Security and Suitability Process Reform

December 2008

Provided by the Joint Security and Suitability Reform Team

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

DEPUTY DIRECTOR
FOR MANAGEMENT

December 17, 2008

The Honorable George W. Bush
President of the United States
Washington, DC

Dear President Bush:

This is to report on the progress made to improve the timeliness and effectiveness of our hiring and clearing decisions and the specific plan to reform the process further, in accordance with our initial proposals made in April of this year.

In 2005, the fastest 90% of security clearance determinations took an average of 265 days to complete, which was unsatisfactory. The Intelligence and Terrorism Prevention Act of 2004 (IRTPA) calls for the fastest 90% of security clearance determinations to be made in 60 days by December, 2009, to the extent practicable. This created a target to improve timeliness by 205 days, 90% of which has been accomplished. This detailed plan to improve and reform the process further will make it possible to achieve the IRTPA timeliness goal, at a minimum, and better ensure the quality of hiring and clearing decisions.

The governance structure for this reform effort, the Suitability and Security Clearance Performance Accountability Council (PAC), will ensure these reforms are implemented as promised.

Sincerely,

Clay Johnson

EXECUTIVE SUMMARY

In response to significant, continuing security clearance timeliness concerns, Congress called for improvements and established specific timeliness goals as part of the Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA). Since the enactment of IRTPA, ***average timeliness for 90 percent of all clearance determinations reported has been substantially improved, from 265 days (in 2005) to 82 days (4th Quarter, Fiscal Year (FY) 2008).*** These performance gains have been realized primarily as a result of increased investigative and adjudicative capacity, and increased accountability for performance.

To further improve timeliness and achieve the IRTPA goal of 60 days or better, a transformed process for making hiring and clearing determinations has been designed, as first described in the Initial Report on Security and Suitability Process Reform, dated April 30, 2008. This process will leverage modern tools and technologies, yet still yield the quality of information needed to make these determinations. Progress toward, and future plans for, implementing the transformed process are detailed in this report, including:

Foundational policy changes needed to ensure reform takes root and is sustained. This includes Executive Order 13467, signed June 30, 2008, and a December 2008 revision to the Federal Investigative Standards that changes the ground rules by which background investigations are performed.

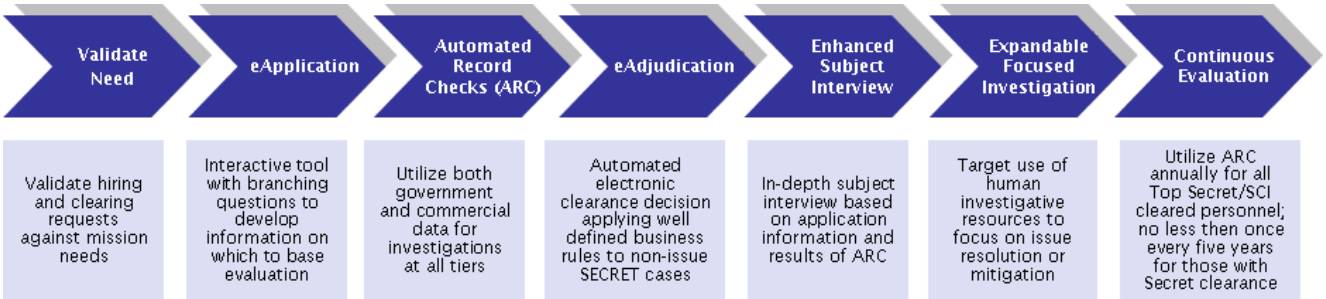
The establishment of a governance structure for this reform effort, the Suitability and Security Clearance Performance Accountability Council (PAC), to ensure these reforms are adopted and put into operation as planned. The PAC will hold agencies accountable for the timeliness of their determinations, and ensure all stakeholders are kept informed as to the progress of the reform effort.

An Information Technology (IT) strategy that focuses on utilizing existing systems and applications within the Federal Government, modifying and adapting the systems and applications to create a framework for future phased implementation. This approach will enable near term implementation, align IT modernization plans with the transformed process, and enable the use of components to reduce duplication and enhance reciprocity while focusing on quality, service, and cost.

With sustained leadership attention and commitment, these reforms will be substantially operational across the Federal Government by the end of Calendar Year (CY) 2010, with plans to begin phased implementation in 2009. These plans, in conjunction with improvements made to date, provide the confidence to project that we will meet the December 2009 goal of making initial hiring and clearing determinations in an average 60 days or less.

INTRODUCTION

The Joint Security and Suitability Reform Team (Joint Reform Team) Initial Report on Security and Suitability Process Reform, dated April 30, 2008, provided a framework to make the hiring and clearing processes even more timely and efficient. The framework aligns suitability and security clearance processes, enabling the application of consistent standards and the reciprocal recognition of investigations.



This report highlights key reform milestones and outlines future activities and their expected implementation timeframes. It also documents progress toward meeting Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA) timeliness requirements.

KEY ENABLERS OF REFORM

Security clearance and suitability reform requires not only the technological and process refinements to conduct hiring and clearing decisions more quickly and efficiently, but also the leadership structure and oversight authority to carry the reform efforts through to its intended vision. The three key enablers of reform necessary to create the foundation for the transformed system and ensure its success are: an effective Federal governance structure; revised Federal Investigative Standards; and an integrated Enterprise Information Technology (IT) Strategy.

Governance. The April 2008 Report recommended that an Executive Branch governance structure is needed to ensure the hiring and clearing processes are effectively coordinated across the government. The necessary structure is provided by Executive Order 13467, *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information,* which was signed on June 30, 2008.

Executive Order 13467 established an executive agent to oversee investigations and adjudications for employment suitability, and another to have the corresponding role for security clearances. OPM became the Suitability Executive Agent, continuing its statutory responsibilities over suitability matters, and the Director of National Intelligence was named the Security Executive Agent, and will be responsible for overseeing investigations and determinations of eligibility for access to classified information. Executive Order 13467 also established a Federal-level Suitability and Security Clearance Performance Accountability Council (PAC), responsible to the President for achieving reform goals, ensuring alignment, measuring agency performance, holding agencies accountable for implementation, and establishing information technology requirements.

The PAC established two standing subcommittees. The Performance Measurement and Management Subcommittee is responsible for establishing government-wide metrics that measure quality, timeliness, and reciprocity for investigations and adjudications. The Training Subcommittee is responsible for establishing core competencies for security clearance and suitability professionals, and developing standardized training and certification programs. The PAC and its subcommittees will continue to steer and monitor implementation of reform by the Suitability and Security Executive Agents and executive branch agencies.

Two future initiatives have potential to enhance governance and promote alignment of suitability and security processes. One would address reciprocity for agency determinations of whether excepted service and contractor employees are fit to perform work for or on behalf of the Federal Government based on their character and conduct. The other considers requiring reinvestigations of those Federal employees holding public trust positions.

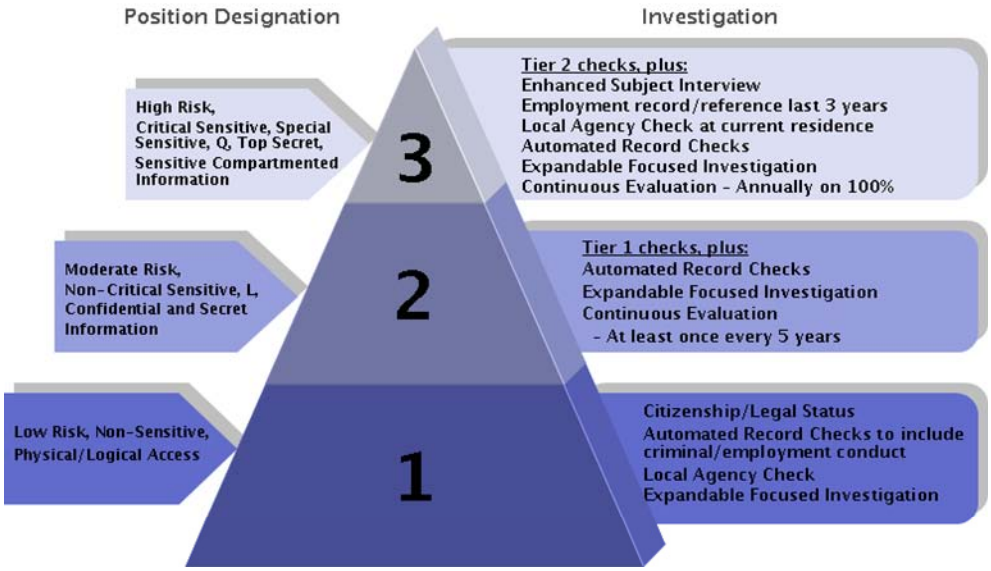
Together, these initiatives will provide the governing foundation to sustain reform momentum. The Joint Reform Team will continue to assess whether additional executive branch policy or legislative authority is required to steer reform and, if so, make recommendations to the Suitability and Security Executive Agents to adopt or seek those policies or authorities.

Federal Investigative Standards. In December 2008, the Director of National Intelligence and Director of the Office of Personnel Management approved revised Federal Investigative Standards to implement the transformed process design. The revised standards will be used for both hiring and clearing investigations and are a vital piece of the reform effort. They require the use of automation to the greatest extent practicable, both to speed processing and to permit use of new tools.

Case Flagging Strategy: The revised investigative standards apply a case flagging strategy to identify cases with potential issues that require further investigation. This strategy uses automated record checks of commercial and government databases, the subject's application, and when required, the subject interview to identify those cases requiring human investigation and adjudication. The "clean cases" with no flagged issues will be electronically adjudicated (eAdjudicated), which improves timeliness and allows adjudicative resources to concentrate on cases where issues are present.

This transition to automated case flagging in the investigative standards is driven by the results of several research efforts. The research showed that the flagging strategy, as described, is as effective as traditional field leads at identifying cases with issues. The case flagging strategy, in concert with Expandable Focused Investigation (EFI) methods, focuses investigative resources on the cases that need additional scrutiny.

Tiered Investigative Model and Simplified Position Designation Approach: The revised investigative standards employ a three-tiered investigative model that aligns the investigative requirements for both security clearance and suitability cases according to their relative risk. This alignment reduces the types of *initial* investigations from fifteen to three and the types of *reinvestigations* from five to two. The alignment also eliminates customization of investigations, further emphasizing standardization and better enabling government-wide reciprocity. The position designation process, used to determine risk and sensitivity based on the nature and duties of the position, also was simplified to align with the tiered investigative model. These initiatives improve the efficiency of the investigative and adjudicative agency infrastructures since investigators, adjudicators, and associated policies and processes will no longer have to support numerous specialized requirements.



The new investigative tiers depicted on page 4 align low, moderate, and high risk position designations with investigative requirements for determining access to classified information. Each successive investigative tier builds on, but does not duplicate, the tier below it. Additionally, investigations do not duplicate leads previously conducted that do not change over time. Reducing the range of investigative levels will simplify the process, focus resources, ensure consistency, and support reciprocity.

Implementation: Adoption of the revised investigative standards is dependent upon the availability of automated collection capabilities to support implementation. The implementation strategy will provide for incremental deployment in select populations beginning in 2009. Initial implementation plans will be complete no later than March 2009. Agencies will continue to use the existing investigative standards until the implementation of the revised investigative standards.

Relevant data is better used for subsequent hiring or clearing decisions, reducing duplication of requests and ensuring consistent quality and standards.

Enterprise IT Strategy. Currently, there are many hiring and clearing systems in use across the U.S. government. Many of these systems provide similar functionality, but are not interoperable. The IT strategy for the reform effort, scheduled for completion February 2009, focuses on leveraging the existing systems and applications by modifying and adapting their capabilities to create a framework for phased implementation. This approach will enable near-term implementation, align IT modernization plans with the reform vision, reduce duplication, and enhance reciprocity. The strategy recognizes the unique requirements of the Intelligence Community (IC), which necessitate operation outside the Federal-civilian and Department of Defense (DoD) populations (mainstream). Nevertheless their need to share information and collaborate within the larger community means the tools, services, and standards developed for the mainstream will be leveraged to the maximum extent possible in the IC environment.

Each of the seven process design modules that follow is an enterprise capability and when integrated together will enable the end-to-end transformed process. The figure on pages 13 - 14 summarizes the CY09 implementation timelines.

PROCESS DESIGN IMPLEMENTATION

The transformed process design was validated through research and demonstration projects. Each step of the transformed design provides opportunities to leverage current processes and introduce new capabilities where necessary. These reforms are described below in further detail, and highlight the capabilities achieved to date and those planned for the future.

Validate Need

Validate Need focuses on ensuring hiring and clearing requests are tied to mission needs by optimizing policy, procedures, and tools to prevent unnecessary investigation requests. This design provides a predictable, consistent process whereby agencies can validate existing information and only submit individuals to the hiring and clearing process as needed. Employers will check the appropriate databases to determine if individuals selected for Federal positions or to work as contractor employees have qualifying clearances or open investigations that meet current requirements.

Achievements: Established a single access point to search relevant clearance and investigation data via OPM's enhanced Clearance Verification System (CVS) to increase reciprocity of investigations and hiring and clearing decisions.	**Sept 08**
2009 Milestones: Further improvements will include a web-based platform to increase accessibility and improve access to IC records to enhance reciprocity of investigations and clearance determinations.	**Sept 09**
Estimated Operational Date:	**2QCY10**

Pre-Application Best Practices: Best practices for reducing errors and identifying common mistakes in the application process have been gathered from Government and Industry and compiled into a product available to all stakeholders. Through the PAC, recommended standard operating procedures will be promoted, and agency performance measured, to reduce submission time and improve quality of information available for Investigative Service Providers.

Single Search Automated Interface for Verification of Existing Investigations: Access to investigative and clearance information minimizes duplicate, unnecessary investigations, and enables reciprocal recognition of existing favorable suitability determinations and security clearances, thereby saving time and money. To support information sharing throughout the Federal Government, OPM expanded its CVS in September 2008 to include information related to Homeland Security Presidential Directive-12 (HSPD-12), suitability for government employment, fitness for excepted service and contractor employees and eligibility for access to classified information. The September 2009 enhancements will permit an expanded base of users from across government to search OPM and DoD data from a single web-based entry point, further enabling reciprocity and reducing unnecessary requests for investigations. Forthcoming improvements will include greater accessibility of suitability data and increased access to IC clearance records.

Automated Solution to Validate Investigations Requested, Conducted, and Costs Billed: The Air Force Central Adjudication Facility (CAF) has successfully deployed an automated billing tool that enables rapid reconciliation of OPM billing for Air Force investigations. This automated solution enables the ability to validate investigations requested, evaluate projections for numbers of investigations, and track investigative expenditures against available budgets in an end-to-end system. Evaluation is underway to deploy the automated billing capability across DoD.

eApplication

The Electronic Application (eApplication) is a dynamic, interactive, web-based tool that guides users in providing additional relevant suitability or security clearance information. The eApplication is essential to the success of the transformed end-to-end process by ensuring earlier, efficient collection and transmission of information supporting investigation requests.

Achievements: The Enhanced Electronic Questionnaires for Investigations Processing (e-QIP) system was deployed to introduce additional branching questions and expand upfront collection of information from the user to improve accuracy and quality of data to enable electronic flagging of issues.	**Sept 08**
2009 Milestones: Implement revised e-QIP designed to be more interactive and collect more information from the user earlier in the process and improve the quality of the data entered.	**Dec 09**
Estimated Operational Date:	**Dec 09**

e-QIP: Electronic submission through e-QIP has led to improved processing times for all types of investigations and dramatically reduced the overall error and rejection rates for completed standard investigative forms.

More relevant data is collected and validated at the beginning of the process.

Research verified that the investigative questionnaire and the subject interview are key sources of relevant issue information that arises during a background investigation. The online e-QIP now gathers more information from the subject through the use of additional branching questions. The application asks follow-up questions as necessary to enhance the collection of relevant subject-reported information, facilitating faster hiring and clearing determinations. The questions also help flag investigations for the EFI. A more comprehensive suite of branching questions will be included in the next-generation of e-QIP, which is targeted for deployment in December 2009.

Other revisions to the investigative questionnaire planned for 2009 include changes to the consent form to inform applicants that the information provided could be used for research and/or study purposes, and also advises individuals that they will

be subject to continuous evaluation while they have access to classified information or occupy sensitive positions. The PAC will continue to promote even greater use of e-QIP by suitability and security stakeholders.

Electronic and Digital Signatures: Today's technology enables the collection and processing of signatures through digital (unique codes generated in transmission) and electronic (captured using a pad and stylus) signatures. The use of these technologies on the application and electronic release authorizations, currently planned for February 2009, will eliminate the need for hardcopy submissions of signature pages.

Electronic Fingerprints: An essential element of every investigation is the use of fingerprints to identify criminal history on record with the Federal Bureau of Investigation (FBI). Currently there are hundreds of locations with electronic fingerprint scanning stations deployed or soon to be deployed across the Federal Government. Some are used for the suitability or security clearance process; others are for HSPD-12, immigration, or port security.

Automation is used to make the process faster, reduce manual activity, and leverage additional data sources.

A feasibility study assessing the use of existing and planned fingerprint scanning stations across the government to optimize the automation opportunities in processing investigative requests will be completed by February 2009.

Automated Record Checks (ARC)

Automated Record Checks (ARC) utilize applicant data to collect relevant information available through government and commercial databases. These additional sources of information will assist in verifying identity and afford access to timely, robust and ever-expanding sets of data that are relevant to hiring and clearing decisions. Research validated the use of ARC to flag issues up front, allowing field investigative resources to focus on cases with issues.

The ARC capability will provide automated data collection along with the ability to validate and analyze completeness, timeliness and cost of automated leads. It will also provide an automated means to derive and initiate additional record checks based on initial results, scope field leads (e.g., Local Agency Checks (LACs), employment checks), and filter out records that

Achievements: Revised Federal Investigative Standards to optimize use of commercially available electronic data to streamline the investigative process.	**Dec 08**
2009 Milestones:	
Initial ARC capability fielded to select Department of the Army populations.	**Jun 09**
Implementation strategy for future ARC capability finalized.	**Jun 09**
Estimated Operational Date:	**3QCY10**

are not applicable to the subject. Investigative Service Providers will use the results of the automated record checks to inform the expandable focused investigation and enhanced subject interview, as appropriate. Once implemented, redundant record checks may be discontinued, realizing cost savings and efficiencies.

ARC Initial Operating Capability (IOC): ARC IOC will be achieved in 2009 and leverage the existing record check capability at OPM and DoD. OPM's current record check capability taps into prior investigation records, conducts automated fingerprint searches, performs credit checks, and reviews other external systems, where electronic linkages exist. DoD's current capabilities include performing record checks using over 30 commercial and government databases and applying automated identity resolution, issue identification, and report generation mechanisms. DoD's Automated Continuous Evaluation System (ACES), which is currently deployed in a limited test environment, could be scaled to meet the Federal requirements. These services, in conjunction with the revised investigative standards, will be applied to a select population that includes both DoD and non-DoD security and suitability cases in 2009. Additional populations will be phased in as the ARC capability is expanded.

eAdjudication

Electronic adjudication (eAdjudication) is a viable technical means to automatically, electronically render hiring and clearing determinations in cases with no actionable issues. Approximately 25 percent of all Secret cases can be favorably eAdjudicated by applying computer coded business rules to the adjudicative decision process. The use of eAdjudication procedures improves timeliness, ensures consistent "clean cases" decision-making, and allows adjudicators to focus on cases where issues have been identified. Executive Order 13467 permits the use of "appropriate automated procedures" when determining security clearance eligibility within the executive branch departments and agencies.

Achievements: Clean case eAdjudication for Army cases requiring a Secret security clearance demonstrates a reduction in processing time and enables the reallocation of adjudicative resources to cases with issues present.	**Nov 08**
2009 Milestones: Phased implementation is planned for clean case eAdjudication in DoD Industry, select DoD, and non-DoD, populations to improve timeliness and workflow.	**Apr 09 –Dec 09**
Estimated Operational Date:	**2QCY10**

In November 2008, DoD issued guidance to implement eAdjudication of Secret clean cases within DoD and began implementation with the Army. During this phase, Secret clean cases underwent parallel electronic and manual adjudicative processing as part of an established audit function. The audit function will evolve into a long-term program for continuous assurance and quality control of eAdjudication results. The use of eAdjudication will be deployed to non-DoD populations concurrent with broader DoD implementation. In April 2009, DoD will implement eAdjudication for all Industry Secret clean cases and continue to expand the capability to eAdjudicate all DoD Secret clean cases. Business rules, revised issue-codes, and reliable electronic file formats are currently being developed to support a broader implementation of eAdjudication, to be operable by December 2009.

Enhanced Subject Interview

An Enhanced Subject Interview (ESI) is an in-depth discussion between an interviewer and the subject to ensure a full understanding of the applicant's information, potential issues, and mitigating factors. The revised investigative standards require an ESI at Tier Three.

Achievements: Demonstration results validated the utility of a modified, interactive approach to interviewing subjects compared to current methods.	**Oct 08**
2009 Milestones: Training Subcommittee to develop curriculum for training national security clearance professionals, as well as training materials for inclusion in the handbooks for investigators and adjudicators.	**Jun 09**
Estimated Operational Date:	**2QCY09**

The ESI will provide a more interactive, in-depth approach to interviewing the subject to gain accurate and detailed data. The ESI will focus on flagged issues arising from the subject's application and/or automated record checks as areas of potential concern. During the ESI, the subject will also have an opportunity to refute, explain, clarify, or mitigate unfavorable information gathered during the investigation. The ESI concept was tested in a demonstration which suggested that an ESI may uncover issues the subject did not disclose on their application. The results indicated that additional detail on self-reported issues could facilitate a more complete understanding of those issues and better inform the hiring or clearance decision.

Field investigative activity is focused to collect and validate targeted information.

Expandable Focused Investigation

An Expandable Focused Investigation (EFI) is an in-depth field investigation of potential issues as reported by the subject or found through ARC. This approach is an alternative to today's requirement to pursue all lead types in all cases. EFI focuses investigative field leads on potential issue cases detected but not resolved by information previously collected. By analyzing case facts that have been reported in the eApplication, ARC, and/or the ESI, appropriate field leads are performed to collect information required for resolution of issues. Discontinuing the practice of routinely pursuing all leads should result in increased process timeliness and efficiency. The revised investigative standards mandate an EFI at all tiers when issue cases are flagged.

Achievements: The revised Federal Investigative Standards enable the case flagging strategy to focus investigative resources to the types of leads that will provide the most productive information thereby optimizing investigative resources.	**Dec 08**
2009 Milestones: Demonstrate an ARC-enabled EFI on select non-DoD populations to determine cost-effectiveness, timeliness, and productivity.	**Dec 09**
Estimated Operational Date:	**3QCY10**

Implementation plans for EFI are being developed in tandem with the new case flagging strategy. Available systems are currently being examined to perform the initial checks necessary to flag cases, and determining which additional investigative elements should be conducted when case issues are present. The EFI model will be fully developed by February 2009.

Continuous Evaluation

Continuous Evaluation (CE) includes an electronic review of scheduled updates of a subject's application information, ARC, and an electronic assessment of the information acquired. CE will ascertain on a more frequent basis whether an eligible employee with access to classified information continues to meet the requirements for access. The revised investigative standards replace the periodic reinvestigation model with CE annually

Achievements:	
Issued for public comment the revised 'consent' portion of the application (SF-86) to inform applicants of CE.	**Oct 08**
Revised Federal Investigative Standards from the current 5, 10, and 15 year field reinvestigative cycle to manage risk by evaluating cleared population more frequently.	**Dec 08**
2009 Milestones: Develop Implementation Plan to transition from periodic reinvestigations to CE.	**Jun 09**
Estimated Operational Date:	**3QCY10**

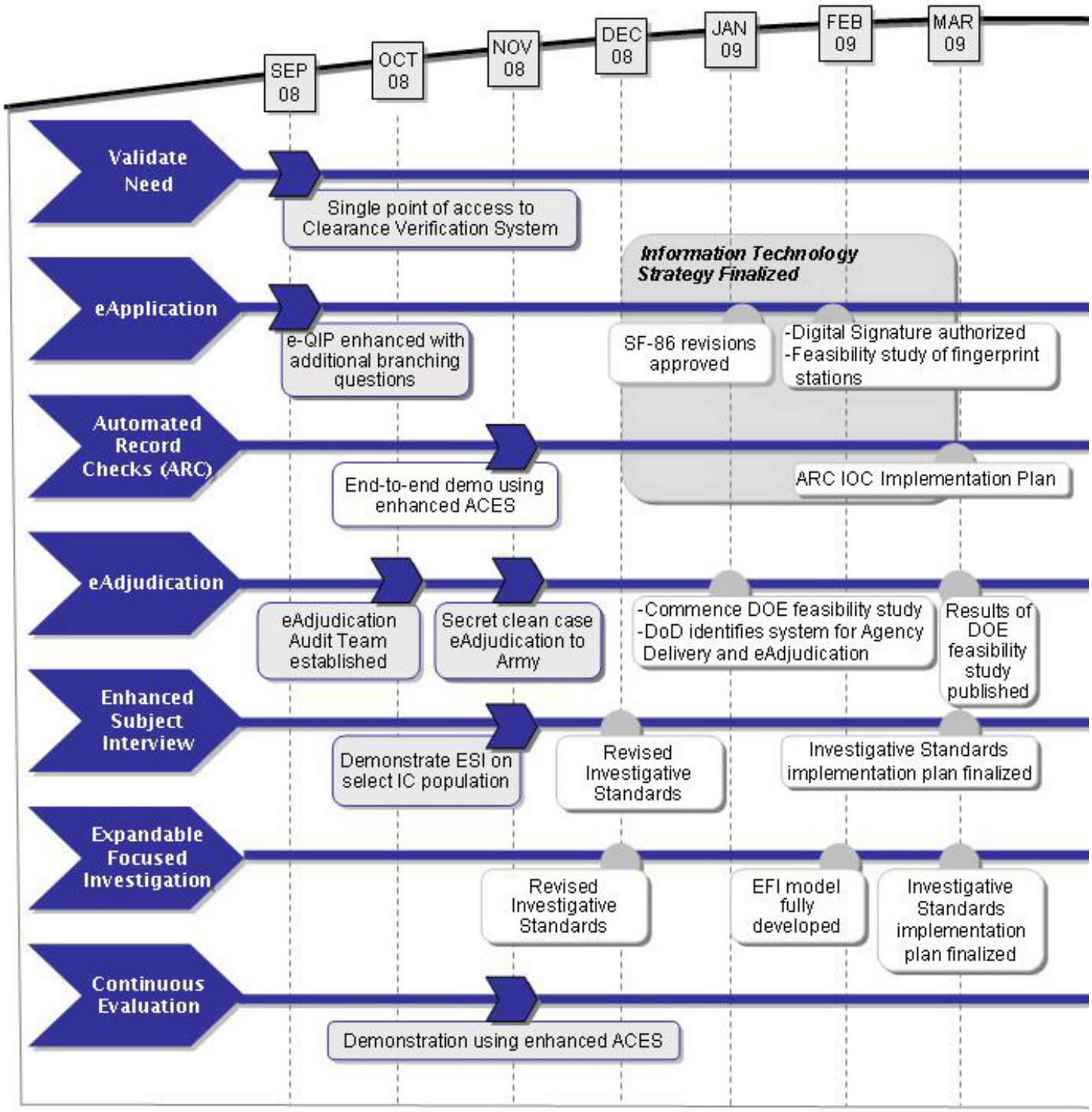
for Tier Three (Top Secret or high risk positions) and at least once every five years for Tier Two (Secret, Confidential, or moderate risk positions). This will reveal security-relevant information earlier than the previous method, and provide increased scrutiny on populations that could potentially represent risk to the government because they already have access to classified information.

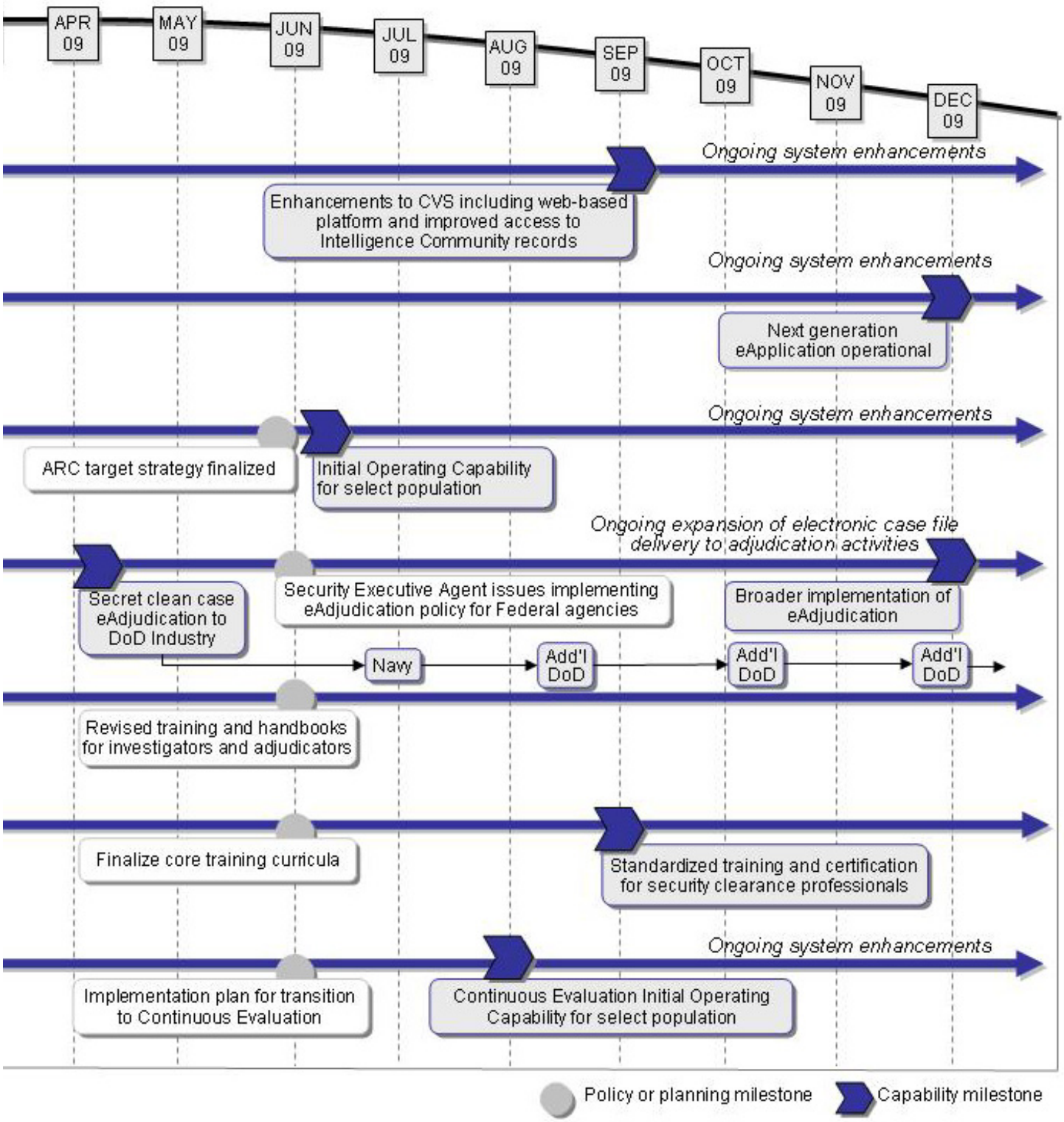
IMPLEMENTATION TIMELINE

The reforms described above are part of a comprehensive, phased implementation plan beginning in September 2008 (shown on pages 13 - 14). Much of what is planned relies on IT to incrementally achieve capabilities needed to enable the transformed process. For example, an end-to-end IT process demonstration was conducted to perform clearance investigations for "live cases" on Secret and Top Secret applicants within the Department of the Army. The results of the demonstration support the approach to leverage existing capabilities to achieve near-term results. Over time, the end-to-end transformed process will be available throughout the Federal Government to support hiring and clearing decisions more efficiently and effectively.

Continuous evaluation techniques rely on modern analytic methods rather than practices that avoid risk.

Resource Considerations. Resources from DoD and OPM should be sufficient to enable implementation of the transformed process design for the mainstream elements of the process. Funding has been identified by each of these entities to support planned reforms as the upgrades are implemented in phases. In addition, existing system modernization plans will be reviewed to ensure alignment with the transformed vision and to avoid investments in systems and processes that are inconsistent with the overall reform vision. These resources are not intended to cover any costs associated with respective agency IT modifications that may be necessary. Agency IT modernization plans should be consistent with the end-to-end automation framework and architecture as approved by the PAC.


SEP 08
OCT 08
NOV 08
DEC 08
JAN 09
FEB 09
MAR 09
Validate Need
Single point of access to Clearance Verification System
Information Technology Strategy Finalized
eApplication
e-QIP enhanced with additional branching questions
SF-86 revisions approved
-Digital Signature authorized
-Feasibility study of fingerprint stations
Automated Record Checks (ARC)
End-to-end demo using enhanced ACES
ARC IOC Implementation Plan
eAdjudication
eAdjudication Audit Team established
Secret clean case eAdjudication to Army
-Commence DOE feasibility study
-DoD identifies system for Agency Delivery and eAdjudication
Results of DOE feasibility study published
Enhanced Subject Interview
Demonstrate ESI on select IC population
Revised Investigative Standards
Investigative Standards implementation plan finalized
Expandable Focused Investigation
Revised Investigative Standards
EFI model fully developed
Investigative Standards implementation plan finalized
Continuous Evaluation
Demonstration using enhanced ACES


APR 09
MAY 09
JUN 09
JUL 09
AUG 09
SEP 09
OCT 09
NOV 09
DEC 09
Ongoing system enhancements
Enhancements to CVS including web-based platform and improved access to Intelligence Community records
Ongoing system enhancements
Next generation eApplication operational
Ongoing system enhancements
ARC target strategy finalized
Initial Operating Capability for select population
Ongoing expansion of electronic case file delivery to adjudication activities
Secret clean case eAdjudication to DoD Industry
Security Executive Agent issues implementing eAdjudication policy for Federal agencies
Broader implementation of eAdjudication
Navy
Add'l DoD
Add'l DoD
Add'l DoD
Revised training and handbooks for investigators and adjudicators
Finalize core training curricula
Standardized training and certification for security clearance professionals
Ongoing system enhancements
Implementation plan for transition to Continuous Evaluation
Continuous Evaluation Initial Operating Capability for select population
Policy or planning milestone
Capability milestone

PERFORMANCE MANAGEMENT

The IRTPA established goals and performance measures for security clearances only. Under the direction of the PAC, the Performance Measurement and Management Subcommittee (Performance Subcommittee) is increasing the scope of performance measurement to include suitability determinations. The Performance Subcommittee is also establishing standardized metric definitions, and performance collection and reporting processes. In addition to IRTPA-defined categories the Performance Subcommittee has established the following definitions:

End-to-End Time: the time from the date of submission by the applicant to the date of adjudicative decision;

Initiate Time: the time 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;

Investigative Time: the time from the receipt date of the completed personnel security package (PSI forms, releases, fingerprint cards, etc.) to the date the adjudicative unit receives the complete investigative product; and

Adjudicative Time: the time from receipt date of the final report of investigation to the date of the adjudicative decision.

Metrics Collection. In addition to standardizing metric definitions, the Performance Subcommittee is establishing standard performance definitions for use in metrics collection. Some data is currently available in existing systems, while others will require significant agency changes to collect. Key components of the metrics criteria include:

Timeliness: The average number of calendar days to complete the end-to-end process along with each subcomponent. Metrics collection for "initiate", "investigate" and "adjudicate" measures can be accomplished in the near-term.

Inventory/ Work In Progress (WIP): A normalized metric that provides trend data and permits forecasting of each agency's ability to meet goals based on current performance and workload. A target (number of weeks of work) will be set for both investigation and adjudication processes. A measure in excess of that target indicates a negative trend and backlog growth.

Quality: Measurements for both investigative and adjudicative quality will be collected.

Investigative quality will be captured in two metrics: (1) the number of deficient investigations returned by the customer and accepted by the Investigative Service Provider; and (2) the validated results of an investigative product survey to be completed by the adjudicator. The Performance Subcommittee will initiate use of the performance data gathering tool in the 1st Quarter of CY09.

The Performance Subcommittee will develop a similar tool to measure adjudicative quality and begin use in 2009.

Reciprocity: The initial measures of reciprocity will identify two equally important areas of agency's non-compliance with policy: (1) agencies requesting applicants to complete personnel security questionnaires when they have a current security clearance; and (2) an agency's efforts to request a new investigation when there is a current existing investigation within scope. Initially both metrics will be collected by each agency in an automated fashion by OPM with the results being forwarded to the Security Executive Agent for analysis and validation. The results will be addressed during frequent oversight assessments. Reciprocity measures for suitability will also be developed.

The Performance Subcommittee will continue to refine current definitions, as necessary, to ensure all components of the investigative and adjudicative process are measured. This includes establishing the means to measure post-adjudication notification time. Collection of "notify" measures will need to be accomplished through major changes to the current systems, which is a long-term goal. The Performance Subcommittee will also develop measures and goals for reinvestigations to make sure that timeliness measures are captured during each phase of the hiring and clearing process.

Performance Goals for December 2009. The IRTPA states that by December 2009 agencies are to complete 90 percent of security clearance determinations in 60 days (investigations in 40 days and adjudications in 20 days), to the extent practicable. The Performance Subcommittee expanded the end-to-end definition in an effort to further capture the entire process from an applicant's perspective.

Initial Security Clearances and Suitability Determinations	
Initiate	Complete within 14 days
Investigation	Complete within 40 days
Delivery	Shared between Investigation and Adjudication
Adjudication	Complete within 20 days
Total End-to-End	90% complete within 74 days

Performance Oversight: Following the guidance of Executive Order 13467, the Security and Suitability Executive Agents are monitoring the timeliness and quality of all agencies that conduct investigations and/or that make suitability and security clearance determinations. The oversight assessments results will be presented to the PAC.

In addition, the Security and Suitability Executive Agents will oversee and assess agencies that conduct both security clearance and suitability investigations along with adjudication determinations. With a combination of surveys and on-site audits, the Security Executive Agent will closely monitor compliance with IRTPA processing goals and future performance requirements.

A national report card will be developed to clearly report investigative and adjudicative performance by all agencies. In addition to displaying all applicable metrics, the report card will inform Agency heads of their organization's performance. This will enable agencies to quickly acknowledge processing shortfalls or recognize their agency's quality of performance processing.

TRAINING AND CERTIFICATION

Quality is as important to investigations and adjudications as timeliness. A critical first step toward improving quality is to ensure that those doing the day-to-day investigative and adjudicative work are properly trained and appropriately certified. Toward that end, the PAC's Training Subcommittee has examined existing training programs and has begun working with member agencies to identify core competencies to be mastered by every investigator and adjudicator. These core competencies, once established as national standards, will provide the foundation for three separate training curricula— one each for the roles of investigators, suitability adjudicators, and security clearance adjudicators. The Training Subcommittee expects to develop distinct training tracks for each role, as well as a core course common to all. The training would support a formalized certification for each role upon completion, by both new professionals as well as those already on the job.

The Training Subcommittee plans to complete the final draft of core competencies in the 1st Quarter of CY09, and to finalize curricula for the common core course, as well as the three-track training program in the 2nd Quarter of CY09. The strategy and timeline for certifying existing investigators and adjudicators will be developed by the 3rd Quarter of CY09. The Training Subcommittee will periodically examine the three career paths to ensure continuous improvement in the training and certification process.

CONCLUSION

Reform efforts to date, concentrating on increased capacity and accountability, have achieved 90 percent of the IRTPA-mandated improvement in timeliness. However, in order to reach and potentially exceed IRTPA guidelines, the transformed process must be operationalized. Essential institutional changes have been made to both enable that transformation and achieve the critically important step of aligning related security clearance and suitability activities. Most notably, these changes include the establishment of a Federal-level governing body to oversee reform and drive its implementation and necessary policy changes enacted with the revision of the Federal Investigative Standards. These indispensable building blocks, and the leadership commitment to implement them, are needed in order to realize the benefits of reform.

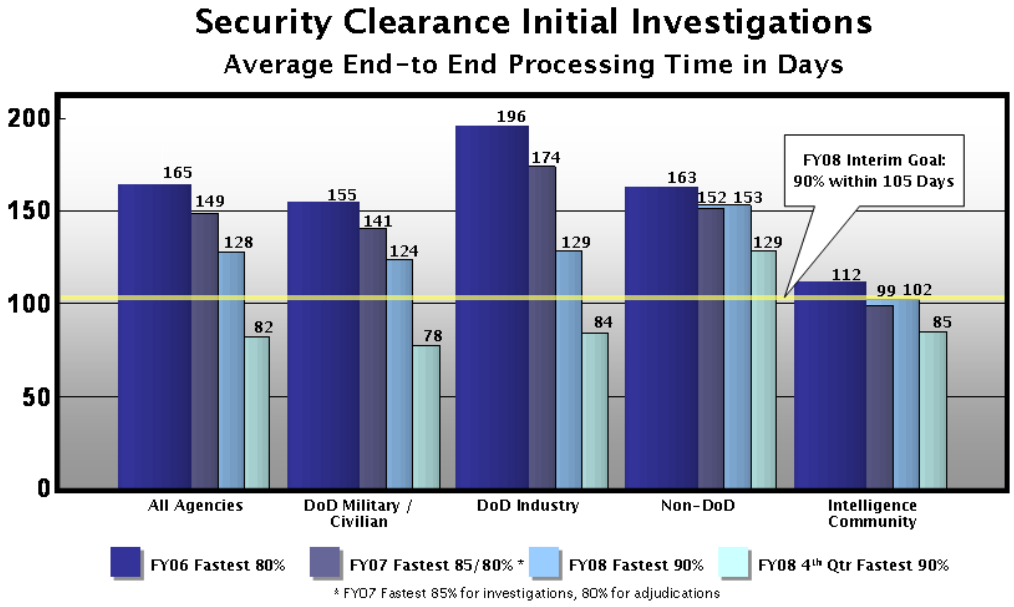
Future process reform efforts, the majority to be placed into operation over the next two years, will include a strong focus on delivering near term capability while laying the basis for broad, long-term implementation. Successful implementation will require agencies to act with discipline and accountability, ensuring execution against the plan and follow up through established performance measures.

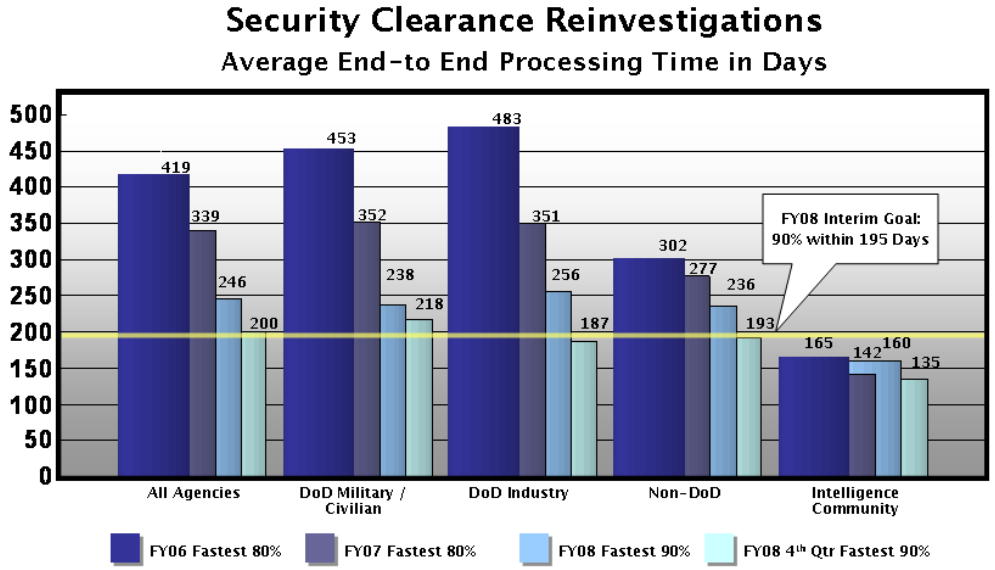
APPENDIX

Accountability Through Metrics. IRTPA requires every agency performing either security clearance investigations or adjudications to be responsive to new national security clearance processing standards. All agencies must, to the extent practicable, be compliant with these performance standards by December 2009. To assist the agencies in projecting workload and resource requirements to be compliant with IRTPA, the Office of Management and Budget (OMB) issued interim government-wide processing goals for security clearances. Extensive metrics collection by OPM and the DNI monitored the investigation and adjudication timeliness of the government. The OMB goals for calendar year 2008 were as follows:

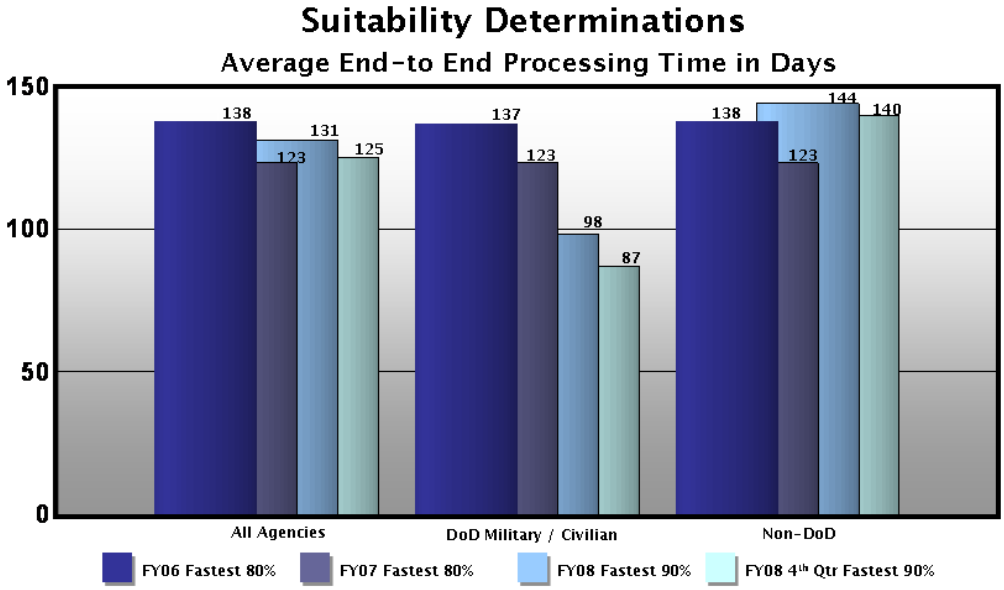
Security Clearance	Initial Investigations	Reinvestigations
Submission	15 Days	15 Days
Investigation:	90% complete within 65 days	90% complete within 150 days
Adjudication:	90% complete within 25 days	90% complete within 30 days
Total End-to-End	105 days	195 days

Performance to Date. Significant improvements in security clearance investigations and adjudications performance have been achieved over time through increases in investigative and adjudicative capacity, process improvements, and greater accountability. The charts below depict the performance improvements from 2006 through 2008, and for the 4th Quarter of FY 2008. This data indicates trends towards meeting the goals defined by IRTPA.





Although not required by IRTPA, suitability performance data are depicted below.



LIST OF ACRONYMS

ACES	Automated Continuing Evaluation System
ARC	Automated Record Checks
CAF	Central Adjudication Facility
CE	Continuous Evaluation
CVS	Clearance Verification System
CY	Calendar Year
DNI	Director of National Intelligence
DoD	Department of Defense
DOE	Department of Energy
EFI	Expandable Focused Investigation
e-QIP	Electronic Questionnaires for Investigations Processing
ESI	Enhanced Subject Interview
FBI	Federal Bureau of Investigation
FY	Fiscal Year
HSPD	Homeland Security Presidential Directive
IC	Intelligence Community
IOC	Initial Operating Capability
IRTPA	Intelligence Reform and Terrorism Prevention ACT of 2004
IT	Information Technology
LAC	Local Agency Check
OMB	Office of Management and Budget
OPM	Office of Personnel Management
PAC	Suitability and Security Clearance Performance Accountability Council
PSI	Personnel Security Investigation
SF-86	Standard Form 86
WIP	Work In Progress