Insider Threat and Security Clearance Reform

Goal Leaders:
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FY2016 Quarter 1

Overview

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

Meeting the Risks and Challenges

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 FY16 Q1

Enterprise Management of Information Technology and Resources
- Designated eApplication and eAdjudication as enterprise shared services
- Established the initial SSC Enterprise IT Catalog
- Began development of the Enterprise IT Strategy and PAC Strategic Intent / EIT Strategy Implementation Plan
- Initiated the inaugural SSCLoB Enterprise Research & Innovation (R&I) Program

Develop Insider Threat Programs
- Conducted scenario-based training course for Insider Threat program personnel
- Conducted independent assessments of 13 agencies
- Conducted 6-month follow-up visits to ensure previously assessed agencies are progressing

Continuous Evaluation (CE)
- Public Records CE pilot ongoing at the U.S. Department of State
- DOD expanded CE pilot capability to 225,000

Availability and Sharing of Relevant Information
- Coordinating SEAD 3 Reporting Requirements
- Ongoing Mental Health Working Group study of the intersection between mental health issues and reporting
- FY 16 NDAA amendments to 5 USC 9101 to mandating State/Local/Federal law enforcement provide criminal history information to ISPs
- Establishment of a Federal Background Investigation Liaison Office has been held in abeyance pending the establishment of the NBIB

Oversight and Quality of Background Investigations and Adjudications
- Investigation Quality Assessment and Reporting Tool coding completed in Sept 2015. Testing with the community and A & A process through IC CIO is ongoing.
- DoD and OPM developed implementation plans to better align accessions and related investigative processes to more completely address third party influence.
- Automated adjudication business rules for Tier 3 investigations being developed and validated by DoD, OPM, ODNI and PMO.

Security and Suitability Alignment and Reciprocity
- Coordinating credentialing memo to mandate use of OPM's supplemental criteria and authorize OPM to develop suspension procedures

Improve Risk Management with Appropriate Position Designations and Associated Investigations
- Modified existing position designation tool to reflect 5CFR 1400 requirements.

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.	• 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 Enterprise Line of Business (LOB) mechanisms to collect, analyze, manage, oversee government-wide spending linked to enterprise information technology and workforce development	• Number of agencies investing in enterprise line of business • Percentage of Increase/Decrease of Annual Suitability/Security Program Costs by Agencies
Develop Insider Threat Programs: 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.	• Achieve program establishment • Achieve Initial Operating Capability (IOC) • Achieve Full Operating Capability (FOC) *Note: As defined and promulgated by the National Insider Threat Task Force (NITTF) and Steering Committee.*	• Percentage of Departments or Agencies (D/As) that have met the three program establishment criteria • Percentage of agencies that have met the IOC/FOC criteria
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.	• Accelerate government wide implementation of a standardized program of CE, ensure full integration with agency Insider Threat Programs, and reassess PR intervals as appropriate	• Percentage of designated D/As meeting the requirement for a minimum of 5% to their Tier 5 population under CE by September 2017 • Percentage of overdue PR population screened using automated record checks

Action Plan Summary

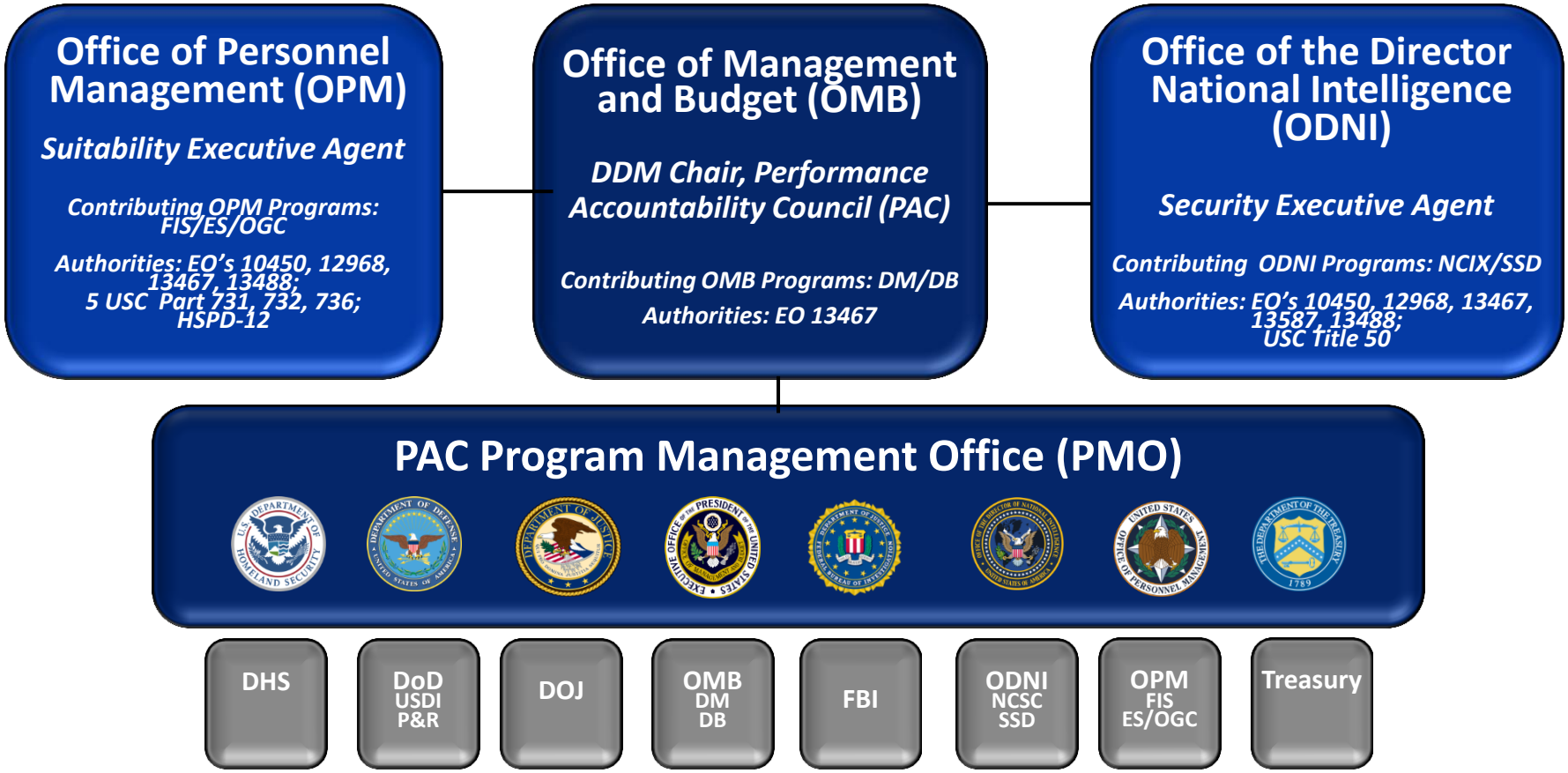
Impact Area / Sub-Goal	Major Actions to Achieve Impact	Key Indicators
Improve Availability and Sharing of Relevant Information: Ensure internal and external processes exist for reporting and sharing information.	• Improve access to and availability of state and local criminal records • Clarify and expand requirements for reporting actions and behavior of employees and contractors to support decisions on access to facilities, classified/sensitive information, and IT systems	• Percentage of local law enforcement records provided of total number requested • Percentage of local law enforcement records provided via automated means
Implement Federal Investigative Standards: Accelerate implementation of elements of Revised Federal Investigative Standards (FIS) to address gaps identified in existing investigative processes.	• Accelerate implementation of elements of Revised FIS to address gaps identified in existing investigative processes	• Percentage of agencies in compliance with Tiers 1 & 2 IOC • Percentage of agencies in compliance with Tier 3 IOC • Percentage of agencies in compliance with Tiers 4 & 5 IOC • Percentage of agencies in compliance with FOC
Improve Oversight and Quality of Background Investigations and Adjudications: Improve oversight to ensure investigations and adjudication meet government-wide quality standards.	• Accelerate the development of quality standards and implementation of consistent measures and metrics for investigations and adjudications • 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	• Percentage of agencies using Investigative Quality Standards • Ratio of Quality to Non-Quality completed investigations • Percentage of targeted agencies assessed for oversight purposes

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.	• Reduce 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	• Percent reduction in overdue reinvestigations • Percent reduction in total number of clearance holders
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.	• 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 • Accelerate implementation of National Security and Suitability Investigator and Adjudicator Training Standards to drive consistency and improve reciprocity	• Number of agencies fully implementing government-wide credential standards/criteria • Percent of agencies in compliance with Training Standards (with measurements beginning one year from standards signature date)

Governance and Contributing Programs (PAC)

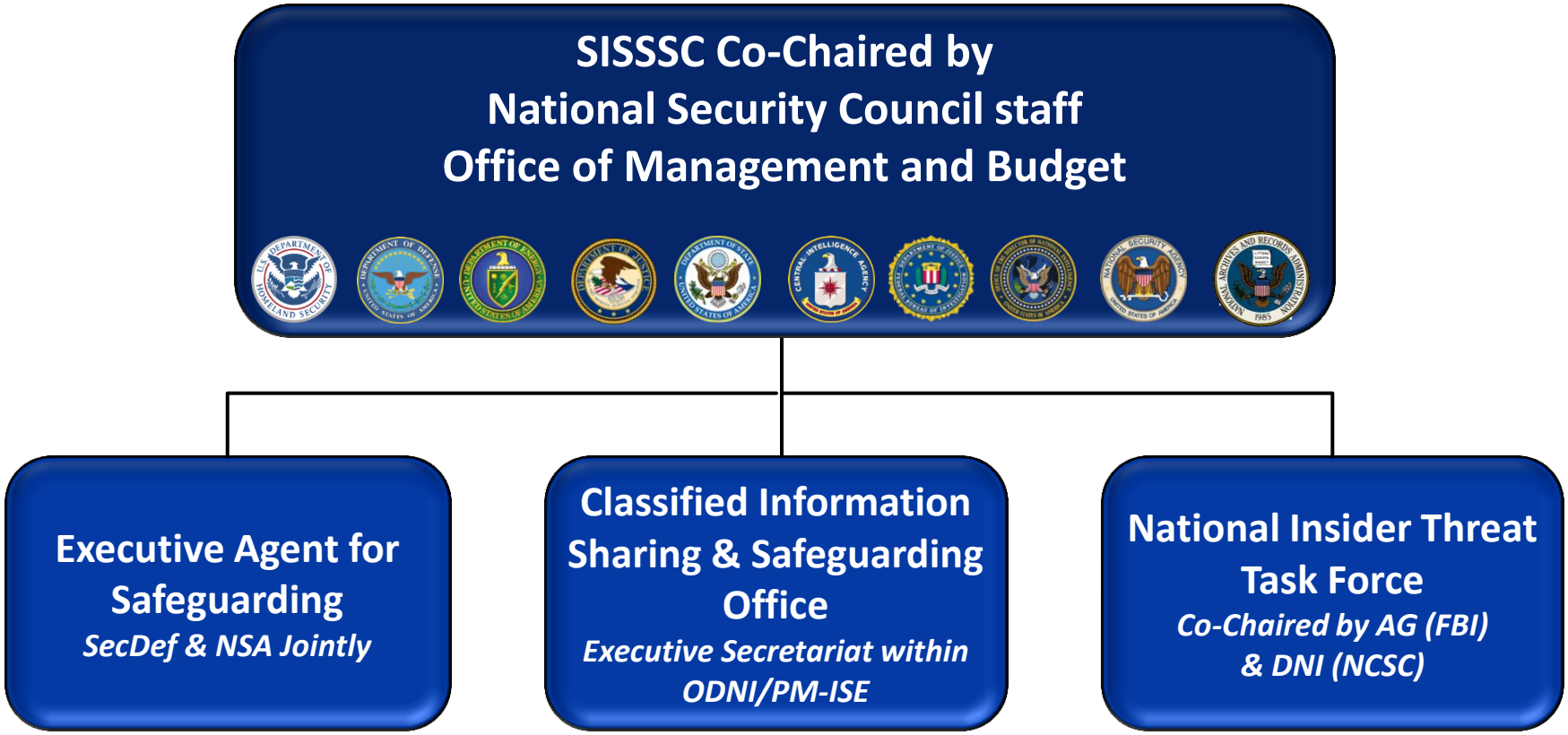
The Performance Accountability Council* (PAC) is ultimately responsible to the President for driving implementation of the reform effort, ensuring accountability by agencies, ensuring the Security and Suitability Executive Agents (EA) align their respective processes, and sustaining reform momentum.



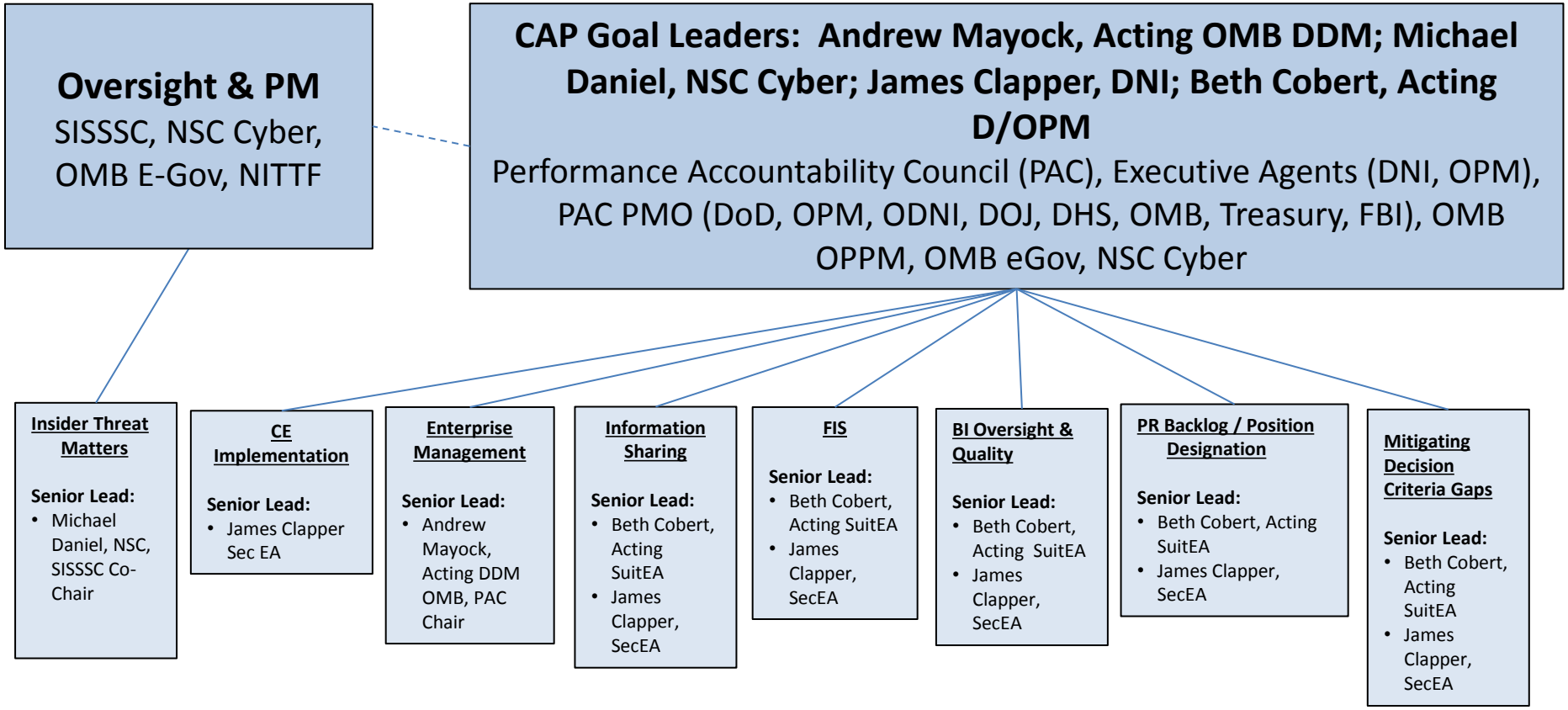
*Current PAC member agencies: Department of Homeland Security (DHS), Department of Defense (DoD), Department of Justice (DOJ), Office of Management and Budget (OMB), Federal Bureau of Investigation (FBI), Office of the Director of National Intelligence (ODNI), Office of Personnel Management (OPM), Department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

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	Missed**	NITTF
Achieve FOC*	12/2016	At Risk**	NITTF

**Defined on next slide.*

***Most of the executive branch departments and agencies have accomplished program establishment tasks. Many departments and agencies are discovering challenges with issues such as organizational culture, legal questions, and resource identification, to name a few. 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	Complete	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 continuing to develop 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	Missed*	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 3rd 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	Completed	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	Missed*	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
• Develop a plan to Accelerate the following items: ○ SSA Check ○ Defense Management Data Center Check ○ Scattered Castles ○ Fully Implement ESI ○ Expand automated checks to verify citizenship, measure effectiveness of DHS SAVE checks	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	Complete**	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	Missed***	ODNI, OPM (FISIWG)

**Completed adjudication of 1st round of comments received from interagency review on July 14, 2015.*

*** There continues to be a 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	Missed***	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.	10/2015	Complete	DoD, OPM

**Standards signed January 2015.*

*** Implementation guidance is in draft and will be coordinated with Working Group upon approval of standards. Coding in final stages of development. 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	Missed*	ODNI, OPM
Develop plans to implement improved investigator and adjudicator training to better identify and act upon falsification.	10/2015	Missed**	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	Missed*	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	Missed***	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 2nd 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.	12/2016	On Track	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	Missed**	PAC

**GAO report entitled "Personnel Security Clearances: Funding Estimates and Government-Wide Metrics Are Needed to Implement Long-Standing Reform Efforts (GAO-15-179SU) " was issued April, 2015.*

*** 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	Complete	OPM, ODNI
Issue joint ODNI/OPM implementation guidance for position designations under 5 CFR 1400 and other populations.	10/2015	Missed***	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. Guidance documents currently in final joint legal review.*

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	Complete***	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 on July 3rd, 2014. Associated milestone due dates were adjusted by one month to reflect implementation progress starting August 1st. The compliance assessment is still underway, and results will be reported in the next CAP Goal reporting cycle.*

**** OPM and ODNI are coordinating on the approach for non-compliant agencies.*

Key Indicators – Enterprise Management of Information Technology and Resources

Implement Enterprise Management – Timeliness Data (Fastest 90%)						
Indicator	**Source**	**Baseline***	**Target**	**Frequency**	**Latest Data* FY16 (Q1)**	**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	116 Days	Did Not Meet Goal
Government-wide Security Clearance Timeliness – Initial Top Secret Cases	ODNI and all Agencies		114 Days End-to-End	Quarterly	203 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.*

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

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 Enterprise Strategy Implemented	TBD	TBD
Percentage of Increase/Decrease of Annual Suitability/Security Programs Cost by Agencies	TBD	TBD

FY 2015 USG Performance to Date

FY16 Q1 Government-Wide Security Clearance Timeliness

(PAC Methodology)

Fastest 90% →

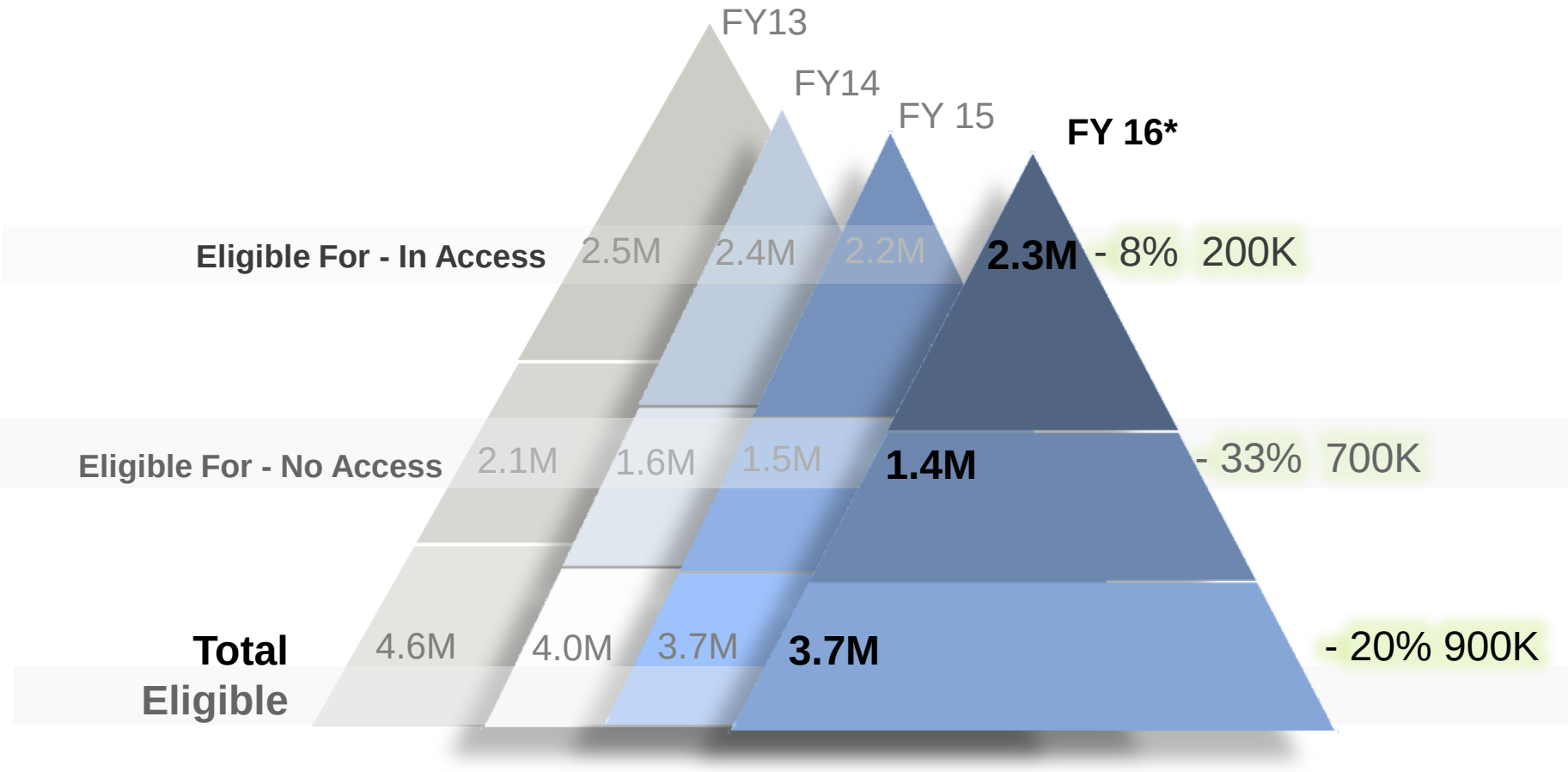
	Volume	Initiate	Investigate	Adjudicate	End-to-End (Initiate + Inv. + Adj.)
		Goal: 14 Days	40 Days	20 Days	74 Days
Initial Secret/Tier 3 Comb Cases	82,186	9	92	15	116
		Goal: 14 Days	80 Days	20 Days	114 Days
Initial Top Secret Cases	17,100	19	168	16	203
		Goal: 15 Days	150 Days	30 Days	195 Days
Periodic Reinvestigations/Tier 3R Comb	36,674	12	192	23	227

Red Text: Goal Not Met

Blue Text: Goal Met

DoD “In Access” and “Eligible” Populations*

Decrease in DoD Clearances from FY13 to FY16



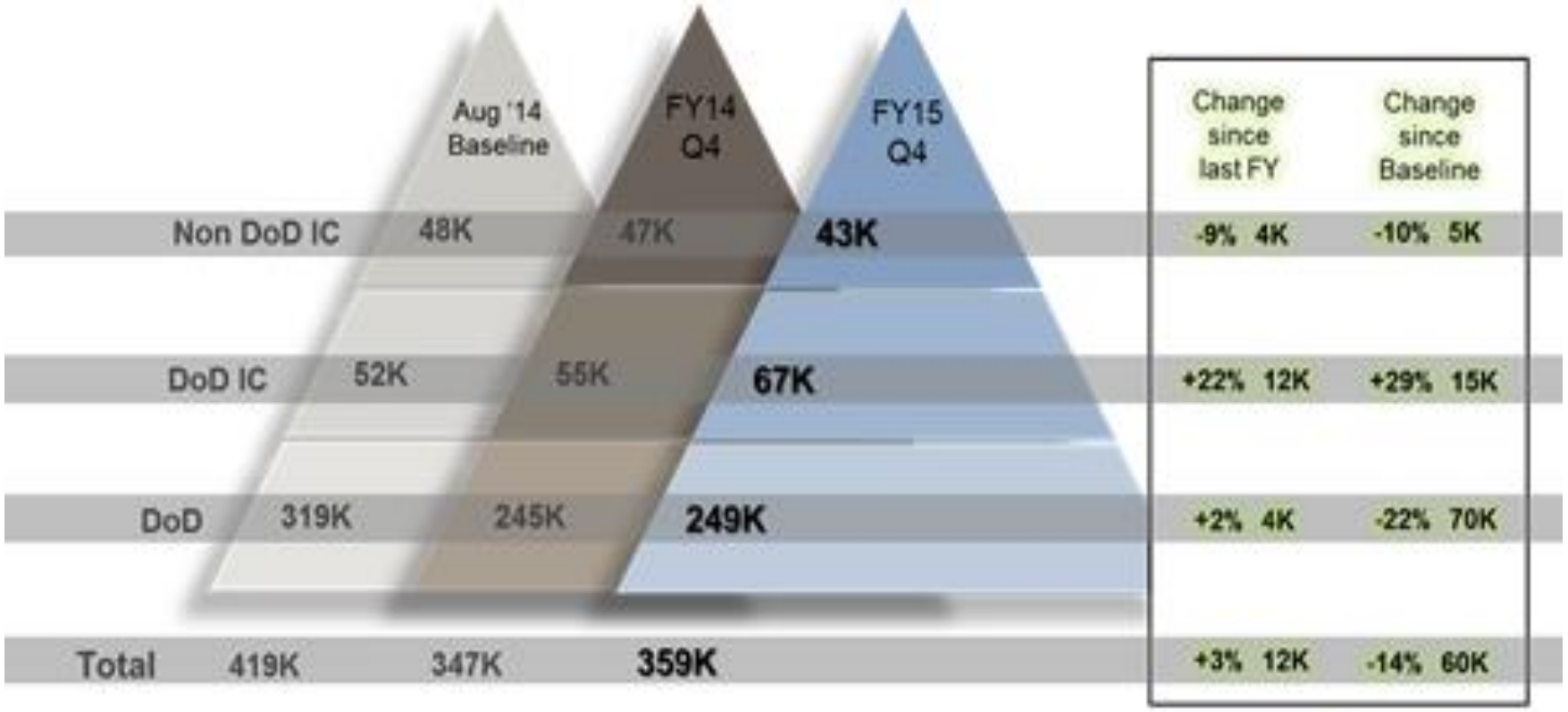
Source: DoD Reporting to ODN * FY16 1ST Quarter Reporting

1 Jan 2016

**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*

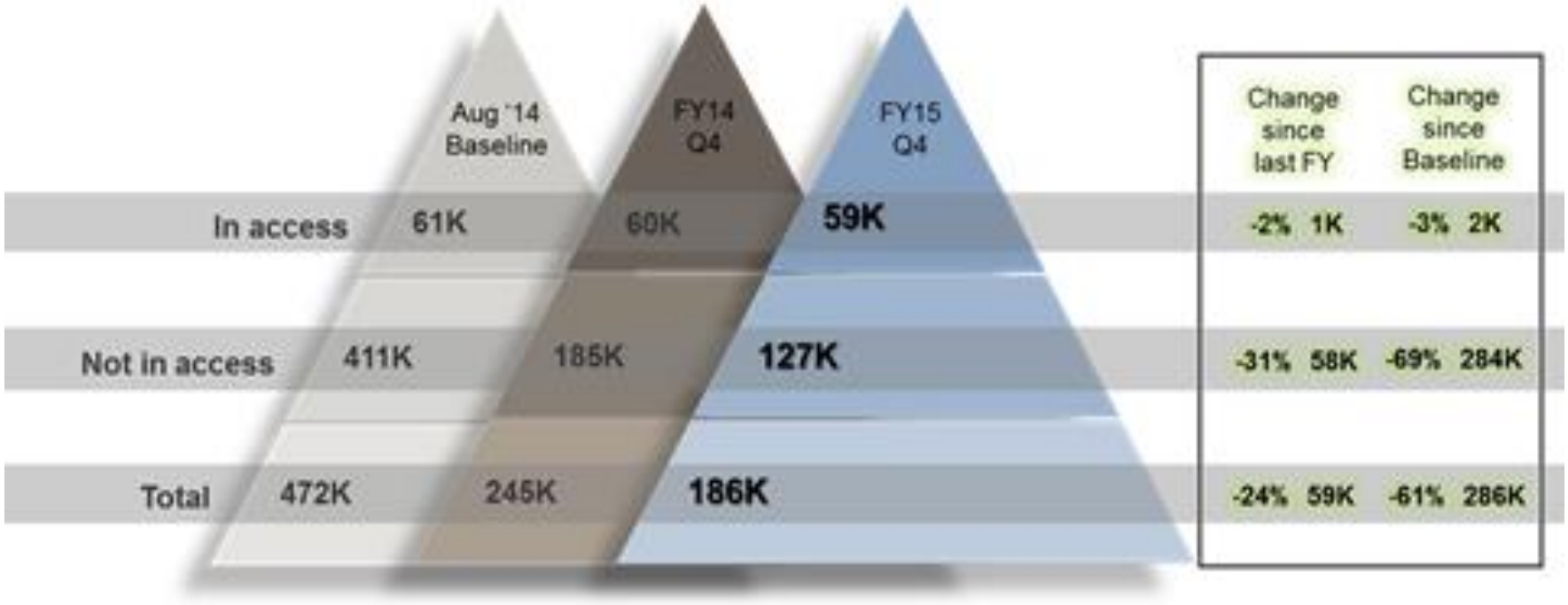
TS and TS/SCI "Out of Scope" Populations



Overall change since baseline: **-14% 60K**

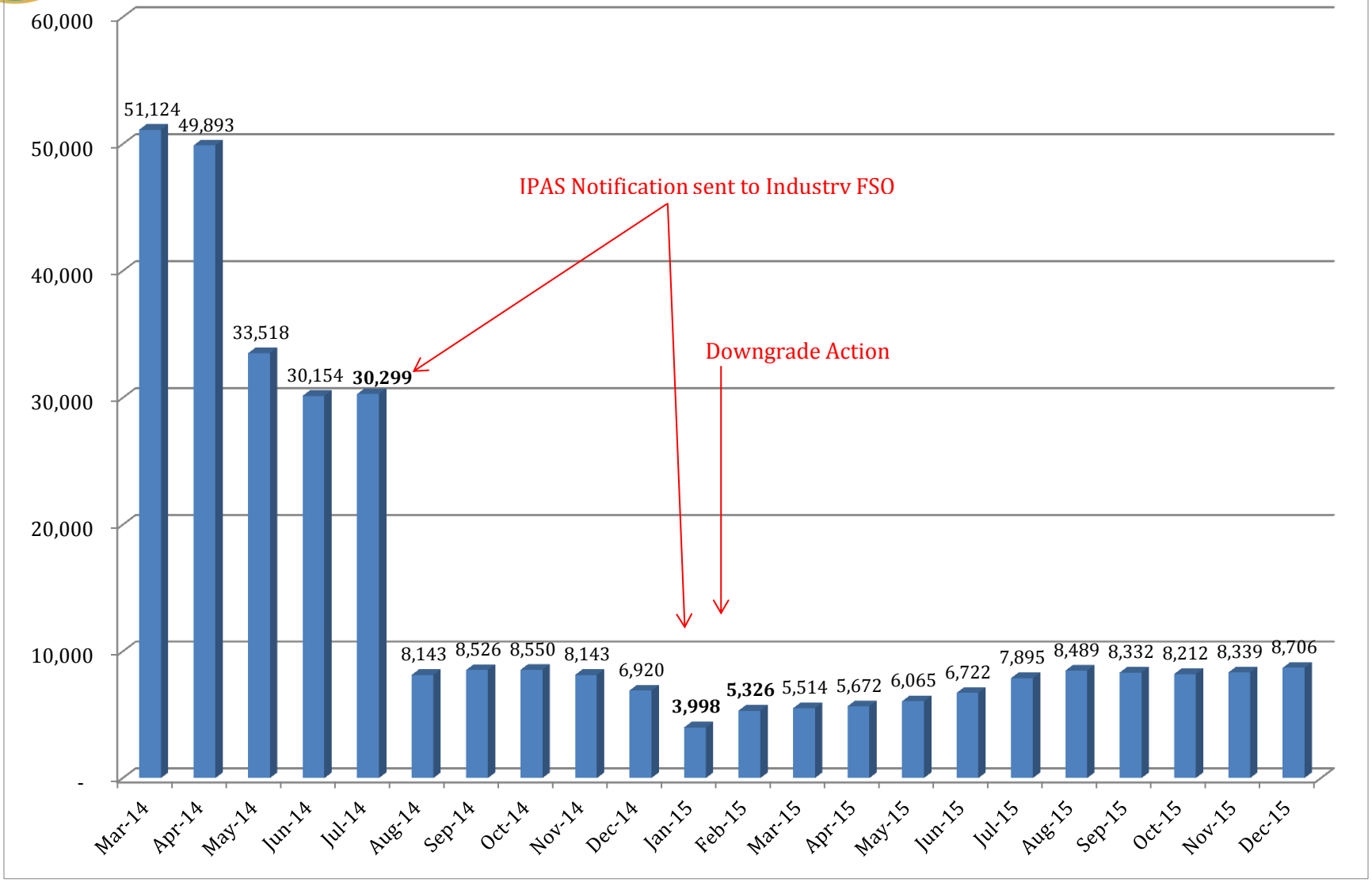
10/15/2015 Source: Scattered Castles & JPAS

DoD Secret "Out of Scope" Populations



Overall change since baseline: **-61% 286K**

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[1] that have satisfied the program establishment criteria	KISSI[2]	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	

[1] *Results reflected as a government-wide average. Individual agency results are weighted by the number of cleared persons in each agency*
[2] *KISSI data are often supplemented and validated by independent assessments conducted by the NITTF*
[3] *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 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**	

*The percent reduction in total number of clearance holders with data from CDA NCSC-15-009, Annual Report on Security Clearance Determinations," is 5/9%.
**Reduction from FY2014 Q4 to FY 2015 Q4 based on data from Scattered Castles and JPAS is 8%.

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 .

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 Buisiness
- 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