



**DOD PLAN  
FOR IMPROVEMENT  
IN THE  
GAO HIGH RISK AREA  
OF  
SECURITY CLEARANCE PROCESSING  
TIMELINESS AND QUALITY**

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# High Risk: Security Clearance Processing

## Planning Document

**OMB Contact:** Richard Allen (202.395.3799)

**DoD Owner:** Elizabeth McGrath (703.695.9715)

**DoD Contact:** David Kudla (571.216.2539)

**GAO Contact(s):** Brenda Farrell (202.512.3604), David Moser (202.512.7611)

**Scope:** The Joint Security and Suitability Reform Team (Joint Reform Team)\* must resolve existing timing and quality issues by modernizing and streamlining personnel security clearance processes.

**Overall:** Develop and deploy a transformed, modernized, fair and reciprocal security clearance process universally applicable to the DoD, Intelligence Community and other U.S. Government agencies.

**Short-Term:** Produce significant improvements to the timeliness of making security clearance determinations and the quality of the investigations and adjudications that support them.

### Focus Areas:

#### 1. Policy:

- Establish a Federal governance structure that oversees the alignment of the clearance and suitability processes and drives implementation across the Federal government.
- Review and modify, if necessary, statutes, legislation and executive-level documents to support the transformed clearance process.

#### 2. Information Technology (IT):

- Apply 21st century technology using an enterprise-wide approach that will result in an end-to-end automated capability required for all components and operations of the personnel security and suitability community
- Provide an end-to-end, secure, authoritative capability within the Federal Government for timely dissemination of and access to security information
- Use automation to make the process faster, reduce manual activity and leverage additional data sources

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\* The Joint Reform Team is comprised of representatives from the Department of Defense, the Office of the Director of National Intelligence, the Office of Personnel Management, and the Office of Management and Budget.

**3. Process:**

- Identify near term process improvements and longer term initiatives needed to enable implementation of the transformed vision.
- Apply Business Process Reengineering methodologies including Lean Six Sigma principles to streamline processes.

**Responsible Organizations**

The Joint Reform Team is composed of representatives from the Department of Defense, the Office of Management and Budget (OMB), the Office of the Director of National Intelligence (ODNI), and the Office of Personnel Management (OPM).

**Goals:**

The Joint Reform Team’s goals under this plan are to improve quality and timelines of security clearance processing by creating a modernized and comprehensive credentialing, security clearance and suitability processes that would employ updated and consistent standards and methods.

The Joint Reform Team is adopting and pursuing implementation of a process design whereby:

- More relevant information is collected and validated at the beginning of the process, using the application, automated record checks, and subject interview.
- Automation is used to make the process faster, reduce manual activity and leverage additional data sources.
- Field investigative activity is focused to collect and validate targeted information.
- Risk decisions rely on modern analytic methods rather than practices that avoid risk.
- Relevant data is better used for subsequent hiring or clearing decisions, reducing duplication of requests and ensuring consistent quality and standards.
- Continuous evaluation techniques replace periodic reinvestigations, utilizing more frequent automated database checks to identify security relevant issues among already cleared personnel, permitting targeted resolution of cases as issues arise.

**Metrics and Annual Targets:**

<b>Metric</b>	<b>CY06</b>	<b>CY09</b>
Processing Time*	80% of initial clearances processed in an average of 120 days (90 days for investigation, 30 days for adjudication)	90% of initial clearances processed in an average of 60 days (40 days for investigation, 20 days for adjudication)
Cost		STAGE 1: Average cost of applicant and security manager time by case type during the SF-86 submission process (Not being measured in FY08) STAGE 2: Average investigation cost for each case type based on OPM billing to DoD for scheduled cases (includes add-

		on work such as SPINs) STAGE 3: Average adjudication cost per case type based on data from JPAS and CAFs
Timeliness		STAGE 1: Average time in days for each case type for the SF-86 submission process starting with security manager inviting the subject into eQIP to fill out the security questionnaire. STAGE 2: Investigation time in days required by OPM for each case type measured from acceptance to OPM mail date. Measures include minimum, mean, and maximum days for fastest 90 percent, 95 percent, and all cases STAGE 3: Time in days required by CAFs to complete adjudications for each case type measured from OPM mail date to adjudication completion. Measures include minimum, mean, and maximum days for fastest 90 percent, 95 percent, and all cases.
Quality		STAGE 1: Percentage of SF-86s by case type rejected by OPM including reasons for rejection STAGE 2: Estimate of the percentage by case type of incomplete investigations and reasons for deficiency (scope/ issue resolution) using PERSEREC on-line form - Rapid Assessment of Incomplete Security Evaluations (RAISE) of Evaluations I. STAGE 3: Estimate of the percentage by case type of incomplete adjudication decision documentation and reasons why the documentation is incomplete using PERSEREC on-line form - Review of Adjudication Documentation Accuracy and Rationales (RADAR)

\* Timeliness goals from Intelligence Reform and Terrorism Prevention Act of 2004

**Initiatives:**

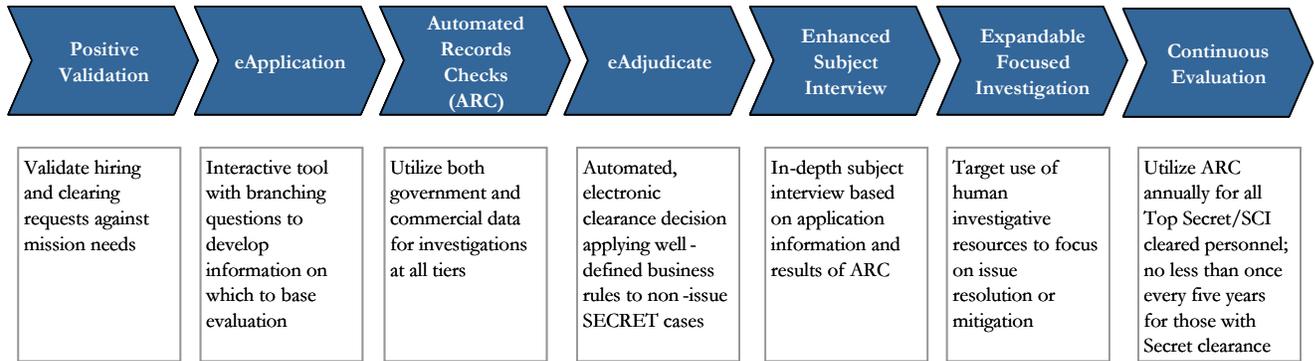
The major initiatives are the six process steps of the transformed vision for security clearance processing, which include Validate Need, eApplication, Automated Records Checks, eAdjudicate, Expanded Focused Investigation/Enhanced Subject Interview and Continuous Evaluation. All of these steps contribute to the three identified focus areas, Policy, Information Technology and Process.

Details on each initiative are attached and include a description of the initiative, the responsible organization, expected outcomes, accomplishments, milestones, impediments/challenges, and metrics. A summary is also included in Appendix A.

**Methodology:**

The transformed process depicted below is composed of steps common to all hiring and clearing decisions. By managing the hiring and clearing process from an enterprise end-to-end perspective, we are postured to design, coordinate, and implement policies and standards that enable effective and efficient hiring and clearing decisions. In addition, we will apply process improvement principles to establish performance metrics for each step to more rapidly identify bottlenecks that negatively impact overall case processing timelines.

The overall program is comprised of the process steps and enablers listed above. Various representatives from the Joint Reform Team are responsible for the management of the policy, process and IT aspects of each initiative which are coordinated to inform the overall the enterprise-wide solution.



# Validate Need

**Focus Area:** Policy, Information Technology, Process

**Lead Agency:** Joint Reform Team (DoD, DNI, OPM, OMB)

**Description:** Optimizing policy, procedures, and tools before an application is submitted and investigations are requested to ensure that all investigative requests are authorized, funded and not redundant.

**Expected Outcomes:**

- Improves collection of accurate security program costs
- Standardizes clearances tied to agency position designations
- Enhances reciprocity through greater transparency (i.e. visibility of existing clearances)
- Reduces duplicate requests and unnecessary investigative activity
- Improves billing accuracy associated with investigation requests

**Accomplishments:**

Mar 08	Completed <i>Analysis of Third Party Data Validation Findings</i> demonstration
Jul 08	Develop functional requirements for a solution to Validate Need
Aug 08	Develop high level functional requirements for DoD billing validation

**Milestones:**

Sep 08	Develop and deploy single sign-on interface for DoD and non-DoD entities to provide expanded HSPD-12, suitability and clearance data
Nov 08	Develop policy and functional requirements for incorporating previously collected and validated data by a trusted information provider into the Personnel Security Investigation
Nov 08	Publish pre-application best practices
Dec 08	Develop simplified position designation structure
Jan 09	Develop billing validation tool

**Impediments/Challenges:**

- Information access/sharing across Federal government

**Proposed Metrics:**

- Total number of requests by type (Hiring, adding new contractor, assignment of new position)
- Number of invalid requests by type
- Number of duplicative requests by type
- Number of requests designated as high priority by type
- Number of requests over projection/budget by type
- Billing accuracy against investigation requests

- Average number of days from initiate to authorize e-application

**Remarks:**

The Joint Reform Team will draft policy authorizing the use of certified pre-employment screening in lieu of duplicative field leads and vouchers to support this initiative.

# eApplication

**Focus Area:** Policy, Information Technology, Process

**Lead Agency:** Joint Reform Team (DoD, DNI, OPM, OMB)

**Description:** Electronic application that is a dynamic, interactive, web-based tool that guides users in providing biographic details required by the hiring and clearing process.

**Expected Outcomes:**

- Branching questions provides for more efficiently collected background data for decisions
- Reduces initial processing time through use of electronic fingerprinting, on-demand instructions, and quality controls
- Improves self-reporting of issues and reduces overall case processing times due to increased accuracy

**Accomplishments:**

Feb 08	Conducted Information Technology As-Is Assessment
Mar 08	Completed <i>Value of Collecting Additional Applicant Information</i> demonstration
Mar 08	Completed <i>Branching Questions Developed and Vetted by Subject Matter Experts</i> demonstration
Mar 08	Completed <i>Advantages of Using eApplication</i> demonstration

**Milestones:**

Sep 08	Field enhanced eQIP
Nov 08	Continue procurement and deployment of worldwide fingerprint stations
Nov 08	Complete end-to-end demonstration which feeds eQIP applicant submission data to downstream processes
Jan 09	Complete public vetting of Standard Form 86 that includes branching questions and revised consent form
Feb 09	Field digital signature capability
Jul 09	Field next generation eApplication to include branching questions, tiered eQIP, and expanded quality controls/data validation
Sep 09	Complete implementation of eQIP across the USG

**Impediments/Challenges:**

- Coordination of modifications of multiple forms (Standard Forms 85, 85P and 86) to incorporate future electronic application requirements
- Developing an automated solution with continuing need for hardcopy forms

**Proposed Metrics:**

- Average time for subject to complete eApplication by type
- Number of application errors by type

- Number of incomplete applications submitted by type
- Percent of applications rejected

**Remarks:**

Development activities for eApplication are dependent on the completion of the public vetting of branching questions, the completion of the simplified position designation structure and revision of the investigative standards.

# Automated Records Checks (ARC)

**Focus Area:** Policy, Information Technology, Process

**Lead Agency:** Joint Reform Team (DoD, DNI, OPM, OMB)

**Description:** ARC is a centralized and integrated set of IT services to request, collect, and validate electronically accessible, adjudicative-relevant data using the most efficient and cost-effective technology and methods available. Ultimately, ARC entails fully automatic, machine-to-machine interaction to request, collect, and validate machine readable data and inform subsequent steps in an end-to-end electronic case management system.

## Expected Outcomes:

- Reduces time and cost of investigative activity
- Identifies issue information faster
- Supports electronic adjudication and continuous evaluation of cleared personnel

## Accomplishments:

Feb 08            Conducted Information Technology As-Is Assessment  
Mar 08            Completed *Study of Automated Records Check Effectiveness for Early Issue Detection in Periodic Reinvestigations* demonstration

## Milestones:

Sep 08            Enhance Automated Continuous Evaluation System (ACES) to support end-to-end demonstration with the Department of the Army  
Oct 08            Complete Electronic Data Provider Studies  
Nov 08            Deploy enhanced ACES capability to select DoD population  
Nov 08            Develop plan for potential near-term enhancements to current records checks capability at OPM  
Nov 08            Complete end-to-end demonstration performing automated records checks on recipient data (results analyzed against traditional record checks)  
Dec 08            Develop plan for Initial Operating Capability of ARC  
Sep 09            Deploy ARC for Continuous Evaluation

## Impediments/Challenges:

- The availability of select records checks (i.e. Local Agency Checks)
- Filtering of false positives from Electronic Data Provider (EDP) results

## Proposed Metrics:

- Processing time from EDPs by source
- EDP error rate of returned information by source
- Number of data sources
- Number of data requests outstanding

**Remarks:**

ARC is the single initiative in the overall program without a system in operation throughout the Federal government. Components of automated records checks exist today, such as electronic checks of fingerprints with the FBI, however such checks need to be consolidated to form the overarching system.

The Joint Reform Team will develop aligned Suitability and Security Investigative Standards which will mandate the use of automated checks to the greatest extent possible and to ensure standard and criminal record checks are conducted to mitigate gaps in automated checks.

# eAdjudication

**Focus Area:** Policy, Information Technology, Process

**Lead Agency:** Joint Reform Team (DoD, DNI, OPM, OMB)

**Description:** A viable technical means to automatically, electronically grant clearances in cases with no actionable issues by applying computer coded business rules to the adjudicative decision process.

**Expected Outcomes:**

- Reduces time and cost of adjudication of cases with no actionable issues
- Reduces work load volume
- Promotes consistency in application of adjudicative guidelines
- Reduces time and cost of investigative file transmission

**Accomplishments:**

Feb 08	Completed Information Technology As-Is Assessment
Mar 08	Completed <i>DoD/Personnel Security Research and Education Center (PERSEREC) Studies Based on Previously Adjudicated Cases</i> demonstration
Mar 08	Completed <i>Central Adjudication Facility (CAF) Backlog Analysis</i> demonstration
Mar 08	Completed <i>Evaluation of Adjudicator Training and Certification</i> demonstration

**Milestones:**

Dec 08	Deploy Secret clean case eAdjudication for select DoD populations
Feb 08	Deploy clean case eAdjudication for all DoD populations
Sep 09	Implement delivery of enhanced electronic case file data
Sep 09	Expand electronic case file delivery to all adjudication facilities

**Impediments/Challenges:**

**Proposed Metrics:**

- Number of cases eAdjudicated and manually adjudicated
- Number of issues by issue code
- Number of cases with incomplete data
- Number of actionable cases identified by eAdjudication
- Average time to process eAdjudication to grant or deny interim SECRET / TS.
- Average time to make grant SECRET clearance.
- Post adjudication audit for quality control

**Remarks:**

Executive Order 13467 amended Executive Order 12968 to permit eAdjudication.

Developments of the eAdjudication strategy are being communicated to the Central Adjudication Facilities Consolidation initiative for assured alignment.

The Joint Reform Team will develop e-Adjudication Policy that will authorize e-Adjudication and provide implementation guidelines.

# Expanded Focused Investigation (EFI)/ Enhanced Subject Interview (ESI)

**Focus Area:** Policy, Information Technology, Process

**Lead Agency:** Joint Reform Team (DoD, DNI, OPM, OMB)

## **Description:**

**EFI:** In-depth field investigation of potential issues reported by the subject or found through Automated Records Checks.

**ESI:** An in-depth discussion between an interviewer and subject to ensure a full understanding of the applicant's information, potential issues and mitigating factors.

## **Expected Outcomes:**

- Reduce largest driver of time and costs for investigations (manual investigations)
- Relevant investigative leads gathered through more efficient collection of applicant data
- Mitigates some risk that may be added by greater reliance on automated record checks
- Training improves quality of investigations and adjudications, increasing reciprocity

## **Accomplishments:**

Feb 08            Completed Information Technology As-Is Assessment which identified the ability to "bundle" investigative information and route it for focused investigations

Mar 08            Completed *Expanded Focused Investigation (EFI) Study of Actionable Information Relevant to Adjudication* demonstration

## **Milestones:**

Sep 08            Revise current Top Secret subject interview policy to address developed issues

Nov 08            Demonstrate EFI/ESI concept on select IC population

Dec 08            Revise Investigative Standards for EFI/ESI

Jan 09            Initiate implementation of revised EFI/ESI standards

Dec 09            Develop standardized training and certification for security professionals

## **Impediments/Challenges:**

- Agreement on investigation standards across all agencies

## **Proposed Metrics:**

- Number of cases requiring further investigation and number of leads
- Average time to process further investigation and leads
- Number of insufficient reports of investigation.

**Remarks:**

The EFI and ESI initiatives are closely linked in outcomes, accomplishments, milestones and metrics and are therefore paired for this analysis.

The Joint Reform Team will develop aligned Suitability and Security Investigative Standards which will mandate Expanded Focused Investigations for issue cases.

# Continuous Evaluation (CE)

**Focus Area:** Policy, Information Technology, Process

**Lead Agency:** Joint Reform Team (DoD, DNI, OPM, OMB)

**Description:** Scheduled updates of a subject's eApplication information and ARC data to ascertain on a more frequent basis whether an eligible employee with access to classified information continues to meet the requirements for access.

**Expected Outcomes:**

- Continuous evaluation conducted in lieu of 5, 10, and 15 year periodic reinvestigations
- Mitigates some risk that may be added by greater reliance on automated record checks and focused investigations in initial cases
- Reduces time and cost of investigative activity
- Identifies issue information faster
- Supports electronic adjudication and continuous evaluation of cleared personnel

**Accomplishments:**

Feb 08            Completed Information Technology As-Is Assessment  
Mar 08            Completed *Need Analysis Based on Current Periodic Reinvestigation (PR)*  
                      *Backlog* demonstration

**Milestones:**

Dec 08            Develop plan for Initial Operating Capability for ARC  
Sep 09            Deploy ARC for Continuous Evaluation

**Impediments/Challenges:**

- Filtering of false positives from Electronic Data Provider (EDP) results

**Proposed Metrics:**

- Percent of population currently in CE
- Average number of days/years between CE
- Percent not clean from CE
- Reasons for trigger into CE (360 review, event, etc.)
- Number and frequency of individuals leaving system
- Average number of days to process CE actionable and non-actionable cases.

**Remarks:**

Executive Order 13467 amended Executive Order 12968 to support Continuous Evaluation.

This initiative utilizes automated records checks as a means for performing periodic reinvestigations.

The Joint Reform Team will develop aligned Suitability and Security Investigative Standards which will mandate the use of automated checks to the greatest extent possible, ensure standard and criminal record checks are conducted to mitigate gaps in automated checks, and Continuous Evaluation/Reinvestigations.

The Joint Reform Team will develop a Fitness Reciprocity Executive Order which will grant reciprocity for fitness determination and authorize reinvestigations for individuals in public trust position