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From: [Redacted] b3
Sent: Friday, February 25, 2011 10:50 AM
To: [Redacted] b6
Cc: [Redacted] b3
Subject: Monthly Report to Congress update

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Hi [Redacted],

Here is the sentence in the Monthly Suitability and Security Clearance Reform Update to Congress that we discussed. Would you please review and get us any updates? Thanks! [Redacted] b3

- OPM re-published 5 CFR Part 731 in the Federal Register on November 5, 2010 for a 30-day comment period to address agency concerns regarding reinvestigation requirements for individuals in public trust positions under Executive Order 13488. The public comment period closed on December 6, 2010 and the Office of Management and Budget is adjudicating comments

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Suitability and Security Clearance Reform Update

Policy:

- Completed 30 day public comment on revised Standard Form 86 through the Federal Register - all 732 technical comments have been resolved.
- Proposed Standard Executive Branch eAdjudication business rules for NACL (Secret) cases in coordination with Security Executive agent for approval and issuance - Legal review complete, pending signature.
- OPM coordinated initial draft of revised policy with DoD and ODNI to broaden sensitive position designations (5 CFR 732). Anticipate near term posting in the Federal Register for public comment.
- Drafted changes to Federal Regulations to define requirements to reinvestigate individuals in public trust positions under EO 13488. The Federal Register public comment period ended 4 January 2010. Public comments are being reviewed by OPM prior to publishing reinvestigation requirements for public trust positions.
- Drafted revised Federal Investigative Standards for initial investigations of positions at Tier 1 (low risk, non-sensitive) Tier 2 (moderate risk public trust) and Tier 3 (non-critical sensitive, and Secret clearances). The draft standards include models for expandable focused investigation and select automated record checks, as appropriate, to each tier level. The methodology to conduct a cost and timeliness analysis of each draft tier has been developed and is in the coordination process.
- Inter-agency Federal Investigation Standards Working Group (FISWG) will meet in late January to address continuous evaluation requirements at Tier 3 and begin discussions on Tier 4 requirements.
- Expert working group within Intelligence Community is conducting research to inform the development of Federal Investigative Standards for access to Top Secret/SCI access (Tier 4).

Information Technology:

- Deployed OPM's enhanced online investigations questionnaire (eQIP). Includes improved data entry validation and additional branching questions.
- Preliminary requirements collection for the next release of eQIP that will incorporate the revisions to the SF-86 is complete. Final requirements collection will be completed after final approval of the revised SF86.
- Deployed eAdjudication at the Department of the Navy Central Adjudication Facility (CAF) to provide electronic delivery and identify and electronically adjudicate Secret-level cases that have no actionable issues present. The Army CAF and the Defense Industrial Security Clearance Office CAF are already on line.
Enabled electronic delivery (eDelivery) of investigative packages from OPM to Air Force. Deployment of Air Force electronic adjudication expected by February 2010.

Governance:

- Published Milestone Template to enable the Performance Accountability Council (PAC) to monitor Executive Branch agencies' progress in implementing reform. First data collection due in January 2010.
- Held Performance Accountability Council meeting in December. Agenda included - 2010 implementation efforts, ARC Pilots, SF-86 approval status, performance data and training.

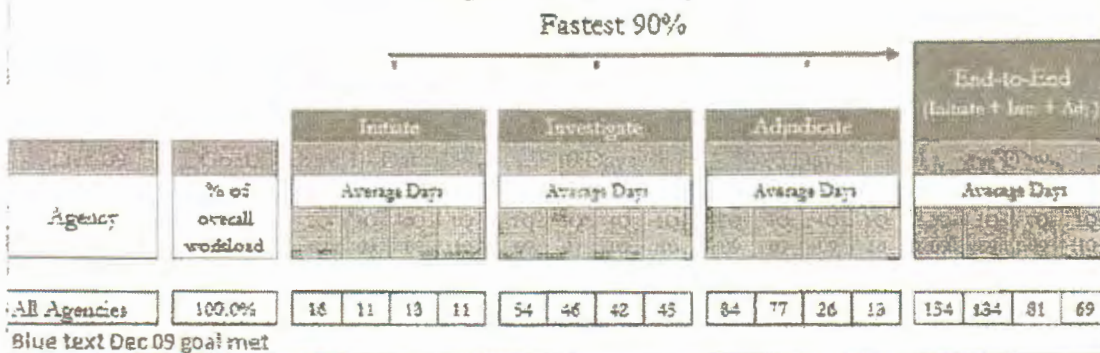
Performance

- The chart below indicates the following changes in performance between November 2009 and December 2009 for OPM customers only:
 - o 54% reduction in the number of duplicative requests for Top Secret Investigation; and some reductions in end-to-end timelines improvements.

| Clearance/Suitability Investigation Type | | Top Secret/ | Secret/Conf/ | Initial TS and Secret |
|--|--|-------------|-----------------------------------|-----------------------|
| | | SBR's | NACLC's & ANACT's and Other IIP's | & Confidential |
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 7,894 | 43,381 | 51,285 |
| | Initiate | 14 | 9 | 10 |
| | Investigate | 76 | 37 | 43 |
| | Adjudicate | 18 | 13 | 13 |
| | End-to-End | 106 | 69 | 66 |
| | Prior Month's Comparison | 106 | 69 | 66 |
| Validate Need | Requirements Met - Requests Returned to Agency | 14 | 85 | 99 |
| | Prior Month's Comparison | 14 | 85 | 99 |

- Data for the entire executive branch is collected and reported to the PAC on a quarterly basis. The chart below includes data for the first quarter of FY2010 ending in December 2010.

**Government-wide Initial Clearances
Reported Quarterly**



Suitability and Security Clearance Reform Update

Policy:

- OMB is leading the Reform Effort review of revisions to the proposed language for part 732 to broaden sensitive position designation prior to entering the Federal Register process for public comment.
- Drafted minimum data standards necessary to support reciprocity were approved by the Security and Suitability Executive Agents designated representatives on 17 June 2010
- OPM is scheduled to provide their analysis of the impact of the proposed tiered standards to the cost and timeliness of their product line by the end of July. Analysis and research by the JRT will follow to achieve a comparison of traditional investigative cost and timeliness in an end-to-end reformed approach.
- OPM will re-publish 5 CFR 731 in the Federal Register for limited period to address agency concerns on reinvestigation requirements for individuals in public trust positions under EO 13488. Anticipate publication in the Federal Register in July 2010.
- OPM updated its System of Records Notice (SORN) and posted it in the Federal Register on May 20, 2010 for a 30-day public notice. Approval of the SORN will permit agencies to forward OPM-conducted investigations to DoD's Case Adjudication Tracking System (CATS) for electronic adjudication. OPM is working with DOE to approve their release of investigative records for electronic adjudication by the DoD system based upon the updated SORN language
- OPM has met with several Cabinet level agencies to discuss the proposed FY2011 product line, which will align existing investigative products with reform concepts (2010 Reform deliverable) and address specific agency impacts. A broader executive branch meeting occurred on 29 June 2010. The proposed products will include enhanced subject interviews triggered by issues flags, and standardized coverage to support reciprocity

Information Technology:

- Continued RAISE pilot between OPM and DoD to assess the electronic reporting of investigative quality. A "live" exchange of RAISE results from Army CCF to OPM will begin 1 July.
- Awarded contract for investigative service provider (ISP) support for the National Reconnaissance Office (NRO) end-to-end electronic data pilot using US Army recruit cases. Pilot was scheduled to begin in early April, however a protest to the contract award was filed with GAO. Contract protest was withdrawn. Pilot activities have recommenced. System certification and accreditation process is under way.
- The OPM-ACES Automated Records Checks (ARC) pilot is proceeding. 400 initial DoD cases were processed between DoD, OPM and PERSEREC. Initial adjustments to the search and reporting process are ongoing. A second round of 400 cases is expected to be initiated in July. The process and quantity for a statistically significant pilot will be finalized following the successful analysis of the second round of test cases.

Governance:

- The PAC Training Subcommittee program of instruction designed to address PAC national suitability adjudication training standards was piloted April 19-30 and June 14-25. OPM conducted pilot testing of a new training course, entitled *Fundamentals of Suitability Review and Adjudication*, for suitability adjudicators. By the end of 2010, OPM anticipates the course will be available for open enrollment to the suitability adjudicator community.
- The PAC Training Subcommittee program of instruction designed to address PAC national background investigations training standards was piloted May 17-June 11. OPM conducted pilot testing of a new four-week

course, entitled *Basic Background Investigations Course*. By the end of 2010, OPM anticipates the course will be available for open enrollment to the background investigator community

- The Reform Effort briefed Executive Branch agencies on 29 June 2010 to provide updates on major Reform activities.

Performance:

The chart below indicates the changes in performance between April 2010 and May 2010 for OPM customers only

| Clearance/Suitability Investigation type | Top Secret//SI | | Secret//Conf, BACL//SI & BRAC//SI and Other EPs | | Initial TS and Secret & Confidential | |
|--|--|----------|---|----------|--------------------------------------|----------|
| | Count | Avg Days | Count | Avg Days | Count | Avg Days |
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 8,762 | 43,469 | 52,231 | | |
| | Initial | 73 | 11 | 17 | | |
| | Investigate | 75 | 32 | 38 | | |
| | Adjudicate | 16 | 10 | 12 | | |
| | End-to-End | 104 | 53 | 61 | | |
| Prior Month's Comparison | 107 | 5 | 7 | | | |
| Validate Need | Requirements Met - Requests Returned to Agency | 17 | 50 | 75 | | |
| | Prior Month's Comparison | 22 | 11 | 13 | | |

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Data for the entire executive branch is collected and reported to the PAC on a quarterly basis. The chart below is an extract of the report for the second quarter 2010.

Fastest 90%

| Agency | % of overall workload (FY10Q2) | Initial | | | | Investigate | | | | Adjudicate | | | | End-to-End (Initial + Inv. + Adj.) | | | |
|--------------|--------------------------------|--------------|----|--------------|----|--------------|----|--------------|----|--------------|----|--------------|----|------------------------------------|----|----|----|
| | | Average Days | | Average Days | | Average Days | | Average Days | | Average Days | | Average Days | | Average Days | | | |
| All Agencies | 100.0% | 11 | 13 | 11 | 11 | 46 | 42 | 46 | 47 | 77 | 26 | 14 | 13 | 134 | 81 | 71 | 71 |

Suitability and Security Clearance Reform Update

Policy:

- The Reform Effort review of revisions to the proposed language for 5 CFR part 732 to broaden sensitive position designation has concluded. OPM will forward the proposed revisions to OMB for review prior to entering the Federal Register process for public comment.
- As a result of proposed changes to 5 CFR part 732, an additional investigative tier will be created to accommodate the remaining population of civilian positions designated as High Risk public trust. Because of the similarities between these positions and Top Secret National Security positions, work on Tiers 4 and 5 will remain linked and their schedule for development will extend into CY 2011
- Continued the cost and timeliness analysis of current investigative products with the proposed Tiers 1-3. OPM delivered the OPM product line impact assessment in early August. Further data collection and analysis will be required to identify all potential investigative activities that impact time and cost under the proposed tiered investigations and provide sufficient data to inform the Federal Investigative Standards Working Group (FISWG) on further revisions of the draft Tiers 1-3.
- The FISWG completed review of over 220 informal agency comments on the revised Tiers 1-3 standards and flagging strategy. Formal agency comment is expected to begin in September 2010 in order to deliver the final proposed Federal Investigative Standards for Tiers 1-3 to the Security and Suitability Executive Agents for approval by 31 December 2010.
- OPM will re-publish 5 CFR 731 in the Federal Register for a limited period to address agency concerns on reinvestigation requirements for individuals in public trust positions under EO 13488. 5 CFR 731 was signed out of OPM and is currently awaiting OMB review.

Information Technology:

- OPM continues development of the revised SF 86 (2010 version) in its EPIC suite of systems and is on track for delivery in December 2010. OPM continues to work with other Investigative Service Providers, other agency Personnel Security/Adjudication systems, and non e-QIP SF 86 data collection systems as they progress with their individual implementation schedules.
- DoD continues RAISE deployment to assess investigative quality. Analysis of data by DoD and OPM continues to refine reporting accuracy.
- System certification and accreditation process for the National Reconnaissance Office (NRO) end-to-end electronic data pilot using US Army recruit cases is scheduled to complete by early September 2010.
- The OPM-ACES Automated Records Checks (ARC) pilot is proceeding. 400 initial DoD cases were processed between DoD, OPM and PERSEREC. Initial adjustments to the search and reporting process were made. 430 additional DoD cases are being processed to validate the performance of the adjustments. When this case processing is successfully completed, a statistically relevant sample will be processed to extract the data needed to recommend the ARC suite of checks.

Governance:

- On 18 August 2010, the Co-Chairs of the PAC Training Subcommittee briefed the PAC membership on the developed national training standards for the Security Adjudication, Suitability Adjudication and Background Investigation training. Next steps include: finalize agency coordination on training curricula; collect data on agency training requirements/capabilities; obtain agency comments on grandfathering/contractor requirements/ and audit responsibilities; and obtain Executive Agent approvals.
- On 24 August 2010, representatives for the Security and Suitability Executive Agents jointly endorsed a memorandum to agency heads aligning updated OPM investigative products supporting reform concepts and enhancements, thus taking a critical step towards reciprocity.

Performance:

The chart below indicates the changes in performance between June 2010 and July 2010 for OPM customers only.

| Clearance/ Suitability Investigation Type | Total Adjudications Reported | Top Secret/Q | Secret/Conf/L | Initial TS and Secret |
|---|--|--------------|----------------------------------|-----------------------|
| | | SBI's | NACLC's & ANACI's and Other BI's | & Confidential |
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 7,303 | 38,259 | 45,562 |
| | Initiate | 15 | 11 | 12 |
| | Investigate | 74 | 34 | 40 |
| | Adjudicate | 14 | 7 | 8 |
| | End-to-End | 103 | 52 | 60 |
| Prior Month's Comparison | | | | |
| Validate Need | Requirements Met - Requests Returned to Agency | 19 | 65 | 84 |

Data for the entire executive branch is collected and reported to the PAC on a quarterly basis. The chart below is an extract of the report for the third quarter 2010.

Initial Clearances

Fastest 90%

| Agency | % of overall workload (FY10Q3) | Initiate | | | | Investigate | | | | Adjudicate | | | | End-to-End (Initiate, Investigate, Adjudicate) | | | |
|--------------|--------------------------------|--------------|----|----|----|--------------|----|----|----|--------------|----|----|----|--|----|----|----|
| | | Average Days | | | | Average Days | | | | Average Days | | | | Average Days | | | |
| All Agencies | 100.0% | 13 | 11 | 11 | 12 | 42 | 46 | 47 | 41 | 26 | 14 | 13 | 10 | 81 | 71 | 71 | 63 |

Suitability and Security Clearance Reform Update

Policy:

- The Reform Effort review of changes to the proposed language for 5 CFR part 732 to broaden sensitive position designation has concluded. Prior to publication in the Federal Register for public comment, OMB is currently conducting an inter-agency review per the regulatory process.
- As a result of proposed changes to 5 CFR part 732, an additional investigative tier will be created to accommodate the remaining population of civilian positions designated as High Risk public trust. Because of the similarities between these positions and Top Secret National Security positions, work on Tiers 4 and 5 will remain linked and their schedule for development will extend into CY 2011.
- Continued the cost and timeliness analysis of current investigative products with the proposed Tiers 1-3. OPM delivered the OPM product line impact assessment in early August. Further data collection and analysis is underway to identify all potential investigative activities that impact time and cost under the proposed tiered investigations AND provide sufficient data to the Federal Investigative Standards Working Group (FISWG) to better understand the potential impact of further revisions of the draft Tiers 2-3. Results from Tier 1 were briefed to the FISWG on September 27th. The FISWG is now adding the Tier 1 cost and timeliness information to the productivity of sources information to determine if further adjustments to the proposed tier 1 investigative standards are necessary.
- The Intelligence Community Working Group completed studies to inform the investigative standards development. The FISWG is expected to be briefed within the next 30 days following a leadership review within the ODNI.
- OPM will re-publish 5 CFR part 731 in the Federal Register for a limited period to address agency concerns on reinvestigation requirements for individuals in public trust positions under EO 13488. Prior to publication in the Federal Register, OMB is currently conducting an inter-agency review per the regulatory process.

Information Technology:

- OPM continues development of the revised SF 86 (2010 version) in its EPIC suite of systems and is on track for delivery in December 2010. OPM continues to work with other Investigative Service Providers, other agency Personnel Security/Adjudication systems, and non e-QIP SF 86 data collection systems as they progress with their individual implementation schedules.
- DoD continues RAISE deployment to assess investigative quality. RAISE ratings were completed for 1,945 Army and Navy investigations over the course of July and August. These ratings provided the information needed to refine sampling strategies and procedures for sharing of information between the DoD and OPM. September and October RAISE ratings will be completed in November.
- System certification and accreditation process for the National Reconnaissance Office (NRO) end-to-end electronic data pilot using US Army recruit cases was completed on 14 September 2010. Pilot initiation is expected within the next 30 days.
- The OPM-ACES Automated Records Checks (ARC) pilot is proceeding with a 2nd group of over 400 DoD cases. 75% of the cases in this sample have been closed, and just under 25% of the results have been entered into an auditing tool that will be used for data analysis. Following the completion of this data analysis, which is expected by November, a statistically relevant sample will be processed.
- OPM eDelivery, the electronic delivery of completed National Security & Suitability investigations, has increased from 27% in Q1FY09 to 56% in Q1FY10 end to 69% in Q3FY10.

Governance:

- On 18 August 2010, the Co-Chairs of the PAC Training Subcommittee briefed the PAC membership on the developed national training standards for the Security Adjudication, Suitability Adjudication and Background Investigation training. A PAC Training Standards Data Call and Key Decisions memorandum was subsequently distributed to PAC members to collect data on agency training requirements/capabilities; attain agency comments on grandfathering/contractor requirements; and audit responsibilities. In September, the PAC Training Subcommittee Co-Chairs briefed the Security Executive Agent Advisory Committee on the next steps to finalize agency coordination on training curricula and obtain Executive Agent approvals.
- On 24 August 2010, representatives for the Security and Suitability Executive Agents jointly endorsed a memorandum to agency heads aligning updated OPM investigative products supporting reform concepts and enhancements, thus taking a critical step towards reciprocity.

Performance:

The chart below indicates the changes in performance between July 2010 and August 2010 for OPM customers only.

| Investigation Type | Clearance/Suitability | Top Secret/Q | | Secret/Conf/L | | Initial TS and Secret & Confidential | |
|---------------------------------------|--|--------------|-------|----------------------------------|--------|--------------------------------------|--------|
| | | SBI's | | NACLC's & ANACI's and Other BI's | | | |
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | | 8,337 | | 45,305 | | 59,732 |
| | Initiate | | 15 | | 11 | | 11 |
| | Investigate | | 75 | | 33 | | 39 |
| | Adjudicate | | 19 | | 9 | | 11 |
| | End-to-End | | 109 | | 53 | | 61 |
| Prior Month's Comparison | | | 103 | | 52 | | 60 |
| Validate Need | Requirements Met - Requests Returned to Agency | | 18 | | 66 | | 84 |
| | Prior Month's Comparison | | 15 | | 61 | | 76 |

Data for the entire executive branch is collected and reported to the PAC on a quarterly basis. The chart below is an extract of the report for the third quarter 2010.

Initial Clearances

Fastest 90%

| Agency | % of overall workload (FY10Q3) | Initiate | | | | Investigate | | | | Adjudicate | | | | End-to-End (init + adj) | | | |
|--------------|--------------------------------|--------------|----|--------------|----|--------------|----|--------------|----|--------------|----|--------------|----|-------------------------|----|----|----|
| | | Average Days | | Average Days | | Average Days | | Average Days | | Average Days | | Average Days | | Average Days | | | |
| All Agencies | 100.0% | 13 | 11 | 11 | 12 | 42 | 46 | 47 | 41 | 26 | 14 | 13 | 10 | 81 | 71 | 71 | 63 |

Suitability and Security Clearance Reform Update

Policy:

- The Reform Effort review of changes to the proposed language for 5 CFR part 732 to broaden sensitive position designation has concluded. Prior to publication in the Federal Register for public comment, the Office of Management and Budget (OMB) is adjudicating comments received in the inter-agency review per the regulatory process.
- As a result of proposed changes to 5 CFR part 732, an additional investigative tier will be created to accommodate the remaining population of civilian positions designated as High Risk public trust. Because of similarities between these positions and Top Secret National Security positions, work on Tiers 4 and 5 will remain linked.
- Continued cost and timeliness analysis of current investigative products with proposed Tiers 1-3 to identify all potential investigative activities impacting time and cost under the proposed tiered investigations AND provide sufficient data to the Federal Investigative Standards Working Group (FISWG) to better understand potential impact of further revisions of draft Tiers 1-3. Results from Tier 1 were briefed to FISWG in September. Tier 3 was briefed on October 26th. Tier 2 data is expected to be presented in November and will initiate FISWG's consolidated analysis that may impact draft standards prior to beginning executive branch agency coordination.
- The Intelligence Community Working Group completed studies to inform the investigative standards development. A briefing for the Director of National Intelligence (DNI) is scheduled for November 15th.
- The Office of Personnel Management (OPM) will re-publish 5 CFR part 731 in the Federal Register for a limited period to address agency concerns on reinvestigation requirements for individuals in public trust positions under Executive Order 13488. Prior to publication in the Federal Register, OMB is conducting an inter-agency review per the regulatory process.
- OPM has simplified their Fiscal Year (FY) 2011 investigative products by eliminating three products. Products have also been enhanced to incorporate the expandable focused investigation (EFI) concepts and enhanced subject interviews (ESI) for issue resolution of public trust and national security investigations. This effort is a critical step in the move toward accomplishing reciprocity.
- Effective October 1, 2010, OPM amended issue coding procedures and refined the number of seriousness codes assigned to closed investigations. The changes were made to assist agencies in the adjudication process.

Information Technology:

- OPM continues development of the revised SF 86 (2010 version) in its EPIC suite of systems. User acceptance testing of a limited number of PIPS modules began October 4th, and testing of e-QIP revisions began on October 16th. The project is on track for delivery in December 2010. OPM continues to work with other Investigative Service Providers, agency Personnel Security/Adjudication systems and non e-QIP SF 86 data collection systems as they progress with their individual implementation schedules.
- The National Reconnaissance Office (NRO) end-to-end electronic data pilot using US Army recruit cases is expected to start running cases in November following completion of interagency memorandums of agreement.
- The OPM-ACES Automated Records Checks (ARC) pilot has completed processing of the second group of 400 DoD cases. Data analysis has begun, with results expected in November.

- As part of the goal to expand the use of eDelivery, OPM deployed Electronic File Release to agencies currently participating in eDelivery. The October 4th implementation provides agencies with secure, electronic delivery of investigative files from previously conducted OPM investigations in the same manner in which they currently receive the results of new investigations.
- During FY 2010, more than 323 new submitting offices deployed electronic fingerprint capability bringing the total to 1,238 submitting offices with the ability to transmit to OPM's Fingerprint Transaction System, improving timeliness and accuracy. This represents a 31% increase from FY 2009.

Governance:

- In September 2010, the Performance Accountability Council (PAC) issued a request for executive branch coordination on proposed investigative and adjudicative training standards for Security and Suitability. Responses to that coordination are expected back at the beginning of November for incorporation into the package for Security and Suitability executive agent approval by December 2010.
- Joint Reform Team Implementation assistance visits have been scheduled with multiple executive branch agencies. Agencies who expressed a desire for PAC assistance with their Agency implementation plans are scheduled for November.

Performance:

The chart below indicates changes in performance between August and September 2010 for OPM customers only.

| Clearance/ Suitability Investigation Type | | Top Secret/Q SBI's | Secret/Conf/L NACLIC's & ANACI's and Other BI's | Initial TS and Secret & Confidential |
|---|--|--------------------|---|--------------------------------------|
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 7,209 | 35,659 | 42,868 |
| | Initiate | 15 | 11 | 12 |
| | Investigate | 72 | 35 | 40 |
| | Adjudicate | 18 | 10 | 12 |
| | End-to-End | 105 | 56 | 64 |
| | Prior Month's Comparison | | | |
| Validate Need | Requirements Met - Requests Returned to Agency | 17 | 74 | 91 |

Data for the entire executive branch is collected and reported to PAC on a quarterly basis. The chart below is an extract of the report for the Third Quarter, FY 2010.

Initial Clearances

Fastest 90%

| Agency | % of overall workload (FY10Q3) | Initiate | | | | Investigate | | | | Adjudicate | | | | End-to-End (initiate + investigate + adjudicate) | | | |
|--------------|--------------------------------|--------------|----|----|----|--------------|----|----|----|--------------|----|----|----|--|----|----|----|
| | | Average Days | | | | Average Days | | | | Average Days | | | | Average Days | | | |
| All Agencies | 100.0% | 13 | 11 | 11 | 12 | 42 | 46 | 47 | 41 | 26 | 14 | 13 | 10 | 81 | 71 | 71 | 63 |

Suitability and Security Clearance Reform Update

Policy:

- The Reform Effort review of changes to the proposed language for 5 CFR part 732 to broaden sensitive position designation has concluded. Prior to publication in the Federal Register for public comment, the Office of Management and Budget (OMB) is adjudicating comments received in the inter-agency review per the regulatory process. OMB is expected to conclude that process in early December 2010.
- Continued cost and timeliness analysis of current investigative products with proposed Tiers 1-3 to identify all potential investigative activities impacting time and cost under the proposed tiered investigations AND provide sufficient data to the Federal Investigative Standards Working Group (FISWG) to better understand potential impact of further revisions of draft Tiers 1-3. Results from Tier 1 and 3 were briefed to FISWG in September and October respectively. Tier 2 data was briefed November 19th. FISWG's consolidated analysis that may impact draft standards is now under way. Formal executive branch agency coordination is expected to begin in December.
- The Intelligence Community Working Group (ICWG) completed studies to inform the investigative standards development. The FISWG will be briefed on the ICWG findings on December 7, 2010.
- The Office of Personnel Management (OPM) re-published 5 CFR part 731 in the Federal Register on November 5, 2010 for a 30-day comment period to address agency concerns on reinvestigation requirements for individuals in public trust positions under Executive Order 13488. Public comments are due to OMB by December 6, 2010.

Information Technology:

- OPM continues development of the revised SF 86 (2010 version). User acceptance testing of a limited number of PIPS modules began October 4th, and testing of e-QIP revisions began on October 16th. The project's target delivery date is December 2010. OPM continues to work with other Investigative Service Providers, agency Personnel Security/Adjudication systems and non e-QIP SF 86 data collection systems as they progress with their individual implementation schedules.
- The National Reconnaissance Office (NRO) end-to-end electronic data pilot using US Army recruit cases is expected to begin in December following the completion of two interagency memorandums of agreement.
- The next phase of the OPM-ACES Automated Records Checks (ARC) pilot has started. This phase expands the population to 4,000 cases that will provide a statistically relevant sample from which to conduct analysis and draw conclusions.

Governance:

- In September 2010, the Performance Accountability Council (PAC) issued a request for executive branch coordination on proposed investigative and adjudicative training standards for Security and Suitability. Responses to that coordination have been received for incorporation into the package for Security and Suitability executive agent approval by December 2010.
- Joint Reform Team implementation assistance visits were completed with three executive branch agencies. Additional assistance visits are scheduled with a focus on agencies not currently meeting IRTPA requirements. Initial observations and findings from those visits will be provided to the PAC in December.

Performance:

The chart below indicates changes in performance between September and October 2010 for OPM customers only.

| Clearance/Suitability Investigation Type | | Top Secret/Q SBFs | Secret/Conf/NACLC's & ANAC's and Other BI's | Initial TS and Secret & Confidential |
|--|--|-------------------|---|--------------------------------------|
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 8,033 | 37,766 | 45,799 |
| | Initiate | 14 | 12 | 13 |
| | Investigate | 72 | 35 | 41 |
| | Adjudicate | 18 | 11 | 12 |
| | End-to-End | 104 | 58 | 66 |
| Prior Month's Comparison | | 105 | 58 | 64 |
| Validate Need | Requirements Met - Requests Returned to Agency | 17 | 118 | 133 |
| | Prior Month's Comparison | 17 | 74 | 91 |

Data for the entire executive branch is collected and reported to PAC on a quarterly basis. The chart below is an extract of the report for the Fourth Quarter, FY 2010.

Initial Clearances

Fastest 90%

| Agency | % of overall workload (FY10Q4) | Initiate | | | | Investigate | | | | Adjudicate | | | | End-to-End (Initiate + Investigate + Adjudicate) | | | |
|--------------|--------------------------------|--------------|----|----|----|--------------|----|----|----|--------------|----|----|----|--|----|----|----|
| | | Average Days | | | | Average Days | | | | Average Days | | | | Average Days | | | |
| All Agencies | 100.0% | 11 | 11 | 12 | 12 | 46 | 47 | 41 | 42 | 14 | 13 | 10 | 11 | 71 | 71 | 63 | 65 |

Suitability and Security Clearance Reform Update

Policy:

- The Reform Effort review of changes to the proposed language for 5 CFR part 732 to broaden sensitive position designation has concluded. Prior to publication in the Federal Register for public comment, the Office of Management and Budget (OMB) conducted an inter-agency review per the regulatory process. OMB has concluded that process, and the regulation was published in the Federal Register on 14 December 2010 for a 60-day comment period.
- The Federal Investigative Standards Working Group (FISWG) continued their review and consideration of the cost and timeliness results and made further revisions to the proposed Tiers 1-3 investigative standards and expandable focused investigation models. Draft Tiers 1-3 standards were forwarded for formal executive branch agency coordination on December 27.
- The Intelligence Community Working Group (ICWG) completed studies to inform the investigative standards development. The FISWG was briefed on the ICWG findings on December 7, 2010.
- OPM re-published 5 CFR part 731 in the Federal Register on November 5, 2010 for a 30-day comment period to address agency concerns on reinvestigation requirements for individuals in public trust positions under Executive Order 13488. The public comment period closed on December 6, 2010 and OMB is in process of adjudicating comments.

Information Technology:

- The 2010 version of the SF 86 was moved into the e-QIP production environment on December 17, 2010. OPM will host orientation/training for its customers and other Investigative Service Providers (ISP's) in January. OPM continues to work with other ISP's and with representatives of other agencies with Personnel Security/ Adjudication systems and non e-QIP SF 86 data collection systems as they progress with their individual implementation schedules.
- The National Reconnaissance Office (NRO) end-to-end electronic data pilot using US Army recruit cases is expected to begin in January following the completion of two interagency memorandums of agreement.
- The OPM-ACES Automated Records Checks (ARC) pilot has been expanded to include 4,000 cases that will provide a statistically relevant sample from which to conduct analysis and draw conclusions.

Governance:

- In September 2010, the Performance Accountability Council (PAC) issued a request for executive branch coordination on proposed Investigative and Security and Suitability adjudicative training standards. Responses to that coordination were briefed to the PAC and incorporated into the approval packages for Security and Suitability executive agents.
- Joint Reform Team (JRT) implementation assistance visits were completed with three executive branch agencies. Additional assistance visits are scheduled with a focus on agencies not currently meeting IRTPA requirements. Initial observations and findings from those visits were provided to the PAC in December and included agencies reporting: Lengthy processes for obtaining funding for Information Technology (IT) changes; multiple IT systems at subordinate agency organizations causing connectivity challenges; lack of control over subordinate agency priorities; agencies with populations that require subject interviews take longer to adjudicate. The Security Executive Agent in coordination with the JRT will be requesting that agencies not meeting IRTPA timeliness goals provide their formal agency plan of action and milestone documentation for review and JRT/PAC engagement as necessary.

Performance:

The chart below indicates changes in performance between October and November 2010 for OPM customers only.

| Clearance/Suitability Investigation Type | | Top Secret//SI | Secret//Conf//NACLC's & AIACF's and Other SI's | Initial TS and Secret & Confidential |
|--|--|----------------|--|--------------------------------------|
| | | SI's | SI's | SI's |
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 7,779 | 36,676 | 44,455 |
| | Initiate | 14 | 10 | 11 |
| | Investigate | 77 | 35 | 41 |
| | Adjudicate | 22 | 11 | 13 |
| | End-to-End | 113 | 56 | 65 |
| | Prior Month's Comparison | 104 | 58 | 66 |
| Validate Need | Requirements Met - Requests Returned to Agency | 10 | 57 | 57 |
| | Prior Month's Comparison | 11 | 16 | 14 |

Data for the entire executive branch is collected and reported to PAC on a quarterly basis. The chart below is an extract of the report for the Fourth Quarter, FY 2010.

Initial Clearances

Fastest 90% →

| Agency | % of overall workload (FY10Q4) | Initiate | | | | Investigate | | | | Adjudicate | | | | End-to-End (Initiate + Investigate + Adjudicate) | | | |
|--------------|--------------------------------|--------------|----|----|----|--------------|----|----|----|--------------|----|----|----|--|----|----|----|
| | | Average Days | | | | Average Days | | | | Average Days | | | | Average Days | | | |
| All Agencies | 100.0% | 11 | 11 | 12 | 12 | 46 | 47 | 41 | 42 | 14 | 13 | 10 | 11 | 71 | 71 | 63 | 65 |

Suitability and Security Clearance Reform Update

Policy:

- Proposed revisions to 5 CFR Part 732, to broaden sensitive position designation was published in the Federal Register on December 14, 2010 for a 60-day comment period. Comments are due to the Office of Personnel Management (OPM) on February 14, 2011.
- The Performance Accountability Council (PAC) forwarded proposed draft Tiers 1-3 Federal Investigative Standards and Expandable Focused Investigation models for formal executive branch agency coordination on December 27, 2010. Formal agency comments are due February 4, 2011.
- OPM re-published 5 CFR Part 731 in the Federal Register on November 5, 2010 for a 30-day comment period to address agency concerns regarding reinvestigation requirements for individuals in public trust positions under Executive Order 13488. The public comment period closed on December 6, 2010 and the Office of Management and Budget is adjudicating comments.
- OPM published the proposed revised Questionnaire for Public Trust Positions (SF 85P) and the Supplemental Questionnaire for Selected Positions (SF 85P-S) in the Federal Register on December 29, 2010. The general public and federal agencies have 60 days to comment on these information collection forms. Comments are due to OPM by February 28, 2011.

Information Technology:

- Since implementation of the 2010 version of the SF 86 in the e-QIP production environment in December 2010, the Department of State, has begun using the new form in its investigative process. OPM is hosting multiple orientation/training sessions for its customers and other ISPs this month. OPM continues to work with other ISPs and representatives from other agencies with Personnel Security/ Adjudication systems and non e-QIP SF 86 data collection systems as they progress with their individual implementation schedules.
- The National Reconnaissance Office end-to-end electronic data pilot using U.S. Army recruit cases is expected to begin in February following completion of two interagency memorandums of agreement.
- OPM's Automated Continuous Evaluation System (ACES) Automated Records Checks pilot was expanded to include 4,000 cases that will provide a statistically relevant sample from which to conduct analysis and draw conclusions. The pilot identified several anomalies in the ACES software. The cause of these anomalies is being corrected while the pilot continues.
- As a result of process improvements and EPIC Transformation initiatives, which included implementation of event driven architecture and a redesign of the Fingerprint Transaction System, OPM realized tremendous timeliness improvements. At the close of Calendar Year 2008, electronic submissions were processed (i.e., receipt from customer, processing at OPM, search of the Federal Bureau of Investigation (FBI), results returned to OPM) in an average of 38 hours. This improved to less than 3 hours in November 2010. Similarly, hard card submissions were taking 65 hours in 2008 and have improved to less than 26 hours in November 2010. Additional programming changes are pending as well as further discussions with the FBI to improve the fingerprint name check process.

Governance:

- In September 2010, the PAC issued a request for executive branch coordination on proposed Investigative and Security and Suitability adjudicative training standards. Responses to that coordination were briefed to the PAC and incorporated into approval packages for Security and Suitability Executive Agents. Standards were transmitted to the Security and Suitability Executive Agents for approval and implementation.
- The Joint Reform Team (JRT) completed implementation assistance visits with three executive branch agencies. Additional assistance visits are scheduled with a focus on agencies not currently meeting IRTPA requirements.

Initial observations and findings from those visits were provided to the PAC in December and included agencies reporting: lengthy processes for obtaining funding for Information Technology (IT) changes; multiple IT systems at subordinate agency organizations causing connectivity challenges; lack of control over subordinate agency priorities; agencies with populations requiring subject interviews take longer to adjudicate. The Security Executive Agent in coordination with the JRT will request agencies not meeting IRTPA timeliness goals provide their formal agency plan of action and milestone documentation for review and JRT/PAC engagement as necessary. Action plans have started to come in.

- Executive branch agencies were briefed on proposed changes to the federal investigative standards for Tiers 1 through 3, the proposed revisions to 5 CFR Part 732 and proposed revisions to the questionnaires for public trust positions at a Joint Suitability and Security Reform Effort briefing on January 19, 2011. This session was designed to provide agencies with an interactive forum to discuss these issues as they prepare their formal agency comments.
- In its February 2010 Security and Suitability Process Reform Strategic Framework document, the PAC defined 30 key deliverables for 2010, of which 24 are now complete. From a timeliness perspective, four quarters after the deadline to meet the December 2009 IRTPA goals, the Government as a whole continues to meet the 60 day goal for investigations and adjudications, as well as the overall PAC end-to-end timeliness goal of 74 days.

Performance:

The chart below indicates changes in performance between November and December 2010 for OPM customers only.

| Clearance/Suitability Investigation Type | | Top Secret/Q | Secret/Conf. | Initial TS and Secret & Confidential |
|--|--|--------------|-----------------------------------|--------------------------------------|
| | | SBI's | TRACIC's & ANACT's and Other BI's | |
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 7,144 | 34,492 | 41,636 |
| | Initiate | 14 | 12 | 12 |
| | Investigate | 81 | 39 | 42 |
| | Adjudicate | 14 | 10 | 11 |
| | End-to-End | 109 | 57 | 65 |
| | Prior Month's Comparison | 113 | 56 | 65 |
| Validate Need | Requirements Met - Requests Returned to Agency | 22 | 83 | 105 |
| | Prior Month's Comparison | 10 | 57 | 67 |

Data for the entire executive branch is collected and reported to the PAC on a quarterly basis. The chart below is an extract of the report for the Fourth Quarter, Fiscal Year (FY) 2010. Data for First Quarter, FY 2011, will be available for the February report.

Initial Clearances

Fastest 90%

| Agency | % of overall workload (FY10Q4) | Fastest 90% | | | | | | | | | | | | | | | |
|--------------|--------------------------------|--------------|----|--------------|----|--------------|----|--------------|----|--------------|----|--------------|----|----------------------------------|----|----|----|
| | | Initiate | | | | Investigate | | | | Adjudicate | | | | End-to-End (Init. + Inv. + Adj.) | | | |
| | | Average Days | | Average Days | | Average Days | | Average Days | | Average Days | | Average Days | | | | | |
| All Agencies | 100.0% | 11 | 11 | 12 | 12 | 46 | 47 | 41 | 42 | 14 | 13 | 10 | 11 | 71 | 71 | 63 | 65 |

Suitability and Security Clearance Reform Update

Policy:

- Proposed revisions to 5 CFR Part 732 to broaden sensitive position designation was published in the Federal Register on December 14, 2010, for a 60-day comment period, which concluded February 14, 2011. The Office of Personnel Management (OPM) is currently reviewing comments.
- The Performance Accountability Council (PAC) forwarded proposed draft Tiers 1-3 Federal Investigative Standards and Expandable Focused Investigation models for formal executive branch agency coordination on December 27, 2010. Executive branch agencies submitted 202 comments. The Inter-agency Federal Investigative Standards Working Group reviewed agency comments and made revisions to the proposed drafts, which are currently under review by the Reform Effort leadership.
- OPM re-published 5 CFR Part 731 in the Federal Register on November 5, 2010, for a 30-day comment period to address agency concerns regarding reinvestigation requirements for individuals in public trust positions under Executive Order 13488. OPM is reviewing comments which include recommendations by agencies related to alignment of processes within the 5 CFR Part 732 revisions.
- OPM published the proposed revised Questionnaire for Public Trust Positions (SF 85P) and the Supplemental Questionnaire for Selected Positions (SF 85P-S) in the Federal Register on December 29, 2010, for a 60-day comment period which concluded February 28, 2011. OPM is currently reviewing the extensive comments and evaluating the questions posed.

Information Technology:

- Since implementation of the 2010 version of the SF 86 in the e-QIP production environment in December 2010, four agencies are now using the new form in their investigative processes: the Department of State, Agency for International Development, Peace Corps, and the Office of Personnel Management. OPM began a phased approach to implementing use of this new form with customer agencies beginning in late March. The activated customers for OPM are: Government Printing Office, National Credit Union Administration, and OPM's own personnel security entities. OPM also continues to work with representatives from agencies with personnel security/adjudication systems and non e-QIP SF 86 data collection systems as they progress with their individual implementation schedules.
- The National Reconnaissance Office end-to-end electronic data pilot using U.S. Army recruit cases began April 25.
- The OPM/Automated Continuous Evaluation System (ACES) Automated Records Checks pilot was expanded to include 4,000 cases to provide a statistically relevant sample from which to conduct analysis and draw conclusions. The pilot as of 29 April has coded 1,598 cases, 387 cases have undergone quality review, PERSEREC has sent 4,045 cases to OPM, and OPM has closed 4,002 cases.
- The Department's e-Adjudication Web service became available in February 2011 and is being utilized by the Department of Energy. To date 331 cases have been processed with 58% of the cases being e-determined.

Governance:

- In September 2010, the PAC issued a request for executive branch coordination on proposed Security and Suitability investigative and adjudicative training standards. Responses to that coordination request were briefed to the PAC and incorporated into approval packages for Security and Suitability Executive Agents. Standards were transmitted to the Security and Suitability Executive Agents for approval and implementation. Approval letters are currently in the final signature process.
- In March the Security Executive Agent, in coordination with the Joint Reform Team, requested agencies not meeting IRTPA timeliness goals provide their formal agency plan of action and milestone documentation. Action plans have been submitted and are under review.

- On April 15, the Security Executive Agent held an Advisory Committee meeting to provide updates on National personnel security initiatives and facilitate greater information sharing across Executive Branch agencies. The meeting included 87 participants with 33 Agencies represented. As a result, new inter-agency working groups will be formed to address on-going personnel security initiatives.

Performance:

The chart below indicates changes in performance between February 2011 and March 2011 for OPM customers only

| Clearance/Suitability Investigation Type | | Top Secret/Q SBI's | Secret/Conf/NACLC's & ANAC's and Other BI's | Initial TS and Secret & Confidential |
|--|--|--------------------|---|--------------------------------------|
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 10,481 | 48,961 | 59,442 |
| | Initiate | 16 | 11 | 12 |
| | Investigate | 76 | 35 | 42 |
| | Adjudicate | 14 | 9 | 10 |
| | End-to-End | 106 | 55 | 64 |
| Prior Month's Comparison | | 13 | 57 | 65 |
| Validate Need | Requirements Met - Requests Returned to Agency | *130 | *1,415 | *1,545 |
| | Prior Month's Comparison | 87 | 292 | 309 |

Data for the entire executive branch is collected and reported to the PAC on a quarterly basis. The chart below is an extract of the report for the First Quarter, Fiscal Year 2011.

Initial Clearances

Fastest 90%

| Agency | % of overall workload (FY11Q1) | Fastest 90% | | | | | | | | | | | | | | | |
|--------------|--------------------------------|-------------|----|--------------|----|-------------|----|--------------|----|------------|----|--------------|----|-------------------------------------|----|--------------|----|
| | | Initiate | | | | Investigate | | | | Adjudicate | | | | End-to-End (Initiate + Inv. + Adj.) | | | |
| | | Days | | Average Days | | Days | | Average Days | | Days | | Average Days | | Days | | Average Days | |
| All Agencies | 100.0% | 11 | 22 | 12 | 12 | 4 | 41 | 42 | 43 | 13 | 10 | 11 | 13 | 7 | 63 | 65 | 65 |

Suitability and Security Clearance Reform Update

Policy:

- Proposed revisions to 5 CFR Part 732, to broaden sensitive position designation was published in the Federal Register on December 14, 2010, for a 60-day comment period, which concluded February 14, 2011. The Office of Personnel Management (OPM) is currently reviewing comments.
- The Performance Accountability Council (PAC) forwarded proposed draft Tiers 1-3 Federal Investigative Standards and Expandable Focused Investigation models for formal executive branch agency coordination on December 27, 2010. Executive branch agencies submitted 202 comments. The inter-agency Federal Investigative Standards Working Group reviewed agency comments and made revisions to the proposed drafts, which are currently under review by the Reform Effort leadership.
- OPM re-published 5 CFR Part 731 in the Federal Register on November 5, 2010, for a 30-day comment period to address agency concerns regarding reinvestigation requirements for individuals in public trust positions under Executive Order 13488. OPM is reviewing comments which include recommendations by agencies related to alignment of processes within the 5 CFR Part 732 revisions.
- OPM published the proposed revised Questionnaire for Public Trust Positions (SF 85P) and the Supplemental Questionnaire for Selected Positions (SF 85P-S) in the Federal Register on December 29, 2010, for a 60-day comment period, which concluded February 28, 2011. OPM is currently reviewing comments.

Information Technology:

- Since implementation of the 2010 version of the SF 86 in the e-QIP production environment in December 2010, three agencies are now using the new form in their investigative processes: the Department of State, Agency for International Development, and Peace Corps. OPM's development in its EPIC Suite of systems is currently in the Production Validation stage. They anticipate initiating a phased approach to implementing use of this new form with customer agencies beginning in late March. OPM hosted multiple orientation/training sessions for its customers and other Investigations Service Providers (ISPs), and sessions will continue as long as needed. OPM also continues to work with other ISPs and representatives from agencies with personnel security/adjudication systems and non e-QIP SF 86 data collection systems as they progress with their individual implementation schedules.
- The National Reconnaissance Office end-to-end electronic data pilot using U.S. Army recruit cases is expected to begin in April following completion of two interagency memorandums of agreement.
- OPM's Automated Continuous Evaluation System (ACES) Automated Records Checks pilot was expanded to include 4,000 cases that provided a statistically relevant sample from which to conduct analysis and draw conclusions. This phase completed in March 2011, and analysis is currently underway.
- The Department's e-Adjudication Web service became available in February 2011 and is currently being tested in a 60-day pilot by the Department of Energy.

Governance:

- In September 2010, the PAC issued a request for executive branch coordination on proposed Security and Suitability investigative and adjudicative training standards. Responses to that coordination request were briefed to the PAC and incorporated into approval packages for Security and Suitability Executive Agents. Standards were transmitted to the Security and Suitability Executive Agents for approval and implementation. Approval letters are currently in the final signature process.
- In March the Security Executive Agent, in coordination with the Joint Reform Team, requested agencies not meeting IRTPA timeliness goals provide their formal agency plan of action and milestone documentation. Action plans have started to come in and are under review.

Performance:

The chart below indicates changes in performance between January 2011 and February 2011 for OPM customers only.

| Clearance/ Suitability Investigation Type | | Top Secret/O | Secret/Conf/L | Initial TS and Secret |
|---|--|--------------|----------------------------------|-----------------------|
| | | SBI's | NACLC's & ANACI's and Other BI's | & Confidential |
| End-to-End Overall Timeliness for 90% | Total Adjudications Reported | 8,127 | 37,596 | 45,723 |
| | Initiate | 15 | 12 | 12 |
| | Investigate | 84 | 37 | 44 |
| | Adjudicate | 14 | 8 | 10 |
| | End-to-End | 113 | 57 | 66 |
| | Prior Month's Comparison | 115 | 57 | 65 |
| Validate Need | Requirements Met - Requests Returned to Agency | 37 | 292 | 329 |
| | Prior Month's Comparison | 18 | 66 | 84 |

Data for the entire executive branch is collected and reported to the PAC on a quarterly basis. The chart below is an extract of the report for the First Quarter, Fiscal Year 2011.

Initial Clearances

Fastest 90%

| Agency | % of overall workload (FY11 Q1) | Initiate | | | | Investigate | | | | Adjudicate | | | | End-to-End (Initiate + Inv. + Adj.) | | | |
|--------------|---------------------------------|--------------|----|----|----|--------------|----|----|----|--------------|----|----|----|-------------------------------------|----|----|----|
| | | Average Days | | | | Average Days | | | | Average Days | | | | Average Days | | | |
| | | 11 | 12 | 12 | 12 | 17 | 41 | 42 | 43 | 13 | 10 | 11 | 13 | 71 | 63 | 65 | 69 |
| All Agencies | 100.0% | | | | | | | | | | | | | | | | |