely utilized as a measure of stability. A special "Police and Public Safety Selection Report" based on normative data for police applicants is available through Psychological Assessment Resources, Inc. The report includes a profile of an applicant's scores against previously tested applicants of the same ethnic and sex group (Title VII requirement), as well as a profile based on aggregated applicant norms (1991 Civil Rights Act requirement).

g. The Personal History Questionnaire (PHQ) is an automated life history review developed specifically for use in evaluating police applicants. It has been administered to over 50,000 police and public safety officer applicants. It is an inventory of over 300 questions relevant to evaluating suitability for law enforcement work. Questionnaires of this nature serve as an adjunct to the structured psychological interview. In the specific case of the PHQ, a structured psychological interview report has been developed based on information provided by the applicant on the PHQ. These materials are available through Law Enforcement Psychological Services Inc.

h. The Sixteen Personality Factor Questionnaire (16PF) is a general measure of personality characteristics that has been used as a measure of suitability in the assessment of law enforcement officers. This 187-item test consists of fifteen scales representing Cattell's primary factor traits. This test does not have a specific scale or specialized report tailored to the assessment of police officers. However, it is the suitability component of the Clinical Analysis Questionnaire described above.

The CPI, MMPI-2, and PAI are all available within the VISTA Mental Health Package. However, none of the specialized scoring systems or reports for law enforcement personnel is included. At the present time, these specialized components are only available directly from the publisher through individual facility purchase.

### Attachment 3

#### INFORMED CONSENT (FOR PROSPECTIVE EMPLOYEE)

(sample)

I, (print your name here) \_\_\_\_\_ consent to participating in an evaluation to assess my psychological suitability for an assignment/job/career that requires human reliability. I acknowledge that I have received a conditional offer of employment from the Department of Veterans Affairs NA Maryland Health Care System (VAMHCS)/ Veterans Integrated Service Network (VISN) 5 in the Police and Security Service, who has requested this evaluation. I understand that employment with assignment to carry a firearm is, at least in part, contingent on successful completion of this evaluation. I also understand that this evaluation is just one of a number of elements used to assess candidates by the employer with which I seek employment. I understand that this evaluation will consist of taking psychological tests, meaning I will be answering questions in written examinations that will be scored to measure my psychological characteristics. Additionally, I understand that I will participate in a structured clinical interview; a licensed psychologist will ask me questions about my past experiences and may ask me about my responses to test questions in order to aid in test interpretation. I also realize that in responding to such questions I am expected to provide full and honest disclosure. It is further my understanding that the results of this psychological evaluation are time limited, meaning that the measure of my psychological characteristics may not be accurate at a later date and that all information I provide will be considered only for the purpose of reaching a hiring decision and conducting selection research. I also understand that my results may be used in validating the screening process and research in the development of psychological screening instruments, but if used in such research, my name will not be associated with my results or otherwise disclosed.

I consent to taking psychological tests and providing complete, honest answers in a structured clinical interview with a licensed psychologist. I fully understand that the identified client is the Department of Veterans Affairs/VAMHCS/VISN 5 who has requested this evaluation, not me. As such, if I agree to undergo this evaluation, the psychologist is not in any way obliged to maintain my confidentiality regarding test results, including interpretation, recommendations and my speaking with the psychologist. I do not have confidentiality. The evaluation results belong to the Department of Veterans Affairs (as the client), not to me. I release the psychologist(s) involved in this evaluation from any restrictions in disclosing evaluation data, findings or in sharing their opinions regarding my psychological suitability

with the employer processing my application for employment. I know that any/all information I share in the course of the psychological evaluation may be provided to the representatives of the Department of Veterans Affairs with which I seek employment.

Signature \_\_\_\_\_ Date \_\_\_\_\_



United States  
**Office of  
Personnel Management**

Washington, DC 20415-0001

In Reply Refer To:

Your Reference:

Mr. William Harper, Director  
Policy and Security Service  
Office of Security and Law Enforcement (07)  
810 Vermont Avenue NW  
Washington, DC 20420

JUN 19 2000

Dear Mr. Harper:

This letter is in response to your request regarding the use of written psychological assessment tools. Under your delegated examining authority, your agency has the flexibility to choose the assessments you will use for examining. As you noted in your letter, along with this flexibility comes agency responsibility to ensure that all assessments are valid predictors of success on the job. Therefore, we encourage you to work with a trained professional to develop and/or validate your written assessment procedure, as you indicated. As part of this process, you may want to refer to the *Delegated Examining Handbook*, which provides further information on professional and regulatory standards for test development and validation, including the *Uniform Guidelines on Employee Selection Procedures*. In addition to the hardcopy provided to your agency, the *Handbook* can be found on our website at <http://www.opm.gov/deu>.

If we may be of further assistance in this matter, please contact Cynthia Diane of my staff on 202-606-1696.

Sincerely,

A handwritten signature in cursive script, reading "Donna J. Gregory", is written over the typed name.

Donna J. Gregory, Director  
Nationwide Examining  
Policy Office

## OPM ADJUDICATION OF PSYCHIATRIC/PSYCHOLOGICAL CASES

Psychiatric/psychological objections to preference eligibles *must* be based on a clinical diagnosis made by an appropriately certified mental health professional. The clinical diagnosis may *or may not* be supported by the results of a test or tests of psychological functioning.

If the results of a test of psychological functioning do *not* provide clinical evidence that would lead to the diagnosing of a mental disorder or impairment, then they *are not* considered medical in nature. For example, findings of psychological tests that are used to measure personality and behavioral traits, temperaments, interests, attitudes, or similar elements, and are not used to diagnosis clinical mental disabilities *are not* a basis for a medical disqualification.

Agency objections to preference eligibles that are based *solely* on the results of a psychological screening test(s) without a supporting clinical diagnosis, *will not* be sustained and *will not* be processed as a medical objection.

Any medical objection submitted to OPM that is based on mental health reasons must be consistent with the diagnostic criteria as outlined in the *Diagnostic and Statistical Manual of Mental Disorders, DSM-IV*, published by the American Psychiatric Association, and should include the results of a multi-axial assessment. —

According to the *Diagnostic and Statistical Manual of Mental Disorders, DSM-IV*, the purpose of a multi-axial assessment "facilitates comprehensive and systematic evaluation with attention to the various mental disorders and general medical conditions, psychosocial and environmental problems, and level of functioning that might be overlooked if the focus were on assessing a single presenting problem."

Mental health professionals who elect not to use the multi-axial system, must still follow *Diagnostic and Statistical Manual of Mental Disorders, DSM-IV*, guidelines for reporting the results of a *DSM-IV* assessment.

For further discussion of OPM's adjudication of psychiatric/psychological referrals, see Attachment B.

If you have any questions on these subjects please contact J.C. Phillip Spottswood, Staffing Reinvention Office, Employment Service on:  
Telephone: 202-606-1389  
E-mail: [jcspotsw@opm.gov](mailto:jcspotsw@opm.gov)  
Fax: 202-606-0390

## **PRE-EMPLOYMENT DRUG SCREENING**

This attachment discusses the role of the United States Office of Personnel Management (OPM) in the adjudication of medical objections to preference eligibles who test positive on a pre-employment drug screen. We hope this discussion will be useful in understanding OPM procedures for preference eligibles and clarifying how agency responsibilities differ for non-preference eligibles.

Several agencies with positions in such fields as medicine and health, law enforcement and national security are requiring applicants as part of the pre-employment medical clearance process to undergo drug testing (urinalysis) to determine the presence of illegal drugs.

Agency objections to preference eligibles which are based on the results of a verified confirmed positive pre-employment drug screen should be considered as medical disqualifications or passovers and referred to OPM for adjudication. They should not be processed as suitability cases.

Situations in which applicants refuse or ignore the requirement to take a pre-employment drug test are to be handled as declinations.

Please note that OPM decides pre-employment drug cases submitted to us as medical objections on the basis of the urinalysis results alone. If a confirmatory test proves positive, we will sustain the objection. This approach differs from our usual handling of medical objections in which the employment history, supporting medical documentation, position description, results of OPM or Agency investigation reports, and related materials are thoroughly analyzed to determine whether applicants are capable or carrying out the full range of duties of the position without endangering themselves or others.

In adjudicating medical cases involving illegal drug use OPM requires a Medical Review Officer's (MRO) certification of a verified confirmed positive drug test result. As long as the MRO certifies to the agency that he or she has *verified* the confirmed positive test result and provides information on the type of test(s) used, OPM does not require the actual drug test results and accompanying Chain-Of-Custody (COC) documentation. An MRO verification is necessary to establish that the drug test result is accurate and not the result of legitimate drug use or some other medically supportable cause.

According to *The Mandatory Guidelines for Federal Workplace Drug Testing Programs*, April 11, 1988, Federal Register, Vol. 53, No. 69, Page 11970, prepared by the Department of Health and Human Services, Alcohol, Drug Abuse, and Mental Health Administration, "The Medical Review Officer may be an agency or contract employee who is a licensed physician with knowledge of substance abuse disorders." The role of the MRO is to review and interpret positive drug test results obtained through the agency's testing program. In the conduct of this responsibility, the MRO should undertake the examination of alternate medical explanations for a positive test result.

## **OPM ADJUDICATION OF PSYCHIATRIC/PSYCHOLOGICAL CASES**

This attachment discusses OPM's role in the adjudication of psychiatric suitability referrals, provides an understanding of the procedures and provides guidance used in evaluating these types of cases.

Please note that OPM regulations governing the use of medical examinations (5 CFR 339 *Medical Qualification Determinations*) severely restrict the use of psychiatric/psychological assessments as a means of determining qualifications for federal employment. A psychiatric/psychological assessment is permissible *only* when it is specifically required as part of an OPM approved medical standard, or where a medical doctor who is otherwise authorized to conduct a medical examination believes a psychiatric assessment is indicated.

Psychiatric Suitability Referrals submitted to OPM usually contain Agency Investigation Reports, application materials and some form of medical examination results or records for a medical history. The medical psychiatric records normally fall into one of the following categories:

1. The record includes evidence that the applicant is currently under treatment for a psychiatric or behavior disorder, that may or may not require medication.
2. The record includes evidence that the applicant has been treated in the recent past for a psychiatric or behavior disorder, but is no longer under treatment.
3. The record includes evidence that the applicant has been treated in the distant past for a psychiatric disorder, and also includes results of a recent psychiatric evaluation that concludes while there is no present condition warranting treatment, the type of behavior manifested in the past is still evident.
4. The record includes no evidence of present or past treatment, but does include results of a current psychiatric evaluation that identifies a specific psychiatric condition or behavior disorder which may affect job performance.
5. The record includes evidence that the applicant has been treated in the distant past for psychiatric disorder, and may include results of a recent psychiatric evaluation showing no current significant psychiatric or behavioral problem.
6. The record includes no evidence of present or past treatment, but does include results of a current psychiatric/psychological evaluation that does not identify a specific psychiatric condition as outlined in the *Diagnostic and Statistical Manual of Mental Disorders, DSM- IV*, published by the American Psychiatric Association, Washington, D.C., and cites specific behavior and personality tendencies which may affect job performance.



7. The record includes no evidence of present or past treatment, but does include the results of a test or tests of psychological functioning that does not support a clinical diagnosis *per se* of a mental health condition or impairment.

Psychiatric/psychological case records in categories 1- 4 above are generally straight forward. We evaluate these cases in conjunction with the applicant's past/present work history to determine whether the psychiatric/psychological condition is likely to adversely affect safe and efficient job performance.

Psychiatric case records in category 5 above is based on *history* alone, and *cannot* be easily handled as a medical objection unless there is a medical standard which specifically addresses the question of past psychiatric history. Generally, our view is that evidence of past psychiatric history is not critical to the decision to hire, and the question of other types of suitability issues would take precedence.

Psychiatric case records in categories 6 and 7 above are problematic in that they generally provide no basis to consider a medical disqualification.

#### OPM Decision Criteria

Psychiatric/psychological cases are very complex and require an extensive evaluation that cannot be accomplished by using *only* the results of a psychological screening test(s).

Before reaching a conclusion about whether or not the medical objection is warranted, OPM evaluates the nature and extent of the applicant's psychiatric/psychological condition, medication requirements, its duration, the duties and requirements of the job (i.e., safety sensitive and safety critical jobs, law enforcement, fire fighter, individuals holding security clearances, etc.), and the applicant's past and present work history (especially during the period covered by the psychiatric/psychological condition). Even in cases where a physical/medical standard has been approved that explicitly provides for disqualification on the basis of a psychiatric condition, further analysis is required to determine if that blanket disqualification can be sustained under the provisions and guidance contained in 5 CFR 339 *Medical Qualification Determinations*, ADA, EEOC, and the Rehabilitation Act of 1973.

Any mental health diagnosis must be consistent with the diagnostic criteria as outlined in the *Diagnostic and Statistical Manual of Mental Disorders, DSM-IV*, and should include the results of a multi-axial assessment.

Additionally, some cases may require a neuropsychological evaluation to determine whether or not there are any alterations in cognitive functioning (long/short term memory problems, impaired judgment, ability to process information, reaction time, etc.) that may adversely affect safe and efficient job performance.

In summary, OPM is committed to ensuring that: (1) medical standards and physical requirements relating to the employment of individuals with mental health problems are applied reasonably and fairly; and (2) individuals who have fully recovered or whose mental health symptoms are controlled by various therapeutic and treatment plans are not discriminated against, or treated differently from those individuals suffering from other medical and physical illnesses. This effort is further supported by the significant advances in medicine, research, and treatment that allows individuals with mental health problems to make a significant contribution to federal employment.

If you have any questions on this subject please contact J.C. Phillip Spottswood,  
Staffing Reinvention Office, Employment Service on:

Telephone: 202-606-1389

E-mail: [jcspotsw@opm.gov](mailto:jcspotsw@opm.gov)

Fax: 202-606-0390