



May 31, 2010

The Honorable Daniel K. Akaka
Chairman
Subcommittee on Oversight of Government
Management, the Federal Workforce, and the
District of Columbia
Committee on Homeland Security and Governmental Affairs
United States Senate
Washington, DC 20510

Dear Chairman Akaka:

We are writing to update you on the coordination efforts among the Office of Management and Budget, the Office of Personnel Management, the Department of Defense, Office of the Director of National Intelligence, and the Government Accountability Office (GAO) related to the development of quality metrics for security clearance investigations and adjudications. As you are aware, GAO first raised concerns about quality in the security clearance process in its 2007 *High-Risk Series: An Update*. Over the past few years, we have been working collaboratively to address this high-risk issue.

Since the briefing that you held on March 17, 2010 with members of your subcommittee, following the reform leaders' February release of the *Security and Suitability Process Reform Strategic Framework*, we have met to share ideas regarding quality performance measures for clearance investigations and adjudications. As a result of these discussions, leaders of the reform effort are taking intentional steps to develop quality measures and to address the high-risk issue. GAO views these steps as positive.

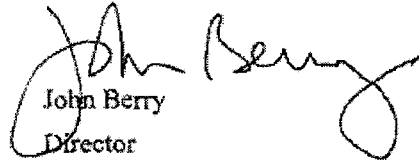
Collectively, we believe that the quality measures being developed by reform leaders (summary attached) identify specific quantifiable targets linked to goals that are intended to be measured objectively and will ultimately be used by leaders and others to gauge progress and assess the quality of the personnel security clearance process. Given the role of the executive branch and the need for GAO to remain independent in carrying out its auditing responsibilities, decisions related to performance measures and their effective implementation are fundamentally an executive branch management responsibility.

We appreciate your continued interest in the personnel security clearance process and look forward to continued cooperation and coordination of effort among all of our agencies.

Sincerely,



Jeffrey Zients
Deputy Director for Management
Office of Management and Budget



John Berry
Director
Office of Personnel Management



James Clapper
Under Secretary of Defense for Intelligence
Department of Defense



David Shedd
Deputy Director of National Intelligence for
Policy, Plans and Requirements
Office of the Director for National Intelligence



Gene L. Dodaro
Acting Comptroller General
U.S. Government Accountability Office

cc:
The Honorable George V. Voinovich
Ranking Member

ATTACHMENT: REFORM EFFORT QUALITY PERFORMANCE MEASURES

To ensure the quality measures support reform desired outcomes, the Strategic Framework document prescribed performance measures and results-oriented targets for reform activities with objectives tied directly to each strategic goal such as timeliness and reciprocity. While certain overall quality requirements such as timeliness and reciprocity were set forth in the Intelligence Reform and Terrorism Prevention Act of 2004, and the Reform Effort set and communicated the initial performance goals for the Validate Need and eApplication modules of the reformed approach in their Initial Implementation Plan (IIP) dated November 2009, additional quality measures have been developed to enhance/enable the prevention, detection and oversight of investigative and adjudicative products. The attached updated quality performance measures will be communicated through Executive Branch-wide reform effort meetings, updates to the IIP and on shared collaborative websites.

In order to maintain the leadership commitment necessary to implement and sustain quality, the Suitability and Security Executive Agents will execute their EO 13467 assigned oversight responsibilities through the Performance Accountability Council (PAC) through the collection and analysis of the attached quality measures, quarterly reported agency measures and on-site assessments of agency personnel programs.

The attached spreadsheet outlines 17 specific benchmarks and targets that describe the detailed collection methods and oversight techniques necessary to measure quality and our progress towards reaching our quality goals. Twelve of those measures are being used currently and an additional five will be in use by the end of this calendar year. In addition, the spreadsheet outlines additional quality activity (not quantitatively based) that also supports reform quality goals.

The objective describes the standards used to reach the over-arching goal and the metric outlines how the success of the objective is measured. The chart also indicates which organization is responsible for the metric/objective. The collection column shows where and how that metric is obtained. The quality baseline represents the time period that was used to establish the baseline and the goals are outlined for the current and next calendar year. The final column indicates if the objective and metric is currently in place or is a future enhancement. In addition to the Quality Performance Measures, the "Activities" narrative explains how the measures will be used to detect or prevent errors and/or support quality oversight objectives, and includes an overview of other quality activities that are not quantitative in nature, but are critical to the overall quality program.

| REFORM EFFORT QUALITY PERFORMANCE MEASURES | | | | | | | |
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| OBJECTIVE | METRIC | RESP. ORG | COLLECTION VENUE/ METHOD | BASELINE | CY 2010 GOAL | CY 2011 GOAL | CURRENT OR FUTURE |
| INVESTIGATIVE QUALITY METRICS AND ACTIVITIES | | | | | | | |
| Quality Reports of Investigation: Complete and thorough reports of investigation | Multiple Metrics (Percentage of investigations determined to be deficient due to errors in investigation processing - See below) | OPM FIS | Multiple (see below) | FY09 0.1% | <1% | <1% | C |
| | Percent of investigations returned from CAF for re-work | OPM | OPM PIPS | | | | C |
| | Percent of investigations identified for rework from OPM's web-based Quality Assessment Tool | OPM | OPM PIPS/ Quality Tool | | | | C |
| | Percent of investigations with deficiencies from DoD's RAISE Tool | DoD | DoD RAISE | | | | F (2 nd qtr CY10) |
| | Percent of investigations reported as deficient to OPM quality hotline from CAF Adjudicators | OPM | OPM FID Quality Hotline | | | | C |
| <p>Investigative Quality Activities: As provided above, a number of metrics for investigative quality will be collected and combined to measure progress towards the target of 99% complete reports of investigation. Measuring the percentage of investigations returned from CAF for re-work; investigations deficient for adjudication purposes as identified using OPM's web-based Quality Assessment Tool and DoD's RAISE Tool; and Adjudicator calls to OPM quality hotline attributed to deficiencies in reports, will all individually be used to detect and correct errors. As collective data points, these measure totals provide data to inform targeted process improvements or adjustments needed to minimize investigative deficiencies. The trends data from these measures can also be used to demonstrate if the process improvements have had a beneficial effect on the overall quality demonstrated by diminishing percent of identified deficiencies.</p> <p>In addition to the quality metrics/measures outlined above, the investigation program includes the following quality activities:</p> <ul style="list-style-type: none"> Quality Assurance reviews by OPM personnel prior to agency delivery Additional in-depth random sampling quality reviews OPM validation of information gathered by investigator through their integrity assurance re-contacts of source program <p>Further, there are a number of metrics which act as indicators for investigative quality including:</p> <ul style="list-style-type: none"> Adjudicator satisfaction survey results as to the quality and content of investigative reports Percentage of compliant reports as randomly sampled and reviewed during Security Executive Agent on-site agency assessments | | | | | | | |

*A deficient investigative report is defined as one that does not document that reason for missing required elements. Deficiency reporting from RAISE will be reviewed by the Security Executive Agent prior to publication.

| REFORM EFFORT QUALITY PERFORMANCE MEASURES | | | | | | | |
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| OBJECTIVE | METRIC | RESP. ORG | COLLECTION VENUE/METHOD | BASELINE | CY 2010 GOAL | CY 2011 GOAL | CURRENT OR FUTURE |
| ADJUDICATIVE QUALITY METRICS AND ACTIVITIES | | | | | | | |
| Quality Adjudicative Determinations. Complete and thoroughly documented rationale for each adjudicative determination (includes identification and documentation of disqualifying/mitigating information, or missing investigative information.) | Percentage of files that meet 2009 DoD adjudicative documentation standard | DoD | DoD OUSD(I)/ Reviewed through RADAR | 63% in 2008 | 90% | 95% | F (3 rd qtr CY10) |
| | Percentage of files that meet 2009 DoD adjudicative documentation standard as sampled during oversight audits | DoD | CAF Internal Quality Oversight-Audit reviews and reports to OUSD(I) | N/A | 90% | 95% | C |
| Training to provide quality through consistently applied rationale and documentation | Percent of adjudications reviewed and approved by certified adjudicators | DoD | DoD OUSD(I) Security Directorate | N/A | N/A | 100% | F (1 st qtr CY11) |
| | Percent of certified adjudicators | DoD | DoD OUSD(I) Security Directorate | Certification process will begin NLT 2010 | 50% | 90% | F (4 th qtr CY10) |

REFORM EFFORT QUALITY PERFORMANCE MEASURES

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|-----------|--------|--------------|--------------------------------|----------|--------------------|--------------------|-------------------------|
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ADJUDICATIVE QUALITY METRICS AND ACTIVITIES

Adjudicative Quality Activities: As provided above, the percentage of files that meet 2009 DoD adjudicative documentation standards. These measures provide data to inform targeted process improvements or adjustments needed to minimize investigative report and adjudicative determination documentation deficiencies. The trends data from these measures will also be used to demonstrate if the process improvements have a beneficial effect on the overall quality. The percentage of adjudications reviewed and approved by certified adjudicators is an indicator of increased consistency in the rationale and documentation of decisions. Increasing the percentage of certified adjudicator will improve overall consistency and accuracy.

Trend analysis of adjudicative timeliness may improve quality by alerting adjudicative agencies of the possible need to adjust case distribution based on volume and complexity. This measure facilitates focused oversight when goals are not met which could prompt additional resources and prioritization.

In addition to the quality metrics/measures outlined above, adjudication programs promote quality determinations through:

- Multi- level review of adjudications with issues
- Final determinations when issues are present by highly experienced adjudicators
- Adjudicator Peer-reviews

Further, there are a number of metrics which act as indicators for investigative quality including:

- Individual Adjudicator workload reports

Personnel Security Appeals Board reviews. Additionally, the Performance Accountability Council Measurement and Management Subcommittee (PMMS) is exploring methods for measuring adjudicative performance through review of RADAR results.

REFORM EFFORT QUALITY PERFORMANCE MEASURES

| OBJECTIVE | METRIC | RESP. ORG | COLLECTION VENUE/ METHOD | BASELINE | CY 2010 GOAL | CY 2011 GOAL | CURRENT OR FUTURE |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------|--------------------|-------------------------|
| RECIPROCITY & AUTOMATION QUALITY METRICS AND ACTIVITIES | | | | | | | |
| <p>Validate Need: Eliminate unnecessary investigations through a check of the centralized repository for the existence of a prior and sufficient investigation and/or adjudication.</p> | <p>The number/percentage of investigations requested from OPM that are not required and are rejected (previous investigation information available via CVS)</p> | <p>OPM</p> | <p>Personnel Investigations Processing System (PIPS) and Dashboard via Monthly & Quarterly Agency Oversight Reports</p> | <p>FY09 6,159 (or 0.6%)</p> | <p><0.5%</p> | <p><0.3%</p> | <p>C</p> |
| | <p>Average percentage of cases for which prior CVS checks are conducted as reported by executive branch agencies</p> | <p>JRT/ All</p> | <p>Quarterly Agency Reporting via Milestone Template</p> | <p>74%</p> | <p>90%</p> | <p>95%</p> | <p>C</p> |
| <p>eApplication: Expand use of OPM's e-QIP for improved quality and timeliness gained by using discrete, data fields for consistency & accuracy and reduced submission times by enabling end-to-end automation</p> | <p>Percent of applications submitted using eQIP</p> | <p>OPM</p> | <p>OPM PIPs Monthly and Quarterly Agency Reports</p> | <p>96%</p> | <p>98%</p> | <p>98%</p> | <p>C</p> |
| | <p>Number of electronic applications submitted by applicant, but rejected by OPM as unacceptable due to missing information or forms (fingerprint or releases)</p> | <p>OPM</p> | <p>OPM PIPs Monthly and Quarterly Agency Reports</p> | <p>9%</p> | <p><5%</p> | <p><5%</p> | <p>C</p> |
| | <p>Percentage of fingerprint submissions determined to be "unclassifiable" by the FBI</p> | <p>OPM</p> | <p>OPM PIPs Monthly and Quarterly Agency Reports</p> | <p>7%</p> | <p><7%</p> | <p><7%</p> | <p>C</p> |

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|-----------|--------|--------------|--------------------------------|----------|--------------------|--------------------|-------------------------|
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RECIPROCITY & AUTOMATION QUALITY METRICS AND ACTIVITIES (CONT.)

Reciprocity (Validate Need) Quality Activities: For the processes to validate need to enhance reciprocity, knowing the number/percentage of investigations requested from OPM that are not required and are rejected (previous investigation information available via CVS), and the average percentage of cases for which prior CVS checks are conducted as reported by executive branch agencies are both measures that permit agencies to immediately know if they are properly trending to improve reciprocity demonstrations or if a flag should go up alerting that a particular agency may need to correct procedures to improve their up-front validation processes. This measure facilitates focused oversight when goals are not met which could prompt additional resources and prioritization in impacted agencies.

Two additional future measures that are indicators of the health of the reciprocity initiative are:

- the number of reported, validated failures to accept an existing, sufficient clearance to the DNI Security Executive Agent Hotline, and
- the number of accesses granted based on an Agency's acceptance of an existing, sufficient investigations as reported quarterly to the DNI Security Executive Agent.

e-Application Quality Activities: Finally, for the processes used to request investigations, the e-QIP system electronically validates data at the time of entry to prevent data errors to the extent possible. Knowing the percent of Agencies (or applications submitted, i.e. "volume") using e-QIP facilitates focused oversight when continued improvements are not demonstrated. Knowing the number of electronic applications submitted by applicant, but rejected by OPM as unacceptable due to missing information or forms (fingerprint or releases), and the percentage of fingerprint submissions determined to be "unclassifiable" by the FBI, provides detection to permit correction. These data points provide agencies with specific information on failures so they can address with education and training. Overall reports on agency use of automation in the investigation request processes have the benefit of review by the OMB chaired Performance Accountability Council and other cabinet level program managers.

Additionally, the Performance Accountability Council Management and Metrics Subcommittee (PMMS) is exploring methods for measuring the time it takes to "initiate" and submit applications for investigation to provide an accurate measure of end-to-end timeliness from the applicants perspective.

REFORM EFFORT QUALITY PERFORMANCE MEASURES

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| TIMELINESS METRICS | | | | | | | |
| Timeliness of investigations meets IRTPA requirements for 40 days or less investigative time for fastest 90% of cases | Average number of days investigation required for fastest 90% of initial cases | DNI Sec. Exec. Agent | Quarterly Agency Reports to DNI Special Security Center | 42 days (as of 4Q 09) | 40 | 40 or less | C |
| Timeliness of adjudications meets IRTPA requirements for 20 days or less investigative time for fastest 90% of cases | Average number of days adjudication for fastest 90% of initial cases | DNI Sec. Exec. Agent | Quarterly Agency Reports to DNI Special Security Center | 26 days (as of 4Q 09) | 20 | 20 or less | C |