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STATE OF THE SECURITY CLEARANCE PROCESS

A 20-YEAR REVIEW

SECURITY CLEARANCE REFORM

"Those who fail to learn from history are doomed to repeat it." Winston Churchill

Many of the security clearance reform topics we debate today began with the enactment of the Intelligence Reform and Terrorism Prevention Act (IRTPA) in December 2004. Title III of the IRTPA was a response to a backlog of over 500,000 security clearance investigations at the Department of Defense (DoD). By the time the IRTPA was enacted, responsibility for DoD security clearance investigations was already being transferred from the Defense Security Service (DSS) to the Office of Personnel Management (OPM). Title III of the IRTPA set a number of requirements for clearance reform.

EO 13587 created new protections and established government-wide Insider Threat programs following the leak of thousands of classified documents to Wikileaks. But greater impetus for personnel security reform occurred in September 2013, when Aaron Alexis, a federal contractor with a Secret clearance, shot and murdered 12 people at the Washington Navy Yard (WNY). The President directed the Office of Management and Budget (OMB) to review security clearance policy.

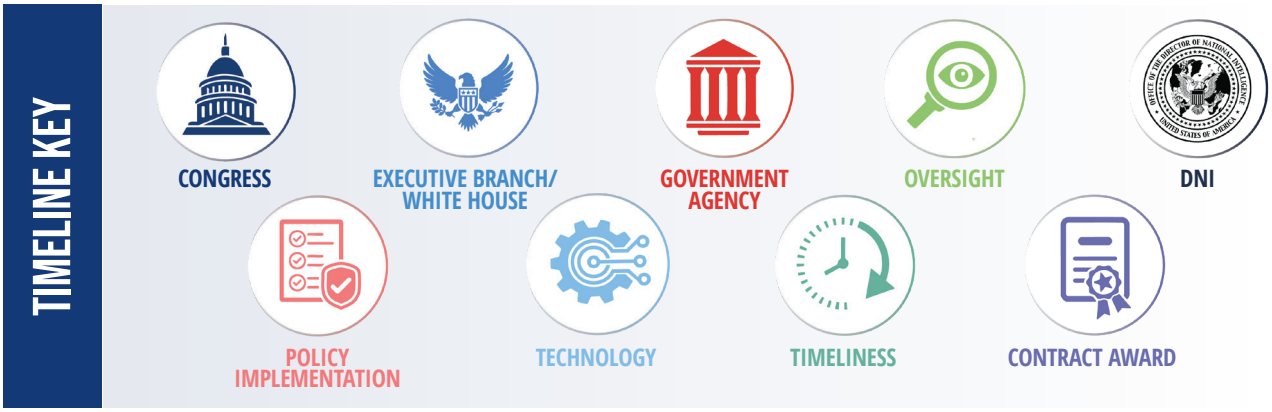
The data breach of approximately 22.1 million personnel security records reported in June 2015 by the Office of Personnel Management (OPM) gave further urgency to reform efforts. The data breach consisted of two separate, but linked attacks by China that were discovered in 2014 and 2015.

In 2018 the government launched its Trusted Workforce 2.0 security clearance reform effort, the most comprehensive overhaul of the security clearance reform process since IRTPA.
In the past two decades, dozens of policies have changed, but critical problems remain. Where policy meets process, it's clear that in the future it's time to push for progress. We can learn from history – so we don't have to keep repeating it.

EVOLUTION OF FEDERAL PERSONNEL SECURITY PROGRAMS

To fully understand security clearance reform, it's helpful to study the evolution of federal personnel security programs. The following timeline outlines major policy and process changes from 2004 to today.

REFORM TIMELINE SINCE 2004



2004

December 2004: The IRPTA was enacted and Title III of the Act required:

- **Timeliness**—By December 2009 90% of security clearance determinations be made within an average of 60 days from date of receipt of a completed application.
- **Responsibility**—A single entity within the executive branch with responsibility for oversight of the security clearance process and a single agency to conduct, to the maximum extent practicable, security clearance investigations.
- **Integrated Database**—A single consolidated database of all security clearances, allowing that certain records may be excluded for national security reasons.
- **Reciprocity**—Prohibit duplicate investigations and require transferability and acceptance of investigations and clearances between federal agencies.
- **Reports**—Beginning in February 15, 2006 and annually thereafter through 2011, a report be submitted to Congress on the progress made toward meeting the timeliness goals.

2005

February 2005: DSS formalized the transfer of the DoD Personnel Security Investigations (PSI) function and about 1,600 investigative personnel to OPM, which already had about 4,200 contract investigators and field support personnel.

June 2005: E.O. 13381, "Strengthening Processes Relating to Determining Eligibility for Access to Classified National Security Information," designated OMB as the Executive Branch entity responsible for oversight of all investigations and adjudication for personnel security clearances. OMB further designated OPM as primary investigative agency for conducting PSIs in the federal government.

2006

February 2006: OMB issued the first report to Congress in compliance with the IRTPA, indicating that initial clearance processing time was reduced by 6% (18 days) between September 2005 and December 2005.

2007

February 2007: Security Clearance Oversight Group (SCOG) submitted the second report to Congress in compliance with IRTPA. The report projected that the December 2006 interim IRTPA timeliness requirements (80% of clearances be completed in an average of 120 days) would be met.

April 2007: DNI announced a 100-Day Plan that included development and implementation of security clearance process improvements, both within the Intelligence Community (IC) and at the national level.

June 2007: OMB, DNI, OPM and DoD created a Joint Security and Suitability Reform Team (JSSRT) to completely revamp and unify the federal government suitability and security clearance process.

October 2007: DNI began execution of its 500-Day Plan, which included modernization of the security clearance process as one of its core initiatives.

2008

February 2008: President Bush issued a memorandum directing that DoD, DNI, OPM, OMB, and the assistant to the President for National Security Affairs submit a proposal by April 30, 2008 to modernize, standardize, and integrate comprehensive credentialing, security clearance, and suitability processes.

April 2008: In response to the President's February 2008 memorandum, the JSSRT issued its "Security and Suitability Process Reform Initial Report" outlining a general framework for near and long term goals to modernize, streamline and integrate security clearance, employment suitability, and access to federally-controlled facilities and information systems government-wide.

July 2008: E.O. 13467, "Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information" was issued. It called for an efficient, practical, reciprocal, and aligned system for investigating and determining suitability for Government employment, contractor employee fitness, and eligibility for access to classified information" was issued. It created the Suitability and Security Clearance Performance Accountability Council (PAC) and designated the Director of OPM as the Suitability Executive Agent (SuitEA) and the DNI as the Security Executive Agent (SecEA). The PAC was made responsible for driving government-wide implementation of security, suitability, and credentialing reform, ensuring alignment and consistency across federal D/As.

December 2008: The JSSRT issued a progress report detailing the changes it initiated and planned to implement over an 18 month period, including eApplication, Automated Record Checks (ARC), eAdjudication, and Continuous Evaluation (CE). Some of these changes were implemented on schedule, some were delayed, modified, or partially implemented, and new changes were added. Full implementation of all the original or modified changes was projected to occur by 2014.

December 2008: The SecEA and the SuitEA (jointly—the EAs) approved new 3-tier investigative standards for suitability and security clearance investigations. The new investigative standards were described in the JSSRT December 2008 follow up report on process reform. Full implementation of the new investigative standards was planned for late summer 2010, but did not occur.

2009

January 16, 2009: E.O. 13488, "Granting Reciprocity on Excepted Service and Federal Contractor Employee Fitness and Reinvestigating Individuals in Positions of Public Trust," was issued.

August 2009: SWFT (Secure Web Fingerprint Transmission), a web-enabled biometric system, became available to defense contractors to transmit electronic fingerprints to OPM.

September 2009: It was announced that the Federal Investigative Standards that were approved in December 2008 would have to be revised. They expected the new revised standards would be finalized by the end of the year.

December 2009: The National Industrial Security Program Policy Advisory Committee (NISPPAC) March 2010 report indicated that in December 2009, 90% of all initial security clearance investigations of contractor personnel were competed in 72 days (12 days longer than the IRTPA December 2009 requirement).

2010

April 2010: CATS (Case Adjudication Tracking System) became operational at all major DoD Central Adjudication Facilities allowing electronic transfer of completed investigations from OPM and conversion of these files to a machine readable format. It resulted in reducing the transfer time by 50% and permitting electronic adjudication (eAdjudication) of about 25% of Secret clearance investigations.

2011

October 2011: E.O. 13587, "Structural Reforms To Improve the Security of Classified Networks and the Responsible Sharing and Safeguarding of Classified Information," was issued. This E.O. directed the establishment of an interagency Insider Threat Task Force to develop a Government-wide program for deterring, detecting, and mitigating insider threats.

2012

March 2012: Four years after having been designated the SecEA by E.O. 13467, the DNI issued Security Executive Agent Directive 1 (SEAD 1), outlining the authorities and responsibilities of the Security Executive Agent.

August 2012: Overall, the Government met the IRTPA timeliness requirement to complete 90% of initial clearances in an average of 60 days, but major problems involving reciprocity of security clearances still existed and a single integrated database of all security clearances had not been created. OPM had significantly reduced the time it takes to conduct investigations, but the quality of investigations declined, increasing the time required to adjudicate problematic cases.

December 2012: The EAs jointly approved a new 5-tier Federal Investigative Standards (FIS), but no action was immediately taken to implement any changes. Unlike previous federal investigative standard, the 2012 FIS were designed "For Official Use Only," so the scope and period of coverage of each investigation was not made publicly available.

2014

January 2014: "Insider Threat and Security Clearance Reform" became one of the 15 original Cross-Agency Priority (CAP) goals in response to the Washington Navy Yard shootings. The goal aimed to promote and protect the nation's interests by ensuring aligned, effective, efficient, secure, and reciprocal vetting processes to support a trusted federal workforce. Since CAP Goals only remained on the list for four years, Insider Threat and Security Clearance Reform was removed as a CAP goal in 2018. But the reforms and initiatives introduced during that period continue to influence security clearance processes. CAP Goal progress reports were issued on a quarterly basis.

September 2014: The SecEA issued SEAD 2, "Use of Polygraph in Support of Personnel Security Determinations for Initial or Continued Eligibility for Access to Classified Information or Eligibility to Hold a Sensitive Position," which established policy and responsibilities associated with the use of polygraph exams for access to classified information. SEAD 2 was revised in September 2020.

October 2014: DoD initiated a CE concept demonstration on approximately 100,000 cleared military, DoD civilian, and contractor personnel using a limited set of trusted commercial and government data sources.

November 2014: OPM implemented Tier 1 and Tier 2 investigations of the new 5-tier system of investigations, replacing the NACI and MBI investigations previously used for low risk and moderate risk employment suitability determinations.

2015

July 2015: Title 5 Code of Federal Regulations (CFR) Part 1400, Designation of National Security Positions, was issued and replaced Title 5 CFR Part 732, National Security Positions. The change was part of an effort to streamline and simplify the federal government's investigative and adjudicative processes for national security positions.

July 2015: The PAC to conduct a 90-day review of a series of massive data breaches affecting the personnel and security clearance records of OPM and two of its contract investigations service providers that occurred between May 2014 and April 2015. The data breaches affected the personal information of over 21 million people. All Standard Form 86s filled out since 2000 were compromised.

October 2015: OPM implemented Tier 3 and Tier 3R investigations of the new 5-tier system of investigations to replace the NACLC and ANACI investigations previously used for the initial and periodic reinvestigations for Secret clearances.

December 2015: DoD expanded its CE capability to 225,000 personnel.

2016

May 2016: The SecEA issued SEAD 5, "Collection, Use, and Retention of Publicly Available Social Media Information in Personnel Security Background Investigations and Adjudications," which established policy and guidance for the collection, use and retention of publicly available social media information for initial and continued eligibility for access to classified information or eligibility to hold a sensitive position.

September 2016: E.O. 13741, "Amending Executive Order 13467 to Establish the Roles and Responsibilities of the National Background Investigations Bureau and Related Matters," was issued. The primary purpose of E.O. 13741 was to establish the National Background Investigations Bureau (NBIB) and to enhance the efficiency, effectiveness, and security of personnel background investigations.

October 2016: The new semi-autonomous NBIB was established under OPM. NBIB replaced and absorbed the existing mission, functions, and personnel of OPM's Federal Investigative Services Division. NBIB was the primary investigative service provider (ISP) for the Federal Government.

2017

January 2017: E.O. 13764, "Amending the Civil Service Rules, Executive Order 13488, and Executive Order 13467 To Modernize the Executive Branch-Wide Governance Structure and Processes for Security Clearances, Suitability and Fitness for Employment, and Credentialing, and Related Matters," was issued. The E.O. directed the establishment of mutually consistent standards and procedures for determining the reliability, trustworthiness, and good character of individuals working for the government. It also mandated the use of Continuous Vetting (CV) for those in non-sensitive Public Trust positions.

June 2017: SEAD 4 was issued in December 2016 by the SecEA. SEAD 4 Appendix A, "National Security Adjudicative Guidelines for Determining Eligibility for Access to Classified Information or Eligibility to Hold a Sensitive Position," became effective on 8 June 2017 and replaced the December 2005 Adjudicative Guidelines.

June 2017: SEAD 3 was issued in December 2016 by the SecEA and made effective on June 12, 2017. SEAD 3, "Reporting Requirements for Personnel with Access to Classified Information or Who Hold a Sensitive Position," became the first government-wide directive that imposed requirements to report information on cleared personnel. SEAD 3 requirements did not become applicable to federal contractors until Title 32 Code of Federal Regulations Part 117, the National Industrial Security Program Operating Manual (NISPOM), became effective on February 24, 2021.

2018

January 2018: SEAD 6, "Continuous Evaluation," established policy and requirements for the continuous evaluation of individuals who require eligibility for access to classified information or to occupy a national security position.

March 2018: Trusted Workforce (TW) 2.0, the current reform effort of the Federal Government's personnel vetting system was launched. The first Trusted Workforce 2.0 report was issued in March 2018, coinciding with the launch of the initiative by DNI and OPM. Quarterly update reports have been published from 1st Quarter FY2022 to present.

June 2018: Defense Information Systems Agency (DISA) began field testing eApplication (eApp). The public rollout of eApp was repeatedly delayed, but by the end of FY2023 eApp replaced e-QIP (Electronic Questionnaires for Investigations Processing) as the web-based system for completing and submitting federal personnel security forms (Standard Forms 85, 85P, 85P-S, and 86).

June 2018: DISA awarded a contract to Enterprise Solutions LLC to develop the prototype for its secure National Background Investigation Services (NBIS) Investigation Management (IM) Shared Service. The NBIS IM platform is an integrated case management solution that brings together the core functions of the systems and provide the interface for investigative users. The system is intended to expedite the time to process investigations by automating and optimizing key processes from request initiation through investigation completion and adjudication.

November 2018: SEAD 7, "Reciprocity of Background Investigations and Adjudications," established guidelines for reciprocal acceptance of eligibility for access to classified information and sensitive positions and timeliness standards.

2019

April 2019: E.O. 13869, "Transferring Responsibility for Background Investigations to the Department of Defense," was issued.

May 2019: Perspecta Enterprise Solutions LLC was awarded the contract to support the continued reform and modernization of the security clearance personnel vetting processes and continued innovation for the NBIS information technology system.

June 2019: The Defense Security Service was renamed the Defense Counterintelligence and Security Agency (DCSA).

October 2019: The National Background Investigations Bureau (NBIB) was transferred from OPM to the DCSA in accordance with E.O. 13869. NBIB was rebranded as a component of DCSA and is now part of its Adjudication and Vetting Services (AVS).

2020

February 2020: Joint Executive Agent Memo, "Transforming Personnel Vetting: Measures to Expedite Reform and Further Reduce the Federal Government's Background Investigation Inventory," authorized replacing routine Periodic Reinvestigations with Continuous Vetting.

May 2020: SEAD 8, "Temporary Eligibility," established policy and requirements for authorizing temporary (interim) eligibility for access to classified information or temporary eligibility to occupy a sensitive position, or to a higher level, when determined to be in the national interest.

October 2020: OPM transferred ownership of legacy personnel security IT systems to DCSA, but the systems continued to reside on OPM's network.

2021

January 2021: The Federal Personnel Vetting Core Doctrine, a foundational document for TW 2.0, was published in the Federal Register.

February 2021: The President issued National Security Memorandum 3, "Memorandum on Revitalizing America's Foreign Policy and National Security Workforce, Institutions, and Partnerships." The memo created an Interagency Working Group on the National Security Workforce to task D/As to assess implementation of security clearance reforms and reciprocity proposals, additional reforms to eliminate bias, and ensure efficient timelines for completion of security clearance investigations.

March 31, 2021: Defense Information System for Security (DISS), a web-based application used by DoD to manage personnel security, suitability, and credentialing, became fully operational and replaced the Joint Personnel Adjudication System (JPAS).

June 2021: DCSA made Trusted Workforce 1.25 (an intermediate phase of TW 2.0) available as a government-wide service. The TW 1.25 program was designed to enroll DoD and non-DoD agencies into an initial version of the CV system, offering high-value, continuous record checks and removing the requirement for periodic reinvestigations by applying a risk-managed approach with select automated records checks.

September 2021: Executive Branch D/As enrolled over 4 million of their national security sensitive population into continuous vetting (CV) capabilities, meeting the Trusted Workforce 1.25 deadline. DCSA has successfully enrolled all DOD clearance holders in CV.

September 2021: The initial TW 2.0 implementation plan was developed.

October 2021: Phased foundational NBIS capabilities were deployed and onboarding activities initiated. The first four agencies onboarded were Air Force, Treasury, DCSA, and the Smithsonian.

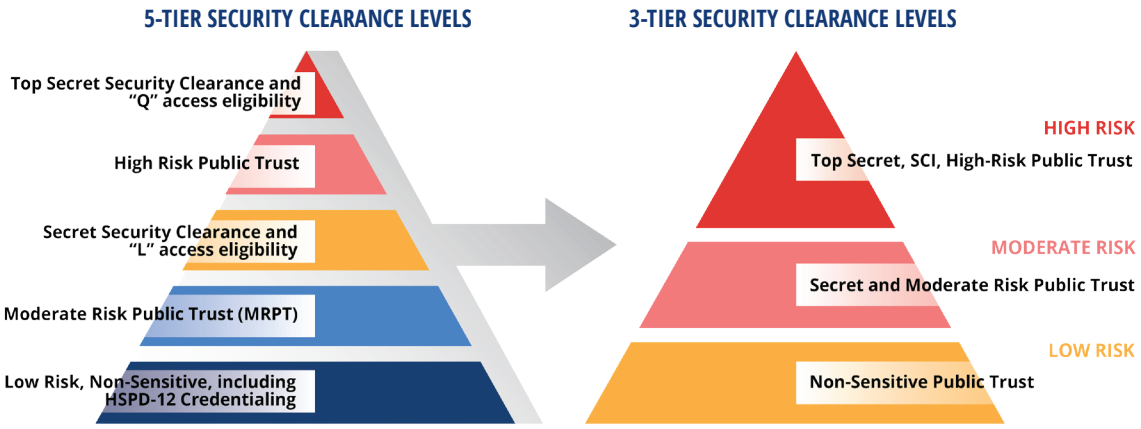
December 2021: DNI as the SecEA issued a memorandum clarifying guidance for agencies concerning individuals involved with marijuana.

December 2021: The Assistant to the President for National Security Affairs issued a Cabinet Memorandum: Transforming Federal Personnel Vetting.

2022

February 2022: The EAs issued three high-level Trusted Workforce guideline documents: Federal Personnel Vetting Guidelines, Federal Personnel Vetting Performance Management Guidelines, and Federal Personnel Vetting Engagement Guidelines. Consistent with the principles of the Federal Personnel Vetting Core Doctrine, these Guidelines describe the vision for creating a personnel vetting program that ensures Americans can trust the Federal workforce to protect people, property, information, and mission; and moreover, is aligned with and supportive of the Federal government's broader efforts to recruit and retain a diverse and talented workforce.

March 2022: The EAs issued the Federal Personnel Vetting Investigative Standards (FPVIS) for a 3-tier system of investigations, but have not yet implemented the new standards, due to delays in full implementation of NBIS. The new tiers are designated as "Low Tier," "Moderate Tier," and "High Tier."



May 2022: SEAD 9, "Whistleblower Protection," established policy for the DNI's appellate review process for employees who seek to appeal an adverse final agency determination with respect to alleged retaliatory action taken by an employing agency affecting the employee's security clearance or access determination as a result of a whistleblower's protected disclosures.

June 2022: DCSA began offering an enhanced continuous vetting capability called Trusted Workforce 1.5 as a government-wide service.

July 2022: The EAs issued the "Common Principles in Applying Federal Personnel Vetting Adjudicative Standards," providing the framework through which agencies render trust determinations based on a thorough evaluation of an individual's conduct and perceived indications of vulnerabilities.

September 2022: The EAs issued the "Federal Personnel Vetting Performance Management Standards," which define the performance metrics and measures used to assess the success of the personnel vetting programs.

2023

September 2023: 99% of federal D/As transitioned from e-QIP to eApp.

November 2023: The new Personnel Vetting Questionnaire (PVQ), created to replace the Standard Forms 85, 85P, 85P-S, and 86 was approved by OMB, but it's dependent on implementation of NBIS.

2024

March 2024: Due to major problems encounter in the implementation of NBIS, recovery plan efforts were initiated.

June 2024: The implementation of the new PVQ, which was initially projected to be available in eApp by June 2024, was postponed due to delays with NBIS. A PVQ Minimum Viable Product (MVP) available for individuals to submit updates when re-establishing trust with non-DCSA ISPs is expected to be available in March 2025. Further phased delivery of PVQ capabilities is expected to occur between FY25 and FY27.

June 2024: In a hearing before the House Subcommittee on Government Operations and the Federal Workforce, the new Director of DCSA answered questions regarding NBIS, which was originally scheduled to be fully operational in 2019. Conceptual work on NBIS began in 2016 and over the past eight years more than $850 million has been spent on developing the system. An additional $575 million was spent on sustaining personnel vetting legacy systems between FY2021 and FY 2023.

June 2024: Update on NBIS Recovery Plan was posted at DCSA website.

July 2024: The EAs issued the "Federal Personnel Vetting Management Standards."

August 2024: Phased implementation of Continuous Vetting (CV) services for the Non-sensitive Public Trust (NSPT) population began. Phased enrollments will continue throughout FY2025. As of October 2024, the following agencies have begun phased enrollment: DOJ, Army, EPA, DOT, Treasury, OPM, and DFC.

October 2024: NBIS Recovery Plan Approval was posted at DCSA website. NBIS is needed to fully implement TW 2.0. During 4th Quarter FY2024, DoD worked on NBIS recovery efforts and produced an updated product roadmap for delivering the IT capabilities in support of the end-to-end vetting process. The roadmap reflects capability delivery projected over 36 months and aligns to the TW 2.0 transformation.

Nov. 27, 2024: DCSA announced its new role in supporting DoD reform of due process and appeals for security clearance denials and revocations. Effective December 8, 2024, DCSA will implement DoD reforms for security review proceedings in support of due process and appeals for military servicemembers, contractors, and DoD civilians whose eligibility for access to Sensitive Compartmented Information (SCI) is adjudicated by DCSA.

This timeline was compiled by William Henderson. (December 2024)

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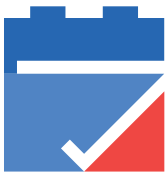

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