

UNCLASSIFIED

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE



Examination of the Adjudicative Guidelines

Appendix B Part 6
Adjudicative Guidelines Literature Review: Preliminary
Recommendations


LEADING INTELLIGENCE INTEGRATION

March 2011

ONCIX Special Security Directorate Research Program

UNCLASSIFIED

This paper was principally authored by


EASI Consult®, LLC

(b)(6)

with contributions from






This paper was completed in January 2010

Contracting support provided by SPAWAR Atlantic
Contract Number N6523606D6857-0448, N6523606D6857-0459

CONTENTS

Introduction.....	1
Strategic and Incremental Recommendations.....	2
Guideline Clusters for Purposes of Recommendations	3
Bases for Recommendations.....	5
Original National Conflict Recommendations.....	6
Strategic Recommendations.....	7
Incremental Recommendations.....	14
Criminal Behavior Cluster of Guidelines: Incremental Recommendations	14
Cluster Level Incremental Recommendations	14
Guideline Level Incremental Recommendations.....	15
The Psychosocial Deviance Cluster of Guidelines: Incremental Recommendations	18
Cluster Level Incremental Recommendations	18
Guideline Level Incremental Recommendations.....	19
National Conflict Cluster of Guidelines: Incremental Recommendations	23
Cluster Level Recommendations	23
Guideline Level Recommendations	26
Research Recommendations	29
References.....	30
Appendix A: Guidance for the Use of the Conflict Risk Assessment Scale	31
The Conflict Risk Assessment Framework.....	32
Key Dimensions of the Framework	33
Dimension 1. Identity Source(s)	33
Dimension 2. Strength of Attachment	33
Dimension 3. Relationship with US Government.....	34
Putting It Together	37
Evaluating Conflict Risk Assessment Dimensions with Guidelines A, B, C, and L.....	37
The “Nature of Relationship to the United States” Dimension in Cluster I.....	37
The “Strength of Attachment” Dimension in Cluster I.....	38

INTRODUCTION

The Adjudicative Guidelines Literature Review Project evaluated the empirical and conceptual evidence available in the social science research literature about the likely effectiveness of the Adjudicative Guidelines for making security clearance decisions. This White Paper reports all recommendations from the Literature Review Project.

Of the 13 Adjudicative Guidelines, two were excluded from this literature review, K. Handling Protected Information and E. Personal Conduct. These latter two Guidelines were excluded because the policy-based justification for their use is self-evident.

Four White Papers were produced, each organized around a cluster of Guidelines sharing common elements.

Organization of White Papers

National Conflict White Paper

- A. Allegiance to the United States
- B. Foreign Influence
- C. Foreign Preference
- L. Outside Activities

Criminal Behavior White Paper

- D. Sexual Behavior (Criminal)
- J. Criminal Conduct
- M. Use of Information Technology Systems

Financial Considerations White Paper

- F. Financial Considerations

Psychosocial Considerations White Paper

- D. Sexual Behavior (Disorder)
- G. Alcohol Consumption
- H. Drug Involvement
- I. Psychological Conditions

Strategic and Incremental Recommendations

Two types of recommendations are reported here. Strategic recommendations apply across all Guidelines and address major questions about the scope, organization and use of the Adjudicative Guidelines to make security clearance decisions. These recommendations are presented first.

Incremental recommendations apply to individual Guidelines or clusters of similar Guidelines. These recommendations are designed to improve the usefulness and research-based justification of the targeted Guideline(s) without substantially changing the meaning, scope or organization of the Guidelines. Incremental recommendations may address specific conditions and mitigators and may also address broader issues relating to the meaning or use of a whole Guideline or cluster of Guidelines.

Implementation of strategic recommendations may render moot some incremental recommendations. At the same time, implementation of strategic recommendations, if any, is likely to require a longer period of time. For that reason, incremental recommendations may be implemented in the near-term without harming the opportunity to implement strategic recommendation over the longer term.

Guideline Clusters for Purposes of Recommendations

For the purposes of organizing these recommendations, the Financial Consideration Guideline, which was addressed singly in a White Paper, will be combined with the Criminal Behavior cluster and the Psychosocial cluster in the same fashion as the Sexual Behavior Guideline. That is, the criminal elements of Financial Considerations evidence will be associated with the Criminal Behavior cluster while the “deviance” elements of Financial Considerations evidence will be combined with the Psychosocial cluster.

The purpose of this slight realignment of the White Paper clusters is to define three somewhat overlapping groups of Guidelines that focus on distinctively different types of information produced by the personal history investigations preceding the adjudication process. The national conflict cluster remains the same as addressed in the National Conflict White Paper. The criminal behavior cluster retains the same substantive meaning around criminality as addressed in the Criminal Behavior White Paper but now includes any criminal behavior emerging from investigations of Financial Considerations. Similarly, the psychosocial cluster retains the same substantive meaning around disordered/deviant behavior as addressed in the Psychosocial White Paper but now includes any deviant behavior such as significant unpaid debt or compulsive gambling that might emerge from the investigation of Financial Considerations. Further, for the purposes of the recommendations, this third cluster will be labeled “psychosocial deviance” to help clarify its distinctive meaning compared to the criminality and national conflict clusters.

As a result of this modest realignment, the recommendations organized around three clusters of Guidelines.

Organization of Recommendations

National Conflict Cluster

- A. Allegiance to the United States
- B. Foreign Influence
- C. Foreign Preference
- L. Outside Activities

Criminal Behavior Cluster

- D. Sexual Behavior (Criminal)
- F. Financial Considerations (Criminal)
- J. Criminal Conduct
- M. Use of Information Technology Systems

Psychosocial Deviance Cluster

- D. Sexual Behavior (Disorder)
- F. Financial Considerations (Disorder)

- G. Alcohol Consumption
- H. Drug Involvement
- I. Psychological Conditions

Bases for Recommendations

The primary basis for these recommendations is the evaluative literature reviews reported in the four White Papers. First and foremost, recommendations are based on the social science evidence – empirical and conceptual, direct and indirect - relating to the prediction of security violation behavior from Guidelines-based evidence. The primary goal of this Literature Review Project is to shape the adjudicative process to be consistent with the scientific evidence.

The research team that conducted the literature reviews has significant experience with similar personnel decision processes in large organizations. These similar personnel decision processes include employment selection, promotion, workforce planning, and certification processes, among others.. Inevitably, this research team has also gathered information about the adjudicative processes themselves and the organizational circumstances – constraints and requirements – that form the practical context in which the security clearance decisions are made. As a byproduct of its primary work, the research team has compared the research evidence and the adjudicative processes through the lens of this related experience. This view has lead to conclusions and speculations about opportunities for improvement that may go beyond the specific scope of this literature review project. In those cases where there is a rationale for making suggestions about possible improvements, those suggestions are reported here. In some cases, these suggestions take the form of recommendations where the rationale is compelling. In other cases where the rationale may not be fully formed, these suggestions will take the form of topics for further consideration and will be identified as such.

The most common example of such “topics for further consideration” are suggestions about adjudicators’ decision making processes. Decision making processes were outside the scope of this literature search project. However, the research team has speculated about possible methods for simplifying the adjudicative decision processes. Some topics for further consideration are about tactics for simplifying the adjudicator’s judgment task.

Original National Conflict Recommendations

The first White Paper, National Conflict, included recommendations. All of those recommendations have been imported into this Recommendation Paper. Only one, the Basic Qualifications recommendation, has been substantively changed in view of the evidence relating to all clusters of Guidelines. None have been withdrawn. However, some of these recommendations were about strategic issues cutting across all Guidelines. These recommendations have also been imported but the language used to describe them may be modified to better accommodate the full scope of this overarching set of recommendations.

STRATEGIC RECOMMENDATIONS

Recommendation S1: Establish a New Standard of Eligibility for Security Clearances

This recommendation is a reframing of Recommendation B3. in the National Conflict White Paper. That original recommendation was to introduce a new “Basic Qualification” Guideline specifically to represent policy-based conditions that could be evaluated at an early stage in the adjudication process to determine whether an individual satisfies basic qualification requirements for warranting a clearance. The reframed version of this recommendation no longer suggests a new Guideline to capture basic qualifications but, instead, suggests establishing an Eligibility Standard that new applicants for security clearances should satisfy. Evidence from all Guidelines would inform the Eligibility decision. No new Guideline would be needed; only a new decision process focusing on basic qualifications that are required for applicants to be regarded as eligible for a clearance.

The fundamental premise of this recommendation is that certain types of evidence provide clear and direct indicators of personal histories that are regarded as disqualifiers. Such indicators currently include criminal acts directed against U.S. national interests, unauthorized association with a suspected or known agent, associate, or employee of a foreign intelligence service, employment with a foreign government, and certain conditions associated with the Personal Conduct and Handling Protected Information Guidelines.

The adjudicator’s task for these types of conditions is to identify the relevant evidence and confirm that it is appropriate to use that evidence as an Eligibility factor. Although the process of confirming the facts and their relevance to eligibility may be time-consuming, once confirmed, the decision process is relatively straightforward and is largely a matter of applying an implied policy about eligibility.

In effect, these conditions represent the basic qualification requirements any individual must satisfy to be eligible for a clearance.

Significant efficiency may be gained by establishing such an Eligibility standard. In order for an Eligibility standard to create efficiency, it is necessary that early stage investigations uncover the critical eligibility factors and that adjudicators could give full consideration to such eligibility evidence in the absence of more complete evidence regarding the full range of risk considerations.

A possible criticism of this strategy is that it may be interpreted as restricting the control of home organizations over the clearance decision. The core issue underlying this concern is whether there is consensus about any types of evidence that are regarded as disqualifiers. If no such consensus exists then this recommendation is unlikely to be effective.

Recommendation S2: Evaluate Whether Positive Security Behavior Should be Targeted by the Guidelines

At a high level, the Whole Person policy directs adjudicators to weigh evidence about the reliability, trustworthiness, loyalty and good judgment of each individual to help ensure that cleared individuals demonstrate those qualities in their security work. This policy was framed in the Foundations Paper by a thorough, research-based description of the likely characteristics of the full range of security behavior, including both negative violation behavior as well as positive citizenship behavior.

While the Adjudicative Guidelines (2005) points adjudicators to consider evidence of reliability, trustworthiness, loyalty and good judgment, it is our conclusion that the meaning and use of the national conflict Guidelines does not effectively accomplish this goal. There are three core reasons:

1. With a few exceptions, the evidence gathered for the national conflict Guidelines is not closely related to the antecedents of reliability, trustworthiness and good judgment. It is somewhat more related to antecedents of loyalty. Research on counterproductive work behavior has shown that the mere absence of risk factors for extra-role negative work behavior (analogous to security violations) is not sufficient to predict extra-role positive work behavior (analogous to reliable, trustworthy security behavior reflecting good judgment).
2. The extremely high clearance rate assures that the clearance process will have virtually no impact on the reliability, trustworthiness, loyalty and good judgment of cleared individuals. This is a statistical consequence of the fact that the extreme majority of individuals are cleared. Such a wide range of cleared employees will exhibit a wide range of security behavior ranging from highly positive to modestly negative. There is no basis for assuming that the 95% of people cleared will all demonstrate reliable, trustworthy behavior showing good judgment. Even if the Guidelines' evidence directly assessed all antecedents of the Whole Person, the clearance process with its high "pass" rate would have no discernable impact on the characteristics of those cleared.
3. Reliability, trustworthiness, loyalty and good judgment are general attributes that have been demonstrated in several studies to predict positive work behavior including rule-compliance as well as extra-role citizenship behaviors such as promoting the goals of the organization. Clearly, the Whole Person attributes are closely aligned with the positive side of the proposed model of security behavior. Because these are general attributes not specific to any particular context, they lead to positive work behaviors across a wide range of types of work and contexts. In contrast, the evidence gathered for the Adjudicative Guidelines is highly specific to the context of work behavior, national attachment, substance use, and other forms of context-specific negative behavior that serve as markers

UNCLASSIFIED

of potential national security risk. Even where an adjudicator concludes that some form of potentially negative evidence is mitigated by time or other circumstances, this highly context-specific characteristic is unlikely to predict positive work behaviors across the full range of security behavior. For example, conscientiousness predicts rule compliance. But to know that an individual strongly identifies with the US or experienced drug use on in high school says little about his general disposition to be conscientious. The vast majority of evidence gathered for the Guidelines is at a very different level of description and meaning than the evidence necessary to draw conclusions about reliability, trustworthiness and a good judgment.

The implications of these conclusions about the meaning and use of Guidelines evidence is that substantial changes would be required to transform the clearance process into one that effectively implements the Whole Person policy. The process would need to gather evidence about more general characteristics of individuals under consideration and would need to disqualify at least 25%-35% of all clearance applicants in order for it to have any noticeable impact of the level of reliability, trustworthiness, loyalty and good judgment demonstrated by cleared employees.

Recommendation S3. Evaluate Risk around Three Major Clusters of Evidence

The literature reviewed for the 11 Guidelines underlying the four White Papers may be clustered into three major domains of evidence: (a) national conflict, (b) criminal behavior, and (c) psychosocial deviance. The behavioral evidence gathered by the adjudicative investigation processes targets different behavior contexts for these three clusters of Guidelines. Also, the reviewed research literature shows that the psychological mechanisms assumed to underlie the riskiness of each cluster are somewhat different, especially between the national conflict cluster and the two remaining clusters. At the same time, these psychological mechanisms are similar within clusters. The relevance of drug use and alcohol use to security risk is based on largely the same psychological factors. The relevance of foreign preferences and foreign attachments are based on largely the same psychological factors.

The adjudicator's judgment task is to aggregate all these sources of evidence into a single assessment of risk for security violations. Given the research evidence that the underlying psychological factors are somewhat different between clusters and similar within clusters, the adjudicator's judgment task could be structured and simplified by introducing three stages of judgment where the judgments are more structured and less complex within each stage.

STAGE 1. ELIGIBILITY As described in Recommendation S1, the adjudicator's first stage of judgment would be to determine whether the individual's pattern of evidence satisfies eligibility requirements.

UNCLASSIFIED

UNCLASSIFIED

STAGE 2. WITHIN-CLUSTER RISK ASSESSMENTS For each of the three clusters, the adjudicator evaluates the level of risk for future security violations based on the evidence within the cluster. A prototypical model of such a cluster-specific risk assessment is provided in Appendix A for the national conflict cluster. Additional research would be required to develop cluster-specific assessment tools to optimally enable adjudicators to make these within-cluster risk assessments.

The advantage of within-cluster risk assessments is that the adjudicator is required to cognitively integrate only comparable information across specific Guidelines. For example, within the psychosocial deviance cluster, the adjudicator's judgment task would be to aggregate evidence about key psychological factors such as self-control across evidence of drug use, alcohol use, sexual behavior, and other psychological conditions. All sources of evidence within this cluster are likely to be relevant to a conclusion about the individual's level of self-control. (It should be noted that for the psychosocial deviance cluster, licensed clinical psychologists should have a primary role in helping the adjudicator make this assessment.)

The output of a within-cluster risk assessment would be a single rating or judgment that expresses the level of risk for security violations represented by that cluster of evidence. An underlying assumption is that the risk assessments for each of the three clusters are relatively separate and independent. One could be high while another is low. This is one reason for evaluating these clusters of evidence separately to better ensure that each type of evidence is evaluated independently of the other types of evidence.

STAGE 3. AGGREGATE WITHIN-CLUSTER RISK ASSESSMENTS INTO AN OVERALL RISK ASSESSMENT The adjudicator's task in Stage 3 is to judgmentally aggregate the three Stage 2 assessments into a single overall judgment about the level of risk associated with the individual. This aggregation task should be guided by instructions to the adjudicators. These instructions would serve as a quasi-policy document about the manner in which the three separate types of evidence should be combined in the most meaningful way. These instructions should be developed by insiders who appreciate the nuances of organizational dynamics and interests.

Based on conversation with the DNI SSC project team, it seems unlikely that aggregation rules as prescriptive as arithmetic or other "hard and fast" rules would be appropriate. The manner in which the three separate assessment should be combined and the meaning of the overall assessment should be defined in a way that fits with the culture and practical requirements surrounding security clearances. For example, even though this recommendation uses the language of "eligibility," implying all or none, the overall assessment may be interpreted in different ways. It could be interpreted as an evidence-based *recommendation* about the level of overall risk associated with the individual. The final clearance decision would weigh this risk recommendation with other considerations critical to the organization that owns the clearance decision.

UNCLASSIFIED

UNCLASSIFIED

Recommendation S4. Conduct “File Drawer” Research Studies about Security Behavior

A number of research objective relevant to the effectiveness of the Guidelines are warranted given the considerable lack of evidence directly related to the prediction of security behavior.

Recommendation S4(a). Compare Spies to Non-Spies

Given the considerable amount of stored data about caught spies and other cleared individuals who have been investigated through the clearance process, investigations comparing characteristics of caught spies to demographically matched non-spies would be valuable. Such a study would be especially relevant to the question of Guideline usefulness if data about historical adjudication results were available for both groups. (Both groups would include only people who were cleared via the Adjudicative Guidelines process.) This would provide direct evidence of the predictive strength of adjudicator. This evidence would be especially compelling if the data about the two groups came from the original adjudication files.

This method of quasi-experimental design would be similar to research designs cited in the White Papers by Thompson (2003) and by Collins and Schmidt (1992). In both of these studies a group of surviving known offenders was compared, after the fact, to a matched group of comparable surviving non-offenders. In Thompson (2003) the known offenders were caught spies sampled from the Project Slammer database. The matched comparison group consisted of known non-spies who were matched to the known spies on certain parameters. In Collins and Schmidt (1992) the known offenders were convicted white collar criminals and the comparison group consisted of non-criminals matched to the criminal on certain characteristics. In both studies, data was collected from members of both groups using current assessment tools.

Such a research design would significantly increase the power of research about security violation behavior or analogous behavior such as criminal behavior by comparing matched offending and non-offending groups.

A second type of similar research design relies on the very wide range of people who have received clearances. Because less than 5% of clearance applicants are denied, the range of cleared people is very wide. Among all cleared people, performance data may be available from various employee databases in government organizations or other organizations. A special challenge in this type of research design would be to locate organizations housing cleared employees who have maintained meaningful performance data. Having located such organizations, data about performance occurring after clearance decisions could be compared to data gathered during the previous clearance investigation. A critical requirement of this research design is that clearance investigation data and subsequent job performance data are both available for a sample of people with clearances.

The goal of this research design would be to correlate the originally judged riskiness “scores” derived from the original clearance investigation records with the subsequent

UNCLASSIFIED

UNCLASSIFIED

performance records of the same cleared people once placed in their job roles that required the clearance. Because the clearance process places a wide range of people in classified work, some will commit security violation and others will not. This will provide a sufficiently wide range of variance in performance and investigative data that the resulting correlations will be statistically dependable. These statistical results can then be used to estimate the degree of impact of the clearance process on the types of security-related performance data included in the study.

Recommendation S4(b). Investigate the Dimensions and Categories of Security Behavior to be Targeted by the Adjudication Process

Perhaps the central research question about the Adjudicative Guidelines is to provide a description of the security behavior(s) to be targeted by the adjudication process. What security behavior is the adjudication process intended to impact? Except for the Whole Person guidance, the current presumed answer to this question is espionage. This answer is implied by the language of the adjudicative guidelines and by the focus on case histories of caught spies as the primary basis for evaluating the adequacy of the Guidelines. But no investigation of security behavior has been done to describe the full domain of security behavior nor to identify the specific security behaviors to be targeted by the clearance process. Such an analysis would be valuable not only for a better understanding of the way in which the clearance process may be improved but also to better understand possible improvements to employment processes for jobs requiring clearances.

Recommendation S4(c). Guidelines Research Should be Framed in a General Theory such as the Theory of Planned Behavior

The Theory of Planned Behavior (TPB) is a general theory of intentional behavior, grounded in social cognition that enables tests of the key explanatory variables and relationships likely to underpin security violation behavior as well as security citizenship behavior. Key elements of TPB fit with the historical perspective about security behavior that it depends on normative attachment, attitudes and beliefs, and personal qualities related to expectations of success. By applying potential explanatory variables measured in the context of security work to the TPB framework, predictions may be made about relationships and outcomes. These predictions will enable a systematic program of research to be undertaken exploring the antecedents of security behavior.

Recommendation S4(d). Investigate the Linkages among The Clearance Process, Employment Processes, Management Processes, and Training Objective

The US national interest in the protection of classified information and technology is supported by four primary organization-level mechanisms – security clearance approvals, employment decisions, performance management and training content. These four processes constitute the organizational “system” supporting the protection of classified information and

UNCLASSIFIED

UNCLASSIFIED

technology. (Law enforcement might be considered a fifth component of this security system but the nature of law enforcement regarding information /technology security is governed by considerations entirely outside the scope of organization management practices.) A fundamental systems question is whether the four systems components are aligned or misaligned, complementary or conflicting, directed at the same objectives of different objectives, and in general are they optimally managed. For example, it is the opinion of this author that the Whole Person principle is relevant to employment selection and performance management but is not relevant to security clearance objectives. A thorough “systems” review and evaluation will help to clarify where there are opportunities to improve the effectiveness and complementary of these interrelated components. To be sure, the realistic goal of such a review would be to identify areas of common interest among the stakeholders and opportunities to eliminate conflict and improve efficiency.

UNCLASSIFIED

INCREMENTAL RECOMMENDATIONS

Criminal Behavior Cluster of Guidelines: Incremental Recommendations

Criminal Cluster

- D. Sexual Behavior (Criminal) (Proposed no longer to be its own Guideline)
- F. Financial Considerations (Criminal)
- J. Criminal Conduct
- M. Use of Information Technology Systems

A general finding for the Criminal Behavior cluster of Guidelines is that direct and indirect evidence is persuasive that criminal behavior is an antecedent of security violation behavior and other forms of counter-normative work behavior. This finding supports two rationales underlying the Criminal Behavior cluster of Guidelines. First, past criminal behavior is itself an antecedent of future security violation behavior and related counter-normative work behavior. Second, the personal attributes that predict criminality also have been shown to be antecedents of various forms counter-normative work place behavior. These attributes include low self-control, high neuroticism (aggressive hostility), high excitement seeking low conscientiousness and low agreeableness.

Cluster Level Incremental Recommendations

Recommendation IA1. Combine the Criminal Conditions of the Sexual Behavior Guideline into the Criminal Conduct Guideline

It is recommended that the criminal components of the Sexual Behavior Guideline be combined into the general Criminal Conduct Guideline and be considered as one of many possible sources of criminal history. There are three primary reasons for this recommendation. First, there is little evidence suggesting that criminal sexual behavior, itself, is an antecedent to security violations. In part, this is because there is little research on criminal sexual behavior as an antecedent to any form of work-related behavior. Second, evidence about recidivism indicates that criminal sexual behavior is not more prone to recidivism than other forms of criminal behavior. Criminal sexual behavior does not pose unique recidivism considerations compared to other forms of criminality. Third, criminal sexual behavior is relatively rare and, in general, evidence about sexual behavior may be more difficult to gather.

In general, this recommendation is based on the finding that criminal sexual behavior does not present unique adjudicative considerations distinctively different from other common forms of criminal behavior. Perhaps the most unique potential adjudicative consideration is the seemingly likely prospect that criminal sexual behavior creates a unique opportunity for

“coercion, exploitation or duress.” However, case studies of espionage in the past two decades find few, if any, instances of US-directed espionage committed as a result of such coercion.

Guideline Level Incremental Recommendations

Guideline M. Use of Information Technology Systems

Recommendation IB1. Focus the Consideration of IT Misuse on Violations of Privacy, National Security, and Theft of Information

The two primary problems with adjudicators’ use of IT misuse evidence is (a) very little research has been done about its relevance to security violations or analogous counter-normative behavior and (b) evidence is difficult to gather and may be ambiguous when it is gathered. In spite of these limitations, considerable detail is described in the eight risk conditions noted for adjudicators. For example, these conditions distinguish between “modification, destruction, manipulation or denial of access” and “introduction, removal, duplication, of hardware.” In effect, the level of detail adjudicators are expected to attend to over reaches the slight evidence underlying such detailed distinctions. Presumably, the multiple descriptions of several detailed risk conditions derives from information about the possible ways security violators can or have used IT systems to violate protected information or technology.

Given the lack of empirical evidence coupled with the compelling likelihood that IT misuse is an increasingly common vehicle for security violations, it is recommended that the focus of the IT misuse Guideline be narrowed to conditions that are highly analogous to security violation behavior. These conditions would include violations of privacy, theft of information and use of IT systems to harm US national interests. By implementing this reduction in the number of conditions and narrowing the focus of the remaining conditions, adjudicators may have a clearer understanding of the conceptual linkage between the type of IT misuse that should be given weight and risk for security violations.

Mitigators

Recommendation IB2. Add an Additional Mitigator Relating to Age of Offender at Time of Offense

Although no empirical evidence has been reported, to our knowledge, about the enduring tendency to sustain IT misuse into adulthood, evidence in the domains of drug use and criminal behavior shows that offenses committed in adolescence have few implications for adult job performance where the adolescent offenses stopped occurring during later adolescence / early adulthood. Given the heightened likelihood that IT misuse may be evidenced at early ages, even pre-adolescence, it is recommended that an additional mitigator be added indicating that little

weight should be given to offenses committed during pre-adolescence or adolescence where there is clear evidence that the offenses have stopped by late adolescence / early adulthood.

Guideline J. Criminal Conduct

Recommendation IB3. Add a Risk Condition Relating to Involvement of Drug Abuse in Criminal Offense

Recidivism evidence shows that ongoing drug abuse as a factor in the criminal offense and continuing after the offense is an indicator of increased likelihood of repeat offenses. It is recommended that an additional risk condition be added, such as “Drug abuse was a factor in the criminal offense and continued after the offense.”

Mitigators

Recommendation IB4. Elaborate Mitigator (d) to Include “Absence of Past Drug Abuse” and “History of Only a Single Criminal Offense”

Mitigator (d) lists factors that should be regarded as mitigators of criminal history. While evidence about recidivism is extensive and a complex, two factors are persuasive indicators that previous criminal history should be mitigated – absence of past drug abuse and a history of having committed only one criminal offense, especially in adolescence..

Guideline D. Sexual Behavior (Criminal)

Recommendations IA1 and IA2 suggest that Guideline D, Sexual Behavior, be eliminated as a stand-alone Guideline largely due to its infrequency, lack of supporting evidence, investigative difficulty, and lack of distinctiveness with regard to security risk as compared to other criminal behavior and other psychosocial deviant behavior.

No specific recommendation is made for Guideline J regarding additional conditions or mitigators about criminal sexual behavior. In effect, this set of related recommendations is based on the conclusions that criminal sexual behavior should be adjudicated in the same manner as any other serious criminal offense.

(It should be noted that this set of recommendations about criminal sexual behavior makes an assumption that the employment processes for positions requiring clearances will exclude job applicants with histories of sex crimes where such criminal histories pose a threat to the organization’s obligation to provide a safe, non-threatening workplace.)

UNCLASSIFIED

Guideline F. Financial Considerations

No recommendation is made to combine Guideline F into any other broader Guideline. This is largely because the extent and nature of investigative evidence typically available about an individual's financial circumstances is extensive and unique to the financial domain of criminal and deviant behaviors. Because of the uniqueness and potential amount of investigative information, singular attention is warranted.

The complexity of the Financial Considerations domain is that security risk may derive from two sources. First, large debt in and of itself poses some degree of risk as an invitation to inducement or recruitment. This risk is not mitigated to any great extent by the reasons for the large debt. The second source of risk is driven by the psychological factors that contributed to the risky financial circumstances. Such factors are manifest in recklessly risky financial decisions, compulsive gambling, and criminal financial behavior. This second source of risk is mitigated by somewhat different factors than those that mitigate against the sheer size of the debt. These considerations lead to a recommendation for an additional mitigator.

Mitigators

Recommendation IB5. Consider High Recidivism Rates for Criminal Compulsive Gambling

It is recommended that an additional mitigator be added to Guideline F addressing the recidivism factors that should be considered when evaluating the likely effectiveness of treatment programs. The recommended language for the new mitigator is:

“In response to compulsive gambling, the individual voluntarily entered and completed a program of treatment and has been free of problem gambling behavior for more than 2 years and has been free of alcohol and drug abuse during that same period. The evaluation of this mitigator should involve the judgment of a duly qualified mental health professional approved by the U.S. Government.”

UNCLASSIFIED

The Psychosocial Deviance Cluster of Guidelines: Incremental Recommendations

Psychosocial Deviance Cluster

- D. Sexual Behavior (Disorder) (Proposed no longer to be its own Guideline)
- F. Financial Considerations (Disorder)
- G. Alcohol Consumption
- H. Drug Involvement
- I. Psychological Conditions

The Psychosocial Deviance cluster of Guidelines represents behaviors that are themselves dysfunctional and counter-normative. Evidence persuasively indicates that these behaviors are caused by the interaction of situational circumstances and personal attributes that put individuals at risk for dysfunctional and counter-normative behavior. The term “deviance” as used here refers to the dysfunctional, counter-normative quality of behavior captured by this cluster of Guidelines; it does not refer to any moral judgment about this cluster of behaviors.

A general finding for the Psychosocial Deviance cluster of Guidelines is that direct and indirect evidence is persuasive that psychosocial deviance is an antecedent of security violation behavior and other forms of counter-normative work behavior. This persuasive evidence is based on a broad set of findings that a common set of identifiable psychological attributes underlies the behaviors represented by the psychosocial deviance cluster and separate behaviors that underlie security violation behavior and similar counter-normative behavior in other work contexts. While the situational contexts may be different, the underlying psychological attributes revealed by psychosocial Guideline behaviors are also likely antecedents of security violation behavior. For example, a hostile narcissist who sabotages peers’ work performance because of a denied promotion is very likely, if placed in a context of responsibility for classified information, to sabotage the security of that information. The same profile of personal attributes leads to context-specific behavior that is similarly dysfunctional and / or counter-normative. The heuristic example captures the essentially features of the social science research findings about the relevance of the psychosocial Guidelines to security risk.

Cluster Level Incremental Recommendations

Recommendation IA2. Combine the Disorder Conditions of the Sexual Behavior Guideline into the Psychological Conditions Guideline

It is recommended that the disorder components of the Sexual Behavior Guideline be combined into the more general Psychological Conditions Guideline and be considered as one of many possible sources of evidence about the individual’s psychological condition. (This recommendation is parallel to and for two of the same reasons as Recommendation IA7 to

combine the criminal components of Sexual Behavior into the more general Criminal Conduct Guideline.) There are two primary reasons for this recommendation. First, there is little evidence suggesting that disordered sexual behavior is, itself, an antecedent to security violations. In part, this is because there is little research on disordered sexual behavior as an antecedent to any form of work-related behavior, with the exception of workplace internet use. Second, disordered (noncriminal) sexual behavior is generally private or hidden and is very difficult to gather evidence about.

In general, this recommendation is based on the conclusions that (a) the linkage between disordered sexual behavior and security violations is likely to be similar to that for other forms of disordered behavior and (b) evidence about it is difficult to acquire, however frequent it is. There is little evidence that disordered sexual behavior presents unique information about security risk. Perhaps the most unique potential adjudicative consideration is the seemingly likely prospect that disordered sexual behavior creates a unique opportunity for “coercion, exploitation or duress.” However, case studies of espionage in the past two decades find few, if any, instances of US-directed espionage committed as a result of such coercion.

Guideline Level Incremental Recommendations

Guideline D. Sexual Behavior (Disorder)

Recommendations IA1 and IA2 suggest that Guideline D, Sexual Behavior, be eliminated as a stand-alone Guideline largely due to its infrequency, lack of supporting evidence, investigative difficulty, and lack of distinctiveness with regard to security risk as compared to other criminal behavior and other psychosocial deviant behavior.

No specific recommendation is made for Guideline I regarding additional conditions or mitigators about disordered sexual behavior. In effect, this set of related recommendations is based on the conclusions that disordered sexual behavior should be adjudicated in the same manner as any other deviant psychological condition.

(It should be noted that this set of recommendations about disordered sexual behavior makes an assumption that the employment processes for positions requiring clearances will exclude job applicants with histories of disordered sexual behavior where such histories pose a threat to the organization’s obligation to provide a safe, non-threatening workplace.)

Guideline F. Financial Considerations

The disorder components of Financial Considerations are most often expressed in the form of compulsive gambling. In addition, it is possible that other dysfunctionally compulsive behaviors such as compulsive shopping behavior may be part of the evidence profile for problematic Financial Considerations. In those cases where a pattern of compulsive behavior

satisfies Guideline F, condition (i), any consideration of mitigators for that condition should apply the new mitigator language in Recommendation IB5.

Guideline G. Alcohol Consumption

The evidence reported in the Psychosocial Considerations White Paper supports the assumption underlying the adjudicative process that alcohol abuse and dependence increases the risk of future security violation behavior. This evidence supports continued reliance of the existing conditions and mitigators described for Guideline G.

The evidence about contributing factors to alcohol abuse/dependence suggests as additional risk condition.

Recommendation IB6. Introduce a Condition That Captures the Importance of Contributing Factors to Alcohol Abuse / Dependence

It is recommended that the following condition be added to the Alcohol Consumption risk conditions:

“Evidence of problem drinking accompanied by any of the following factors:

- ◆ Financial problems or other personal stressors
- ◆ History of solitary drinking
- ◆ Association with heavy drinkers or those who tolerate heavy drinking
- ◆ Family history of problem drinking
- ◆ Personal history of impulsive behavior in response to distressors”

Mitigators

The evidence about alcohol abuse / dependence suggests an additional mitigator that parallels the recommended new risk condition.

Recommendation IB7. Introduce a Mitigator Reflecting the Importance of Contributing Factors to Enduring Alcohol Cessation

It is recommended that the following be added to the list of Alcohol Consumption mitigators.

“Evidence of alcohol cessation accompanied by any of the following factors:

- ◆ Reduction in financial problems or other personal distressors
- ◆ Disassociation with heavy drinkers and those who tolerate heavy drinking
- ◆ Improvement in stress management skills through successfully completed training or treatment programs”

UNCLASSIFIED

Guideline H. Drug Involvement

Similar to the evidence about Alcohol Consumption, the evidence reported in the Psychosocial Considerations White Paper supports the assumption underlying the adjudicative process that drug abuse and dependence increases the risk of future security violation behavior. This evidence supports continued reliance of the existing conditions and mitigators described for Guideline H.

The evidence about contributing factors to drug abuse/dependence suggests as additional risk condition.

Recommendation IB8. Introduce a Condition That Captures the Importance of Contributing Factors to Drug Abuse / Dependence

It is recommended that the following condition be added to the Drug Involvement risk conditions:

“Evidence of problem drug use accompanied by any of the following factors:

- ◆ Financial problems or other personal stressors
- ◆ History of solitary drinking
- ◆ Association with frequent drug users or those who tolerate frequent drug use
- ◆ Family history of drug abuse / dependence
- ◆ Personal history of impulsive behavior in response to distressors”

Recommendation IB9. Supplement Condition (a) to Reference Adult Drug Abuse

It is recommended that condition (a) be modified as follows:

“(a) any drug abuse continuing into adulthood (see above definition).”

Mitigators

The evidence about alcohol abuse / dependence suggests an additional mitigator that parallels the recommended new risk condition.

Recommendation IB10. Introduce a Mitigator Reflecting the Importance of Contributing Factors to Enduring Drug Use Cessation

It is recommended that the following be added to the list of Drug Involvement mitigators:

“Evidence of drug use cessation accompanied by any of the following factors:

- ◆ Reduction in financial problems or other personal distressors
- ◆ Disassociation with frequent drug users and those who tolerate frequent drug use

UNCLASSIFIED

UNCLASSIFIED

- ◆ Improvement in stress management skills through successfully completed training or treatment programs”

Recommendation IB11. Add a Mitigator about Adolescent Drug Abuse Discontinued by Adulthood

It is recommended that the following be added to the list of Drug Involvement mitigators:

“(e) a pattern of adolescent problem drug use that has been discontinued by adulthood.”

Guideline I. Psychological Conditions

The evidence about the linkage between Psychological Conditions and future risk of security violation supports the adjudicative process for relying on such evidence as indicators of future security risk. This supporting evidence is largely explained by the identifications of underlying clinical disorders such as psychopathy, antisocial personality disorder, narcissism, low impulse control, emotional instability and excitement-seeking have also been shown to be associated with a variety of types of counter-normative work behavior in a range of work contexts.

A critical and distinctive feature of the Psychological Conditions Guidelines is that, to a great extent, the evaluation of risk based on the conditions and mitigators evidence should rely on the professional judgment of mental health professionals. In part, this requirement ensures that the most current evidence about treatment strategies and effectiveness, recidivism factors, and specific circumstances of individual cases will be appropriately considered. For example, the most recent evidence about substance abuse treatment indicates that cognitive-behavioral methods have promising effectiveness. It would be inefficient, however, to incorporate into the Guidelines current evidence about specific treatment protocols. That approach would trigger the need to frequently review the currency of that evidence and revise the Guidelines as needed even though the fundamental basis for regarding Psychological Conditions as a source of risk may not have changed.

For this reason and because the current evidence supports the manner in which the Psychological Conditions Guideline is implemented, no modifications are recommended for this Guideline.

UNCLASSIFIED

National Conflict Cluster of Guidelines: Incremental Recommendations

- A. Allegiance to the US
- B. Foreign Influence
- C. Foreign Preference
- L. Outside Activities

The following recommendations are based on two considerations, (a) the evidence reviewed above, and (b) the practical benefit for the adjudication process. A small number of major themes from the evidence influence several of these recommendations. These themes are:

1. Security behavior is likely to be influenced by the attachments themselves and also by the manner in which individuals manage multiple attachments in the face of conflict and in other situations.
2. Identity-based attachment is likely to be the most consequential form of attachment for security behavior.
3. The roles of multiple attachments can change with circumstances.

While the scope of this project did not include an assessment of investigative processes or the decision making processes used by adjudicators, certain key observations about the adjudicative process influenced some recommendations.

1. Historically, new security contexts have led to additional Guidelines, which increase the complexity of the adjudication process.
2. Some adjudicator decisions are largely fact-based. Most require judgment about the weight of multiple sources of evidence.
3. A primary demand on adjudicators is to combine multiple sources and multiple types of evidence into a single assessment of the risk of security violation.

The recommendations are organized into three groups: Across Guidelines, Individual Guidelines including mitigators, and Research.

Cluster Level Recommendations

Recommendation IA3: Increase Focus on Identity-Based Attachment

The adjudicative investigation and decision making processes should increase and sharpen their focus on evidence of *identity*-based attachments to the US, ethnic/social groups, foreign countries and other entities relevant to the particular Guideline. Investigators and interviewers should be taught to seek out attachment information that reflects identity attachment over other forms of attachment. Evidence reflecting identity attachment is described above and includes:

UNCLASSIFIED

- ◆ Formal and informal group membership.
- ◆ Importance of group values and norms.
- ◆ Participation in group activities.
- ◆ Conformance to group rituals and rules.
- ◆ Group language use.
- ◆ In-group contacts.
- ◆ Group-specific civic/political/social participation.
- ◆ In-group marriage.
- ◆ Dominance of group identity in situations of conflict and stress.
- ◆ Circumstances/situations in which group identity is prominent.
- ◆ Managing multiple attachments such that group identity is sustained over time.

Adjudicators should be taught to give primary weight to the implications of identity attachment over other forms of attachment such as instrumental/exchange attachment, ideological attachment, and political attachment.

Recommendation IA4. Explicitly Evaluate Strength of Attachment

Adjudicators should be trained to evaluate, estimate and rely on “strength of attachment” for US attachment and other significant attachments. The evaluation of “strength of attachment” should take into consideration the number of indicators of attachment and the “strength-level” associated with each indicator. Strength level of an indicator may be an informed judgment based on scaled examples. For example, for ethnic group attachment a leadership role in regular group rituals is likely to be an indicator of stronger identity attachment than frequency of contact with family members. For national attachment, holding public office is likely to be a stronger indicator of national identity than registering to vote.

Some amount of research would be required to develop instructions and exemplars/anchors necessary to systematically evaluate “strength of attachment.”

Recommendation IA5: Where There is Evidence of Significant Multiple Attachments, Gather and Evaluate Indicators of Individual’s Strategy for Managing Potential Conflict

Research shows people often successfully manage multiple attachments. Where multiple attachments are in evidence, adjudicators should assess the individual’s perceived success in managing the attachments in those occasions or events that pose potential conflicts, especially where those potential conflicts are nation-oriented. This assessment should focus on the manner in which the individual applies the multiple attachments to the particular circumstances of the occasion or event.

UNCLASSIFIED

Recommendation IA6: Where There is Evidence of Change in an Attachment, Investigate and Evaluate the Factors Leading to the Change

Investigators and adjudicators should gather and evaluate evidence describing the factors that led the individual to significantly increase or reduce, or alter or eliminate a previously significant attachment. The focus should be on the extent to which the change factors bear any relevance to security risk.

Recommendation IA7. Integrate Evidence of Conflict Risk Across Guidelines Using a Conflict Risk Assessment Scale

All national conflict Guidelines provide evidence relating to the individual’s conflict-based risk for future security violations. A cognitively challenging task for the adjudicator is to aggregate all evidence from the four Guidelines into a single overall assessment of the conflict-based risk posed by the individual. Adjudicators should use a structured Conflict-based Risk Assessment Scale as the mechanism by which they systematically aggregate diverse information about the individual’s risk for future violations.

A “working” Conflict Risk Assessment Scale and accompanying explanatory information are provided in Appendix A. The Scale itself is shown here.

Overall Conflict Risk Assessment Scale

Key Dimensions	1 Lowest	2	3	4	5	6	7	8	9	10 Highest
Identity Source(s)	American	American	Mixed with American Leaning	Mixed with Alternative Leaning	Mixed with American Leaning	Mixed with Alternative Leaning	Alternative	Alternative	Alternative	Alternative
	Values-Based	Exchange-Based	American: Values-Based Alternative: Exchange-Based	American: Exchange-Based Alternative: Values-Based	American: Values-Based Alternative: Exchange-Based	American: Exchange-Based Alternative: Values-Based	Exchange-Based	Values-Based	Exchange-Based	Value-Based
Nature of Relationship with US Government	N/A	N/A	Congenial	Congenial	Adversarial	Adversarial	Congenial	Congenial	Adversarial	Adversarial

The design of this Conflict-based Risk Scale captures the operational implications of the literature review on the influence of national and foreign attachments of the individual’s likelihood of future security violations. The risk assessment is based on three considerations: (1) the sources of one’s important identities, (2) the strength of attachment associated with each attachment, and (3) an overall assessment of the individual’s relationships with the US government. Each of these three factors would be judged by the adjudicator based on attachment evidence from across the Guidelines. These three factor-level judgments would then be aggregated into an overall assessment of risk based on the standards expressed in the model. While this Conflict-based Risk Assessment Scale was designed to capture the implications of the

relevant research, it may well be that additional planning, design and research would result in modifications to this approach.

It is worth noting that this proposed Conflict-based Risk Assessment Scale does not change the fundamental complexity of the adjudicator's judgment task. Rather, it is an attempt to provide structure and an organizing framework to enable adjudicators to manage this complexity in more systematic, evidence-based manner. Arriving at an overall assessment of risk is a complex and somewhat ambiguous judgment task for the adjudicator. The adjudicator must collect information on a variety of indicators and combine these indicators in a meaningful way. The Conflict-based Risk Assessment Scale provides a way of managing this complexity based on the most important considerations to yield the most valid assessments possible. Further, this risk scale is intended to be illustrative of a structured method of supporting adjudicators' risk judgments. Certainly, additional development work would be needed to optimize the structure of the scale components and provide a set of user instructions to support adjudicators' use of the scale.

Guideline Level Recommendations

Guideline A. Allegiance to the United States

None in addition to the Cluster Level recommendations.
See the Recommendation S1 about a new "Eligibility Standard."

Mitigators

Recommendation IB12. Revise Mitigator (d) to Focus on Two Types of Evidence:

- a. The individual has deliberately ended the involvement/association in question.
- b. Since ending the involvement/association, the individual has demonstrated increasing attachment to and support of US interests as manifest by changing social norms groups, changing beliefs about US interests, and changing plans with respect to US interests.

Guideline B. Foreign Influence

None in addition to the cross-guideline recommendations.
See the Guideline L recommendation.
See the recommendation about an "Eligibility" Standard.

Mitigators

Recommendation IB13. Revise /Supplement Guideline B Mitigators as Follows

1. Add a mitigator addressing evidence that the individual has integrated foreign connections into a pattern of behavior supportive of US interests.
2. Add a mitigator addressing evidence that the individual has experienced conflicts in the past relating to dual attachments and has resolved them in a manner that does not imply security risk.
3. Add a mitigator addressing evidence that the individual has been increasing identity-based attachments to the US while maintaining / developing foreign expertise for US purposes and/or decreasing foreign identity-based attachments.
4. Modify mitigator (b) to emphasize the “depth” of foreign relationships (i.e., strength of attachment or personal importance accorded to that person, group, government or country) rather than how long the relationship has lasted.

Guideline C. Foreign Preference

Recommendation IB14. In Cases of Dual Citizenship, Emphasize Evidence of National Identity

Recommendation A1 directs attention to a sharper focus on evidence of identity-based attachment. The role of national identity information is especially relevant in cases of dual citizenship. Research shows that dual citizens tend to have lower US national identity and, therefore, are likely to be somewhat more risky for security violations. In any particular individual’s case, evidence of strong US national identity or, conversely, strong foreign national identity, would be important for assessing the weight to attach to dual citizenship.

Mitigators

Recommendation IB15. Revise / Supplement Guideline C Mitigators as Follows

1. Add a mitigator addressing evidence that, for individuals holding dual citizenship, the individual has demonstrated a pattern of increasing attachment to the US in any of a variety of ways including English language usage, voting, civic/political participation, and knowledge of US values, history, governance, and social systems.
2. Add a mitigator(s) to reflect the nature of the relationship (adversarial or congenial) between the US and the country with which foreign attachment is indicated. Such a mitigator should also take into consideration the relatively chronic (or capricious) nature of the relationship between the given countries.

3. Mitigator (c) should be modified to also capture the extent to which the exercise of any right, privilege, or obligation of foreign citizenship is important to that person's self-concept.

Guideline L. Outside Activities

Recommendation IB16: Fold Guideline L into Guideline B

With the significant exception of condition (a) (4), Guideline L covers foreign relationships very similar to those covered in Guideline B. Employment and service relationships could be easily captured under the broad component of condition (b) regarding "connections to a foreign person, group, government, or country that create a potential conflict of interest" The distinctive element of L is condition (a) (4) regarding relationships with others involving the communication of security relevant content. Because this condition does not rest on foreign relationships necessarily it is unique within the foreign conflict cluster of Guidelines.

The evidence-based rationale favoring moving L into B is that the foreign attachment issues associated with L are very highly related to those at the core of B. Both consider foreign attachment unrelated to citizenship (Guideline C) where dependencies or identification with foreign entities may create a risk of disloyalty or inducement or coercion. Employment and service relationships do not introduce a qualitatively different set of attachment considerations than the broader range of relationships captured in B.

Combining L into B would reduce the complexity in aggregating evidence across Guidelines.

Mitigators

Recommendation IB17. Revise / Supplement Guideline L Mitigators as Follows

1. Add a mitigator addressing evidence that individual has taken steps to eliminate potential conflicts with employment/service responsibilities.
2. Add a mitigator addressing evidence that the employment/service relationship is not unusual for naturalized US citizens with the individual's skills, experience and country of origin.
3. Add a mitigator addressing evidence that the individual has complied with prescriptions and expectations regarding security protection practices.
4. Mitigator (a) should be modified to capture both the security risk of the activity itself as well as the nature of the relationship (adversarial or congenial) between the intended audience or beneficiary of such an activity and the united states government (and its interest).

Research Recommendations

A number of topics relevant to the effectiveness of the Guidelines are warranted given the considerable lack of evidence directly related to the prediction of security behavior.

Recommendation IC1. Investigate Measures and Meaning of “Strength of Attachment”

The above recommendations assume, with some support from the literature, that attachments vary in strength, and strength predicts dominance of attachments in situations where different attachments imply different actions. This assumption is central to the manner in which adjudicators make decisions about risk for violations. There is no evidence about this assumption in the security behavior domain and it is possible that the security contexts, with their extreme demands, are qualitatively different from other domains with fewer such demands. Investigations of strength of attachment should compare type of attachment (values-based (identity) v. exchange-based), source of attachment (ethnic groups v. nations), and owner demographics (e.g., race/ethnicity, age, experience with group membership).

Recommendation IC2. Investigate the Ways in Which Cleared Employees Manage Multiple Attachments

Using existing cleared employees, investigate the manner in which they managed multiple attachments in contexts where the attachments imply different behavior. In the very strong security context people may have uniquely adapted the manner in which they manage multiple attachments.

Recommendation IC3. Develop Measures of Identity Attachment to be Applied in the Adjudication Process

Recommendations above call for the assessment of identity attachments as part of the adjudication process. While such measure could be developed initially based on conceptual translations of identity measures in other domains, systematic work should be done in the investigations context of the adjudication process. The distinction between identity attachment and other forms of attachment appears to be significant for the prediction of other nation-oriented behavior but the measurement differences between these forms of attachment can be subtle. Good measurement is necessary for effective adjudication processes.

UNCLASSIFIED

REFERENCES

- Collins, J.M., & Schmidt, F.L. (1993). Personality, integrity, and white-collar crime: A construct validity study. *Personnel Psychology*, *46*, 295–311.
- Thompson, T. (2003). A study of vulnerability factors in espionage by the trusted insider. *Dissertation Abstracts International: Section B: The Sciences and Engineering*. 64(11-B), 5841.

UNCLASSIFIED

APPENDIX A: GUIDANCE FOR THE USE OF THE CONFLICT RISK ASSESSMENT SCALE

In the following, a Conflict Risk Assessment Framework is described that serves as a recommendation and the basis for additional recommendations. As a recommendation in and of itself, the Conflict Risk Assessment Framework is intended to illustrate how to integrate major research findings from the social identity, commitment, and identity management literatures and how this can potentially refine and improve the assessment of risk of future security violation behavior based on Allegiance/Loyalty/Attachment issues. It is important to note that the Framework is not introduced with the goal of automating decisions. The intention is to provide structured guidance for aggregating identity-based evidence and making decisions that are consistent with theoretical and empirical evidence.

The Conflict Risk Assessment Framework also provides a basis for recommendations relevant to the improvement and/or modification of Guidelines A, B, C, and L. We turn to this issue subsequent to describing and explaining the proposed Framework.

The Conflict Risk Assessment Framework

The Conflict Risk Assessment Framework represents a continuum of risk for future security violations based on different combinations of three underlying dimensions: Identity Source(s), Strength of Attachment, and Nature of the Relationship with the United States. These dimensions are based on major findings from the social identity, commitment, and identity management literatures. Based on different combinations of these dimensions, 10 levels of risk are identified. In the following section, each dimension of the Conflict Risk Assessment Framework is described along with the theoretical/empirical rationale for its use. Also included is a discussion of how each dimension can be used to assess risk and improve the predictive accuracy of security clearance decisions.

Key Dimensions of the Framework

Dimension 1. Identity Source(s)

The Identity Source(s) dimension is intended to capture the group(s) with which an individual identifies. As discussed, the groups with which a person identifies can influence his or her attitudes, motivations, and behaviors, making this an important piece of information to capture. The risk assessment is based on three possible identity sources: American, Alternative and Mixed. The Alternative designation is meant to capture both international (e.g., France, Iraq) and domestic (e.g., Ku Klux Klan) groups with values, ideologies, customs, habits that are at some cultural/political distance from those characteristic of the American identity. The Mixed category represents a social identity based on some combination or multiplicity of American and Alternative influences.

With information relevant to this dimension in hand, three levels of risk can be distinguished: low, medium and high. These risk levels correspond to individuals with American, Mixed and Alternative identities, respectively. This dimension provides the most rudimentary assessment of risk. The literature suggests that reliance on this dimension alone would be too coarse and could contribute to a high level of prediction error, such as a high incidence of false positives, whereby people with acceptable risk are more likely to be classified as unacceptably risky and denied a clearance. A more sophisticated, and potentially more accurate, assessment of risk requires collecting information on at least two additional dimensions: Strength of Attachment and the Nature of the Alternative Group's Relationship with the United States.

Dimension 2. Strength of Attachment

As discussed, the literature indicates that a group's influence on an individual's attitudes, motivations and behaviors is contingent on the strength of his or her attachment with that group. The stronger an individual is attached to a group, the more likely the group is to influence the individual's attitudes, motivations and behaviors. Therefore, a "Strength of Attachment" dimension was deemed important and necessary. The organizational commitment literature provides additional insight on how to conceptualize this dimension, suggesting that there are at least two different types of attachment that vary in the strength of their influence on an individual's attitudes, motivations and behaviors. These were referred to as value-based and exchange-based attachment and that the former type of attachment is more influential than the latter. Based on this research, value- and exchange-based attachments are used to define two levels on the "Strength of Attachment Dimension." Value-based attachment represents a stronger form of attachment and exchange-based attachment represents a weaker form. The label "values-based" attachment used in the organizational commitment represents the same type of identity-based attachment as represented by national identity in the country allegiance research.

As shown in Table A1, the addition of this dimension expands the number of risk levels from 3 to 6, providing the adjudicator with a finer-grained representation of risk that may improve the accuracy of prediction. While the American, Mixed and Alternative identities still

UNCLASSIFIED

correspond to low, medium and high levels of risk, respectively, there is now more room within these categories to draw finer distinctions regarding risk.

Table A1 shows how this works. At risk levels 1 and 2, an individual who identifies with the American identity is a greater or lesser risk based on the nature of her attachment to an American identity. A person with a values-based attachment to the American identity (risk level 1) can be considered less risky than a person with an exchange-based attachment (risk level 2). The assumption is that values-based attachment is not as deep or stable or general as affect-based (identity) attachment, and, therefore, they may be more vulnerable to inducements or incentives from external sources to engage in behavior that violates security rules and regulations.

At risk levels 7 and 8 the relationship between the strength of attachment and risk is reversed. A values-based attachment to an Alternative identity (risk level 8) is riskier than an exchange-based attachment (risk level 7). Since an individual with a values-based attachment is more strongly attached to the Alternative group, they are more likely to act in a manner favorable to that group. Under some circumstances, this may involve engaging in behavior that is in violation of security rules and regulations.

The previous example was based on a single identity, either American or and Alternative identity. When the adjudicator is evaluating an individual with only one identity to consider then risk is best assessed by conducting a comparison of attachment types (values v. exchange) *within the identity*. The nature of the comparison is different for those with Mixed identities, since both an American and Alternative identity are involved. Within this identity category, risk assessment is based on a comparison of attachment strength *across groups*. Such a comparison would require the adjudicator to determine the strength of the individual's attachment to both American and Alternative identities. This is intended to answer the question, "Which identity is the individual most strongly attached to?" Individuals with a stronger/more dominant attachment to the Alternative identity would be a higher risk than those with a stronger/more dominant attachment to the American identity. As shown in Table A1, individuals at risk level 3 are less risky than those at risk level 4 because they have a stronger attachment to the American identity, which is value-based, than the Alternative identity, which is exchange-based.

Dimension 3. Relationship with US Government

Including the strength of an individual's attachment to American and/or Alternative identity(ies) improves the predictive accuracy of risk assessment over and above reliance on the Identity Source(s) dimension. However, an even greater level of predictive accuracy may be achieved by considering a third dimension: the relationship of Alternative groups (and associated identities) with the United States. This dimension has two categories labeled Congenial and Adversarial, which are intended to provide a characterization of the relationship between the American and Alternative identities. Adversarial relationships refer to those in which political, economic and/or cultural conflict exists between the United States and the group, whether foreign or domestic, that the Alternative identity characterizes. A current example of a group with an adversarial relationship to the United States is North Korea. Congenial relationships, on

UNCLASSIFIED

UNCLASSIFIED

the other hand, refer to those that are positive in nature by way of shared political ideologies or alliances, economic interdependencies, and/or shared cultural values and beliefs. Great Britain is a good example of a foreign group that has a Congenial relationship with the United States. Of course, even “Congenial” nations may have an interest in clandestine access to US information. So, the distinction between “Congenial” and “Adversarial” fundamentally represents an assessment of the Alternative nation’s threat to engage in counter-intelligence against the US.

The basis for this dimension is empirical evidence that people can possess multiple identities. Apparently, our psychology does not require that we identify with one and only one group. This feature, however, appears to be contingent on contextual variables, such as the nature of the relationships between the groups with which one identifies. Under conditions of conflict, an individual may feel the need to resolve dissonant feelings by allowing one identity to gain dominance over another. When this occurs, the identity with which a person is most strongly attached is likely to take over. This has direct implications for the risk associated with individuals characterized as Mixed in Dimension 1. In Table A1, where the nature of the relationship between the United States and Alternative group is Adversarial, the person is deemed a higher risk than when this relationship is Congenial. This is the case regardless of the individual’s level of attachment to the American and Alternative identity. This is not to suggest that the second dimension is not useful. In fact, considering these dimensions together within the Mixed identity category results in four levels of risk that may aid in predictive accuracy beyond the two risk levels distinguished by the second dimension.

Table A1 shows that a person with a values-based attachment to the American identity and an exchange-based attachment to an Alternative identity where the nature of the relationship between the United States and Alternative groups is Congenial presents the lowest level of risk within this category. In this case, a person is most strongly attached to the American identity and, therefore, is most likely to act in the interests of the United States. Additionally, although the person is attached to an Alternative identity through an exchange-based attachment, the absence of conflict makes it less likely that a representative(s) of that group would use the attachment against them in the form of coercion. An individual that has a values-based attachment to an Alternative identity and an exchange-based attachment to the American identity when there is conflict between the Alternative group and the United States presents the highest level of risk in the Mixed category. In this case, conflict is likely to promote the dominance of the Alternative identity over the American identity, especially since the former is stronger than the latter. Consequently, the individual may be more likely to act on behalf of the Alternative group. In some instances, this may involve the violation of security rules and regulations on behalf on the Alternative group. In addition, this individual may be more likely to feel external pressure from a representative(s) of the Alternative group to engage in security violation behavior.

The applicability of this third dimension is not restricted to individuals falling into the Mixed identity category; it also applies to those with an Alternative identity(ies). Table A1 shows that the addition of this third dimension allows for the expansion of the Alternative category from two to four risk levels. As with the Mixed identity category, individuals attached

UNCLASSIFIED

UNCLASSIFIED

to identities characteristic of groups with an Adversarial relationship to the United States are judged to be more risky than those with identities characteristic of groups with a Congenial relationship with the United States, regardless of the level of attachment. Considering the second dimension in conjunction with the third for this category, however, results in a more fine-grained characterization of the level of risk. At the lowest level of risk within the Alternative category is an individual with an exchange-based attachment to an Alternative identity characteristic of a group with a Congenial relationship with the United States. At the highest level of risk is an individual with a values-based attachment to an Alternative identity characteristic of a group with an Adversarial relationship with the United States.

UNCLASSIFIED

Putting It Together

Combining the different levels/categories of each dimension results in a 10-level continuum of risk. The inclusion of the second and third dimensions allows for a more fine-grained characterization of risk that may improve predictive accuracy/validity. The individual with the lowest level of risk is a person who has a strong attachment to the American identity based on a set of shared values. In contrast, the highest level of risk is posed by a person who strongly identifies with the values of an Alternative group that is threat for counter intelligence against the United States.

Evaluating Conflict Risk Assessment Dimensions with Guidelines A, B, C, and L

Applying the Conflict Risk Assessment Framework to each of the Guidelines comprising Cluster I indicates that this Risk Assessment Framework is consistent with the Guidelines in certain ways and not in others. Consistency between the Framework and Cluster I Guidelines reinforces and validates some features of the Guidelines in their current form, while discrepancies emphasize how the Guidelines might be modified or improved to more accurately reflect social science research on identity and identification processes/dynamics, thus improving the validity of the Guidelines.

Though features common to and distinct to the Conflict Risk Assessment Framework and Cluster I Guidelines will be addressed, the goal of this section is not to provide an exhaustive analysis and/or set of recommendations; rather, the goal is to describe the most readily apparent consistencies, distinctions and implications for the validity of the Guidelines in their current form as well as potential steps needed to modify or improve their validity. To accomplish this, the extent to which dimensions 2 and 3 of the Conflict Risk Assessment Framework are evident in Cluster I Guidelines is discussed.

The “Nature of Relationship to the United States” Dimension in Cluster I

The third dimension of the Conflict Risk Assessment Framework – Nature of the Relationship to the US – is considered more or less explicitly in several of the Cluster I Guidelines. A potentially disqualifying condition in Guideline A is “*association or sympathy with persons who are attempting to commit, or who are committing (sabotage, espionage, treason, terrorism, or sedition against the United States of America).*” This condition refers to an attachment with a group with adversarial relationship with the United States. As another example, a potentially disqualifying condition in Guideline is C is “*performing or attempting to perform duties, or otherwise acting, so as to serve the interests of a foreign person, group, organization or government in conflict with the national security interests.*” As with the condition for Guideline A, this indicates that risk is heightened when an individual is attached to a group in an Adversarial relationship with the United States. Since the third dimension of the risk assessment is consistent with social science research on identity, commitment and identity

UNCLASSIFIED

management processes, and this dimension is evident in several of the Cluster I Guidelines, there is some evidence for the validity of these Guidelines in their current form.

Typically the assessment of whether the US and Alternative groups are “Congenial” or “Adversarial” will be based on expert sources available to the adjudicator. “Congeniality” is not based on evidence from the individual. It is not the individual’s perception of the US – Alternative relationship. Rather, it is the most expert, available assessment of the threat the Alternative nation represents for intelligence gathering against the US.

The “Strength of Attachment” Dimension in Cluster I


The Adjudicator’s Desk Reference identifies several indicators that can be used to assess the risk associated with a particular individual. Several of these indicators refer to the attachments between an individual and a group. For example, a disqualifying condition of Guideline B is “*unauthorized association with a suspected or known agent, associate, or employee of a foreign intelligence service,*” and a disqualifying condition of Guideline L is “*any employment or service, whether compensated or volunteer, with: (1) the government of a foreign country.*” What these examples illustrate is that although the indicators of person-group attachment are considered, the strength of attachment denoted by these attachments is not always clear, making it potentially more difficult to assess the true level of risk. This is not to say that there are not indicators more clearly denoting the strength of the attachment. For example, a disqualifying condition of Guideline A is “*association or sympathy with persons who are attempting to commit, or who are committing (sabotage, espionage, treason, terrorism, or sedition against the United States of America)*” and a disqualifying condition of Guideline B is “*a substantial business, financial, or property interest in a foreign country, or in any foreign-owned or foreign-operated business, which could subject the individual to heightened risk of foreign influence or exploitation.*” The former condition seems indicative of a values-based or strong attachment, particularly considering use of the word “sympathy,” while the latter condition appears to be indicative of exchange-based or weak attachment.

This rationale is the primary basis for Recommendation A2 that strength of attachment should be explicitly evaluated.

UNCLASSIFIED

UNCLASSIFIED

Table A1. Overall Risk Assessment Scale

										
Key Dimensions	1 Lowest	2	3	4	5	6	7	8	9	10 Highest
Identity Source(s)	American	American	Mixed with American Leaning	Mixed with Alternative Leaning	Mixed with American Leaning	Mixed with Alternative Leaning	Alternative	Alternative	Alternative	Alternative
Strength of Attachment	Values-Based	Exchange-Based	<i>American:</i> Values-Based	<i>American:</i> Exchange-Based	<i>American:</i> Values-Based	<i>American:</i> Exchange-Based	Exchange-Based	Values-Based	Exchange-Based	Value-Based
			<i>Alternative:</i> Exchange-Based	<i>Alternative:</i> Values-Based	<i>Alternative:</i> Exchange-Based	<i>Alternative:</i> Values-Based				
Nature of Relationship with US Government	N/A	N/A	Congenial	Congenial	Adversarial	Adversarial	Congenial	Congenial	Adversarial	Adversarial

UNCLASSIFIED