**Cross Agency Priority Goal Quarterly Progress Update** 

# Insider Threat and Security Clearance Reform

**Goal Leaders:** 

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FY2015 Quarter 4

### **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

### Background

#### **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
- PAC Strategic Intent for FY2016-2020 developed

#### **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 FY15 Q4**

#### 90-Day Review

- Due to various issues surrounding the Office of Personnel Management (OMP) Federal Investigative Service, a 90-day
  review was conducted starting in July 2015 to examine background investigative processes and make
  recommendations regarding the future of the mission.
- While the Suitability and Security Process review (120-Day Report) focused on operational challenges, the 90-day review focused on more fundamental issues.
- Four recommendations have been made as a result of the 90-Day review that are currently under advisement .

#### Availability and Sharing of Relevant Information

• Evaluated the feasibility for ISPs to include search of the Department of State, Bureau of Consular Affairs, American Citizen Services (ACS).

### **Action Plan Summary**

Impact Area / Sub-Goal	Major Actions to Achieve Impact	Key Indicators
Improve Enterprise Management of Information Technology (IT) and Resources: Increase enterprise management and oversight and make greater use of automation to access information relevant to background investigations and adjudications.	<ul> <li>Recompose the PAC to actively manage and oversee enterprise issues</li> <li>Develop strategic IT initiatives to ensure IT 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> <li>Number of agencies investing in enterprise line of business</li> <li>Percentage of Increase/Decrease of Annual Suitability/Security Program Costs by Agencies</li> </ul>
<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.	<ul> <li>Achieve program establishment</li> <li>Achieve Initial Operating Capability (IOC)</li> <li>Achieve Full Operating Capability (FOC)</li> <li>Note: As defined and promulgated by the National Insider Threat Task Force (NITTF) and Steering Committee.</li> </ul>	<ul> <li>Percentage of Departments 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>
Implement Continuous Evaluation: Accelerate the implementation of a standardized program of Continuous Evaluation (CE), ensure full integration with agency Insider Threat Programs, and reassess Periodic Reinvestigation (PR) intervals as appropriate.	<ul> <li>Accelerate government wide implementation of a standardized program of CE, ensure full integration with agency Insider Threat Programs, and reassess PR intervals as appropriate</li> </ul>	<ul> <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
Improve Availability and Sharing of Relevant Information: Ensure internal and external processes exist for reporting and sharing information.	<ul> <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> <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>
Implement Federal Investigative Standards: Accelerate implementation of elements of Revised Federal Investigative Standards (FIS) to address gaps identified in existing investigative processes.	<ul> <li>Accelerate implementation of elements of Revised FIS to address gaps identified in existing investigative processes</li> </ul>	<ul> <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>
Improve Oversight and Quality of Background Investigations and Adjudications: Improve oversight to ensure investigations and adjudication meet government-wide quality standards.	<ul> <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> <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
Improve Risk Management with Appropriate Position Designations and Associated Investigations: 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.	<ul> <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> <li>Percent reduction in overdue reinvestigations</li> <li>Percent reduction in total number of clearance holders</li> </ul>
Improve Security and Suitability Alignment and Reciprocity: Ensure alignment through consistent standards, training and processes, avoiding redundancy and duplicative systems and effort, and improving reciprocity.	<ul> <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> <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)**

DHS

DoD

USDI

P&R

DOJ

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

#### **Office of Personnel Office of the Director** Office of Management and Budget (OMB) Management (OPM) **National Intelligence** (ODNI) Suitability Executive Agent DDM Chair, Performance Security Executive Agent Accountability Council (PAC) Contributing OPM Programs: FIS/ES/OGC Authorities: EO's 10450. 12968. **Contributing ODNI Programs: NCIX/SSD** Contributing OMB Programs: DM/DB Authorities: EO's 10450, 12968, 13467, 5 USC Authorities: EO 13467 PAC Program Management Office (PMO)

OMB

DM

DB

\*Current PAC member agencies: Department of Homeland Security (DHS), Department of Defense (DoD), Department of Justice (DOJ), Office of Management and Budget (OMB), Federal Bureau of Investigation (FBI), Office of the Director of National Intelligence (ODNI), Office of Personnel Management (OPM), Department of the Treasury (Treasury), Department of Energy (DOE), ISOO, National Security Council (NSC), General Services Administration (GSA)

FBI

OPM

FIS ES/OGC Treasur

ODNI

NCSC

SSD

### **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 strategic IT initiatives to ensure IT 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 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	Complete	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	Complete	PAC PMO
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	Complete	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 a PAC Strategic Intent for the Security, Suitability, and Credentialing LOB.	12/2014	Complete*	PAC PMO, ODNI, OPM, DoD
PAC will issue an enterprise implementation plan to accomplish the PAC Strategic Intent	TBD**	On Track**	PAC PMO, ODNI, OPM, DoD
Develop a DoD modernization strategy in alignment with the PAC Strategic Intent for FY2016-2020.	TBD***	Not Started***	DoD
Develop metrics for the DoD modernization strategy in alignment with the PAC Strategic Intent implementation plan.	TBD****	Not Started****	DoD

\*The PAC Strategic intent was formally coordinated across the executive branch in June 2015 and was approved by the PAC on 7/7/2015.

\*\*Strategic Intent implementation planning has started. Due date is dependent on the PAC 90 Day Review.

\*\*\*DoD strategy is dependent on issuance of the PAC Strategic Intent implementation plan.

\*\*\*\*DoD metrics development is dependent on completion of the DoD Modernization Strategy and the issuance of the PAC Strategic Intent implementation plan.

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

Milestone Summary	,		
Key Milestones	Milestone Due Date	Milestone Status	Owner
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 SF-85P – 8/2015 SF-85 – 8/2015	8/2015	Missed**	ODNI, OPM, OMB, PAC

\*\*Awaiting Senior Leadership decision on revising Question 21 on the SF86. Modifications to the SF85 and SF85P are dependent on decisions on expanded reporting requirements.

### 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	Missed**	NITTF	
Achieve IOC*	12/2015	At Risk**	NITTF	
Achieve FOC*	12/2016	On Track	NITTF	

\*Defined on next slide.

\*\*Most of the executive branch departments and agencies have accomplished this task. Many of those that have not are discovering challenges with issues such as organizational culture, legal questions, and resource identification. The NITTF is working to address these issues as quickly as possible.

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

Requirements for Insider Threat Programs			
Major Action #1: Program Establishment Basic requirements	Major Action #2: Initial Operating Capability (IOC) Program establishment plus the following	Major Action #3: Final Operating Capability (FOC) 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	Monitoring of user activity 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 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	Missed*	ODNI
ODNI will implement CE capability for at least 5% of the TS and TS/SCI cleared personnel.	3/2017	On Track**	ODNI
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.	10/2014	Completed	DoD
DoD will expand its CE capability to 225,000 personnel.	12/2015	On Track	DoD
DoD will expands CE capability to 500,000 personnel by the end of 2016.	12/2016	On Track	DoD
DoD will expand its CE capability to 1 million personnel during 2017.	12/2017	On Track	DoD
Issue and promulgate CE Policy (SEAD # TBD)	9/2016	On Track	ODNI
In response to the President's Review Group, provide a recommendation to the PAC on the use of a continuous evaluation standard for vetting personnel for access to classified information.	9/2017	On Track***	ODNI, NSC, OMB

\*The ODNI is developing an Executive Branch-wide capability that will be implemented in a phased approach.

\*\* CE will be rolled out in a phased approach, with a goal to have CE completed on a portion of the TS and TS/SCI population in the Executive Branch by the end FY16. \*\*\*Based on the understanding that the term "continuous monitoring" means "continuous evaluation".

### 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
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.	10/2015	On Track*	PAC PMO, DOJ
The ODNI will work with OMB to publish the revised Reporting Requirements policy (SEAD 3) for national security positions, and then establish a working group to expand those requirements to other suitability and contractor populations.	7/2014	Missed**	ODNI
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, 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

\*DOJ instructive materials are under development concurrent with the related Liaison Office stand up activities. Instructive materials will be disseminated as determined by the Liaison Office.

\*\*ODNI is adjudicating the  $3^{rd}$  round of comments received from inter-agency review .

\*\*\*Dependent on SEAD 3 policy issuance. Due date will be established upon consideration of the final issued Reporting Requirements policy.

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

Milestone Summary			
Key Milestones	Milestone Due Date	Milestone Status	Owner
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	On Track	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	Completed	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	At Risk*	PAC

\*Planning for the establishment and placement of a Liaison Office has started; however, this is now dependent on the PAC 90-day Review

### 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
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	Missed*	ODNI, OMB
<ul> <li>Develop a plan to Accelerate the following items:         <ul> <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	Complete	PAC PMO
Achieve IOC for Tier 1 and Tier 2 investigations.	10/2014	Complete	OPM
Achieve IOC for Tier 3 investigations.	10/2015	At Risk**	ODNI, OPM
Achieve IOC for 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	At Risk***	ODNI, OPM (FISIWG)

\*Completed adjudication of 1<sup>st</sup> round of comments received from interagency review on July 14, 2015.

\*\* Challenge with OPM's capacity to conduct high volume checks of Scattered Castles .

\*\*\* Need a dedicated resource group to continue work started through the FISIWG. Primary focus for agencies has been implementation of Tiered investigations. Additional work is required to create the Community Handbook to be used across the Executive Branch.

## 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	Complete*	ODNI, OPM, DoD, (QAWG)					
Once quality standards are approved and quality assessment tool is created issue implementation guidance for quality standards and tool.	TBD**	On Track**	ODNI, OPM, DoD (QAWG)					
Ongoing, the PAC and the Security and Suitability Executive Agents 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	At Risk***	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	Complete	PAC PMO					
DoD and OPM will develop implementation plans to better align accessions and related investigative processes to more completely address third party influence. *Standards signed January 2015.	10/2015	On Track	DoD, OPM					

\*\* Implementation guidance is in draft and will be coordinated with Working Group upon approval of standards. Coding expected to be completed by end of **September 2015**. Then testing with the community and A&A process to begin through IC CIO.

\*\*\* Working group to solicit information to assess adequacy of the current process. Surveying tool under development with support by PAC PMO personnel.

### 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	Missed*	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 plans to 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 Security Executive Agent Directive on National Security Adjudicative Guidelines (SEAD 4).	10/2015	At Risk***	ODNI, OMB

\*Resources assigned to competing priorities. These items will be re-baselined in FY16 to align with PAC strategy and priorities.

\*\*Training development pending development and approved policy, standard criteria and procedures.

\*\*\*ODNI is currently adjudicating the 2<sup>nd</sup> round of interagency comments.

### 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 CAPE Study analysis and determination of whether the current DoD approach for obtaining personnel security investigations and reinvestigations is the most efficient and effective approach.	5/2016	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 AG 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, considering best practices.	10/2015**	On Track	PAC						

\*GAO study has not yet been published. Due Date will be established once study is published.

\*\* An informal assessment of inherently government functions was conducted by ODNI/OPM/DoD staff members as required. During the staff review, it was determined that Federal Acquisition Regulations prohibit Federally Funded Research and Development Centers (FFRDCs) from executing work that can be accomplished by contractors. The original milestone due date of 10/2014 was adjusted to accommodate the best practice assessment; however, due to the prohibition, we will not refer this to the Best Practices Working Group for study.

### 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						
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						
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	Complete*	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	Complete	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	Missed**	OMB, DoD, NSC						
Modify existing position designation tool to reflect 5CFR 1400 requirements.	10/2015	On Track	OPM, ODNI						
Issue joint ODNI/OPM implementation guidance for position designations under 5 CFR 1400 and other populations.	10/2015	On Track***	ODNI, OPM						

\*5 CFR 1400 issued June 5, effective July 5, 2015.

\*\* Technical capabilities pilot (Phase 1) conducted and results provided to the Privileged Access Senior Steering Group. Phase 2 of pilot began in July 2015 to build upon, refine, and validate the results of the Phase 1 pilot. The Phase 2 pilot is scheduled to be complete by July 2016. This item will be re-baselined in FY16 to align with PAC strategy and priorities.

\*\*\* ODNI will provide guidance via Executive Correspondence. OPM to issue guidance separately consistent with its authority.

# 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*	Missed*	OPM					
Issue and promulgate updated National Security Reciprocity policy	9/2016	On Track	ODNI					
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	Complete	OPM, DNI (TSIWG)					
Within 180 days of approval of implementation plan, agencies must develop and implement mitigation strategies to close training gaps.	2/2015	Complete	OPM, DNI (TSIWG)					
Within 270 days of approval of implementation plan, agencies must resolve training gaps identified for incumbent personnel.	5/2015	Complete	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.	10/2015**	On Track	OPM, DNI (TSIWG)					

\*Suspension criteria will be incorporated into supplemental credentialing criteria. Memo authorizing the supplemental standards and development of suspension criteria is in final coordination.

\*\*The training standards implementation plan was signed by OMB in July 2014. Associated milestone due dates have been adjusted by one month to reflect implementation progress starting August 1st.

### Key Indicators – Enterprise Management of Information Technology and Resources

Implement Enterprise Management – Timeliness Data (Fastest 90%)								
Indicator	Source	Baseline*	Target	Frequency	Latest Data* FY15 (Q4)	Trend		
Government-wide Security Clearance Timeliness – Initial Secret Cases	ODNI and all Agencies	In 2005 – 265 Days Average for	74 Days End-to- End	Quarterly	95 Days	Did Not Meet Goal		
Government-wide Security Clearance Timeliness – Initial Top Secret Cases	ODNI and all Agencies	Secret & Top	114 Days End-to- End	Quarterly	179 Days	Did Not Meet Goal		

\*Baseline Timeliness metrics were based on IRTPA collection methodology, which only included investigation and adjudication timeliness, but did not include initiation timeliness. \*\*Due to ODNI Data Collection and Reporting cycles, the data provided is for the previous quarter.

**Indicators in development:** Number of agencies investing in enterprise line of business, Percentage of Suitability and Security processes that are automated, 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 Increase/Decrease of Annual Suitability/Security Programs Cost by Agencies	TBD	TBD

### FY 2015 USG Performance to Date

# Government-Wide Security Clearance Performance

(PAC Methodology)

Fastest 90%

		Initiate Investigate							Adjuo	licate				<b>o-En</b> Inv. +			
		Q1 15			Q1 15	Averaş Q2 15	ge Day Q3 15	Q4 15	Q1 15	Averaş Q2 15	ge Day Q3 15	25 Q4 15					
Initial	Volume:	(	Goal: 14 Days			40 I	Days			20 I	Days			74 I	Days		
Secret Cases	388,071	8	9	9	9	48	61	61	<u>66</u>	11	14	17	20	67	84	87	95
Initial	Volume:	:: Goal: 14 D:		Goal: 14 Days			80 I	Days			20 I	Days			114	Days	
Top Secret Cases	73,744	13	12	13	14	101	123	135	146	21	22	22	19	135	157	170	179
Periodic	Volume:	Goal: 15 Days			150 ]	Days			30 I	Days			195	Days			
<b>Reinvestigations:</b>	117,189	13 12 11 12 129 165 189				189	211	46	40	36	28	188	217	236	251		
		Red Text: Goal Not Met								Blu	e Text:	Goal N	<b>A</b> et				

**Key Indicators – Implement Enterprise Management** 

# FY 2015 USG Performance to Date

### **Government-Wide Security Clearance Performance**

(PAC Methodology)

Fastest 90%

		Initiate Investigate Adjudicate							<b>End-to-End</b> (Initiate + Inv. + Adj.)								
		Q1 15			Q1 15	Averaş Q2 15	ge Day Q3 15	s Q4 15	Q1 15	Averaş Q2 15	ge Day Q3 15	s Q4 15					
Initial	Volume:	(	Goal: 1	4 Day	S		40 I	Days			20 I	Days			74 I	Days	
Secret Cases	388,071	8	9	9	9	48	61	61	<u>66</u>	11	14	17	20	67	84	87	95
Initial	Volume:	(	Goal: 1	.4 Day	S		80 I	Days			20 I	Days			114	Days	
Top Secret Cases	73,744	13	12	13	14	101	123	135	146	21	22	22	19	135	157	170	179
Periodic	Volume:	Goal: 15 Days			150 ]	Days			30 I	Days			195	Days			
Reinvestigations:	117,189	13	12	11	12	129	165	189	211	46	40	36	28	188	217	236	251
				Red 7	Гext: С	oal No	t Met					Blu	e Text	: Goal N	<b>A</b> et		

### **DoD "In Access" and "Eligible" Populations\***



20 Jan 2015

\*Responsive to the following Major Actions:

• Reduce period reinvestigation backlog using a risk-based approach

Reduce total population of 5.1 M Secret and TS/SCI clearance holders to minimize risk of access to sensitive information and reduce costs

### **TS and TS/SCI "Out of Scope" Populations**



# Overall change -14% 60K since baseline:

### **DoD Secret "Out of Scope" Populations**



Overall change -61% 286K since baseline:



# **Overdue Periodic Reinvestigations**



### **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	FY15, Q4	
Percentage of agencies that have achieved IOC	KISSI	Internal	0%	100%	Quarterly	FY15, Q4	
While in progress, the latest projected date for an agency achieving IOC	KISSI	Internal	0%	100%	Quarterly	FY15, Q4	
Percentage of agencies that have achieved FOC	KISSI	Internal	0%	100%	Quarterly	FY15, Q4	
While in progress, the latest projected date for an agency achieving FOC	KISSI	Internal	0%	100%	Quarterly	FY15, Q4	

<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 are therefore not displayed in this report

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	

### **Key Indicators- Federal Investigative Standards**

Key Implementation Data						
Indicator	Source	Baseline	Target	Frequency	Latest data Q4	Trend
Percentage of agencies in compliance with Tier 1 IOC	OPM	0%	100%	Quarterly – Beginning FY15Q1	95%	NA
Percentage of agencies in compliance with Tier 2 IOC	OPM	0%	100%	Quarterly – Beginning FY15Q1	95%	NA
Percentage of agencies in compliance with Tier 3 IOC	Agencies	0%	100%	Quarterly	FY16 Q2*	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

\*Per ODNI, it is anticipated that the data will be analyzed and ready to report in Q2 FY-2016.

### 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	81%*	

\*Per OPM, 13 oversight audits were completed. Two were postponed due to staff shortage and one was cancelled. Per ODNI, there is no baseline number of agencies from which to obtain a percentage.

### 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 redesignation 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*	

\*The ODNI is currently in the process of collecting the necessary information.

# 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	FY16 Q1*	

\*The ODNI is currently in the process of collecting the necessary information and reporting is anticipated in Q1 FY-2016.

### Acronyms

- ACS American Citizens Services
- BI Background Investigations
- CAP Cross Agency Priority
- CAPE Cost Assessment Program Evaluation
- CE Continuous Evaluation
- CFR Code of Federal Regulations
- CIO Chief Information Officer
- D/A Department or Agency
- DDM Deputy Director of Management
- DHS Department of Homeland Security
- DNI Director of National Intelligence
- DoD Department of Defense
- DOJ Department of Justice
- EA Executive Agents
- ESI Emergency Severity Index
- E-QIP Electronic Questionnaires for Investigations Processing
- Federal Acquisition Regulations
- FBI Federal Bureau of Investigation
- FIS Federal Investigative Standards
- FOC Full Operating Capability
- FSO Facility Security Officer
- FY Fiscal Year
- GAO United States Government Accountability Office
- GSA General Services Administration
- HHS Department of Health and Human Services
- HR Human Resource
- IC Intelligence Community
- IOC Initial Operating Capability
- ISOO Information Security Operation Office

- IT Information Technology
- LOB Line of Business
- NDAA National Defense Authorization Act
- NITTF National Insider Threat Task Force
- NSA National Security Agency
- NSC National Security Council
- ODNI Office of the Director of National Intelligence
- OMB Office of Management and Budget
- OPM Office of Personnel Management
- OPPM Office of Performance and Personnel Management
- PAC Performance Accountability Council
- PAEI Publically Available Electronic Information
- POTUS President of the United States
- PM/ISE Program Manager/Information Sharing Environment
- PMO Project Management Office
- PR Periodic Reinvestigation
- SAVE Systematic Alien Verification for Entitlements
- SEAD Security Executive Agent Directive
- SecDef- Secretary of Defense
- SISSSC Senior Information Sharing and Safeguarding Steering Committee
- SSCLOB Security, Suitability, and Credentialing Line of Business
- TBD To Be Determined
- Treasury Department of the Treasury
- TS/SCI Top Secret/ Sensitive Compartmented Information
- U.S.C. United States Code
- VA Veterans Affairs
- WG Work Group