

# Cross Agency Priority Goal Quarterly Progress Update

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## Insider Threat and Security Clearance Reform

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FY2014 Quarter 4

# Overview

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## Goal Statement

Mitigate the inherent risks and vulnerabilities posed by personnel with trusted access to government information, facilities, systems and other personnel

## Urgency

A series of vetting program failures, followed immediately by Presidentially directed reviews, identified solutions needed to safeguard our personnel and protect our nation's most sensitive information.

## Vision

The Federal Government will mitigate the inherent risks posed by personnel with access to government information, facilities, systems and other personnel. To achieve this objective, agencies will work with the Performance Accountability Council (PAC) and the Senior Information Sharing and Safeguarding Steering Committee (SISSSC) to:

- Improve Enterprise Management of Information Technology and Resources
- Develop Insider Threat Programs
- Implement Continuous Evaluation
- Improve Availability and Sharing of Relevant Information
- Implement Federal Investigative Standards (FIS)
- Improve Oversight and Quality of Background Investigations (BI) and Adjudications
- Improve Risk Management with Appropriate Position Designations and Associated Investigations
- Improve Security and Suitability Alignment and Reciprocity

# Quarterly Progress Update

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## **Strong Foundation**

- Program Management Office (PMO) established and fully staffed
- Governance identified, strong PAC leadership engagement
- Leveraging on-going Agencies' security and suitability Reform efforts
- Multiple interagency working groups established, work well underway

## **Aligned Vision**

- Overlapping Enterprise Management efforts (directed by the National Defense Authorization Act (NDAA) and the White House review) have been aligned for synergy and efficiency. Updates are reflected in the key milestone under "Improve Enterprise Management of Information Technology and Resources."

## **Overall Risks and Challenges**

- Harmonizing government-wide efforts across divergent cultures
- Integrating similar Agency-centric projects at varying stages of development
- Developing new or updating existing Information Technology (IT) capabilities to achieve Reform goals
- Overlapping authorities may impact enterprise solutions
- Legislation competing with Administration plans and policies
- Sustaining sufficient resources and leadership focus beyond current crises

# Progress Update Q4

Sub-Goal	Improve Enterprise Management of Information Technology and Resources	Develop Insider Threat Programs	Implement Continuous Evaluation	Improve Availability and Sharing of Relevant Information	Implement Federal Investigative Standards	Improve Oversight and Quality of Background Investigations and Adjudications	Improve Risk Management with Appropriate Position Designations and Associated Investigations	Improve Security and Suitability Alignment and Reciprocity
<b>Quarterly Progress (Q4)</b> <b>Key Milestones Accomplished</b>	<ul style="list-style-type: none"> <li>•Drafted Trusted Workforce Strategy</li> <li>•Drafted IT Reform Strategy</li> <li>•Communicated Phase 1 CAPE Study to Congress</li> <li>•Initiated Phase 2 CAPE study proposal (in progress)</li> <li>•Conducted benchmarking</li> <li>•Established Risk-based prioritization of reinvestigations</li> </ul>	<ul style="list-style-type: none"> <li>•Defined Initial Operating Capability (IOC) and Full Operating Capability (FOC)</li> <li>•Partially achieved Program establishment criteria</li> </ul>	<ul style="list-style-type: none"> <li>•Approved Privacy Act compliance documents for Continuous Evaluation (CE)</li> <li>•Identified near term bridge to CE solutions</li> </ul>	<ul style="list-style-type: none"> <li>•Reached DHS and DOJ agreement on appropriate Federal funding</li> <li>•Established Mental Health Working Group</li> </ul>	<ul style="list-style-type: none"> <li>•Implemented Tier 1 IOC</li> <li>•Implemented Tier 2 IOC</li> <li>•Developed plans for accelerating specifically identified records checks</li> <li>•Agency reporting to PAC on progress initiated</li> </ul>	<ul style="list-style-type: none"> <li>•Developed requirements for Tool for Investigative Quality</li> <li>•Negotiated DoD and OPM plan for standardized approach to addressing third party influence to application /questionnaire</li> <li>•Initiated assessment of federal and contract background investigator workforce initiated</li> </ul>	<ul style="list-style-type: none"> <li>•“Access Score” study underway</li> <li>•Position Designation tool requirements working group underway</li> </ul>	<ul style="list-style-type: none"> <li>•Established specific timing and work plans for credentialing criteria established</li> <li>•Developed draft guidance on credentialing criteria and suspension mechanisms developed</li> <li>•Updated National Security Reciprocity Policy in progress</li> </ul>

# Action Plan Summary

Impact Area / Sub-Goal	Major Actions to Achieve Impact	Key Indicators
<p><b>Improve Enterprise Management of Information Technology and Resources:</b> Increase enterprise management and oversight and make greater use of automation to access information relevant to background investigations and adjudications.</p>	<ul style="list-style-type: none"> <li>• Recompose the PAC to actively manage and oversee enterprise issues</li> <li>• Develop and execute Enterprise Reform IT strategy to ensure interoperability, operationalize CE, automate suitability processes, and improve sharing of relevant information</li> <li>• Establish Enterprise Line of Business (LOB) mechanisms to collect, analyze, manage, oversee government-wide spending linked to enterprise information technology and workforce development</li> </ul>	<ul style="list-style-type: none"> <li>• Number of agencies investing in enterprise line of business</li> <li>• Percentage of IT Strategy implemented</li> <li>• Percentage of Increase/Decrease of Annual Suitability/Security Program Costs by Agencies</li> </ul>
<p><b>Develop Insider Threat Programs:</b> Establish an insider threat program that complies with the President’s National Insider Threat Policy and Minimum Standards in each department or agency that handles classified information.</p>	<ul style="list-style-type: none"> <li>• Achieve program establishment</li> <li>• Achieve Initial Operating Capability (IOC)</li> <li>• Achieve Full Operating Capability (FOC)</li> </ul> <p><i>Note: As defined and promulgated by the National Insider Threat Task Force (NITTF) and Steering Committee.</i></p>	<ul style="list-style-type: none"> <li>• Percentage of Department or Agencies (D/As) that have met the three program establishment criteria</li> <li>• Percentage of agencies that have met the IOC/FOC criteria</li> </ul>
<p><b>Implement Continuous Evaluation:</b> Accelerate the implementation of a standardized program of Continuous Evaluation (CE), ensure full integration with agency Insider Threat Programs, and reassess Periodic Reinvestigation intervals as appropriate.</p>	<ul style="list-style-type: none"> <li>• Accelerate government wide implementation of a standardized program of CE, ensure full integration with agency Insider Threat Programs, and reassess Periodic Reinvestigation (PR) intervals as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of designated D/As meeting IOC</li> <li>• Percentage of designated D/As meeting FOC</li> <li>• Percentage of overdue PR population screened using automated record checks</li> </ul>

# Action Plan Summary

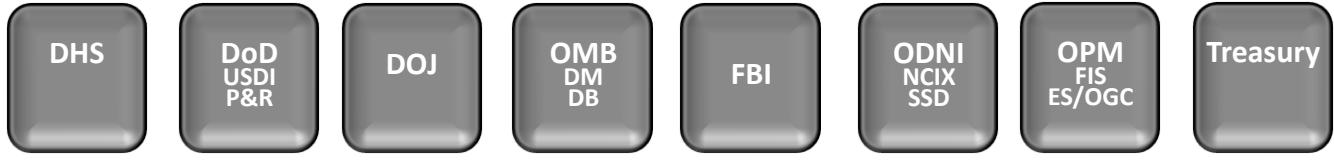
Impact Area / Sub-Goal	Major Actions to Achieve Impact	Key Indicators
<p><b>Improve Availability and Sharing of Relevant Information:</b> Ensure internal and external processes exist for reporting and sharing information.</p>	<ul style="list-style-type: none"> <li>• Improve access to and availability of State and Local criminal records</li> <li>• Clarify and expand requirements for reporting actions and behavior of employees and contractors to support decisions on access to facilities, classified/sensitive information, and IT systems</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of local law enforcement records provided of total number requested</li> <li>• Percentage of local law enforcement records provided via automated means</li> </ul>
<p><b>Implement Federal Investigative Standards:</b> Accelerate implementation of elements of Revised Federal Investigative Standards (FIS) to address gaps identified in existing investigative processes.</p>	<ul style="list-style-type: none"> <li>• Accelerate implementation of elements of Revised FIS to address gaps identified in existing investigative processes</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of agencies in compliance with Tiers 1 &amp; 2 IOC</li> <li>• Percentage of agencies in compliance with Tier 3 IOC</li> <li>• Percentage of agencies in compliance with Tiers 4 &amp; 5 IOC</li> <li>• Percentage of agencies in compliance with FOC</li> </ul>
<p><b>Improve Oversight and Quality of Background Investigations and Adjudications:</b> Improve oversight to ensure investigations and adjudication meet government-wide quality standards.</p>	<ul style="list-style-type: none"> <li>• Accelerate the development of quality standards and implementation of consistent measures and metrics for investigations and adjudications</li> <li>• Improve the quality of existing oversight mechanisms for Federal and contract investigators, and Federal adjudicators</li> <li>• Improve detection of and response to applicant falsification in current processes</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of agencies using Investigative Quality Standards</li> <li>• Ratio of Quality to Non-Quality completed investigations</li> <li>• Percentage of targeted agencies assessed for oversight purposes</li> </ul>

# Action Plan Summary

Impact Area / Sub-Goal	Major Actions to Achieve Impact	Key Indicators
<p><b>Improve Risk Management with Appropriate Position Designations and Associated Investigations:</b>            Drive adherence to existing security and suitability position designation, reinvestigation timeliness guidelines, prioritizing submissions based on risk, and increasing the frequency of reinvestigations for high risk populations.</p>	<ul style="list-style-type: none"> <li>• Reduce reinvestigation backlog using a risk-based approach</li> <li>• Reduce total population of 5.1M Secret and TS/SCI clearance holders to minimize risk of access to sensitive information and reduce cost</li> </ul>	<ul style="list-style-type: none"> <li>• Percent reduction in overdue reinvestigations</li> <li>• Percent reduction in total number of clearance holders</li> </ul>
<p><b>Improve Security and Suitability Alignment and Reciprocity:</b>            Ensure alignment through consistent standards, training and processes, avoiding redundancy and duplicative systems and effort, and improving reciprocity.</p>	<ul style="list-style-type: none"> <li>• Establish new Government-wide adjudication requirements for credentials issued to include the currently optional OPM supplementary standards</li> <li>• Revise the Final Credentialing Standards to establish a suspension mechanism</li> <li>• Accelerate implementation of National Security and Suitability Investigator and Adjudicator Training Standards to drive consistency and improve reciprocity</li> </ul>	<ul style="list-style-type: none"> <li>• Number of agencies fully implementing government-wide credential standards/criteria</li> <li>• Percent of agencies in compliance with Training Standards (with measurements beginning one year from standards signature date)</li> </ul>

# Governance and Contributing Programs (PAC)

The Performance Accountability Council\* (PAC) is ultimately responsible to the President for driving implementation of the reform effort, ensuring accountability by agencies, ensuring the Security and Suitability Executive Agents align their respective processes, and sustaining reform momentum.

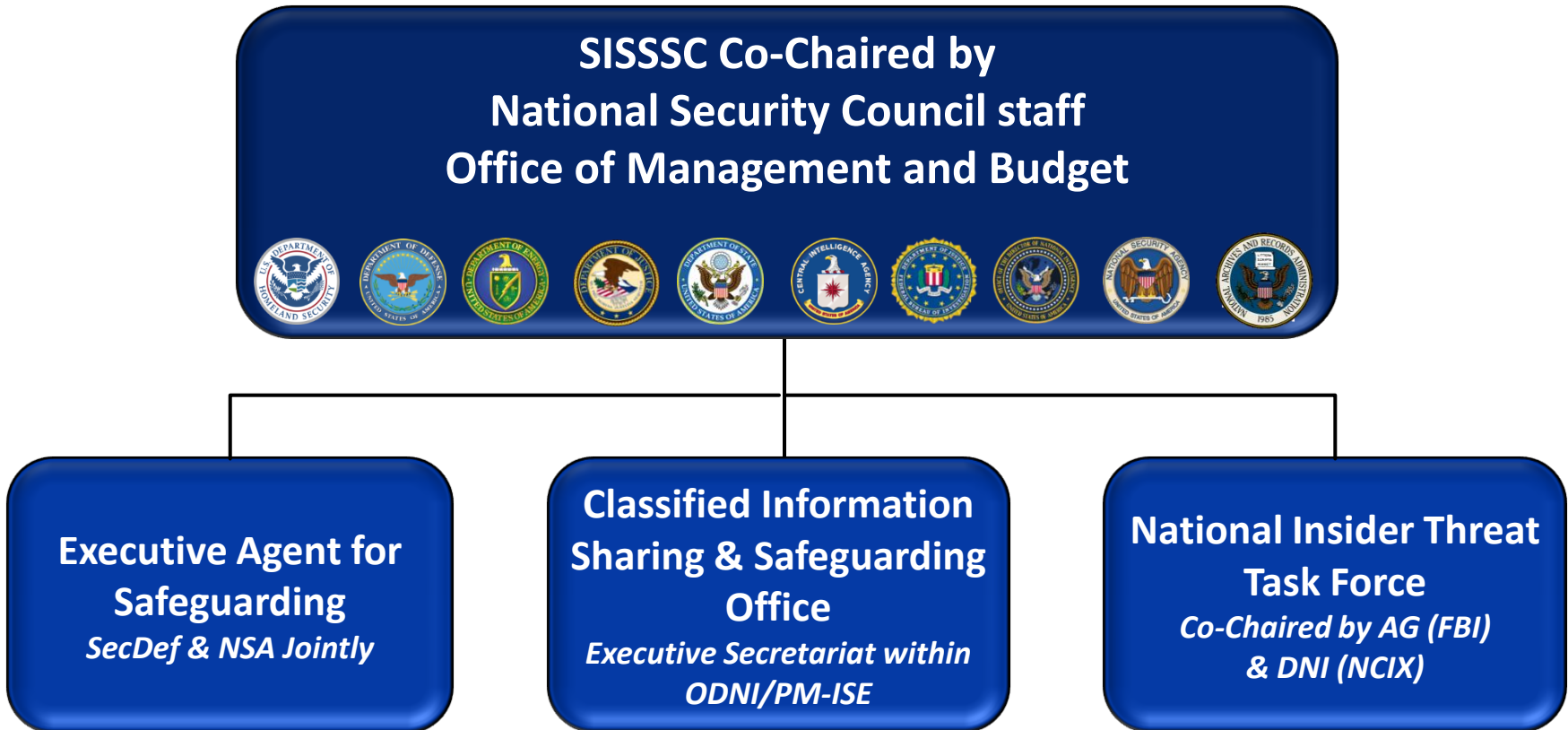


\*Current PAC member agencies: DHS, DoD, DOJ, OMB, FBI, ODNI, OPM, Treasury, DOE, ISOO, NSC, GSA

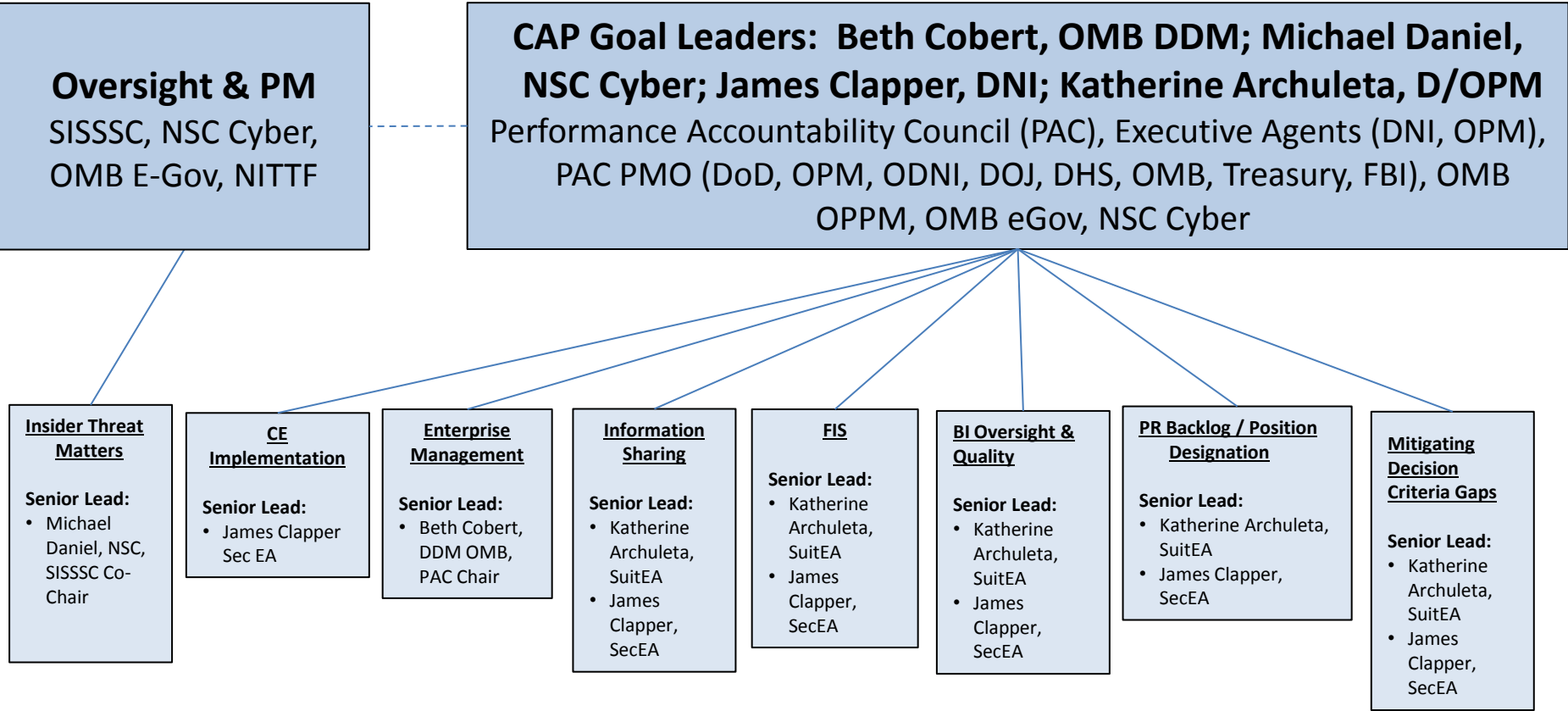


# Governance (SISSSC)

The Senior Information Sharing and Safeguarding Steering Committee (SISSSC) is ultimately responsible to the President for ensuring senior-level accountability for the coordinated interagency development and implementation of policies and standards regarding the sharing and safeguarding of classified information on computer networks.



# Governance (CAP Goal)



**Governance** – The Performance Accountability Council’s Program Management Office, comprised of representatives from the Office of Management and Budget, Office of the Director of National Intelligence, Office of Personnel Management, Department of Defense, Department of Homeland Security, Department of Treasury, Department of Justice, the Federal Bureau of Investigation, as well as the Senior Information Sharing and Safeguarding Steering Committee, will be responsible for driving government-wide implementation of these goals, and identify recommended solutions to further safeguard our personnel and protect our nation’s most sensitive information.

# Work Plan: Improve Enterprise Management of Information Technology and Resources

## **Alignment Goals:**

- Improve enterprise operations

## **Major Actions:**

- Recompose the PAC to actively manage and oversee enterprise issues
- Develop and execute enterprise Reform IT strategy to ensure interoperability, operationalize CE, automate suitability processes, and improve sharing of relevant information
- Establish mechanisms to manage and oversee government-wide spending for suitability and security processes

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
The PAC will immediately identify new members and meet as reconstituted within 30 days of this report.	4/2014	Complete	PAC
The PAC Chair (OMB/DDM) will convene members at least quarterly, and hold senior leaders accountable for implementation as well as bring in agencies whose capabilities are critical to success (e.g., DOJ, FBI, DHS, State, Treasury).	5/2014	Complete	PAC
The PAC will immediately establish a PMO to provide full-time effort and expertise on tasks of implementation. PMO membership shall include a minimum of 1 FTE from each of the following: OMB, DoD, ODNI, OPM, DHS, DOJ, and FBI.	4/2014	Complete	PAC
The PAC Chair will propose funding for the PMO through the FY15 budget (\$500,000 annually per PMO member agency) for implementation efforts continuing at least through FY20 to ensure sustained momentum of these reform efforts.	2/2014	Complete	PAC
The PAC Chair will engage the Federal CIO and or OSTP/Chief Technology Officer for support to the assessment of current IT capabilities across this “line of business” and to develop IT strategy inclusive of line of business objectives for long term needs of suitability and security processes.	1/2015	Not Started	PAC
The PAC will conduct benchmarking of similar Government screening technologies (DHS, TSA, National Counterterrorism Center), as well as benchmarking of commercial solutions for risk-management and rules-based automation of previously manual workflows.	10/2014	On Track	PAC PMO

# Work Plan: Improve Enterprise Management of Information Technology and Resources (cont.)

Milestone Summary			
Key Milestones	Milestone Due Date	Milestone Status	Owner
The PAC PMO will lead the joint development of an Enterprise IT strategy for the Security, Suitability, and Credentialing Line of Business (LOB).	12/2014	At Risk*	PAC PMO, ODNI, OPM, DoD
The PAC will establish a mechanism to collect baseline financial data on security and suitability activities.	4/2015	Complete	PAC PMO
PAC will build on the conclusions of the NDAA efficiency and quality study to develop specific plans for an ongoing capability to evaluate costs of suitability and security activities; identify opportunities for improvement; and provide agency information on quality and timeliness.	3/2015	On Track	PAC PMO
The PAC PMO will lead the joint development of a Trusted Workforce Strategy, for the Security, Suitability, and Credentialing LOB.	12/2014	At Risk*	PAC PMO, ODNI, OPM, DoD
PAC will issue enterprise implementation plans to accomplish the Trusted Workforce Strategy and the Enterprise IT strategy.	3/2015	At Risk*	PAC PMO

*\*Working with key stakeholders to finalize strategy development and coordination.*

# Work Plan: Improve Enterprise Management of Information Technology and Resources (cont.)

Milestone Summary			
Key Milestones	Milestone Due Date	Milestone Status	Owner
Taking into account the results of the CAPE analysis and the results of any ongoing reviews of recent unauthorized disclosures of national security information, the SecDef, ODNI, and OMB with the PAC leadership shall jointly develop, implement, and provide to the appropriate committees of Congress a strategy to modernize all aspects of personnel security for the DoD with the objectives of improving quality, providing for continuous monitoring, decreasing unauthorized disclosures of classified information, lowering costs, increasing efficiencies, and enabling and encouraging reciprocity. The strategy will include performance metrics and will align with the forthcoming Trusted Workforce Strategy.	TBD*	At Risk	DoD/OMB/ODNI/PAC

*\*Following CAPE progress reports to Congress this past quarter, the associated NDAA timelines have been extended to permit continued study and analysis. This milestone is dependent on the CAPE study results and due dates will be assigned upon consideration of CAPE study results. Original date of 12/2014 changed to TBD to reflect the dependency.*

# Work Plan: Improve Enterprise Management of Information Technology and Resources (cont.)

Milestone Summary			
Key Milestones	Milestone Due Date	Milestone Status	Owner
As mandated by the NDAA, not later than February 2015, (at the same time as the POTUS budget submission to Congress for FY16) and yearly through FY19, the SecDef, ODNI, and OMB with PAC leadership shall jointly submit to Congress a report on the metrics and an assessment using the metrics of the effectiveness of the DoD Modernization Strategy in meeting its objectives.	2/2015	Not Started	DoD/ODNI/ OMB/PAC
ODNI shall develop a risk-based approach that prioritizes which cleared individuals shall be subject to frequent reinvestigations and random checks and ensure that if the system of continuous monitoring for all cleared individuals is implemented in phases, it will be implemented on a priority basis and at the level of scrutiny based on level of risk.	10/2014	Complete	ODNI
Modify Security/Suitability forms to account for reform activities such as mental health question, expanded reporting requirements and CE SF 86 - 8/2014 SF85P – 8/2015 SF85 – 8/2015	8/2014 8/2015	Missed*	ODNI/OPM/ OMB PAC

\*Missed deadline for SF 86 due to on-going discussions.

# Work Plan: Develop Insider Threat Programs

**Alignment Goals:**

- E.O. 13587, Steering Committee Priority #2: *Establish Insider Threat Programs*

**Major Actions:**

- Achieve program establishment
- Achieve Initial Operating Capability (IOC), see detailed IOC requirements on next slide
- Achieve Final Operating Capability (FOC), see detailed FOC requirements on next slide

**Milestone Summary**

Key Milestones	Milestone Due Date	Milestone Status	Owner
Achieve establishment criteria*	1/2015	Partially complete	NITTF
Achieve IOC*	1/2017	At Risk	NITTF
Achieve FOC*	TBD	TBD	NITTF

\*Defined on next slide

# Work Plan: Develop Insider Threat Programs (cont.)

## Requirements for Insider Threat Programs

<i>Major Action #1:</i> <b>Program Establishment</b> Basic requirements	<i>Major Action #2:</i> <b>Initial Operating Capability (IOC)</b> Program establishment plus the following	<i>Major Action #3:</i> <b>Final Operating Capability (FOC)</b> IOC plus the following
Name a responsible senior official(s)	Procedures in place for oversight, reporting, and record retention	Regular (if possible, electronic) access to insider threat-related information from counterintelligence, security, information assurance, HR, law enforcement, etc.
Promulgate an agency head-signed Insider Threat Program policy	Some capability to pull data from appropriate sources to retroactively analyze and respond to anomalies	Tailored triggers to monitor cleared user activity on any agency network accessed (including unclassified), as well as portable devices
Develop an Insider Threat Program implementation plan	User Activity Monitoring on at least one classified network	Access to counterintelligence reporting and adversarial threat information
	Employee notification of monitoring (i.e., banner)	A centralized “hub” to proactively assess data
	Annual employee awareness training	Response capability to follow-up on anomalous activity
	Trained Insider Threat Program personnel	Conduct self-assessments



# Work Plan: Implement Continuous Evaluation

**Alignment Goals:**

- Increase availability and quality of critical information to improve decision making
- Reduce inherent risk in current processes
- Improve enterprise operations

**Major Actions:**

- Accelerate the implementation of a standardized program of Continuous Evaluation (CE), ensure full integration with agency Insider Threat Programs, and reassess Periodic Reinvestigation intervals as appropriate

**Milestone Summary**

Key Milestones	Milestone Due Date	Milestone Status	Owner
ODNI will have an initial CE capability for the most sensitive TS and TS/SCI population.	12/2014	At Risk*	ODNI
ODNI will implement CE capability for all TS and TS/SCI cleared personnel.	12/2016	On Track	ODNI
DoD will expand its CE pilots to include a sample of 100,000 cleared military, DoD civilian, and contractor personnel updated on an ongoing basis from trusted data sources.	10/2014	On Track	DoD/ODNI
DoD will expand its CE capability to 225,000 personnel.	12/2015	On Track	DoD
DoD will expands CE capability to 500,000 by the end of 2016.	12/2016	On Track	DoD

\*The ODNI is developing an Executive Branch-wide CE capability that can be scalable to cover the entire cleared population. CE will be rolled out in a phased approach, with a goal to have CE completed on a portion of the Tier 5 population in the Executive Branch by the end of FY16.

# Work plan: Implement Continuous Evaluation (cont.)

Milestone Summary			
Key Milestones	Milestone Due Date	Milestone Status	Owner
DoD will expand its CE capability to 1 million during 2017.	12/2017	On Track	DoD
Through FY 2015 budget guidance, OMB required DOJ, Treasury, and DHS to identify agency funding to prioritize automation requirements for critical key databases that will be essential to service and enable CE capabilities.	2/2014	Complete	PAC PMO
Issue and promulgate CE Policy (SEAD # TBD)	9/2016	Not Started	ODNI/OMB PMO
Publish DoD Continuous Evaluation Concept Demonstration (CECD) SORN	7/2014	Complete	DoD/PMO/ OMB
In response to the President's Review Group, provide a recommendation to the PAC on the use of a continuous monitoring standard for vetting personnel for access to classified information.	9/2017	Not Started	ODNI/PMO/ OMB

# Work plan: Improve Availability and Sharing of Relevant Information

## **Alignment Goals:**

- Increase availability and quality of critical information to improve decision making

## **Major Actions:**

- Improve access to and availability of State and Local criminal records
- Clarify and expand requirements for reporting actions and behavior of employees and contractors to support decisions on access to facilities, classified/sensitive information, and IT systems

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
Complete the study of specific areas for improving information sharing between the Federal Government and state and local law enforcement agencies through the Records Access Task Force, mandated by the NDAA, and issue report.	4/2014	Complete	OMB
Reach agreement with DHS and DOJ on the appropriate Federal funding mechanisms to encourage cooperation or compliance with existing statutes to share data with Federal officials.	7/2014	Complete	DHS/DOJ
The PAC and DOJ will develop training and educational materials to help states and localities understand their legal obligations and the importance of data-sharing along with funding available to offset the cost of automation.	10/2014	On Track	PAC PMO/DOJ
The PAC will work with ODNI and OMB to publish the revised Reporting Requirements policy (SEAD 400) for national security positions, and then establish a working group to expand those requirements to other suitability and contractor populations.	7/2014	Missed*	PAC PMO

\*July date missed. Numerous comments received during the interagency coordination process are now being reviewed.

# Work plan: Improve Availability and Sharing of Relevant Information (cont.)

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
The PAC will work with OMB's Office of Federal Procurement Policy and the Federal Acquisition Regulation Council to propose an appropriate rule to establish needed reporting requirements for the contractor population.	TBD*	Not Started	PAC PMO
In coordination with other Administration efforts, the PAC will establish a working group with participation from ODNI, OPM, DoD, the Department of Veterans Affairs (VA), the Department of Health and Human Services (HHS), and other appropriate Federal experts to further examine the relevant intersection of mental health issues and suitability and security reporting.	10/2014	Complete	PAC PMO
Further explore recommendations provided by the NDAA Records Access Task Force regarding amendment, modification or clarification to Title 5 U.S.C. Section 9101.	10/2015	Not Started	PAC PMO
Explore feasibility for ISPs to include search of the Department of State, Bureau of Consular Affairs, American Citizen Services (ACS), where an individual has contacted ACS for assistance after they have been arrested abroad.	10/2015	Not Started	PAC PMO
Establish a Federal Background Investigations Liaison Office to oversee education initiatives and resolve issues that may develop between Federal investigative service providers and State/local law enforcement agencies	10/2015	On Track	OPM

*\*Dependent on SEAD 400 policy issuance. Due date will be established upon consideration of the final issued Reporting Requirements policy. Original date of 10/2014 changed to TBD to reflect the dependency.*

# Work plan: Implement Federal Investigative Standards

**Alignment Goals:**

- Increase availability and quality of critical information to improve decision making
- Reduce inherent risk in current processes
- Improve enterprise operations

**Major Actions:**

- Accelerate implementation of elements of Revised Federal Investigative Standards (FIS) to address gaps identified in existing investigative processes

**Milestone Summary**

Key Milestones	Milestone Due Date	Milestone Status	Owner
Security and Suitability Executive Agents will submit the comprehensive FIS Implementation Plan to the PAC, including detailed timelines and cost estimates where feasible to fill gaps in current practice.	4/2014	Complete	OPM/ODNI
The PAC will work with the Executive Agents and agencies to accelerate implementation of the critical checks to enable the acceleration of full implementation across government to 2016.	12/2016	On Track	PAC PMO
Issue and promulgate SEAD 5 -Collection, Use, and Retention of Publicly Available Electronic Information (PAEI)	12/2014	At Risk*	ODNI/OMB
<ul style="list-style-type: none"> <li>• Develop a plan to Accelerate the following items:                             <ul style="list-style-type: none"> <li>○ SSA Check</li> <li>○ Defense Management Data Center Check</li> <li>○ Scattered Castles</li> <li>○ Fully Implement ESI</li> <li>○ Expand automated checks to verify citizenship, measure effectiveness of DHS SAVE checks</li> </ul> </li> </ul>	10/2014	On Track	PAC PMO

\* The draft PAEI policy is currently being coordinated.

# Work plan: Implement Federal Investigative Standards

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
Achieve IOC for Tier 1 and Tier 2 investigations.	10/2014	On Track	OPM
Achieve IOC for Tier 3 investigations.	10/2015	On Track	ODNI/ OPM
Achieve IOC to Tier 4 and Tier 5 investigations.	10/2016	On Track	ODNI/ OPM
Achieve FOC for all Tier level investigations.	9/2017	On Track	ODNI/ OPM
Finalize and issue the Community Handbook detailing the conduct of background investigations based on the FIS requirements and methodologies.	10/2015	On Track	ODNI/ OPM (FISIWG)
Beginning FY 14, Q4 Departments/Agencies will report to the PAC progress on FIS implementation milestones.	9/2014	On Track	ODNI/ OPM

# Work plan: Improve Oversight and Quality of Background Investigations and Adjudications

## Alignment Goals:

- Reduce risks that are inherent in our current processes

## Major Actions:

- Accelerate the development of quality standards and implementation of consistent measures and metrics for investigations and adjudications, and improve the quality of existing oversight mechanisms for Federal and contract investigators, and Federal adjudicators
- Improve detection of and response to applicant falsification in current processes

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
The Executive Agents will issue for PAC approval consistent government-wide quality standards for investigations for the first time and begin collecting quality metrics based on these standards by October 2014.	6/2014	Missed*	ODNI/OPM/ DoD (QAWG)
The Quality Assessments Working Group (QAWG) will develop requirements for a quality assessment tool for investigations.	9/2014	Complete	ODNI/OPM/ DoD (QAWG)
Once standards are approved and quality assessment tool is created issue implementation guidance for quality standards and tool.	TBD**	Not Started	ODNI/OPM/ DoD (QAWG)
Ongoing, the PAC and the Security and Suitability Executive Agent will work with agencies to develop adjudicative quality standards, critically examine the existing process, assess the adequacy of oversight mechanisms in place, and share best practices.	10/2015	Not Started	ODNI/OPM/ DoD (QAWG)
The PAC will work with DoD and OPM to expand standardized e-QIP for military and contractor personnel to address third party influence/falsification.	10/2014	On Track	PAC

\*Currently adjudicating comments received on draft quality standards.

\*\*Dependent on tool implementation. Original date of 3/2015 changed to TBD to reflect the dependency.

# Work plan: Improve Oversight and Quality of Background Investigations and Adjudications (cont.)

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
The PAC will develop IT capabilities and other tools to enable detection of falsification that can be integrated with existing systems.	9/2015	Not Started	PAC
Develop standard criteria and procedures to ensure agencies respond appropriately to falsification in all types of security clearance, suitability and credentialing adjudications.	10/2015	Not Started	ODNI/OPM
Develop and implement improved investigator and adjudicator training to better identify and act upon falsification.	10/2015	Not Started	ODNI/OPM/ DoD (TSIWG)
Develop policy and procedures to address problems that occur when third parties are involved in completing suitability and security questionnaires on behalf of applicants (e.g. military recruiters).	10/2015	On Track	OPM/DoD
Develop better tools to validate self-reported information against other available independent sources (e.g., social media, credit, or human resources data).	10/2015	Not Started	PAC PMO/OPM
Issue and promulgate SEAD on National Security Adjudicative Guidelines.	10/2015	On Track	ODNI/OMB



# Work plan: Improve Oversight and Quality of Background Investigations and Adjudications (cont.)

Milestone Summary			
Key Milestones	Milestone Due Date	Milestone Status	Owner
PAC review of, and action on, DoD Report to Congress setting forth a comprehensive analysis comparing (a) the quality, cost, and timeliness (for each type and level of clearance) of security clearance investigations/reinvestigations of DoD employees/contractors that are conducted by OPM with (b) the quality, cost, and timeliness (for each type and level of clearance) of security clearance investigations/reinvestigations that are conducted by DoD components; identifying the elements that contribute to cost, schedule, and performance; identifying mechanisms for permanently improving the transparency of the cost structure of personnel security investigations and reinvestigations; and determining whether the current DoD approach for obtaining personnel security investigations and reinvestigations for DoD employees and contractor personnel is the most efficient and effective approach.	TBD*	On Track*	DoD
PAC review of and action on Comptroller General Quality Analysis (due May 2014) of the Executive branch personnel security process.	TBD**	Not Started	PAC PMO
PAC review of and action on Comptroller General report to Congress (due June 2014) of its Quality Analysis.	TBD**	Not Started	PAC PMO
In response to a President's Review Group recommendation, provide a recommendation to the PAC on whether background investigations/security clearance vetting should be an inherently governmental function, and if not, whether it could be performed by a non-profit, private sector corporation.	10/2014	On Track	PAC

\*.Following CAPE progress reports to Congress this past quarter, the associated NDAA timelines have been extended to permit continued study and analysis. This milestone is dependent on the CAPE study results and due dates will be assigned upon consideration of CAPE study results. The original milestone due date was 3/2014.

\*\*GAO study is still on-going. Due Date will be established once study is complete. The original milestone due date was 10/2014.

# Work plan: Improve Risk Management with Appropriate Position Designations and Associated Investigations

## **Alignment Goals:**

- Reduce inherent risk in current processes

## **Major Actions:**

- Reduce periodic reinvestigation backlog using a risk-based approach
- Reduce total population of 5.1M Secret and TS/SCI clearance holders to minimize risk of access to sensitive information and reduce cost

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
OMB will distribute to the President's Management Council (comprised primarily of agency Deputy Secretaries) the results of agencies' compliance with the DNI's October 2013 memorandum that directs agencies to use a risk-based approach to identify high risk populations and prioritize reinvestigations that have come due or are overdue.	4/2014	Complete	OMB/ ODNI
OMB will distribute to the President's Management Council, the results of agency compliance with October 2013 guidance from the DNI to review all positions determine whether it continues to require access to classified material.	4/2014	Complete	OMB/ ODNI
The Security Executive Agent will determine a near-term government-wide strategy for agencies to identify high risk populations through the use of automated records checks (e.g. derogatory credit or criminal activity) and prioritize overdue investigations based upon risk posed by job responsibilities and access in order to reduce risks posed by potential insider threats.	10/2014	Complete	ODNI

# Work plan: Improve Risk Management with Appropriate Position Designations and Associated Investigations (cont.)

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
OPM and ODNI will work with OMB to finalize a joint regulation to refine the designation of national security positions and more accurately align investigations with risks.	8/2014	Missed*	OPM/ODNI/ OMB
In response to a President's Review Group recommendation, provide advice to the PAC on whether there should be additional differentiation for security clearances including "administrative access" clearances for IT personnel.	10/2014	On Track	NSC/ODNI
In response to a President's Review Group recommendation, advise the PAC on whether to develop an "access score" capability to evaluate access to sensitive information; and subject personnel with high access scores to additional monitoring.	10/2014	On Track**	ODNI/DoD PAC PMO
Modify existing position designation tool to reflect 5CFR 1400 requirements.	10/2015	On Track	ODNI/OPM
Issue joint DNI/OPM implementation guidance for position designations under 5 CFR 1400 and other populations.	10/2015	Not Started	ODNI/OPM/

\* OPM and ODNI team have reached staff-level agreement on the text of the Final Rule; Federal Register notice currently being drafted.

\*\* Technical capabilities pilot conducted and results provided to the Privileged Access Senior Steering Group

# Work plan: Improve Security and Suitability Alignment and Reciprocity

## **Alignment Goals:**

- Reduce risks that are inherent in our current processes

## **Major Actions:**

- Establish new Government-wide adjudication requirements for credentials issued to include the currently optional OPM supplementary standards
- Revise the Final Credentialing Standards to establish a suspension mechanism
- Promulgate necessary Executive Branch-wide policy to mitigate gaps and inconsistencies in decision criteria

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
The PAC will identify the specific timing of actions to mandate supplemental credentialing criteria to apply to all persons with access to government facilities and information systems, including modifications to the FAR.	10/2014	Complete	PAC PMO
OPM will issue additional guidance to outline the criteria and procedures for suspension of PIV credentials.	3/2015*	On Track	OPM
Issue and promulgate updated National Security Reciprocity policy	9/2016	On Track	ODNI

\*Suspension criteria will be incorporated into supplemental credentialing criteria to be issued in March 2015.

# Work plan: Improve Security and Suitability Alignment and Reciprocity

## Milestone Summary

Key Milestones	Milestone Due Date	Milestone Status	Owner
Within 90 days of approval of implementation plan, agency heads must complete a training gap analysis and mitigation plan for each of the disciplines wherein government staff or contractor employees perform investigations or adjudications for their agencies.	10/2014	On Track	OPM/DNI (TSIWG)
Within 180 days of approval of implementation plan, agencies must develop and implement mitigation strategies to close training gaps.	1/2015	On Track	OPM/DNI (TSIWG)
Within 270 days of approval of implementation plan, agencies must resolve training gaps identified for incumbent personnel.	4/2015	On Track	OPM/DNI (TSIWG)
Within 365 days of approval of implementation plan, agencies must implement final compliant training programs for all future personnel performing investigations or adjudications.	6/2015	On Track	OPM/DNI (TSIWG)

# Key Indicators –Enterprise Management of Information Technology and Resources

## Implement Enterprise Management – Timeliness Data (Fastest 90%)

Indicator	Source	Baseline*	Target	Frequency	Latest Data FY14 (Q4)	Trend
Government-wide Security Clearance Timeliness – Initial Secret Cases	ODNI and all Agencies	In 2005 – 265 Days Average for Secret & Top Secret Combined	74 Days End-to-End	Quarterly	52 Days	Consistently Meeting Goal
Government-wide Security Clearance Timeliness – Initial Top Secret Cases	ODNI and all Agencies	In 2005 – 265 Days Average for Secret & Top Secret Combined	114 Days End-to-End	Quarterly	107 Days	Consistently Meeting Goal

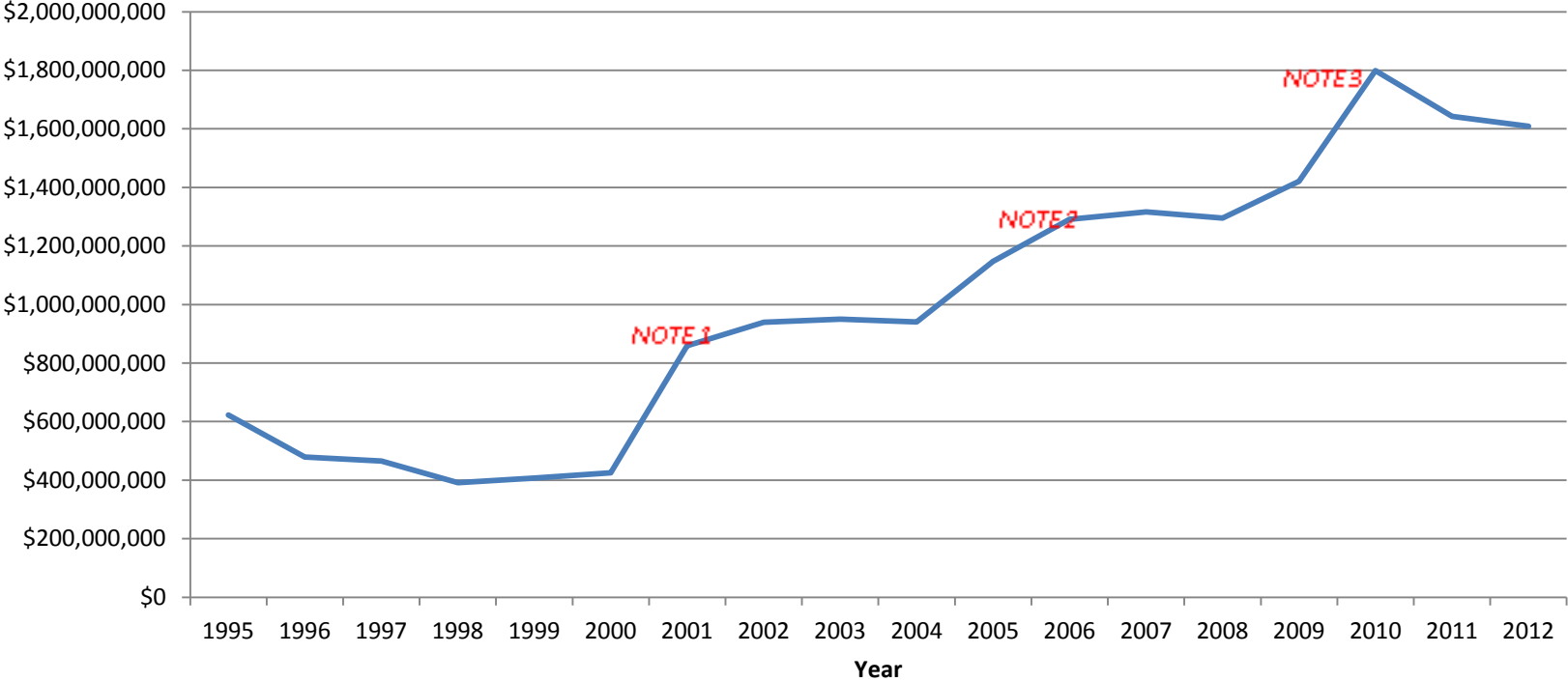
\*Baseline Timeliness metrics were based on IRTPA collection methodology, which only included investigation and adjudication timeliness, but did not include initiation timeliness

**Indicators in development:** Number of agencies investing in enterprise line of business, Percentage of Suitability and Security processes that are automated, Percentage of Enterprise IT Strategy implemented, Percentage of Increase/Decrease of Cost by Agencies

High Level Indicator	Projected Initial Collection Date	Potential Target Areas
Number of agencies investing in enterprise line of business	TBD	TBD
Percentage of Suitability and Security processes that are automated	TBD	TBD
Percentage of Enterprise IT Strategy implemented	TBD	TBD
Percentage of Increase/Decrease of Annual Suitability/Security Programs Cost by Agencies	TBD	TBD

# Contextual Indicators – Enterprise Management Resources

## Personnel Security Costs, 1995-2012



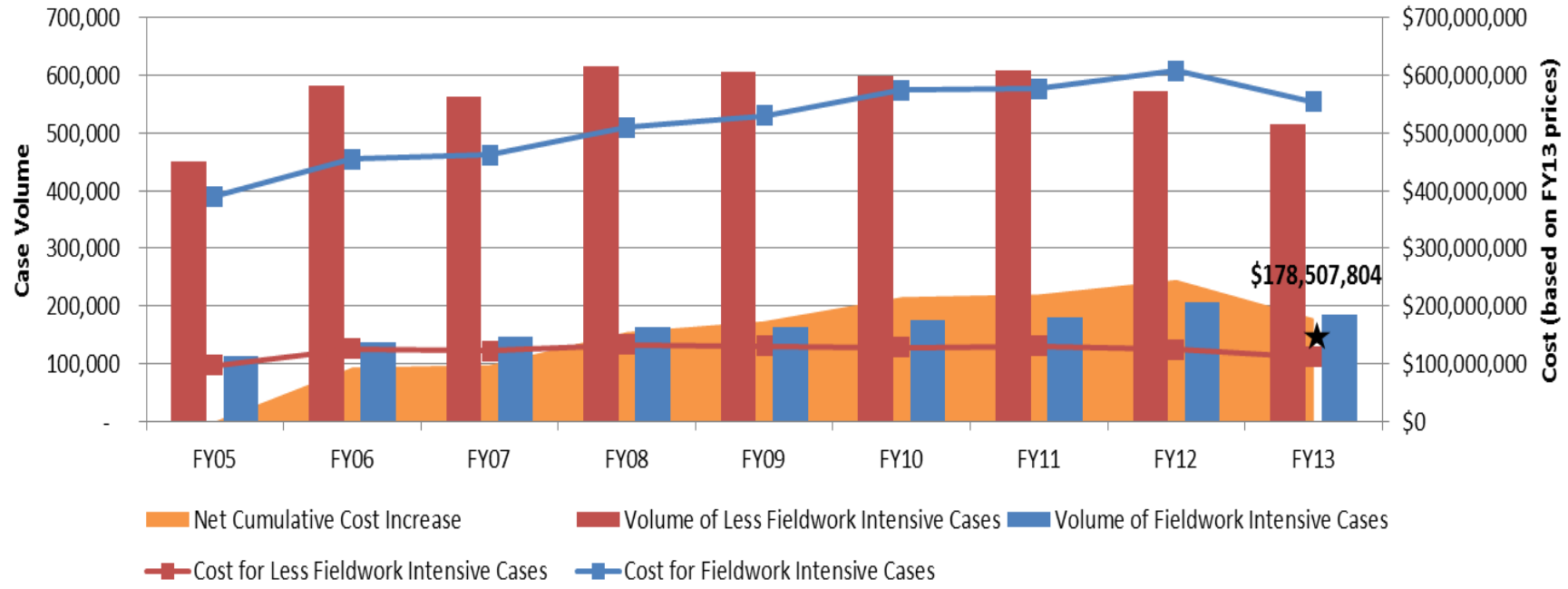
NOTE 1: Both DOD and DOJ had significant increases in personnel security costs in FY 2001.

NOTE 2: Intelligence Community personnel security costs not included prior to 2006.

NOTE 3: Spike in FY 2010 total is attributed to DOD – “Personnel Security Investigation costs are now fully consistent with direct DoD tabulations of funds paid to the Office of Personnel Management for that purpose. Estimates for years FY08 through FY10 averaged around \$220 million more than had been previously estimated. Personnel Security costs were higher than previously reported for FY09 because of the baseline changes, and between FY09 and FY10 costs increased by around \$50 million. Of that, \$38 million is from increased payments for security investigations, with the remainder resulting from increased numbers of civilian O80 security specialists supporting the clearance processing.”

# Key Indicators – Implement Enterprise Management

## Significant Cost Drivers – Investigation Mix – Requested by DoD Only



Investigation Type		FY05	FY06	FY07	FY08	FY09	FY10	FY11	FY12	FY13	% Change FY05 to FY13
Less Fieldwork Intensive	Total	450,505	581,451	563,463	615,437	606,926	598,067	608,515	572,295	515,900	15%
	Cost Based on FY13 Prices	\$96,540,724	\$126,165,959	\$122,258,252	\$132,434,773	\$130,100,938	\$128,066,776	\$130,633,918	\$124,269,698	\$111,792,461	16%
Fieldwork Intensive	Total	113,097	135,954	147,777	164,330	163,718	175,940	181,190	205,585	184,775	63%
	Cost Based on FY13 Prices	\$390,243,657	\$454,016,638	\$462,175,815	\$509,381,612	\$530,464,702	\$574,217,534	\$576,315,714	\$607,880,308	\$553,499,724	42%
<b>Total Cost</b>		<b>\$486,784,381</b>	<b>\$580,182,597</b>	<b>\$584,434,067</b>	<b>\$641,816,385</b>	<b>\$660,565,640</b>	<b>702,284,310</b>	<b>\$706,949,632</b>	<b>\$732,150,006</b>	<b>\$665,292,185</b>	<b>37%</b>

**Note: Costs calculated using current-year (FY13) prices, which have remained fixed since FY10 (SSBI: \$4005; SSBI-PR/Phased PR: \$2711; BI (\$3189); MBI/LBI (\$752); NACL C (\$228) ANACI (\$260); NAC/NACI: \$125)**



# Key Indicators – Insider Threat Programs

## Insider Threat - Key Implementation Data

Indicator	Source	Public/Internal	Baseline	Target	Frequency	Latest data	Trend
Percentage of agencies <sup>1</sup> that have satisfied the program establishment criteria	KISSI <sup>2</sup>	Internal	0%	100%	Quarterly	FY14, Q2 <sup>3</sup>	
Percentage of agencies that have achieved IOC	KISSI	Internal	0%	100%	Quarterly	FY14, Q2	
While in progress, the latest projected date for an agency achieving IOC	KISSI	Internal	0%	100%	Quarterly	FY14, Q2	
Percentage of agencies that have achieved FOC	KISSI	Internal	0%	100%	Quarterly	FY14, Q2	
While in progress, the latest projected date for an agency achieving FOC	KISSI	Internal	0%	100%	Quarterly	FY14, Q2	

<sup>1</sup> Results reflected as a government-wide average. Individual agency results are weighted by the number of cleared persons in each agency  
<sup>2</sup> KISSI data are often supplemented and validated by independent assessments conducted by the NITTF  
<sup>3</sup> KISSI results are classified and will not be processed on this enclave

### Indicators in development:

High Level Indicator	Potential Target Areas
	CE program data supporting Insider Threat Programs

# Key Indicators – Continuous Evaluation / Availability and Sharing of Relevant Information

**Indicators in development:** Develop mechanism to track CE metrics, Percentage of designated D/As meeting IOC  
 Percentage of designated D/As meeting FOC, Percentage of overdue PR population screened using automated record checks

High Level Indicator	Projected Initial Collection Date	Potential Target Areas
Develop mechanism to track CE metrics	TBD	
Percentage of designated D/As meeting IOC		
Percentage of designated D/As meeting FOC		
Percentage of overdue PR population screened using automated record checks		

**Indicators in development:** Percentage of local law enforcement records provided of number requested, Percentage of local law enforcement records provided of number requested, Percentage of local law enforcement records provided via automated means

High Level Indicator	Projected Initial Collection Date	Potential Target Areas
Percentage of local law enforcement records provided of number requested	TBD	
Percentage of local law enforcement records provided via automated means	TBD	

# Contextual Indicators – Availability of Relevant Information

## Denial of Criminal History Record Information by State (FY13 data)



### Law Enforcement Record Search Volumes by Method (OPM FY13 Data)

Method	Total	Percentage of Total Searches
Electronic Database (Nlets and Statewide)	977,434	34%
Mailed or Faxed Inquiry	642,227	22%
In-Person Contacts With Law Enforcement Agencies	1,021,377	36%
Court Checks in lieu of law checks	215,202	8%
<b>Total</b>	<b>2,856,240</b>	<b>100%</b>

<sup>1</sup> Nlets, which is owned by the States, is a 501 (c) (3) nonprofit organization that was created over 45 years ago by the principal law enforcement agencies of the States.

# Key Indicators- Federal Investigative Standards

Key Implementation Data						
Indicator	Source	Baseline	Target	Frequency	Latest data	Trend
Percentage of agencies in compliance with Tier 1 IOC	Agencies	0%	100%	Quarterly – Beginning FY15Q1	TBD	NA
Percentage of agencies in compliance with Tier 2 IOC	Agencies	0%	100%	Quarterly – Beginning FY15Q1	TBD	NA
Percentage of agencies in compliance with Tier 3 IOC	Agencies	0%	100%	Quarterly	TBD	NA
Percentage of agencies in compliance with Tier 4 IOC	Agencies	0%	100%	Quarterly	TBD	NA
Percentage of agencies in compliance with Tier 5 IOC	Agencies	0%	100%	Quarterly	TBD	NA
Percentage of agencies in compliance with Tier 1 FOC	Agencies	0%	100%	Quarterly	TBD	NA

# Key Indicators – Oversight and Quality of Background Investigations and Adjudications

**Indicators in development:** Assess and establish means and measures for Adjudicative Quality, Percentage of agencies using the Investigative Quality Standards, Ratio of Quality to Non-Quality completed investigations, Percentage of targeted agencies assessed for oversight purposes

High Level Indicator	Projected Initial Collection Date	Potential Target Areas
Percentage of agencies using the Investigative Quality Standards	TBD	
Ratio of Quality to Non-Quality completed investigations	TBD	
Percentage of targeted agencies assessed for oversight purposes	FY15 Q4	

# Key Indicators – Risk Management with Appropriate Position Designations and Associated Investigations

**Indicators in development:** Establish mechanism to track position re-designation outcomes/results, Agency reports of position re-designation results, Percent reduction in total number of clearance holders, Percent reduction in overdue reinvestigations

High Level Indicator	Projected Initial Collection Date	Potential Target Areas
Agency reports of position re-designation outcomes/results	TBD	
Percent reduction in total number of clearance holders	FY15 Q4	
Percent reduction in overdue reinvestigations	FY15 Q4	

# Key Indicators – Security and Suitability Alignment and Reciprocity

**Indicators in development:** Number of agencies fully implementing government wide credential standards/criteria, Percent of agencies in compliance with training standards

High Level Indicator	Projected Initial Collection Date	Potential Target Areas
Number of agencies fully implementing government-wide credentialing standards/criteria	TBD	
Percent of agencies in compliance with training standards	FY15 Q4	