



# SECURITY AND SUITABILITY PROCESS REFORM

## *STRATEGIC FRAMEWORK*

FEBRUARY 2010

## SECURITY AND SUITABILITY REFORM

As requested in your letter of September 24, 2009 we are pleased to forward a comprehensive Strategic Framework including a Strategic Communications Plan that articulates the goals of security clearance reforms across the federal government. The Strategic Framework sets forth a mission and strategic goals, performance measures, a communications strategy, roles and responsibilities, and metrics to measure the quality of security clearance investigations and adjudications.

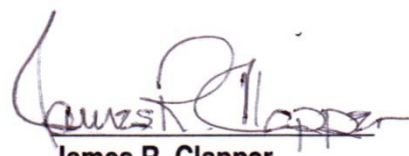
The annual reporting requirement mandated under Title III of the [Intelligence Reform and Terrorism Prevention Act of 2004](#) (IRTPA), which is also the statutory basis for security and suitability reform, requires the Office of Management and Budget (OMB) to report key measurements as to timeliness of the security clearance process in February of each year through 2011. It specifically requires those reports to include the average number of days for the investigation and for the adjudication elements of the clearance process towards increasingly more timely goals set for each year through December 2009. The Government Accountability Office (GAO) has further recommended that additional measures such as the average processing time for 100% (vice 90% as IRTPA requires) of the investigations and adjudications as well as the "end-to-end" processing time be reported to Congress as part of the annual reporting requirements in order to provide deeper insight as to progress on reform capability development and implementation within agencies.

To satisfy IRTPA's Title III reporting requirements, the 2009 Annual Report is appended to this Strategic Framework document as Attachment B. For 2009, this IRTPA Annual Report includes currently available metrics in addition to the statutorily-required measures in support of GAO's recommendations. Please note that the Strategic Framework, Section E outlines the full body of measurements that will be used to gauge reform module implementation progress, provide more fidelity into the processing time for distinct steps of the security and suitability process, and measure quality of the design and its implementation as additional reforms are implemented in 2010 and beyond.


We appreciate your continued support in our effort, welcome your comments on this Strategic Framework and look forward to opportunities to discuss the progress we have made toward clearance reform.



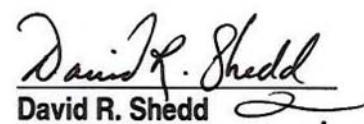
**Jeffrey Zients**  
Deputy Director for Management  
Office of Management and Budget



**James R. Clapper**  
Under Secretary of Defense  
for Intelligence  
Department of Defense



**John Berry**  
Director, Office of Personnel Management



**David R. Shedd**  
Deputy Director of National  
Intelligence for Policy, Plans and  
Requirements

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## INTRODUCTION

The Suitability and Security Clearance Reform Effort (“Reform Effort”) organizes and drives Executive Branch efforts to improve the timeliness, efficiency and quality of the United States (U.S.) Government’s personnel security and suitability determination processes.

The [Intelligence Reform and Terrorism Prevention Act of 2004](#) (IRTPA) <sup>1</sup> challenged the federal government to address longstanding problems with the timeliness and coordination of the process for granting national security clearances. The leadership of the Executive Branch entities primarily responsible for enterprise performance of these processes - the Office of Management and Budget (OMB), the Office of the Director of National Intelligence (ODNI), the Office of Personnel Management (OPM), and the Department of Defense (DOD) – continue to direct deliberate and collaborative action to ensure the goals of IRTPA are met. The policy and performance needs of reform were set forth in [Executive Order \(EO\) 13467](#), which calls for greater alignment of the processes for determining suitability for Federal employment, fitness to work on Government contracts, eligibility for access to classified information or for sensitive national security positions, and eligibility for access to federally controlled facilities and information systems, under the leadership of the Performance Accountability Council (PAC), which manages the Reform Effort. The PAC, chaired by the Deputy Director for Management, OMB, is accountable to the President to ensure coordination across the Federal Government, to align processes to the extent possible, drive reform efforts, and oversee implementation of reform.

Significant progress on overall initiatives to meet requirements of IRTPA has been made, not only through the use of additional resources but also through improvements in policy, processes, and information technology (IT). Initial Reform Effort capabilities such as OPM enhancements to its Central Verification System (CVS) provide a “single search” capability between the two major government clearance repositories: CVS and DOD’s Joint Personnel Adjudication System (JPAS). As part of the Reform Effort’s Validate Need approach, this single search initiative effectively provides access to approximately 90% of the investigative records across government thereby promoting reciprocity and reducing unnecessary investigation requests.

Timeliness has greatly improved over the past five years. In November 2005, Top Secret investigations were completed in an average of 314 days with only 8% being completed within 90 days; currently, 90% are completed within 71 days. In November 2005, Secret and Confidential investigations were completed in an average of 153 days with 44% completed within 90 days; currently 90% are completed within 34 days. The decades-old backlog of investigations, which as recently as October 2006 stood at almost 100,000 cases, has been eliminated.

Eliminating the backlog and achieving acceptable timeliness required changes to antiquated systems, processes and policies. IT initiatives that helped to reach these milestones included transformation of both DOD and OPM systems that support investigations and adjudications. Some of the more significant changes included: DoD’s implementation of its Case Adjudication Tracking System (CATS), which contributed to process and timeliness improvements for security cases by providing electronic receipt from OPM, electronic sorting, prioritization, and adjudication of non-issue, Secret level clearances; greater numbers of agencies moving to electronic submission of investigation requests; use of digital capture and electronic transmission of fingerprints; and OPM’s establishment of additional electronic record exchanges with Federal, state and local entities. As a result, metrics from the last quarter of fiscal year 2009 showed processing times meeting the 2009 IRTPA requirements, with OPM completing, on average, 90% of initial investigations in 39 days.

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<sup>1</sup> [Pub. L. No. 108-458, § 3001](#) (2004).

The progress realized thus far has heralded significant strides in efficiency, cost savings, and productivity. In the Government Accountability Office's (GAO) report GAO-04-344,<sup>2</sup> GAO referenced their 1981 estimation that the DOD investigations backlog alone could cost nearly \$1 billion per year in lost productivity. More than a decade later, the Joint Security Commission report noted that the costs directly attributable to investigative delays in Fiscal Year 1994 could be as high as several billion dollars because workers were unable to perform their jobs while awaiting a clearance. With the elimination of the backlog and the current timeliness of investigations, the associated threats to security and efficiency recognized when the IRTPA legislation was enacted have been reduced. Although significant progress has been made, additional reforms are necessary to achieve long-term sustainable performance.

This Strategic Framework documents all aspects of the Reform Effort, including its mission, strategic goals, desired outcomes, and a results-oriented method for measuring performance towards those goals.

## A. MISSION STATEMENT

*Reform Security and Suitability processes to gain timeliness, reciprocity, quality and cost efficiencies, to the extent possible, through design and implementation of a secure, end-to-end automated information technology capability that electronically collects, reviews, and shares relevant personnel data government-wide, guided by relevant Executive Orders to deliver and maintain a Federal and contractor workforce that is appropriately vetted for employment and access.*

### A.1. STATUTORY AUTHORITY FOR REFORM EFFORT

Security and Suitability Reform Efforts are driven by relevant statutory guidance, as well as Presidential direction and Congressional oversight. They include:

**Intelligence Reform and Terrorism Prevention Act of 2004.** IRTPA mandates:

- **Reciprocity.**<sup>3</sup> All security clearance background investigations and determinations completed by an authorized investigative agency or authorized adjudicative agency shall be transferable and accepted by all other agencies to meet equivalent or lesser investigative or adjudicative requirements.
- **Integrated Database.**<sup>4</sup> The Director of OPM shall, in cooperation with other authorities, not later than 12 months from IRTPA's enactment, establish and commence operating an integrated, secure, database into which appropriate data relevant to the granting, denial or revocation of security or access is entered from all authorized investigative and adjudicative agencies.
- **Leveraging Information Technology (IT).**<sup>5</sup> Evaluate use of available IT and databases to expedite the timeliness of the investigative and adjudicative processes.
- **Timeliness.**<sup>6</sup> By December 2009, 90% of determinations shall be made within an average of 60 days end-to-end (40 days for investigations, 20 days for adjudications).

While IRTPA served as a solid statutory platform from which to launch necessary Reform Efforts, additional requirements and authorities were needed to drive reform across the federal enterprise. Executive Orders [13467](#) and [13488](#) further expand on IRTPA by forming the Performance Accountability Council, designating Suitability and Security Executive Agents, establishing responsibility for policies and procedures related to eligibility for logical and physical access, and providing a framework for reciprocity when agencies make determinations of fitness.

### A.2. EXECUTIVE GUIDANCE ON SECURITY AND SUITABILITY REFORM

**Executive Order 13467.**<sup>7</sup> In addition to establishing an Executive Branch policy on alignment, EO 13467 expanded on IRTPA requirements to further align and guide reform efforts within Government:

<sup>2</sup> [GAO-04-344](#), *DOD Personnel Clearances: DOD Needs to Overcome Impediments to Eliminating Backlog and Determining Its Size*, (Washington, D.C.: February 24, 2004).

<sup>3</sup> [IRTPA](#), §3001(d) Reciprocity of Security Clearance and Access Determinations

<sup>4</sup> [IRTPA](#), §3001(e) Database on Security Clearances

<sup>5</sup> [IRTPA](#), §3001(f) Evaluation of Use of Available Technology in Clearance Investigations and Adjudications

<sup>6</sup> [IRTPA](#), §3001(g) Reduction in Length of Personnel Security Clearance

- **Reciprocity between Security and Suitability.** Establish reciprocity not only between agencies for security clearances, but also between security clearance and suitability determination investigations to the extent possible to reduce unnecessary investigations when individuals move between positions in the federal and contract workforce.
- **Security and Suitability Alignment.** Align the suitability investigation and determination processes for Government employment suitability, contractor employee fitness, and security clearances, to the extent possible, to gain further efficiencies by reducing the number of investigation types and agency-unique adjudication criteria thereby enabling “one system” to serve both needs.

EO 13467 established the leadership structure for Security and Suitability reform headed by the Performance Accountability Council as the entity responsible for aligning security and suitability, holding agencies accountable for implementation, and overseeing progress towards the reformed vision. This order also designated the Director of National Intelligence as the Security Executive Agent and the Director of OPM as the Suitability Executive Agent responsible for developing and ensuring implementation of reformed policies and processes. Details on the management roles and responsibilities of the individuals designated to lead this reform effort are provided in Section G of this report.

- **End-to-End Automation.** In accordance with Section 2.1 of EO 13467, the aligned system shall employ updated and consistent standards and methods, enable innovations with enterprise IT capabilities and end-to-end automation, to the extent practicable, and ensure that relevant information maintained by agencies can be accessed and shared rapidly across the Executive Branch, while protecting national security, protecting privacy-related information, ensuring resulting decisions are in the national interest, and providing the Federal Government with an effective workforce. As defined by EO 13467, “end-to-end automation” means an Executive Branch-wide, federated capability that uses automation to manage and monitor cases and maintain relevant documentation of the security or suitability application, investigation, adjudication, and continuous evaluation processes.
- **Continuous Evaluation (CE).** EO 13467 amended [EO 12968](#) by requiring that “an individual who has been determined to be eligible for, or who currently has access to classified information, shall be subject to continuous evaluation under standards (including, but not limited to, the frequency of such evaluation) as determined by the Director of National Intelligence.”

**Executive Order 13488.**<sup>8</sup> EO 13488 provides for:

- **Reciprocity for Prior Fitness or Suitability Determinations.** With certain exceptions, EO 13488 mandates, for excepted service and contract employment, reciprocal recognition of prior favorable fitness and suitability determinations when determinations are based on OPM suitability criteria as outlined in 5 CFR part 731 (or equivalent criteria).
- **Periodic Reinvestigation Requirement for Positions of Public Trust.** Instituted reinvestigation for individuals in Positions of Public Trust (standards and frequency as set by Director, OPM).

### A.3. GOVERNMENT ACCOUNTABILITY OFFICE EVALUATIONS

**Quality.** In September 2006, GAO cited lack of full reciprocity of clearances as an outgrowth of agencies’ concerns over the quality of other agencies’ investigation and adjudication processes. In February 2008, GAO identified quality control and quality monitoring as key factors in a reformed security clearance process. The reformed approach addresses quality throughout the system by ensuring government-wide consistency through more standardized and streamlined policies, processes and training; the collection of more accurate investigative and

<sup>7</sup> [EO 13467](#), *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information*, (June 30, 2008) requires that “background investigations and adjudications shall be mutually and reciprocally accepted by all agencies.”

<sup>8</sup> [EO 13488](#), *Granting Reciprocity on Excepted Service and Federal Contractor Employee Fitness and Reinvestigating Individuals in Positions of Public Trust*, (January 16, 2009) complements EO 13467 by further aligning reciprocity between Fitness, Public Trust, and security clearances to the extent possible.

adjudicative-relevant information through common electronic data gathering and verification capabilities; and identification and sharing of best practices between agencies. To ensure these quality controls are effectively implemented and maintained, agency security and suitability programs are reviewed onsite by the Security and Suitability Executive Agent Assessment Program teams.<sup>9</sup>

Additionally, the PAC Training Subcommittee developed training objectives and assessment tools for each training curriculum (e.g. suitability adjudicator, security adjudicator, and investigator). Existing training standards are being updated to achieve a standardized training curricula built upon associated core competencies. Final coordination of these core competencies is now complete, and training objectives have been established. The PAC will monitor the implementation and effectiveness of both the modernization and training efforts to ensure they meet the goals identified in this strategy.

## B. STRATEGIC GOALS

These strategic goals are derived from the authorities cited above and support the stated reform purpose: to improve the timeliness, efficiency, and quality aspects of the existing security clearance and suitability determinations systems.

**GOAL 1 – RECIPROCITY.** Establish policies and processes to support Government-wide reciprocity between agency investigations and adjudications and between security and suitability to the extent possible in order to eliminate unnecessary investigations and adjudications.<sup>10,11</sup>

**GOAL 2 – SECURITY CLEARANCE AND SUITABILITY DATABASE (INTEGRATED DATABASE).** Enhance utility and increase access to the integrated, secure database of security clearance and suitability investigations and adjudications information, in order to facilitate reciprocity.<sup>12</sup>

**GOAL 3 – IT/END-TO-END AUTOMATION.** Leverage technology to improve timeliness and quality using end-to-end automated IT capabilities.<sup>13</sup>

**GOAL 4 – TIMELINESS.** By December 2009, make 90% of determinations within an average of 60 days from application submission to adjudicative decision (average of 40 days for investigation and 20 days for adjudication).<sup>14</sup>

**GOAL 5 – SECURITY AND SUITABILITY ALIGNMENT.** Align Security and Suitability policies and processes using consistent standards to the extent possible to provide for reciprocity, cost, and time efficiencies.<sup>15</sup>

**GOAL 6 – CONTINUOUS EVALUATION/PERIODIC REINVESTIGATION.** Implement more frequent investigation of cleared individuals to ensure continuing eligibility for access to classified information, thereby reducing risk to national security, and periodic reinvestigation for those in public trust positions to ensure earlier detection of potential issues.

**GOAL 7 – QUALITY.** Build quality into every step of reformed security and suitability process.<sup>16</sup>

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<sup>9</sup> OPM is required to exercise oversight over agencies' personnel suitability and security programs under 5 U.S.C. 1104 and 1302, EO 10450, as amended, and EO 10577, as amended. ODNI is required to exercise oversight over agencies' personnel security programs under EO 13467. The National Security Council has ultimate responsibility for addressing improvements to agency security programs. See Section 101 of the National Security Act of 1947, as amended, and EO 10450, as amended.

<sup>10</sup> [IRTPA §3001\(d\)](#) Reciprocity of Security Clearance and Access Determinations; See also EO 13467 and EO 13488

<sup>11</sup> OMB Memo, [Reciprocal Recognition of Existing Security Clearances](#), dated July 17, 2006

<sup>12</sup> [IRTPA §3001\(e\)](#) and [EO 10450](#)

<sup>13</sup> [IRTPA §3001\(f\)](#) and [EO 13467](#)

<sup>14</sup> [IRTPA §3001\(g\)](#) Reduction in Length of Personnel Security Clearance Process

<sup>15</sup> [EO 13467 §1.1](#) Policy

<sup>16</sup> [GAO-09-488](#), *Personnel Security Clearances: An Outcome-Focused Strategy...*, (Washington, D.C.: May 2009)

## C. APPROACH

Guided by the PAC, the goals of reform are being achieved through the following seven-step process. The PAC uses this construct regularly to define, focus and manage reform objectives and activities. Additionally, business process analysis was employed to assess and compare the steps used in the security and suitability investigative and adjudicative processes. By aligning similar steps and engineering the processes to concurrently conduct activities where possible and by leveraging IT automation, seven distinct operational modules were used to manage deliverables and operationalize the reform goals. The seven process modules provide the approach for reporting deliverables and measuring performance.



### C.1. VALIDATE NEED (VN) VISION

For agencies that request investigations, Validate Need will provide a standard method to ensure that requests for investigations meet and do not exceed the needs of the positions being filled and do not duplicate prior investigations or adjudicative determinations that meet standards for those positions, thereby eliminating unnecessary investigations, improving timeliness, and reducing costs.

### C.2. eAPPLICATION (eAPP) VISION

For applicants and agency users who submit requests for background investigations, eApplication will collect information required for investigations, adjudications, and continuous evaluation through the use of information technology to minimize the need for manual review for data correction, leveraging storage of data to eliminate redundant data collection and support complete, accurate, and timely initiation of requests for investigations.

### C.3. AUTOMATED RECORDS CHECKS (ARC) VISION

For authorized investigating agencies and investigative service providers, ARC will provide an automated process to run subject data against appropriate government and validated commercial databases to collect, analyze, and validate data, and to flag potential issues, thereby providing cost, consistency, and time efficiencies.

### C.4. eADJUDICATE (eADJ) VISION

eAdjudication will provide standard sets of business rules to be computer executed for consistent, automated, electronic determinations, and provide adjudicative decision support tools.

### C.5. ENHANCED SUBJECT INTERVIEW (ESI) VISION

For investigators who interview subjects, ESI will provide a common framework for the complete collection and full development of favorable, unfavorable, and explanatory information from the subject.

### C.6. EXPANDABLE FOCUSED INVESTIGATION (EFI) VISION

For investigative service providers, EFI will provide a common framework to focus investigative resources on flagged cases to fully resolve all known and developed issues.

### C.7. CONTINUOUS EVALUATION (CE)/PERIODIC REINVESTIGATION (PR)

For agencies with personnel who are eligible for access to classified information, CE will more frequently evaluate those personnel by using periodic, aperiodic, and event-driven assessments to better identify risks to national security.

## D. RELATIONSHIP BETWEEN APPROACH, KEY DELIVERABLES, AND STRATEGIC GOALS

### D.1. APPROACH AND DELIVERABLES FOR 2010 AND BEYOND

The Office of Management and Budget, OPM, ODNI and DOD have developed and are executing program plans to incrementally implement the capabilities needed to achieve reform goals. The capabilities planned for delivery in 2010 will result in a substantial operational capability across each of the process modules. Further actions are needed beyond 2010 to achieve full operational capability across the federal government. The table below describes key deliverables associated with each step of the process, the strategic goals that they enable, and the timeframe for delivery.

The deliverable dates are based on current activities and expected outcomes. Many of the deliverable dates are dependent upon a number of factors, including public comments on proposed changes, input from stakeholders, resolution of legal issues, budgetary concerns, and technological capabilities. As reform activities progress, the deliverable dates will be redefined with increasing accuracy to ensure clearance reform is substantially operational by the end of 2010 and to keep future reform implementations and enhancements on track for 2011 and beyond.

RELATIONSHIP BETWEEN APPROACH, KEY DELIVERABLES, AND LONG-TERM GOALS		
APPROACH	TIME-FRAME	DELIVERABLE/DATE
* STRATEGIC GOALS: 1-Reciprocity • 2-Integrated DB • 3-IT/End to End Automation • 4-Timeliness • 5-Security and Suitability Alignment • 6-CE/PR • 7-Quality		
<i>Validate Need (VN)</i>	2010	<ul style="list-style-type: none"> <li>• Enable enterprise access for Intelligence Community users to search relevant clearance, suitability and investigation data via OPM's CVS (Responsible entity: OPM) <i>March 2010</i></li> <li>• Set standards for data fields required to provide enough data on which other agencies can grant access (Responsible entities: OPM/ODNI) <i>March 2010</i></li> <li>• Maximize data input to CVS by agencies to provide visibility for the majority of the federal government to the extent practical (Responsible entity: OPM) <i>December 2010</i></li> <li>• Continue Security and Suitability oversight visits and audit programs to review agency position designation alignment and monitor compliance (Responsible entities: ODNI/OPM) <i>December 2010</i></li> <li>• Increase CVS user base across Executive Branch (Responsible entity: OPM) <i>December 2010</i></li> <li>• Prepare Analysis of Alternatives (AoA) to support Federated Single Search solution (Responsible entities: ODNI/DoD/OPM) <i>December 2010</i></li> </ul>
	Future	<ul style="list-style-type: none"> <li>• Continue to improve the completeness of agency data reported to a federated single search solution (Responsible entities: ODNI/DoD/OPM) <i>December 2011</i></li> <li>• Align investigation requests with future updated position sensitivity (Responsible entities: All agencies) <i>December 2012</i></li> <li>• Determine the feasibility of joint audit programs to monitor compliance (Responsible entities: ODNI/OPM) <i>December 2011</i></li> <li>• Revise the Position Designation Tool (Responsible entity: OPM) <i>June 2012</i></li> </ul>

RELATIONSHIP BETWEEN APPROACH, KEY DELIVERABLES, AND LONG-TERM GOALS (CONT.)		
APPROACH	TIME-FRAME	DELIVERABLE/DATE
<i>eApp</i>	2010	<ul style="list-style-type: none"> <li>• OMB approval of revised Standard Form 86 (SF-86) (Responsible entity: OMB) <i>March 2010</i></li> <li>• Implement revised e-QIP functionality/validation requirements to improve accuracy of data entered in e-QIP (Responsible entity: OPM) <i>December 2009</i></li> <li>• Implement revised SF-86 (e-QIP) with expanded (branching) questions and revised consent forms (Responsible entity: OPM) <i>December 2010</i></li> <li>• Enhance OPM fingerprint processing time (Responsible entity: OPM) <i>December 2010</i></li> <li>• Submit next version of SF-85P to Federal Register for public comment (Responsible entity: OPM) <i>December 2010</i></li> </ul>
	Future	<ul style="list-style-type: none"> <li>• Evaluate the feasibility of automated signature capability (Responsible entities: OPM/DoD), <i>February 2011</i></li> <li>• Determine eApp plans for agencies not using eQIP (Responsible entity: ODNI) <i>December 2011</i></li> <li>• OMB approval of revised SF-85P (Responsible entity: OMB) <i>December 2011</i></li> <li>• Explore potential to further develop interactive interview (Responsible entity: OPM) <i>December 2011</i></li> </ul>
<i>ARC</i>	2010	<ul style="list-style-type: none"> <li>• Evaluate ARC capability and its progress toward enabling the flagging strategy and EFI (Responsible entities: OPM/ODNI) <i>December 2010</i></li> <li>• Additional conversion of manual checks to validated automated checks, expanding use of automation (Responsible entity: OPM) <i>December 2010</i></li> <li>• Pilot Intelligence Community DoD Automated Continuous Evaluation System (ACES) in National Reconnaissance Office (NRO) program with select Army population (Responsible entity: DoD) <i>August 2010</i></li> <li>• Pilot ARC capability within select DoD population with applicant information electronically processed against government and commercial databases via OPM and the Defense Personnel Security Research Center (PERSEREC) ACES (Responsible entity: OPM/DoD) <i>July 2010</i></li> <li>• Integrate select ACES records checks and OPM record checks into a consolidated ARC product line and/or in OPM existing product line as their utility is confirmed (Responsible entities: OPM/investigative service providers/DoD's PERSEREC) <i>December 2010</i></li> <li>• Continue to improve information exchanges with governmental record repositories (Responsible entity: OPM) <i>December 2010</i></li> <li>• DoD ACES in State Department pilot program (Responsible entities: DoD's PERSEREC/State Dept.) <i>December 2010</i></li> </ul>
	Future	<ul style="list-style-type: none"> <li>• Explore options for a secure ARC capability within the Intelligence Community (Responsible entities: ODNI) <i>December 2011</i></li> <li>• Continue to improve information exchanges with governmental record repositories (Responsible entities: All agencies) <i>December 2011</i></li> <li>• Convert additional manual checks to automated checks, expanding use of automation to the extent consistent with legal requirements for written inquiries (Responsible entities: OPM/investigative service provider agencies) <i>December 2012</i></li> </ul>

RELATIONSHIP BETWEEN APPROACH, KEY DELIVERABLES, AND LONG-TERM GOALS (CONT.)		
APPROACH	TIME-FRAME	DELIVERABLE/DATE
<i>eAdj</i>	2010	<ul style="list-style-type: none"> <li>• Implement DoD Rapid Assessment of Incomplete Security Evaluations (RAISE) and Review of Adjudication Documentation Accuracy and Rationales (RADAR) within DoD and continue manual feedback/coordination with OPM until two-way communication is implemented (Responsible entity: DoD) <i>April 2010</i></li> <li>• Deploy OPM quality assessment tool for non-DoD agencies (Responsible entities: OPM/Non-DoD agencies) <i>March 2010</i></li> <li>• Complete CATS eAdjudication implementation for all DOD (Responsible entity: DoD) <i>April 2010</i></li> <li>• Enhance investigative case seriousness code scheme and implement with 2011 product line to improve ability to identify "Clean" cases and support adjudicators (SF-86 July 2008 version) (Responsible entity: OPM) <i>October 2010</i></li> <li>• Implement DoD web services capability, CATS (Responsible entity: DoD) <i>December 2010</i></li> <li>• Conduct business case to determine Report of Investigation extensible mark-up language (XML) tagging to enhance eAdjudication (Responsible entity: DoD's PERSEREC) <i>December 2010</i></li> <li>• Develop Suitability and Security adjudicator training (Responsible entities: DoD/OPM) <i>December 2010</i></li> </ul>
	Future	<ul style="list-style-type: none"> <li>• Implement automated two-way communication with OPM for RAISE (Responsible entities: OPM/DoD) <i>December 2011</i></li> <li>• Implement toolbox to support suitability adjudications (Responsible entity: OPM) <i>December 2012</i></li> <li>• Following implementation of new SF-86, further enhance case and investigative issue coding to optimize eAdjudication functionality to improve ability to identify "Clean" cases and enable progress toward greater support to human adjudicators (SF-86 2010 version) (Responsible entities: OPM/ODNI/DoD) <i>December 2012</i></li> <li>• Develop eAdjudication business rules for additional case types / Tiers / Populations (Responsible entities: ODNI/DoD/OPM) <i>December 2011</i></li> </ul>

RELATIONSHIP BETWEEN APPROACH, KEY DELIVERABLES, AND LONG-TERM GOALS (CONT.)		
APPROACH	TIME-FRAME	DELIVERABLE/DATE
<i>ESI/EFI</i>	2010	<ul style="list-style-type: none"> <li>• Align OPM investigative levels (existing products) with Reform concepts (Responsible entity: OPM) <i>October 2010</i></li> <li>• Issue revised Federal Investigative Standards (Responsible entities: ODNI/OPM) <i>December 2010</i></li> <li>• Develop standard techniques and content for subject interviews (Responsible entity: PAC Training and Certification Subcommittee) <i>December 2010</i></li> <li>• Develop investigator training (Responsible entity: PAC Training and Certification Subcommittee) <i>December 2010</i></li> </ul>
	Future	<ul style="list-style-type: none"> <li>• Implement expansion of Enhanced Subject Interview informed by implementation of the new SF-86 branching questions and future products enhanced by ARC (Responsible entities: OPM/investigative service providers) <i>June 2012</i></li> <li>• Publish clear guidance on what investigative and/or adjudication activity, if any, is appropriate when an individual moves between Tier levels and/or type of appointment (National Security Public Trust versus non-National Security Public Trust) (Responsible entities: OPM/ODNI) <i>December 2011</i></li> <li>• Implement Revised Federal Investigative Standards (ARC-enabled EFI) (Responsible entities: ODNI/OPM) <i>December 2013</i></li> </ul>
<i>CE/PR</i>	2010	<ul style="list-style-type: none"> <li>• Offer a level of investigation that will provide a validated suite of automated record checks that can be used as an annual assessment for individuals cleared at the Top Secret/Sensitive Compartmented Information level (Responsible entity: OPM) <i>October 2010</i></li> </ul>
	Future	<ul style="list-style-type: none"> <li>• Pilot Continuous Evaluation Capability within select DoD population (Responsible entity: DoD's PERSEREC/OPM) <i>December 2011</i></li> <li>• Explore options for a secure ARC capability for CE within the Intelligence Community (Responsible entity: ODNI) <i>December 2012</i></li> <li>• Establish Periodic Reinvestigation standards and execute program for those individuals in positions of public trust (Responsible entity: OPM) <i>December 2012</i></li> </ul>

**D.2. STRATEGIC GOALS AS SUPPORTED BY APPROACH AND DELIVERABLES**

The Reform Effort identified key capabilities with defined performance attributes necessary to achieve the strategic goals. Program plans and specific deliverables were designed to ensure reform activity results in measurable outcomes that address each of the strategic goals.

**GOAL 1 – RECIPROCITY.** Reciprocity is enabled through a combination of changes to policy and improved access to relevant investigative and adjudicative decision data. Reciprocity is enhanced by consistent implementation of overarching policy guidance, such as Federal Investigative Standards that provide a tiered model for both security and suitability investigations, and position designation guidance that assists agencies in selecting the appropriate investigative level for their position. These policies and practices are overseen by the Security Executive Agent and Suitability Executive Agent to ensure appropriate application across the government, and to maintain quality through oversight and sharing of best practices. Further, information technology and database enhancements provide access

by all Executive Branch agencies to relevant records allowing an existing investigation to be found and mutually accepted in lieu of an agency requesting a new investigation. Agencies will also thoroughly document adjudication decisions and rationale to provide transparency and trust between agencies to facilitate reciprocity.

**GOAL 2 – INTEGRATED, SECURE DATABASE.** OPM's CVS system serves as the foundation to enable enterprise access across the Federal Government thereby promoting reciprocity through a readily available pool of investigative and adjudicative records across government. The Reform Effort's Initial Implementation Plan encourages agencies to obtain additional CVS accounts as needed, and ensures regular upload of agency decisions through oversight (Executive Agent Assessment Programs) to ensure that existing personnel investigative records are available and current, as IRTPA intended.

**GOAL 3 – IT/END-TO-END AUTOMATION.** All modules of the approach are supported by information technologies designed to standardize and streamline the process. For example, under eApplication, the planned functionality and validation enhancements to OPM's eQIP, including online consent forms and other improvements, will improve timeliness through electronic versus manual transmission, enhance quality through error checking, and provide data collection necessary to support automated records checks and required investigation – thereby further improving timeliness and meeting the end-to-end automation goals requisite for a reformed system.

**GOAL 4 – TIMELINESS.** IRTPA set forth specific timeliness goals which require a reformed approach through use of technology and standardization to ensure performance is sustained and improved in the future. Use of automated questionnaires decreases the time it takes to begin conducting the necessary background investigation, automated records checks collect the data more quickly, and where appropriate, eAdjudication applies consistent business rules to quickly adjudicate or appropriately route cases to adjudicators for decisions.

**GOAL 5 – SECURITY AND SUITABILITY ALIGNMENT.** Jointly developed Security and Suitability Executive Agent policies, procedures, and capabilities promote the alignment of security and suitability where possible enabling reciprocity, cost and time efficiencies. Executive Agent Assessment Programs help ensure this alignment is maintained in practice at the agency level and provide a mechanism for two-way communication and sharing of best practices across the Executive Branch.

**GOAL 6 – CONTINUOUS EVALUATION/PERIODIC REINVESTIGATION.** The continuous evaluation process will lead to more frequent investigations of cleared individuals to ensure continuing eligibility for access to classified information thereby reducing risk to national security, and Periodic Reinvestigation for those in public trust position to ensure earlier detection of issues which may affect clearance eligibility. The "flagging" strategy of using automated records checks, and then expanded investigations and subject interviews as necessary, is a cost-effective way to protect critical programs and the Federal Workforce. Further ensuring that investigative data is current promotes reciprocity and trust between agencies facilitating the mobility of cleared, uniquely qualified individuals to where their skills are needed most.

**GOAL 7– QUALITY.** The reform approach incorporates quality measures to include consistency, accuracy, standardization and oversight into every step of the process. For example, eApplication leverages automation and data validation to ensure collection of more detailed, consistent and accurate information. Automated records checks leverage existing technology to validate identity and relevant investigative and adjudicative information more quickly and accurately. eAdjudication provides automated assessment tools to provide the framework for evaluating investigative and adjudicative outcomes, providing the information needed to identify and correct quality problems such as missing or inaccurate data. Standardizing and enhancing the expanded focused investigation and enhanced subject interview criteria ensure that best-practice techniques for gathering information are applied consistently across the government, providing better quality investigative reports and information for adjudicators to make sound determinations. The more frequent and standardized set of electronic checks designed into continuous evaluation and periodic reinvestigations helps ensure a quality workforce. Finally, the Executive Agent assessment process provides the mechanism to promote, where possible, consistent policy, processes and technology necessary to sustain reform. It enables the two-way communication needed to continually improve the reformed design and facilitates sharing of best practices across the government, allowing for better quality across the Executive Branch.

## E. PERFORMANCE MEASURES

Near and long term performance measures have been identified for the Reform Effort. A number of these measures are used to evaluate performance of existing capabilities. As additional capabilities, policies and processes are implemented, additional performance measures will be defined to monitor progress and quality. The PAC Performance Measures and Management Subcommittee (PMMS) is responsible for assisting in the development and oversight of these measures. See also Attachment B - *IRTPA 2009 Annual Report* for metrics required by IRTPA as well as additional PAC PMMS developed measures gathered.

REFORM EFFORT PERFORMANCE MEASURES		
GOAL	OBJECTIVE	PERFORMANCE MEASURE
GOAL 1 - RECIPROCIITY	Eliminate unnecessary investigations and processing time when a current, sufficient investigation or adjudication already exists	<ul style="list-style-type: none"> <li>• Compare number of investigative requests rejected by OPM for existing clearances in 2009 per quarter against number rejected for same period in 2010</li> <li>• Increase agency checks of CVS prior to requesting new application</li> </ul>
	Align Security and Suitability investigative standards to the extent possible so that investigations and determinations at same levels can be used to facilitate transfer of people between positions	<ul style="list-style-type: none"> <li>• Issue revised Federal Investigative Standards by December 2010 to align security and suitability investigative standards to the extent possible</li> </ul>
GOAL 2 – INTEGRATED, SECURE DATABASE	Promote reciprocity by enabling enterprise access to search relevant investigative and adjudicative data	<ul style="list-style-type: none"> <li>• Enable enterprise access for Intelligence Community users to search relevant clearance, suitability and investigation data via OPM's CVS by March 2010</li> </ul>
	Provide sufficient data in electronic form to allow for real time validation of security and suitability data in lieu of manual validation (phone calls or transfer of hardcopy records between agencies)	<ul style="list-style-type: none"> <li>• Increase percentage of records successfully uploaded to/made available through CVS for Single Search by agency over same period from prior year</li> </ul>
GOAL 3 - IT/ END-TO-END AUTOMATION	Use IT in lieu of manual processes to improve timeliness and quality	<ul style="list-style-type: none"> <li>• OPM Delivery of enhanced e-QIP with branching questions as scheduled by December 2010</li> <li>• Increased use of e-QIP</li> <li>• Increased use of eAdjudication screening</li> <li>• Increased use of Investigative Report e-Delivery</li> </ul>

REFORM EFFORT PERFORMANCE MEASURES (CONT.)		
GOAL	OBJECTIVE	PERFORMANCE MEASURE
GOAL 4- TIMELINESS	<p>Reduce length of time it takes to initiate, investigate and make security clearance and suitability determinations</p> <p>Provide greater transparency into the reformed process by measuring and reporting the timeliness of the entire suitability and clearance process.</p>	<ul style="list-style-type: none"> <li>• Compare agency reported metrics on timeliness of investigation initiation to produce quarterly trends</li> <li>• Compare agency reported metrics on timeliness of investigation completion to produce quarterly trends</li> <li>• Compare agency reported metrics on timeliness of adjudicative decisions made to produce quarterly trends.</li> <li>• Compare combination of initiation, investigation and adjudication to produce end-to-end quarterly trends</li> </ul>
GOAL 5 - ALIGNMENT	Better align Security and Suitability policies to provide for reciprocity, cost and time efficiencies by publishing clear guidance as to what investigative and adjudicative activity is appropriate when an individual moves between tier levels.	<ul style="list-style-type: none"> <li>• Issue revised Federal Investigative Standards by December 2010</li> <li>• OPM Guidance published upon issuance and implementation of Federal Investigative Standards</li> </ul>
GOAL 6 – CE/PR	<p>For those eligible for access to classified information, replace 5/10/15 year manual reinvestigations with more frequent electronic automated records checks and expanded investigation as needed to mitigate risks going undetected for long periods of time between investigations</p>	<ul style="list-style-type: none"> <li>• Percentage of TOP SECRET cleared individuals who have had a CE within the timeframe required by the Federal Investigative Standards (once revised, issued and implemented)</li> <li>• Percentage of SECRET cleared individuals who have had a CE within the timeframe required by Federal Investigative Standards (once revised, issued and implemented)</li> </ul>
	Implement EO 13488 Periodic Reinvestigation Requirement for Public Trust	<ul style="list-style-type: none"> <li>• Percentage of individuals in positions of public trust who have had a PR within the timeframe required by the Federal Investigative Standards (once revised, issued, and implemented)</li> </ul>

REFORM EFFORT PERFORMANCE MEASURES (CONT.)		
GOAL	OBJECTIVE	PERFORMANCE MEASURE
<b>GOAL 7 - QUALITY</b>	Establish and collect metrics on which to analyze "health" of reform effort progress	<ul style="list-style-type: none"> <li>● Increased percentage of investigations that meet the federal investigative standards.</li> <li>● Decreased percentage of adjudications that do not appropriately document the rationale for adjudicative decisions</li> </ul>
	Provide an automated tool to assess <u>adjudication</u> documentation completeness Provide an automated tool to assess of <u>investigative</u> product completeness	<ul style="list-style-type: none"> <li>● Implement RADAR for all DoD adjudications</li> <li>● Implement RAISE for all investigations received by DoD from OPM</li> </ul>
	Security Executive Agent and Suitability Executive Agent conducting on-site agency assessments to monitor consistency of policy and processes and to share best practices. Recurring audits of agencies will include review of proper position designation, proper investigation level requests, investigative product completeness, and consistently documented adjudicative decisions.	<ul style="list-style-type: none"> <li>● Percentage of agencies reviewed with delegated <u>security</u> investigation or adjudication authority</li> <li>● Percentage of agencies reviewed with delegated <u>suitability</u> investigation or determination authority</li> </ul>

## F. KEY EXTERNAL FACTORS (RISK)

Reform Effort activity crosscuts every Executive Branch agency which means that a number of factors can impact its ability to achieve its goals.

### F.1. TECHNOLOGICAL FACTORS

Emerging technologies underpin the hopes and plans for continuing today's communication revolution into the future. Popular scenarios of an always-connected future may assume levels and concentrations of technologies that, in some cases, do not yet exist or exist only in configurations or at prices that pose barriers to their adoption. The Reform Effort must pursue development and deployment of innovative communications technologies while ensuring transparency of its efforts by reporting to Executive Branch leadership and Congress on the viability of IT/automation solutions.

### F.2. LEGAL FACTORS

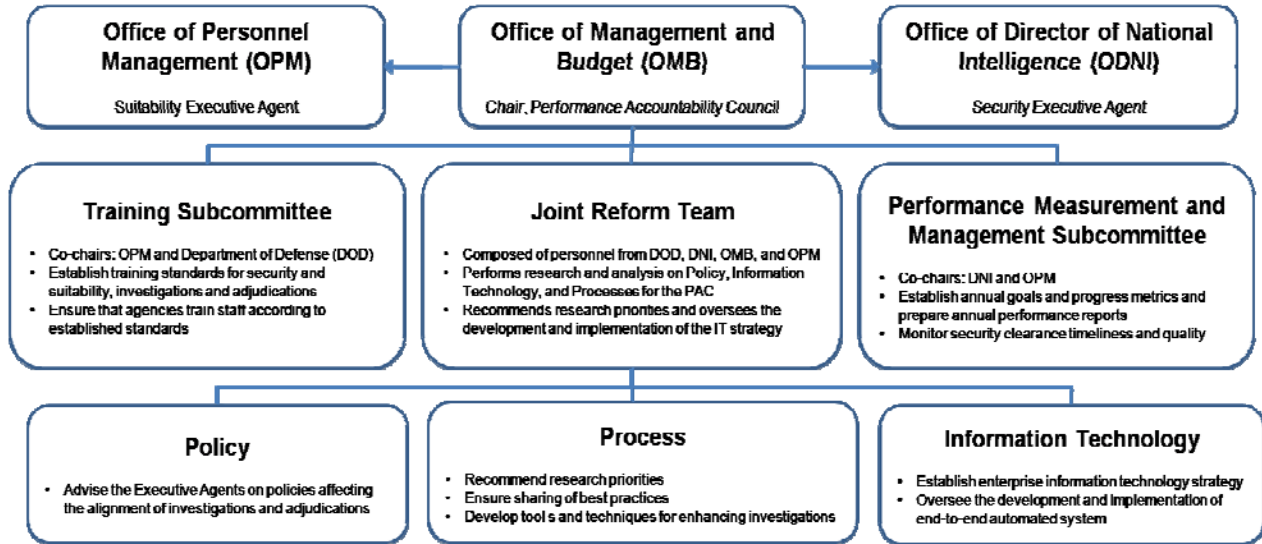
The Federal Government's ability to conduct its personnel security and suitability functions is affected by laws as ultimately interpreted by the courts. Privacy issues, in particular, must be taken into account when collecting and using personal information including identification of Personally Identifiable Information (PII), medical and other sensitive data used to make security and suitability determinations.

### F.3. AGENCY SUPPORT

Security and Suitability Reform requires active participation by Federal agencies required to implement new capabilities and processes to achieve IRTPA goals. Rate of agency implementation may vary due to cultural, budget planning or security issues.

## G. REFORM MANAGEMENT AND IT STRATEGY IMPLEMENTATION ROLES AND RESPONSIBILITIES

This portion of the Strategic Framework outlines the high level roles and responsibilities for the major stakeholders in the reform effort. It also discusses significant components of the Information Technology strategies for those stakeholders. Among other guidance, EO 13467 established the PAC to oversee and guide alignment between security and suitability. This executive order also established Security and Suitability Executive Agents' roles and detailed their responsibilities. The Reform organizational structure is provided below:



Derived from GAO Analysis of Joint Reform Team Data

Note: The Joint Reform Team is not formally part of the governance structure established by Executive Order 13467 but in practice, reports to the Performance Accountability Council.

The 11 federal agencies represented on the Performance Accountability Council are OMB, ODNI, OPM, DOD, Department of State, Federal Bureau of Investigations, Department of Homeland Security, Department of Energy, Department of Health and Human Services, Department of Veterans Affairs, and Department of Treasury

### G.1. THE PERFORMANCE ACCOUNTABILITY COUNCIL

The Performance Accountability Council is ultimately responsible to the President for “driving implementation of the reform effort, ensuring accountability by agencies, ensuring the Suitability Executive Agent and the Security Executive Agent align their respective processes, and sustaining reform momentum.” In accordance with Executive Order 13467, the Deputy Director for Management of the Office of Management and Budget serves as the Chair of the PAC. The Chair has authority, direction, and control over the Council’s functions, and may designate officials from additional agencies to serve as members of the Council. Roles and responsibilities of the PAC include:

- Ensuring alignment of suitability, security, and contractor fitness as appropriate;
- Holding agencies accountable for implementation of suitability, security, and contractor fitness processes and procedures;
- Establishing requirements for enterprise information technology;
- Establishing annual goals and progress metrics and preparing annual reports on results;
- Ensuring and overseeing the development of tools and techniques for enhancing background investigations and making eligibility determinations;
- Arbitrating disparities in procedures between Suitability and Security Executive Agents;
- Ensuring the sharing of best practices; and

- Advising the Suitability Executive Agent and the Security Executive Agent on policies affecting the alignment of investigation and adjudication.

In accordance with its responsibility to coordinate and drive reform implementation, the PAC establishes requirements for enterprise information technology needed to achieve the goals of modernizing processes and meeting performance goals. It does so in partnership with lead implementing agencies; OPM, DOD and the ODNI on behalf of the Intelligence Community, who are responsible for managing and modernizing the family of systems that supply federal-level capabilities necessary to achieve the goal of end-to-end technology. The PAC also guides the direction of IT modernization efforts of agencies to ensure their systems, particularly those for the management of investigative and adjudicative cases, will comply and interoperate with the enterprise systems and ensure that record repositories automate their information so they can be accessed and shared rapidly across the Executive Branch.

The reform effort's information technology approach is to leverage and continue to modernize existing federal capabilities to meet the needs of security and suitability processes from end-to-end. Specifically, this includes standardizing on the OPM eQIP electronic application platform, transitioning agencies to electronic delivery of investigations, increasing use of electronic fingerprint and signature technologies, ensuring access to relevant security and suitability data through federated search capabilities of existing databases, and developing and optimizing automated records checking capabilities at the Federal level. IT and data management standards are critical to ensure the quality and consistency of output from investigative and adjudicative processes and systems. Enterprise standards for recording investigative and adjudicative determinations in central databases, coding the seriousness of issues that arise in investigations, and case-type specific business rules for screening cases via eAdjudication, are examples of how standardization will be employed in support of enterprise performance and technology goals.

## **G.2. THE OFFICE OF DIRECTOR NATIONAL INTELLIGENCE**

EO 13467 designated the Director of National Intelligence as the Security Executive Agent. The Security Executive Agent is one of two permanent members of the PAC. As the Security Executive Agent, the Director of National Intelligence has the following roles and responsibilities:

- Directing the oversight of investigations and determinations of eligibility for access to classified information or assignment to a sensitive position;
- Developing uniform and consistent policies and procedures for effective, efficient and timely completion of national security investigation and adjudication;
- Providing the final authority to designate agencies to conduct investigations of persons for access to classified information or assignment to sensitive position;
- Providing the final authority to designate agencies to adjudicate persons for security clearance;
- Ensuring reciprocal recognition of eligibility for access to classified information;
- Arbitrating and resolving disputes among agencies involving the reciprocity of investigations and determinations to access classified information or occupy a sensitive position; and
- Prescribing under EO 12968, as amended, standards for investigating, reinvestigating, continuously evaluating, and adjudicating eligibility for access to classified information.

In addition, Sections 2.4 and 3 of EO 13467 reserved and reaffirmed the DNI's existing authorities. These include:

- Prescribing uniform standards, procedures, and guidelines for access to sensitive compartmented information (Section 102A, National Security Act of 1947, as amended, EO 12333).

The Intelligence Community IT Strategy includes leveraging mainstream capabilities to the extent practicable (for example use of CVS, JPAS, eQIP and electronic fingerprint systems) while also developing and securely implementing capabilities that meet unique Intelligence Community agency missions authorities, and related security needs.

Expectations for clearance reform within the Intelligence Community match those of the enterprise: to ensure the individuals comprising its blended workforce are appropriately vetted and available to support the mobility requirements of mission critical programs in a timely manner. The Intelligence Community, therefore, will ensure its

implementations follow closely those of the mainstream to ensure consistency of approach and adherence to national standards.

The plan will extend over the next five years. Key accomplishments include:

- Established the Clearance Reform Intelligence Community Working Group to help ensure Intelligence Community clearance reform activities leverage mainstream progress where practicable and develop new capabilities where required;
- Established the Security Executive Agent Advisory Group to provide a range of stakeholder expertise and advice in executing security executive agent responsibilities; and
- Integrated Intelligence Community recommendations and capabilities, where appropriate, for the mainstream automated records check (ARC) capability.

Ongoing and future activities include:

- Modifying the Intelligence Community's clearance verification database, Scattered Castles (SC), to include clearance data on non-Intelligence Community personnel that is contained in OPM's CVS;
- Exploring the possibility of including unclassified data from Scattered Castles in CVS;
- Increasing the CVS user base across the Intelligence Community where possible to further enable reciprocity, and ensuring Intelligence Community electronic applications developed on high-side networks are interoperable with e-QIP standards;
- Augmenting National Geospatial-Intelligence Agency (NGA) and Defense Intelligence Agency (DIA) with the implementation of the Clearance Workflow and Verification System (CWVS) to automate their case management systems;
- Expanding digital fingerprint capture capability within the Intelligence Community;
- Participating in the evaluation of the mainstream ARC capability and determining how to meet unique Intelligence Community requirements for security, especially with regard to protection of intelligence identities; and
- Piloting the DoD Automated Continuous Evaluation System (ACES) in partnership with NRO's personnel security program to further assess a secure ARC capability.

### **G.3. THE OFFICE OF PERSONNEL MANAGEMENT**

EO 13467 designated the Director of the Office of Personnel Management as the Suitability Executive Agent. The Suitability Executive Agent is one of the two permanent members of the PAC. As the Suitability Executive Agent, the Director of the Office of Personnel Management has the following roles and responsibilities:

- Developing and implementing uniform and consistent policies and procedures to ensure the effective, efficient, and timely completion of investigation and adjudications relating to determinations of suitability and eligibility for logical and physical access.

In addition, Sections 2.4 and 3 of EO 13467 reserved and reaffirmed the OPM Director's existing authorities. These include:

- Executing, administering, and enforcing civil service laws, rules, and regulations, and regulating and enforcing statutes and executive orders conferring responsibilities on OPM, including those concerning suitability and security (5 U.S.C. 1103, 1104; EO 10577);
- Conducting security, suitability, and credentialing investigations for the competitive service (and for the excepted service upon request); conducting investigations for the Department of Defense (including security clearance investigations for Defense contractors and the Armed Forces); and conducting reimbursable investigations (EO 10450, 10577; PL 108-136; 5 U.S.C. 1304, 9101);
- Maintaining an index of security investigations; approving reemployment of persons who have been summarily removed on national security grounds; conducting an ongoing review of agencies' personnel security programs; and reporting compliance to the National Security Council (EO 10450);
- Establishing suitability standards, conducting suitability adjudications, and taking suitability actions for the competitive service (EO 10577); and

- Conducting oversight of agencies' compliance with the civil service rules, and of their performance of delegated investigative and adjudicative authorities. (5 U.S.C. 1104, 1303; EO 10577).

Further, under a subsequent order, EO 13488, OPM prescribes fitness reciprocity requirements for contract and excepted service employment, reinvestigative requirements for contract and excepted service employment, and reinvestigative requirements for public trust positions.

OPM, Federal Investigative Services (FIS) IT strategy for reform includes a wide ranging transformation of the EPIC application suite of systems, which includes: the Electronic Questionnaires for Investigations Processing (e-QIP), Personnel Investigations Processing System (PIPS), OPM PIPS Imaging System (OPIS), Clearance Verification System (CVS), Fingerprint Transaction System (FTS), Field Work System (FWS), FIS Secure Portal, and the Management Reporting System (Dashboard). The robust plan will extend over the next 3 to 5 years and includes the following:

- Platform enhancements to update hardware and software;
- Implementation of a state-of-the-art *event driven* architecture;
- Maximizing use of additional Commercial Off-the-Shelf (COTS) products;
- Incorporating relational data base functionality to increase system flexibility;
- Providing additional utility for field investigative staff by taking advantage of state of the art technology; and
- Enabling the EPIC Suite to accept a single sign on (one door into the system).

The plan includes provisions to mitigate the risk of incorporating new technology to critical, time-sensitive processes by maintaining parallel operations and provide for a safe recovery path through the legacy systems.

OPM-FIS maintains a philosophy of continuous improvement with regard to its processes and systems, making ongoing refinements and adjustments as to how business is done and incorporating changes to applications and processes to meet the needs of its customers. Key efforts that have already taken place and those currently underway are:

- All EPIC Systems enhanced to accommodate the revised Standard Form 86 (07/08 version), the primary source document used for the security investigations process;
- Development of a new Field Work System, used by FIS Field staff, which is designed to increase investigator productivity through improved user interface and data transfer protocols;
- Expanding the use of imaging to make essential documents available to field personnel via a web-based interface (known as the Field Document Repository);
- Redesigning the Fingerprint Transaction System, used to route fingerprints between the customer agency, OPM, and the FBI;
- A series of incremental releases to the PIPS area of EPIC began in 2008 and continue, transitioning the legacy main frame system to a state-of-the-art platform;
- Transitioning the current Secure Portal to promote consistency and single sign on as well as enhanced security;
- Making enhancements to CVS to provide enhanced support to customer agencies by providing critical data regarding suitability determinations, Homeland Security Presidential Directive-12 (HSPD-12), and searches across multiple sources;
- Implementing improvements to imaging functions, enhancing "virtual pending case files." This will reduce the dependence on paper case files for review and archive;
- Expanding the use of OPM-FIS eDelivery functionality – which delivers completed investigations to customer agencies via secure images and XML file format; and
- Implementation of the dashboard/reporting tools. Continual enhancements are implemented on an ongoing basis to provide greater visibility into workload and workforce resources to optimize visibility of key performance indicators.

The above efforts are in addition to those addressed throughout this Strategic Framework.

#### G.4. THE DEPARTMENT OF DEFENSE

DOD generates 90% of the security investigation requirements in the Executive Branch, and 70% of Security and Suitability investigation requirements when combined. DOD is also responsible for making the Suitability<sup>17</sup> and Security eligibility determinations associated with those investigations, and has responsibility for industrial security and counterintelligence functions. Although DOD is not assigned a statutory role in Security and Suitability reform, Section 3 of EO 13467 reaffirms DOD's industrial security role under EO 12829, as amended. In addition, DOD, along with OPM and the DNI, is a key component and participant of the reform effort and is specifically responsible for serving as Vice Chair of the Performance Accountability Council. DOD efforts that contribute to the broader Executive Branch reform effort include:

- Pilot eAdjudication business rules to demonstrate and inform capability for the Executive Branch;
- Pilot the full suite of Automated Records Checks to inform Executive Branch policies;
- Identify fully automated end-to-end capabilities through multiple demonstrations to inform agencies with independent investigative authority as well as agencies seeking to leverage existing IT capabilities; and
- Demonstrate Continuous Evaluation using ARC capabilities to inform Executive Branch CE policies.

The DOD is internally pursuing an Information Technology approach that leverages existing systems and capabilities, where applicable, and developing new tools where necessary. Some of these DOD systems include its clearance system of record for civilian, military and contractor personnel called the Joint Personnel Adjudication System (JPAS), the Army's CATS, National Security Administration's CWVS and the Defense Personnel Security Research Center (PERSEREC) ACES.

Key efforts that have been accomplished and that are currently underway include:

- The Army's electronic case management and adjudication system, CATS, has been deployed in the Army, Defense Industrial Security Clearance Office (DISCO) and the Navy. CATS' capabilities include electronic delivery of cases, electronic adjudication and paperless workflow processing;
- Developed and deployed tools to capture metrics on the quality of investigations;
- Developed and deployed tool to meet adjudicative guideline standards;
- Developed and deployed electronic application quality assurance tool;
- Deployed expanded insider-threat capability within Army;
- Developing a strategy for the use of electronic fingerprint and signature technologies; and
- Defining requirements for the replacement of JPAS - currently the DOD system of record for recording DOD civilian, military, and National Industrial Security Program (NISP) contractor clearance eligibility and access determinations.

Key efforts to be accomplished include:

- Further deployment of the Army's case management and adjudication system within DOD (Air Force and Washington Headquarter Services);
- Expansion of National Security Agency's CWVS within the DOD Intelligence Communities;
- Complete deployment of tool that captures metrics on the quality of investigations;
- Replacement of JPAS;
- Develop recommendations and plan for the implementation of an automated record check solution - including the use of the PERSEREC ACES;
- Expand the use of electronic application platform within DOD;
- Develop IT and data management standards that will ensure the quality and consistency of output from investigative and adjudicative processes and systems;
- Expand eAdjudication business for processing of expanded case types;
- Continued expansion of insider-threat capability within the Department;
- Develop and deploy DOD portal strategy in conjunction with overall Joint Reform Team strategies; and

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<sup>17</sup> Like other agencies, DOD is also responsible for adjudicating the suitability of applicants for positions at DOD, appointees to those positions, and DOD employees, except as to issues that OPM has reserved to itself. See 5 CFR Part 731.

- Deployed solutions will include Service Oriented Architecture framework.

## G.5. AGENCIES WITH RECORDS REPOSITORY RESPONSIBILITIES

E.O. 13467 (Part 2, Section 2.1 (b)) calls for a system of investigations, which “shall employ updated and consistent methods...and end-to-end automation to the extent practicable, and ensure that relevant information maintained by agencies can be accessed and shared rapidly across the Executive Branch.” Federal agencies with record repositories are responsible for:

- Following PAC standards for automating records for exchange of investigative record requests and responses;
- Automating record repositories;
- Developing an automated means to exchange all record requests; and
- Establishing a means for tracking timeliness of record requests and final record responses between themselves and other record repositories.

## G.6. AGENCY HEADS

The heads of agencies that make security and suitability determinations must conduct their security and suitability programs in accordance with applicable statutes, executive orders, and regulations. Agencies are also fully engaged and held accountable for implementing reform policies, processes and procedures. Agency heads may participate in the PAC as designated by the Council. To the extent consistent with law,<sup>18</sup> Agency heads are specifically responsible for following Executive Agent security and suitability guidance in:

- Implementing security and suitability policies;
- Implementing reform procedures and incorporating IT capabilities requirements to the extent practical as appropriate to satisfy reform goals;
- Reporting on performance progress as required by the Executive Agents and the Deputy Director of Management and Budget;
- Cooperating in oversight and audit efforts; and
- Planning and resourcing to satisfy reform performance requirements.

The Reform effort developed a Milestone Template which each agency completed with data and returned to the reform team in March 2009. These inputs formed a baseline of implementation status for each agency, and the Executive Branch overall, in terms of implementing the reform goals. The reform team leveraged this information to formulate the Security and Suitability Reform Initial Implementation Plan which outlines the first requirements and milestones to drive the reformed Security and Suitability Process. The Initial Implementation Plan was distributed to agencies in December 2009 to provide the details and direction necessary for agencies to implement reforms necessary for the Executive Branch to be substantially operational by the end of calendar year 2010.

Beginning in January 2010, each agency will provide progress updates against their original baseline on a quarterly basis, so that the reform effort progress can be monitored. Agency milestone plans will identify 1) objectives, 2) goals, and 3) impediments to implementation.

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<sup>18</sup> The reform initiative is not intended to affect agency heads' reporting relationships to the President, their statutory responsibility to establish priorities, assign work, and delegate functions within their agencies, or their responsibility under statute and executive order to deny or terminate access to classified information in the interest of the national security (see, e.g., Section 801 of the National Security Act of 1947, as amended). Nor is the initiative intended to affect legal requirements for policymaking through notice and comment rulemaking, or for collective bargaining over the impact and implementation of agencies' internal policies. Nor, finally, is the initiative intended to affect the budget authorities of the Office of Management and Budget or the authority of the Justice Department to establish the litigating position of the United States in Federal court litigation.

## **H. LONG TERM FUNDING FOR CLEARANCE REFORM**

Resources from DOD and OPM are sufficient to enable implementation of the transformed process design for the mainstream elements of the process, as guided by the PAC. Together, their initiatives will field the next generation eApplication, a federal-level automated records check (ARC) capability, a Continuous Evaluation capability, and planned IT modernizations within both agencies. Funding has been identified by each of these entities to support planned reforms using a spiral development approach.

Other Agencies will review their respective system modernization plans to ensure alignment with the transformed vision and the end-to-end automation framework and architecture as approved by the PAC.

As an element of the PAC's oversight role, agencies are required to provide to the PAC quarterly implementation progress reports that identify challenges and impediments to reform implementation. These reports require agencies to include resource constraints they encounter, which the PAC will consider for action.

## **CONCLUSION**

Over the past year, significant reform capabilities have been developed and have begun to be implemented. These include:

- Enhancements to the electronic application form (OPM's e-QIP) to provide more accurate and specific data to enable automated records checks;
- Increased numbers of automated records checks in lieu of manual field investigation;
- Electronic release form submission capability to eliminate mail and handling time;
- Expansion of OPM's CVS system to further enable reciprocity and reduce duplicative investigations; and
- Continued implementation of DoD's electronic case management system to eliminate mail and handling time of investigative reports and to enable automated adjudications, where appropriate.

These changes have significantly contributed to the improvement in timeliness of initial investigations to an average of 40 days for 90% of submissions and an average of 22 days for 90% of the adjudicative decisions across the Executive Branch. These changes are incremental steps in the reform process to the larger strategic goals and activities outlined in this Strategic Framework and are necessary to realize the full benefits of reform.

Continued process reform efforts overseen by the Performance Accountability Council along with strong leadership commitment will ensure that security and suitability clearance reforms are substantially operational across the federal government by the end of CY 2010. Strong emphasis in the coming months will be placed on delivering near term capability while laying the basis for broad, long-term implementation. Our advances in timeliness have been accompanied by a continuing focus on quality. We are committed to ensuring that quality is both sustained and improved as new capabilities are brought into operation. Successful implementation will require agencies to act with discipline and accountability, ensuring execution against the strategic framework and follow up through established performance measures. We are committed to continuing our collaborative work that supports our collective goals for quality, timeliness, efficiency, and privacy protection. By integrating current technology with updated standards and proven information collection techniques, we will continue to protect national security without imposing excessive delays for those who have signed on to serve our Government. Our shared goal of improving the suitability and security clearance process is one of tremendous importance and will remain a high priority for Executive Branch.

## ATTACHMENT A – STRATEGIC COMMUNICATIONS PLAN FOR SUITABILITY AND SECURITY CLEARANCE REFORM

### INTRODUCTION

On September 24, 2009 the United States Senate Committee on Homeland Security and Governmental Affairs requested action from Performance Accountability Council Leadership entities to prepare a fully endorsed joint document that articulates the goals of “reform across the Federal Government (and) addresses the high-risk issues surrounding the DOD personnel security clearance program.”<sup>19</sup> One of the high-risk issues identified by the United States Government Accountability Office in study and testimony is the need for a comprehensive communication strategy that includes consistency of message and encourages two-way communication between the Performance Accountability Council and key stakeholders.<sup>20</sup> The plan that follows was developed to satisfy this need and provide a formal PAC communication strategy to sustain reform initiatives. It sets forth the objectives, methods, and responsibilities to ensure consistency of message and two-way communication in support of suitability and security clearance reform efforts.

### STAKEHOLDERS

The suitability and security clearance reform stakeholders include both internal and external audiences. Communication methods will be tailored to each of the following audiences:

- Performance Accountability Council
- Congress
- Executive Branch Departments and Agency Heads
- Executive Branch Security and Counterintelligence Directors
- Executive Branch Chief Human Capital Officers
- Executive Branch Chief Information Officers
- Executive Branch General Counsels
- Executive Branch Working Groups and Councils concerned with Suitability and Security Clearance Reform
- Industrial contractor community

### OBJECTIVES

The overall objective of this communications plan is to provide a PAC-centric platform to inform and engage stakeholders as appropriate regarding all aspects of reform activities. The goals include the following:

- A single official communication forum to improve consistent message.
- Improved communications quality by:
  - Providing concise and consistent regular messaging regarding the vision, progress, and activities under PAC to appropriate stakeholders.
  - Providing appropriate stakeholders an avenue for both informal and formal comment on critical reform elements prior to finalization or implementation.
- Use of existing and established formal reporting and communication paths and forums for efficient information sharing and two-way communication to the extent practicable.

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<sup>19</sup> Letter from the United States Senate Committee on Homeland Security and Governmental Affairs, September 24, 2009 to the Honorable Jeffrey Zients, DDM, OMB, The Honorable James Clapper, USDI, DoD, the Honorable John Berry, Dir, OPM, Mr. David Shedd, DDNI, ODNI.

<sup>20</sup> United States Government Accountability Office, Testimony before the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Committee on Homeland Security and Governmental Affairs, U.S. Senate, September 15, 2009. Brenda S. Farrell, Director, Defense Capabilities and Management.

## REFORM KEY THEMES

The communication themes we will articulate to our stakeholders are the expected value and benefits to be realized from the security and suitability clearance process design. The communication theme communicated will depend on the stakeholder and their interest and need and conforms to the contents of the strategic framework document. Key themes are that reform:

- Provides modernized and comprehensive credentialing, security clearance, and suitability processes that employ updated and consistent standards and methods;
- Ensures, to the extent consistent with applicable law, that investigative standards for security clearance and suitability investigations support and build on each other without requiring duplicative steps;
- Enables innovations with enterprise information technology capabilities that ensure the most effective and efficient performance across the Federal Government;
- Updates Government information record systems and, as necessary, applicable laws and regulations, to ensure that information maintained by executive departments and agencies and required for investigation and adjudication is available and can be shared rapidly across Government, while still protecting privacy-related information;
- Ensures that a reformed and aligned investigative system maximizes the potential for common ground in the adjudication of those programs whose security and suitability determinations are simultaneous; and
- Ensures that all resulting decisions are in the national interest, protect national security, and provide the Federal Government with an effective workforce.

## REFORM KEY MESSAGES

The following are key messages the reform effort leadership and reform effort members need to communicate to the stakeholders for each of the seven components of the transformed security and suitability process design, as well as for information technology and reciprocity. The messages will depend on the stakeholder and its interest and need for specific information and conforms to the contents of the strategic framework document.

- **Validate Need (VN).** For agencies that request investigations, Validate Need will provide a standard method to ensure that requests for investigations meet and do not exceed the needs of the positions being filled and do not duplicate prior investigations or adjudicative determinations that meet standards for those positions, thereby eliminating unnecessary investigations, improving timeliness, and reducing costs.
- **Electronic Application (eApp).** For applicants and agency users who submit requests for background investigations, eApplication will collect information required for investigations, adjudications, and continuous evaluation through the use of information technology to minimize the need for manual review for data correction or redundant data collection and support complete, accurate, and timely initiation of requests for investigations.
- **Automated Records Check (ARC).** For authorized investigating agencies and investigative service providers, ARC will provide an automated process to run subject data against appropriate government and validated commercial databases to collect, analyze, and validate data, and to flag potential issues, thereby providing cost, consistency, and time efficiencies.
- **eAdjudication (eAdj).** eAdjudication will provide standard sets of business rules to be computer executed for consistent, automated, electronic determinations, and provide adjudicative decision support tools.
- **Enhanced Subject Interview (ESI).** For investigators who interview subjects, ESI will provide a common framework for the complete collection and full development of favorable, unfavorable, and explanatory information from the subject.
- **Expandable Focused Investigation (EFI).** For investigative service providers, EFI will provide a common framework to focus investigative resources on flagged cases to fully resolve all known and developed issues.
- **Continuous Evaluation (CE)/Periodic Reinvestigation (Fitness).** For agencies with personnel who are eligible for access to classified information, CE will more frequently evaluate those personnel by using periodic, aperiodic, and event-driven assessments to better identify risks to national security.

- **Information Technology (IT).** The reform effort IT strategy is to leverage technology to improve timeliness and quality using end-to-end automated IT capabilities.
- **Reciprocity.** Our goal is to establish policies and processes to support Government-wide reciprocity between Agency investigations and adjudications and between security and suitability to the maximum extent possible to eliminate unnecessary investigations and adjudications.

## COMMUNICATION METHODS AND RESPONSIBILITIES

Communication methods will include council and working group meetings, web-based collaboration and information sharing tools, official correspondence, and vetted publically releasable concept papers and status reports. The methods will be applied as appropriate to the stakeholder.

- The PAC will hold quarterly meetings to oversee and assess reform objectives and progress. Information and decision points will be presented by Leadership and other Council membership and staff, as supported and facilitated by the PAC Executive Secretary. The council meetings will provide a forum for two-way communication and exploration of joint reform concepts, policies and implementation expectations for PAC Leadership and Council members, will result in official quarterly accounting of reform progress, impediments, decision points and implementation status.
- The official quarterly reform accounting will be provided to Congress and Oversight Offices, as appropriate, to satisfy information sharing and reporting expectations. Additionally, PAC leadership will provide input for hearings as required.
- Office of Management and Budget Performance Accountability Reporting structures will be used to identify critical reform requirements to agencies for the purpose of providing regular updates of reform implementation progress. The OMB reporting vehicle is currently tracking some of the reform activities as they relate to e-Clearance initiatives, so this would simply expand on this existing performance management tool which provides the opportunity to report regularly and explain progress and impediments. This tool provides specific communication between the OMB Chair of the PAC and all Executive Branch agencies.
- The official quarterly correspondence will be provided to Executive Branch agency heads, as well as Security and Human Resource Directors, providing accounting of Reform progress, impediments, decision points and implementation status. Executive Branch agency heads will be provided an opportunity with each quarterly report to provide comment, raise concerns or otherwise request additional information. These comments and questions will be directed to the Executive Secretary for response development. This broader Executive Branch input will be reported and discussed as a part of each PAC meeting. Quarterly reports will include the input, discussion, resolution and decision points.
- PAC sponsored bi-annual Joint Reform implementation meetings will be held with Executive Branch Security and Human Resource specialists, including Executive Branch Chief Information Officers and information technology personnel. Agenda topics will be solicited from Executive Branch agencies in advance of the meetings, and the meetings will provide a forum for reform status reports, sharing best practices, and for discussing impediments. Meeting minutes will capture and report deliberations for participants and PAC review and consideration.
- Executive Branch Working Groups and Councils concerned with Suitability and Security Clearance reform will be provided PAC reports soliciting feedback. The reports will be offered for incorporation into working group deliberations, to include the Security Executive Agent Personnel Security Committee, the Chief Human Capital Officials Council, the National Industrial Security Council, and Background Investigations Stakeholder Committee.
- The PAC SharePoint™ Site will be advertised to provide the public an excellent means to receive reform communications and key messages.
- The PAC Executive Secretary will manage a supporting SharePoint™ Collaboration Tool to broadcast information, collaborate on draft documents and policies, and collect survey information to support PAC reform

activities. The SharePoint will contain PAC approved Fact Sheets, brochures and other printable materials to that describe the mission, capability development, and implementation efforts of the reformed clearance process. These materials will be available to be used as handouts for Executive Branch Working Groups, and to support Executive Branch agency presentations. (<https://www.intelink.gov/sites/jrt/default.aspx>)

- PAC Leadership will ensure that joint reform briefings to their respective organizations, using information issued by the Performance Accountability Council ensure consistent messaging.
- PAC Leadership will submit articles to publications serving their respective organizations, and Executive Secretary of the PAC will submit articles to broader reaching publications, to enhance awareness and understanding of Joint Reform activities.
- Provide input for HPSCI Hearings: Provide ongoing updates at hearings as required.

## **PERFORMANCE REPORTING AND ASSESSMENT**

IRTPA Performance reports are provided routinely to Congress as required by law. The PAC Leadership of the Performance Management and Measurements Subcommittee plays a key role in ensuring the organization and summary of the information gathered for inclusion in the performance reports.

Additionally, the metrics gathering is supported by Security and Suitability Executive Agent Assessments to fulfill oversight responsibilities. As part of this oversight responsibility, the Security and Suitability Executive Agents have established assessment programs to provide for onsite validation of metrics and evaluation of policy, practices and agency compliance with regulatory requirements relative to the personnel security and suitability determination process. These programs not only provide an evaluation mechanism for reform implementation, but also foster collaboration and efficiency through the identification and sharing of best practices across Executive Branch agencies to further reform efforts. This assessment approach also provides a face-to-face venue for stakeholder input and communication as to current state of reform efforts and suggestions for continuous improvement.

## ATTACHMENT B – IRTPA TITLE III ANNUAL REPORT FOR 2009

### PERFORMANCE MANAGEMENT

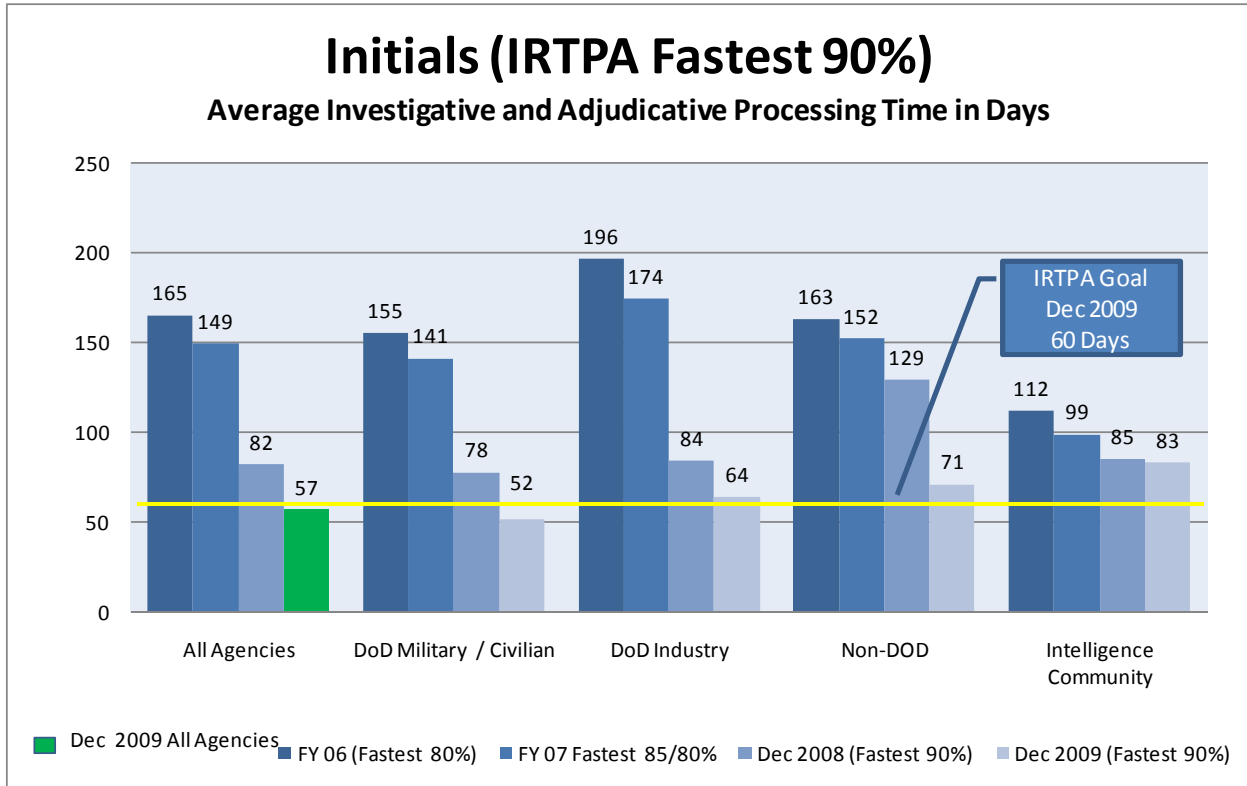
The Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA) established specific performance goals for the timeliness of security clearance investigations and adjudications, requiring an annual report of progress to meet these goals. Specifically, the Act required government agencies by December 2009 to complete 90% of their clearance determinations in an average of 60 days, to the extent practicable, with investigations completed in an average of 40 days and adjudications in an average of 20 days.

The Performance Accountability Council established a Performance Measurement and Management Subcommittee (Performance Subcommittee), which is co-chaired by the Security and Suitability Executive Agents. The Performance Subcommittee undertook a national effort to establish standardized performance measures for collection and reporting of metrics that satisfy the IRTPA requirements and identify additional measures that provide meaningful insight into progress and challenges of reform. With regard to the IRTPA requirements, the Performance Subcommittee established the following definitions for measuring security clearance investigations and adjudications:

- **Investigative time:** the time in days from the receipt date of the completed personnel security package (PSI forms, releases, fingerprint cards, etc.) by the investigative service provider to the date the final investigative file is forwarded to the adjudicative unit or received by the adjudicative facility if sent electronically.
- **Adjudicative time:** the time in days from the date the final investigative file is forwarded (or received electronically) to the adjudicative unit to the date of the adjudicative decision.

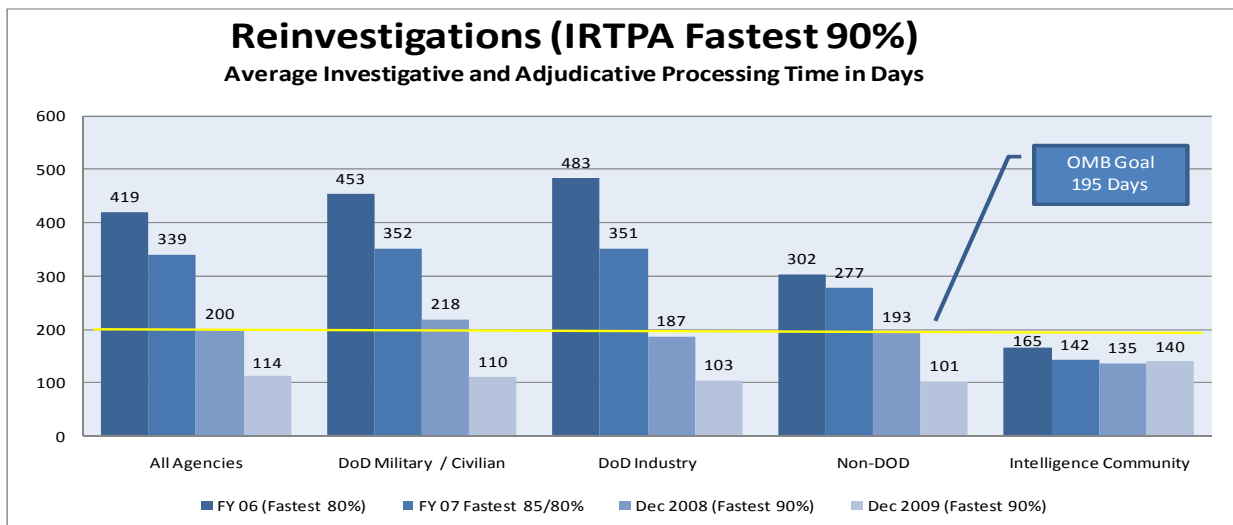
### PERFORMANCE TOWARD IRTPA GOALS FOR DECEMBER 2009

The following chart depicts the progress made from Fiscal Year (FY) 2006 through December 2009 towards IRTPA processing requirements for initial clearances. Overall, the government has shown a 190% improvement in security clearance processing times, reducing the combined investigation and adjudication processing time from 165 days to 57 days, while maintaining volumes approaching 900,000 clearance cases annually. More importantly, with overall processing time of 57 days, the US Government has met the December 2009 required goal (60 days) and is currently IRTPA compliant.

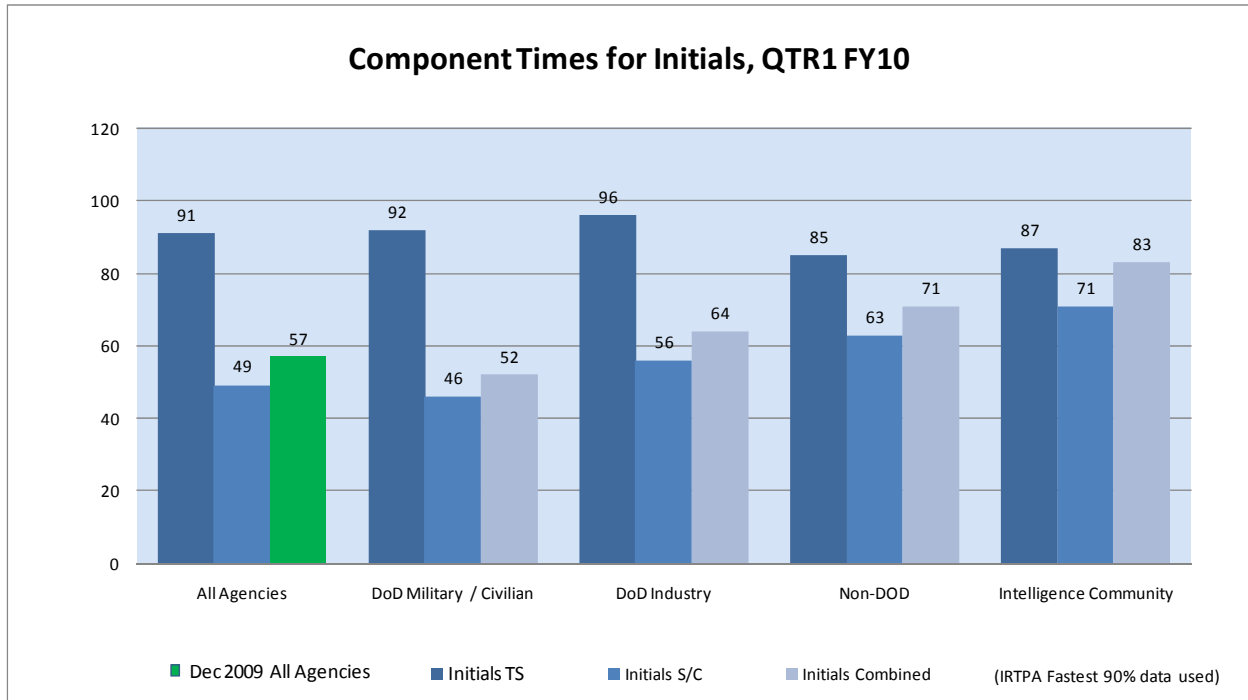


NOTE:  
 "Non-DOD" agencies are those agencies which are serviced by OPM in addition to those agencies with delegated investigative authority and not part of the Intelligence Community.

Although IRTPA did not identify specific timeliness goals for reinvestigation cases, OMB did mandate a government-wide reinvestigation goal of **195** days. The chart below demonstrates a reduction of reinvestigation processing time over the past three years of **305** days or a **268%** improvement throughout the government.



Further insight into performance is gained by breaking down the initial investigations measure by case type. Initial times are derived from the combination of the fastest 90% of Top Secret (TS) and Secret/Confidential (S/C) cases. The number of S/C cases far exceeds the number of TS cases, and S/C cases typically have shorter processing times. For CY 2009 S/C clearances account for 83% of the workload as compared to 17% for TS cases. The chart below reflects the processing times for each type of investigation, here shown alongside the combined average.



## 100% PERFORMANCE

In addition to the IRTPA requirement to measure and report the processing time for 90% of all clearance decisions, interest has been expressed in the processing time for the entire workload of investigations and adjudications. In the aggregate, the average timeliness of 100% of initial clearance cases is 86 days. Additional data and analysis help to better understand the actual performance of cases in the remaining (and most lengthy) 10% of clearance decisions. OPM, which conducted over 93% of initial clearance cases in FY10 Q1 provided the following data, which depicts three distinct performance periods: 61 to 90 days, 91 to 180 days and greater than 180 days.

When a case presents complications, processing times often increase. The IRTPA measure took this into account in focusing on the fastest 90% of cases. Some of the most common reasons for additional case processing time include: the development of serious issues that require extensive investigation for resolution; the coordination and completion of investigative work in overseas and isolated locations; investigations that are placed in a pending status because of other open or pending counterintelligence or law enforcement investigations that must be completed to produce a final investigation; and delays in obtaining third party records.

### Timeliness for remaining 10% of Investigations Completed

Completed in :	Top Secret	Secret / Confidential	All Initial Clearances	
	Number of Cases	Number of Cases	Total	% of All
61 to 90 days	*	8,733	8,733	6%
91 to 180 days	1,747	3,442	5,189	3%
> 180 Days	696	406	1,102	<1%

\*Cases in this age range are included in the fastest 90%

Data from OPM Serviced Agencies; Initial Clearances FY10 1 QTR

### Timeliness for remaining 10% of Adjudications Completed

Completed in :	Top Secret	Secret / Confidential	All Initial Clearances	
	Number of Cases	Number of Cases	Total	% of All
61 to 90 days	600	2,442	3,042	2%
91 to 180 days	819	3,518	4,337	3%
> 180 Days	794	6757	7,551	5%

Data from OPM Records; Initial Clearances FY10 1 QTR

The data in the previous chart is provided by OPM which collected the adjudicative data for those agencies it services.

Some of the most common reasons for adjudications to fall into the remaining 10% of work include: cases where the subject was requested to undergo a mental health, alcohol or drug evaluation by a duly qualified medical professional; cases where a rebuttal to the government's intent to deny or revoke a clearance is pending from the subject; cases where the subject is executing their due process rights of review or appeal, including a personal appearance with an Administrative Judge; cases where listed or developed issues require the investigation to be reopened to fully resolved complex issues; and cases awaiting the outcome of a court decision such as the disposition of DUI charges or bankruptcy proceedings.

NOTE: Total number of adjudication will differ from total investigations because the adjudications can include cases investigated in previous quarters.

## PERFORMANCE ACCOUNTABILITY COUNCIL (PAC) METRICS:

**Additional PAC Performance Goal.** Through the guidance of the PAC, the Performance Subcommittee established a measure to capture more of the end-to-end security clearance process from an applicant's perspective. This measure is referred to as Initiate Time and is defined as follows:

- **Initiate time:** the time in days from the date of submission by the applicant to the receipt date of all information/forms (PSI forms, releases, fingerprint cards, etc.) required to conduct an investigation by the investigative service provider.

This additional metric has a performance goal of 14 days. The intent of this new metric was for oversight entities to be able to more accurately monitor the progress of the entire security clearance process beyond just investigation and adjudication timeliness. Many initial security clearance applicants have the perception the entire process is the responsibility of the agency's security function and that responsibility begins at the time they submit their application. In reality, there is often additional agency processing that is accomplished prior to the information being forwarded to the investigative service provider. With the addition of this metric, the PAC has expanded the elements measured and increased the end-to-end performance measure to 74 days.

The following five charts demonstrate the various reporting criteria using the added PAC metric of "initiate time." The PAC processing requirement of 74 days for initial clearances is being met government-wide with an end-to-end processing time of 71 days. Beginning with the second quarter of FY 2009 when this metric was first collected, the current processing time has improved by 83 days or 116%. It should be noted that the slight variance between these PAC measures and the IRTPA measures is a by-product of slight differences in the case populations sampled for the end-to-end measure.

# Initial Clearances

Fastest 90%

Dec 09	Goal	Fastest 90%												End-to-End (Initiate + Inv. + Adj.)			
		Initiate				Investigate				Adjudicate				74 Days			
		14 Days				40 Days				20 Days				Average Days			
Agency	% of overall workload (FY10Q1)	Average Days				Average Days				Average Days				Average Days			
		2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10
All Agencies	100.0%	16	<b>11</b>	<b>13</b>	<b>11</b>	54	46	42	46	84	77	26	<b>14</b>	154	134	81	<b>71</b>
DoD	88.8%	16	<b>11</b>	<b>13</b>	<b>11</b>	53	46	41	42	88	71	21	<b>15</b>	157	128	75	<b>68</b>
Army	37.4%	<b>11</b>	<b>8</b>	<b>11</b>	<b>6</b>	62	52	42	42	187	132	30	<b>10</b>	260	192	83	<b>58</b>
Navy	17.7%	18	15	15	16	46	<b>38</b>	<b>40</b>	43	<b>14</b>	<b>11</b>	<b>11</b>	<b>12</b>	78	<b>64</b>	<b>66</b>	<b>71</b>
Air Force	13.2%	15	<b>11</b>	<b>12</b>	<b>12</b>	46	<b>36</b>	<b>37</b>	<b>40</b>	<b>17</b>	24	<b>20</b>	28	78	<b>71</b>	<b>69</b>	80
Industry	19.6%	17	15	<b>13</b>	<b>14</b>	50	43	43	44	26	<b>19</b>	28	<b>20</b>	93	77	84	78
DHS	2.3%	33	26	30	29	60	61	47	48	55	153	92	48	148	240	169	125
Energy	0.9%	<b>11</b>	<b>10</b>	<b>9</b>	<b>9</b>	55	43	43	47	37	<b>11</b>	<b>11</b>	<b>11</b>	103	<b>64</b>	<b>63</b>	<b>67</b>
Justice	0.7%	<b>14</b>	<b>13</b>	<b>11</b>	<b>12</b>	75	64	58	60	78	68	42	42	167	145	111	114
NRC	0.3%	43	35	38	23	67	55	55	55	98	112	116	49	208	202	209	127
Transportation	0.3%	18	<b>12</b>	<b>13</b>	15	45	<b>35</b>	<b>35</b>	<b>39</b>	<b>17</b>	<b>9</b>	<b>11</b>	<b>11</b>	80	<b>56</b>	<b>59</b>	<b>65</b>
Treasury	0.2%	21	<b>13</b>	16	18	58	47	50	54	57	23	27	54	136	83	93	126
HHS	0.3%	95	34	25	27	58	49	47	52	36	<b>13</b>	<b>11</b>	<b>13</b>	189	96	83	92
OPM	0.1%	<b>6</b>	<b>5</b>	<b>5</b>	<b>6</b>	78	60	66	70	<b>6</b>	<b>6</b>	<b>10</b>	<b>10</b>	90	<b>71</b>	81	86
Interior	0.1%	30	26	26	18	62	45	55	55	36	<b>19</b>	56	47	128	90	137	120
Commerce	0.1%	<b>10</b>	<b>6</b>	<b>7</b>	<b>9</b>	41	<b>34</b>	<b>37</b>	42	<b>7</b>	<b>6</b>	<b>8</b>	<b>9</b>	<b>58</b>	<b>46</b>	<b>52</b>	<b>60</b>
VA	0.0%	52	33	29	23	141	67	47	54	82	<b>20</b>	27	31	275	120	103	108

\* Either: (Not Applicable / Not Collected / Not Reported)

Blue text Dec 09 goal met

PAC Metrics FY10 Q1 ver3

# Initial Clearances (Cont.)

Fastest 90% →

Dec 09	Goal	Initiate				Investigate				Adjudicate				End-to-End (Initiate + Inv. + Adj.)			
		14 Days				40 Days				20 Days				74 Days			
		Average Days				Average Days				Average Days				Average Days			
Agency	% of overall workload (FY10Q1)	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10
IC	4.5%	*	15	10	7	51	51	56	61	11	13	16	22	62	79	82	90
CIA		*	*	*	*	51	62	71	78	17	32	39	49	68	94	110	127
DIA		*	*	*	41	37	33	35	55	7	8	17	9	44	41	52	105
FBI		37	54	43	35	88	57	73	76	3	5	6	6	128	116	122	117
NGA		*	45	7	7	71	24	28	25	4	18	18	31	75	87	53	63
NRO		25	26	4	3	26	27	26	27	15	13	15	31	66	66	45	61
NSA		*	10	6	7	79	64	60	70	7	8	15	10	86	82	81	87
State		*	*	*	*	44	41	41	43	8	7	5	11	51	48	46	54
Other Delegated	1.2%	16	12	15	13	41	51	86	50	21	13	23	19	65	76	124	82
USCG	0.8%	*	*	*	11	*	*	*	42	*	*	*	12	*	*	*	65
CBP	0.0%	24	70	3	30	35	32	197	233	8	43	15	31	67	145	215	294
ICE	0.0%	2	2	2	8	42	33	34	36	21	19	34	131	64	54	70	175
US AID	0.1%	21	39	38	24	50	39	37	45	6	6	9	20	78	84	84	89
BBG	0.0%	2	108	20	29	8	593	127	264	0	13	39	14	10	714	186	307
USSS	0.0%	*	61	30	14	*	185	171	104	*	27	23	18	*	273	224	136
ATF	0.0%	39	26	24	23	56	70	43	54	38	37	15	26	123	133	82	103
AF OSI	0.0%	14	63	0	1	108	112	63	71	14	22	10	20	136	197	73	92
DHS HQ	0.0%	17	6	8	*	52	42	40	*	34	26	7	*	103	74	55	*
Peace Corps	0.0%	5	3	7	11	35	25	28	33	5	5	4	4	45	33	39	48
TVA	0.0%	*	4	5	2	*	61	26	30	*	7	33	1	*	72	64	33
BEP	0.0%	18	7	4	8	161	156	227	24	29	454	92	2	209	617	323	34
BPD	0.0%	*	*	9	10	*	*	28	16	*	*	1	1	*	*	38	27
Postal Inspect	0.0%	0	0	2	9	92	48	38	43	0	7	1	2	92	55	41	54

\* Either: (Not Applicable / Not Collected / Not Reported)

Blue text Dec 09 goal met

PAC Metrics FY10 Q1 ver3

# Reinvestigation Clearances

Fastest 90%

FY 09	Goal	Fastest 90%												End-to-End (Initiate + Inv. + Adj.)			
		Initiate				Investigate				Adjudicate				195 Days			
		n/a				150 Days				30 Days				Average Days			
Agency	% of overall workload (FY10Q1)	Average Days				Average Days				Average Days				Average Days			
		2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10
All Agencies	100.0%	10	10	10	11	90	75	89	91	25	28	30	22	125	113	129	124
DoD	59.9%	11	11	10	10	92	82	93	90	24	28	24	22	127	121	127	122
Army	9.9%	11	11	11	10	91	85	100	98	14	14	12	10	116	110	123	118
Navv	9.9%	12	12	11	12	92	83	94	90	19	16	16	17	123	111	121	119
Air Force	15.0%	11	11	11	12	102	80	91	87	23	41	25	32	136	132	127	131
Industry	21.3%	8	7	7	8	89	83	91	87	28	31	29	19	125	121	127	114
Energy	6.1%	7	8	8	6	66	62	74	67	20	16	15	11	93	86	97	84
Justice	4.0%	8	7	6	6	97	88	86	90	60	52	22	34	165	147	114	130
Treasury	0.0%	19	9	6	5	80	56	72	77	91	50	13	32	190	115	91	114
DHS	2.5%	14	15	13	16	108	98	98	99	97	128	181	78	219	241	292	193
OPM	1.1%	5	4	4	4	98	94	94	92	4	5	9	9	107	103	107	105
NRC	0.3%	55	22	16	15	145	86	84	71	178	47	20	11	378	155	120	97
Commerce	0.1%	7	5	5	7	58	51	64	77	5	4	9	6	70	60	78	90
Interior	0.1%	25	19	13	12	76	60	87	77	18	24	29	61	119	103	129	150
HHS	0.1%	23	15	18	20	79	66	68	68	12	7	8	8	114	88	94	96
Transportation	0.1%	29	15	25	18	70	67	88	73	18	12	12	13	117	94	125	104
VA	0.0%	50	15	12	4	107	77	109	127	34	16	17	13	191	108	138	144

\* Either: (Not Applicable / Not Collected / Not Reported)

Blue text Dec 09 goal met

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## Reinvestigation Clearances (Cont.)

Fastest 90% →

FY 09	Goal	Initiate				Investigate				Adjudicate				End-to-End (Initiate + Inv. + Adj.)			
		n/a				150 Days				30 Days				195 Days			
		Average Days				Average Days				Average Days				Average Days			
Agency	% of overall workload (FY10Q1)	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10
IC	21.4%	*	13	12	13	85	75	84	99	22	26	20	27	107	114	116	139
CIA		*	*	*	*	157	128	150	230	49	63	50	57	206	191	200	287
DIA		*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
FBI		*	46	41	80	65	11	44	68	11	16	20	26	76	73	105	174
NGA		*	56	7	7	215	61	79	70	16	19	25	21	231	136	111	98
NRO		14	5	6	3	85	72	71	67	18	13	10	19	117	90	87	89
NSA		*	24	16	11	188	164	125	131	26	15	18	19	214	203	159	161
State		*	*	*	*	89	82	86	84	8	33	7	20	97	115	93	104
Other Delegated	2.7%	4	25	21	29	52	83	93	105	19	65	47	26	75	173	161	160
USCG	0.6%	*	*	*	8	*	*	*	81	*	*	*	12	*	*	*	101
ATF	1.4%	13	46	29	29	72	100	114	121	22	63	35	37	107	209	178	187
ICE	0.0%	2	2	2	*	39	32	32	*	26	57	114	*	67	91	148	*
US AID	0.2%	14	7	10	11	91	76	49	47	6	4	18	30	111	87	77	88
Postal Inspect	0.3%	0	0	3	4	53	40	48	39	0	8	2	2	53	48	53	45
CBP	0.0%	12	136	27	0	33	72	116	233	19	58	68	21	63	266	211	254
USSS	0.2%	*	48	*	157	*	85	*	193	*	166	*	18	*	299	*	368
BEP	0.0%	102	8	6	*	73	319	425	*	115	518	645	*	290	845	1,076	*
Peace Corps	0.0%	3	1	9	*	15	17	12	*	3	3	2	*	20	21	23	*
BPD	0.0%	*	*	12	6	*	*	30	34	*	*	1	19	*	*	43	59
TVA	0.0%	*	*	3	*	*	*	32	*	*	*	1	*	*	*	36	*
BBG	0.0%	2	*	*	*	324	*	*	*	6	*	*	*	332	*	*	*

\* Either: (Not Applicable / Not Collected / Not Reported)

Blue text Dec 09 goal met

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## Suitability Determinations (OPM Conducted Investigations)

		Fastest 90%															
Agency	% of overall Gov't workload (FY10Q1)	Initiate				Investigate				Adjudicate				End-to-End (Initiate + Inv. + Adj.)			
		Average Days				Average Days				Average Days				Average Days			
		2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10	2Q 09	3Q 09	4Q 09	1Q 10
All Agencies	100.0%	28	28	25	27	54	44	42	43	63	46	44	40	145	118	111	110
DoD	37.0%	24	25	24	28	49	41	39	40	33	34	34	30	106	100	97	98
Army	11.4%	24	23	22	28	52	43	40	41	32	31	31	28	108	97	93	97
Navy	7.9%	28	29	28	28	46	40	38	40	30	45	39	32	104	114	105	100
Air Force	9.0%	25	20	21	24	48	41	41	40	37	41	39	40	110	102	101	104
Industry	0.1%	*	*	38	38	*	*	36	38	*	*	17	16	*	*	91	92
DHS	12.8%	47	45	35	36	64	49	46	45	117	74	84	76	228	168	165	157
Energy	0.8%	16	25	16	14	48	38	38	39	27	29	40	28	91	92	94	81
Justice	5.1%	54	27	36	29	76	63	54	56	172	105	96	112	302	195	186	197
Transportation	2.7%	21	15	16	15	46	39	37	39	19	8	10	11	86	62	63	65
HHS	3.8%	17	26	21	30	58	50	50	50	148	100	139	175	223	176	210	255
NRC	0.0%	60	53	42	50	67	56	54	47	205	244	41	57	332	353	137	154
OPM	0.3%	9	10	8	11	61	54	57	59	7	5	8	6	77	69	73	76
Treasury	6.5%	25	23	21	17	53	45	49	52	46	52	50	40	124	120	120	109
Interior	4.4%	9	16	19	28	52	39	37	42	80	26	22	42	141	81	78	112
Commerce	3.7%	24	21	23	20	57	52	51	46	96	101	98	75	177	174	172	141
VA	22.8%	26	29	25	23	50	41	39	40	37	31	24	24	113	101	88	87

\* Either: (Not Applicable / Not Collected / Not Reported)

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