



PERSEREC

Management Report 14-01
January 2014

2012 RADAR Adjudication Quality Evaluation

Leissa C. Nelson
*Defense Personnel and Security Research Center
Defense Manpower Data Center*

Donna L. Tadler
Northrop Grumman Technical Services

Approved for Public Distribution: Distribution Unlimited
Defense Personnel and Security Research Center
Defense Manpower Data Center

2012 RADAR Adjudication Quality Evaluation

Leissa C. Nelson—*Defense Personnel and Security Research Center/DMDC*

Donna L. Tadler—*Northrop Grumman Technical Services*

Released by – Eric L. Lang

BACKGROUND

In 2009, Department of Defense (DoD) established standards for documenting personnel security adjudication decisions. The standards required documentation of the factors taken into account when processing derogatory and missing investigative information.

The Defense Personnel and Security Research Center (PERSEREC) developed the Review of Adjudication Documentation Accuracy and Rationales (RADAR) online tool to evaluate DoD adjudicator compliance with the standards through evaluations of the documentation. The first evaluation assessed cases adjudicated at major DoD central adjudication facilities (CAFs) in 2010, and found that the documentation for over 95% of cases met the standards.

This report provides updated information for adjudication documentation quality obtained through RADAR evaluations for a sample of cases adjudicated in 2012.

HIGHLIGHTS

The analysis focused on documentation of potentially derogatory information and documentation of missing scope items. The RADAR evaluations showed that one of 649 decisions (0.2%) did not meet the requirement for documenting potentially derogatory information (i.e., 99.8% met the documentation standard). This represented a 4.3% increase from 95.5% meeting this standard in 2010.

In addition, evaluators rated four of 649 decisions (0.6%) as not consistent with national standards in terms of either the issues identified or the use of disqualifying and mitigating conditions. In other words, 99.4% met the standard. This represented a 4.6% increase from 94.8% meeting this standard in 2010.

Finally, the 2012 evaluation was the first RADAR evaluation to attempt to evaluate documentation of missing scope items. The analysis found (a) the need for better strategies for identifying cases with missing scope items and (b) that missing scope items were either not documented or the documentation was not part of the data provided for the RADAR evaluations.

PREFACE

The Department of Defense (DoD) Personnel Security Program has faced numerous challenges over the years. One of the challenges is that of meeting government-wide requirements for reciprocal acceptance of personnel security determinations. To help meet this challenge and address concerns expressed by the Government Accountability Office (GAO) about adjudication documentation, DoD prepared policy and developed a quality measure to help ensure that DoD adjudicators document factors considered when adjudicating cases containing derogatory or missing investigative information.

The Defense Personnel and Security Research Center (PERSEREC) developed the adjudication quality tool, the Review of Adjudication Documentation Accuracy and Rationales (RADAR). The current report presents the results of RADAR evaluations for adjudication decisions documented in 2012. As the analysis presented in the body of this report demonstrates, DoD adjudicators demonstrated high levels of conformance with documentation requirements for investigations containing potentially derogatory information, although the evaluation also identified room for improvement with regard to documentation of missing scope items.

Eric L. Lang
Director, PERSEREC

EXECUTIVE SUMMARY

This report presents the results of an evaluation of adjudication decisions documented in 2012. As outlined in Department of Defense (DoD) policy, DoD adjudicators must document their decisions in a manner that is consistent with requirements and that supports decision-making for those who must rely on the adjudication determinations to decide about granting access to sensitive information or to reciprocally accept previous adjudication decisions.

The Defense Personnel and Security Research Center (PERSEREC) developed the Review of Adjudication Documentation Accuracy and Rationales (RADAR) tool to help measure how well adjudicators conform to adjudication documentation standards. Independent evaluators use RADAR to review case information and evaluate adjudication documentation and decisions made by DoD adjudicators.

For this round of RADAR data collection, the evaluators rated Single-Scope Background Investigations (SSBIs), SSBI Periodic Reinvestigations (SSBI-PRs), and Phased Periodic Reinvestigations (PPRs) with derogatory information, as well as SSBIs with little to no derogatory information that were missing standard investigation scope items.

DEROGATORY INFORMATION DOCUMENTATION

A key finding of the RADAR evaluations was that the documentation for 648 of 649 cases (99.8%) with potentially derogatory information met the standards. According to evaluator comments, the case that received the unacceptable rating received that rating because there were multiple issues present in the case that the adjudicator did not address in the documentation, although the issues could have been mitigated if they had been addressed.

The second overall assessment was whether the adjudication decision was consistent with national adjudication standards. Evaluators rated 645 of 649 decisions (99.4%) as consistent with national adjudication standards. Evaluators rated the four cases as not meeting these standards because they either disagreed with the use of disqualifying and mitigating conditions or disagreed with the original adjudicators' identification of issues, not because the overall decision was incorrect.

Compared to a previous RADAR adjudication quality evaluation conducted by PERSEREC in 2010 (L.C. Nelson & E.L. Lang, personal communication, May 2, 2011), the overall percentage of adjudication decisions meeting documentation standards increased from 95.5% to 99.8%.

MISSING SCOPE ITEM DOCUMENTATION

The 2012 RADAR data collection was the first to target documentation of missing scope items. However, study data did not allow for firm conclusions about

EXECUTIVE SUMMARY

adjudicator compliance with this documentation requirement. The first step of the 2012 data collection was to identify a sample of cases missing the requisite scope items. Results of the analysis indicated that this step was only partially successful. Spot-checking of this portion of the sample found that many of the cases were not actually missing scope items, and therefore did not require documentation on that dimension. In addition, the evaluators did not appear to consistently identify cases with missing scope items using the RADAR tool.

PERSEREC research staff reviewed the documentation from the original adjudicator to identify any instances where the original adjudicator noted missing scope items in the unclassified rationale text box as instructed in the policy. An analysis of these notes did find that one central adjudication facility (CAF) documented all cases in the missing scope sample. However, it was not possible to determine whether this was due to adjudicator compliance with the documentation requirement or because the sampling strategy differed for this CAF.

RECOMMENDATIONS

Most of the recommendations aim to improve data collection to ensure (a) future RADAR evaluations are based on data that better represent cases with missing scope items and (b) evaluators use the RADAR tool as designed.

- (1) Recommend that the DoD CAF review policy and training for documenting missing scope items across all CAF divisions and ensure that they conform to the documentation requirements.
- (2) Recommend that PERSEREC and Case Adjudication Tracking System (CATS) staff work together to review the CATS adjudication database to identify any differences among DoD CAF divisions in the locations in which adjudication information is recorded. Use information from the review to ensure that the sampling strategy captures the correct data for future RADAR data collections.
- (3) Recommend that PERSEREC and CATS staff work together to review the CATS adjudication database to identify strategies for identifying cases with missing investigative scope items.
- (4) Recommend improvements to evaluator training to ensure they are correctly noting missing investigative scope items with the RADAR tool.
- (5) Recommend review of the RADAR tool to ensure branching logic is functioning correctly.
- (6) Recommend improvements to evaluator training to ensure correct use of branching logic.

TABLE OF CONTENTS

INTRODUCTION	1
ADJUDICATION QUALITY STANDARDS	1
ADJUDICATION QUALITY EVALUATION	2
Quality Measurement Tool: RADAR	2
Data	3
Evaluators	3
Quality Evaluation Approach	3
Interpretation of Results	4
2010 RADAR EVALUATION	4
CURRENT EVALUATION	4
METHODOLOGY	5
PARTICIPATING CAFS	5
SAMPLING PLAN	5
DATA	6
EVALUATORS	7
QUALITY EVALUATION APPROACH	7
DATA REVIEW	7
RESULTS	9
SAMPLE INFORMATION	9
Comparing Actual Sample to Sampling Plan	10
MISSING SCOPE ITEM DOCUMENTATION	12
DEROGATORY INFORMATION DOCUMENTATION	12
Disqualifying and Mitigating Condition Ratings	12
Overall Adjudication Evaluation	14
COMPARE 2010 AND 2012 EVALUATIONS	15
INCLUSION OF POLYGRAPH RESULTS	16
DISCUSSION	18
DEROGATORY INFORMATION DOCUMENTATION	18
MISSING SCOPE ITEM DOCUMENTATION	18
RECOMMENDATIONS	20
REFERENCES	21
APPENDIX A : RADAR ITEMS	A-1

LIST OF TABLES

Table 1 RADAR Sampling Plan Guidelines	6
Table 2 CAF Representation	9
Table 3 Investigation Type	9
Table 4 Eligibility Determinations	10
Table 5 Case Types in the Sample	11

TABLE OF CONTENTS

Table 6	Clean SSBI Cases with Documentation of Missing Scope Items _____	12
Table 7	Disqualifying and Mitigating Condition Ratings (n=88) _____	14
Table 8	Quality of Adjudication Decision Documentation _____	14
Table 9	Adjudication Decision Consistent with National Standards _____	15
Table 10	Detailed Reason Adjudication Decision Rated as Not Consistent with National Standards _____	15
Table 11	Compare Frequency and Percentage of Cases that Met Adjudication Decision Documentation Standards During 2010 and 2012 _____	16
Table 12	Compare Frequency and Percentage of Adjudication Decisions Rated as Consistent with National Standards During 2010 and 2012 __	16
Table 13	Inclusion of Polygraph Results _____	17

INTRODUCTION

Personnel security adjudication determines eligibility for access to classified information. It is a complex task and a critical component of the Department of Defense (DoD) Personnel Security Program. During adjudication, trained personnel (i.e., adjudicators) review investigative information and evaluate it against national adjudicative guidelines (*Adjudicative Guidelines for Determining Eligibility for Access to Classified Information*, 1997; revised December 2005). Based on the evaluation of investigative information, adjudicators decide whether the individual in question is an acceptable security risk under the guidelines.

Until recently, DoD lacked policy that specified the standards for documenting adjudication decisions. A Government Accountability Office (GAO) study estimated that 22 percent of DoD adjudicative files lacked documentation. This included cases with potentially derogatory information that were missing adequate descriptions of the adjudicator's rationale for granting eligibility (GAO, 2009). To help improve adjudication quality, DoD implemented adjudication documentation standards and developed a tool to measure compliance with the standards. This report presents the results of a quality compliance review using this tool. Specifically, the review evaluated the extent to which the documentation of a sample of adjudication decisions met quality standards.

ADJUDICATION QUALITY STANDARDS

In 2009, DoD developed quality standards for adjudication documentation in coordination with numerous stakeholders. These stakeholders included DoD central adjudication facility (CAF) personnel and personnel responsible for oversight of the DoD Personnel Security Program. DoD outlined the quality standards in a policy memorandum issued by the Under Secretary of Defense for Intelligence (USD[I]) (2009).

According to the quality standards, the cases requiring documentation include:

- (1) Every case where the current investigation includes significant derogatory information as defined by the national adjudicative guidelines (e.g., history of not meeting financial obligations), and
- (2) Every Single Scope Background Investigation (SSBI) with one or more missing standard scope item(s) that was not returned to the investigative service provider (ISP) for additional work. The most current Office of Personnel Management (OPM) product tables define the list of standard scope items (e.g., law enforcement checks).

For cases with significant derogatory information, the quality standards require that the adjudicator document the issues present in the case as well as disqualifying and mitigating conditions. If the mitigating conditions are not clearly identifiable, the standards require a short rationale explaining the decision. For

INTRODUCTION

SSBIs with missing standard investigative scope items, the standards require a brief description of the missing scope item(s) and the reason the adjudicator did not return the investigation to the ISP.

ADJUDICATION QUALITY EVALUATION

In addition to establishing adjudication quality standards, DoD also recognized the importance of evaluating compliance with the standards. To assist in this effort, the Defense Personnel and Security Research Center (PERSEREC) used the standards to develop an evaluation tool.

Quality Measurement Tool: RADAR

PERSEREC developed the Review of Adjudication Documentation Accuracy and Rationales (RADAR) in 2008 as a tool to evaluate adjudication quality in DoD (Nelson et al., 2009). Evaluators accessed RADAR through an internet interface. The internet interface allowed for branching logic and other electronic functions to help evaluators complete the evaluations.

RADAR organized the evaluation process around the steps of the adjudication process (i.e., review investigation, identify issue information, select disqualifying and mitigating conditions, document decision). The questions that made up RADAR helped quality evaluators assess whether adjudication decisions were: (a) based on sufficient investigative information, (b) identified adjudicative issues and took into account relevant disqualifying and mitigating conditions, and (c) adequately documented.

The RADAR section that covered the investigation included a list of investigation scope items as well as follow-up questions about the content of the background investigation (e.g., did adjudicators gather additional information, rate the quality of the information available for the adjudication, etc.). The section about adjudicative issues asked the evaluator to identify the issues within the investigative file (e.g., issues that put into question one's allegiance to the United States), as well as disqualifying and mitigating conditions. This section provided lists of the issues and conditions, and described them as they are outlined in the national adjudicative guidelines. Follow-up questions asked the evaluator to rate the original adjudicator's identification of issues and use of the disqualifying and mitigating conditions. Some of the questions asked whether the evaluator agreed that the information in the investigation supported the original adjudicator's use of the disqualifying or mitigating conditions, and whether the mitigating conditions were sufficient to offset the disqualifying information. The RADAR section for evaluating the adjudication documentation first provided a summary reminder of the requirements. The remainder of the section asked the evaluators to rate whether the original adjudicator's documentation met the requirements and whether the adjudication decision appeared consistent with the national adjudicative standards. APPENDIX A lists the RADAR items.

Data

Two types of data were essential to RADAR evaluations: (a) all of the investigative information available to the original adjudicator and (b) complete data documenting the original adjudicator's decision. For most cases, complete investigative data consisted of the reports of investigation (ROIs) from the ISP. Some cases also included additional investigative information obtained from the ISP or by the adjudicator after the original investigation was completed (e.g., a reopen request [REO], a letter to the subject and the subject's response).

Adjudicative data used for RADAR evaluations consisted of information obtained from the Case Adjudication Tracking System (CATS). DoD CAFs use CATS as their case management system. At the time of this data collection, each CAF used a version of CATS that was modified to a greater or lesser degree to accommodate CAF preferences. Adjudicators manage their caseload and document their determinations in CATS, typically by clicking on checkboxes to identify adjudicative issues, disqualifying, and mitigating conditions. Adjudicators enter supporting documentation in an open text box (e.g., for those cases where mitigating conditions are not clearly aligned with the adjudicative guidelines). The adjudicative data is stored in CATS and copied to the Joint Personnel Adjudication System (JPAS).

Evaluators

Individuals who evaluate adjudication quality with RADAR should be practicing adjudicators who are well versed in the DoD adjudication process. These individuals must be intimately familiar with the national adjudication guidelines because they are essentially auditing the work of other adjudicators. In addition to the required adjudication knowledge and experience, these evaluators also receive specialized RADAR training. The training allows these individuals to make independent evaluations about adjudication quality.

Quality Evaluation Approach

RADAR evaluations begin with evaluators comparing ROIs (i.e., the completed investigation) to checklists of investigation scope items. Next, evaluators review the ROI to identify derogatory information and classify it by adjudicative issue, including disqualifying and mitigating conditions. Evaluators document both missing scope items and issue information in RADAR. In essence, evaluators "readjudicate" the cases; they follow the same adjudication process used by the original adjudicators, using RADAR to document their findings. In the final steps, evaluators compare the information documented in RADAR to the information documented by the original adjudicator. Based on this comparison, evaluators determine whether they agree that the original adjudicator documented all required information and whether the documentation meets the standards defined by policy.

INTRODUCTION

Interpretation of Results

An important factor to keep in mind when reviewing RADAR evaluation results is that adjudication is a complicated decision-making process that requires the consideration of many disparate pieces of information. As the national adjudicative guidelines note, the ability to develop specific adjudicative thresholds is limited by the nature and complexity of human behavior and the adjudication decision must be an overall common sense judgment based on the careful weighing of many variables. As a result of this complexity, adjudicators may agree on an overall adjudication decision (i.e., to grant or deny eligibility), but may interpret issue information differently and differ in the way they apply the adjudicative guidelines. Correspondingly, agreement between the evaluators and the original adjudicators is usually greater at higher levels of analysis (e.g., adjudication documentation quality) than at more detailed levels of analysis (e.g., selection of disqualifying factors). As such, greater interest is found in the overall evaluations of whether adjudication documentation and decisions are consistent with standards; they provide a useful assessment of the level of consistency in practice, and adherence to policy guidelines, among those performing DoD adjudications.

2010 RADAR EVALUATION

PERSEREC conducted a RADAR adjudication quality evaluation on DoD adjudication decisions made in 2010 (L.C. Nelson & E.L. Lang, personal communication, May 2, 2011). Using RADAR, evaluators concluded that a majority of the sample of cases evaluated met DoD standards. That is, DoD adjudicators were correctly documenting the required information for case ROIs. However, the findings were only for cases containing significant derogatory information. Evaluations did not specifically target ROIs that were missing scope items, which, according to DoD policy (USD[I], 2009), also require documentation.

CURRENT EVALUATION

The goal of this evaluation was to use RADAR to ensure compliance with the DoD adjudication documentation standards. Unlike the previous RADAR evaluation, this evaluation sought to include both cases with potentially significant derogatory information and cases missing required scope items, as described in DoD policy (USD[I], 2009). Otherwise, the methods used in this evaluation were essentially the same as those employed in the 2010 evaluation. Evaluators audited a sample of cases provided from the CAFs, readjudicated the investigative information, and evaluated the documentation with RADAR. The results are presented in this report, followed by a comparison of the results to those from the RADAR audit performed in 2010.

METHODOLOGY

Data collection and case review methodology are described in the following sections. The first step was to plan the number and types of cases to include in the study. The second step was to obtain the data for the planned sample of cases. The third and final step consisted of the RADAR evaluations.

PARTICIPATING CAFS

As in the 2010 evaluation, the 2012 RADAR data collection included the DoD CAFs that adjudicated cases for the bulk of the DoD population: the Army Central Clearance Facility (Army CCF), the Department of the Navy Central Adjudication Facility (DONCAF), the Air Force Central Adjudication Facility (AFCAF), the Defense Industrial Security Clearance Office (DISCO), and the Washington Headquarters Services (WHS) CAF. Although DoD consolidated these CAFs into a single DoD CAF in fiscal year 2013, this report refers to the CAF structure prior to consolidation because the cases in the sample were adjudicated before consolidation.

SAMPLING PLAN

The sampling plan for this study focused on the case types identified in the DoD adjudication documentation policy (USD[I], 2009): (a) cases with significant derogatory information and (b) SSBI cases missing standard investigation scope items that were not returned to the ISP. This was the first data collection that specifically targeted cases with missing scope items for RADAR evaluation. Previous RADAR evaluations targeted cases with significant derogatory information only; cases with missing scope items were not specifically targeted for inclusion. Although the documentation requirement applies to all SSBI with missing scope items, the sampling plan for the current evaluation emphasized those with little to no derogatory information. Given that cases without derogatory information did not otherwise require documentation, they were a good test of whether adjudicators were complying with the requirement to document missing scope items.

Adjudication decisions may result in several possible eligibility determinations, based in part on the type of investigation performed. The most common types of eligibility are Secret (based on National Agency Check, Local Agency Check and Credit Check [NACLC]), Top Secret or Top Secret/Sensitive Compartmented Information (TS/SCI) Initial (based on SSBI), and Top Secret or TS/SCI Periodic Review (PR) (based on SSBI-PR or Phased PR). The highest eligibility granted by DISCO is Top Secret, but Army CCF, DONCAF, and AFCAF all adjudicate to TS/SCI. The sampling plan targeted cases with favorable Top Secret or TS/SCI Initial (based on SSBI), and Top Secret or TS/SCI PR (based on SSBI-PR or Phased PR) cases. The proposed sample did not include other types of eligibility determinations, such as Position of Trust, Loss of Jurisdiction, and No Determination Made because the documentation standards do not specifically apply to these types of decisions.

METHODOLOGY

As shown in Table 1, the sampling plan specified 150 cases each from Army CCF, DONCAF, AFCAF, and DISCO. Due to the smaller caseload at WHS, the sampling plan specified only 45 cases from this CAF. The overall sample size (645 cases) was selected to produce an estimated margin of error of 2.3%, with a 95% confidence level and a 90% response distribution (based on previous data collections). The sample consisted of one-third SSBI cases with derogatory information, one-third SSBI-PR or Phased Periodic Reinvestigation (PPR) cases with derogatory information, and one-third SSBI cases with little to no derogatory information that were missing standard scope items.

Table 1
RADAR Sampling Plan Guidelines

	Proposed Sample Size			Total
	SSBI Cases with Derogatory Information	SSBI Cases Missing Scope Items ¹	SSBI-PR Cases with Derogatory Information	
Army CCF	50	50	50	150
DONCAF	50	50	50	150
AFCAF	50	50	50	150
DISCO	50	50	50	150
WHS	15	15	15	45
Total	215	215	215	645

¹ Non-issue cases missing at least one standard scope item and not sent back to the ISP.

DATA

CATS staff used information available from CATS to select a stratified random sample of cases for RADAR evaluation. The first sampling factor was the case seriousness code assigned by the ISP (for the current data collection, the Office of Personnel Management, Federal Investigative Services [OPM-FIS] performed all of the investigations). OPM-FIS uses the case seriousness code to highlight the presence and seriousness of potential adjudicative issues. Although not a perfect indicator of the presence of personnel security issues, it was the best available criterion for independently identifying cases that adjudicators should document. For the purposes of the RADAR evaluation, cases with potentially significant derogatory information were identified by case seriousness codes that fell into either the moderate (B code), substantial (C code), or major (D code) categories.

Identifying cases that were missing scope items was a more difficult task because the data did not include a clear indicator to denote incomplete investigations (e.g., nothing similar to the case seriousness code). Instead, cases with missing scope items were identified from the pool of cases with little to no derogatory information (e.g., G or R coded cases – “No Issues” and “No Actionable Issues”, respectively). Identification of missing scope items was based on an electronic scan of the case

closing transmittal form from the ROI or on information provided by the original adjudicator in their documentation. The documentation requirement applied to cases that the adjudicator did not return to the ISP for additional information. As a result, the sample of incomplete cases was not to include any cases that had undergone a REO, a Special Interview (SPIN), or an Enhanced Subject Interview (ESI).

After CATS staff identified a set of cases meeting the specified criteria, they created an Excel dataset that contained adjudication documentation for each case. CATS staff used the case numbers from the Excel dataset to identify the electronic files containing the corresponding investigation information. CATS staff compiled the Excel dataset and zip files containing all the investigative information associated with each case and sent the information to PERSEREC via secure transfer. Data became available from each CAF at different times between November 2012 and February 2013.

EVALUATORS

The evaluators who conducted the RADAR evaluations received DoD adjudicator training but were not adjudicators at the DoD CAFs. Rather, they worked for a contractor organization (not affiliated with PERSEREC) that performed adjudicative work to support a government agency. The evaluators had the knowledge and experience to review investigative data, adjudicate cases, and use RADAR to make informed and independent evaluations of DoD adjudication documentation.

QUALITY EVALUATION APPROACH

After the data arrived at PERSEREC, PERSEREC research staff logged the data and sent it via encrypted disk to the firm employing the evaluators. The evaluators performed the RADAR evaluations described in this report from November 2012 to May 2013, as data became available from the participating DoD CAFs. They accessed RADAR through an internet website via a link provided by PERSEREC research staff. The evaluations themselves did not include any personally identifying information and collected no other privacy or sensitive data.

As described earlier, the evaluators essentially readjudicated each case, noting missing scope items and adjudicative issue information. After this information was documented in RADAR, the evaluator reviewed the adjudication documentation provided by the original adjudicator and rated the documentation against the quality standards.

DATA REVIEW

After the evaluations were complete, PERSEREC research staff reviewed the data to ensure that all cases in the sample received ratings. This review identified and eliminated a number of partial ratings where the evaluator appeared to have

METHODOLOGY

stopped part of the way through the evaluation and started over. Evaluators did not provide explanations in RADAR for the incomplete ratings, but they did perform complete ratings for these cases, which were retained. Approximately 60 cases received no ratings. These cases were returned to the evaluators and the ratings completed.

The review also identified a problem with the way the evaluators used the RADAR tool. When used correctly, evaluators document missing investigation scope items, all adjudicative issues, and overall ratings about whether the documentation conforms to policy requirements. RADAR uses branching logic to allow evaluators to skip the sections about missing scope items and disqualifying and mitigating conditions if the sections do not apply to the case. However, in the current evaluations, the evaluators skipped these sections incorrectly for many cases. Instead of using the checkboxes and other RADAR elements to document issues, the evaluators documented the issues in text boxes used for general comments for many of the cases.

Not only was this result unexpected, it led to concern about the thoroughness of the evaluations. To resolve these concerns, PERSEREC research staff carefully examined the data, particularly open-field comments by the evaluators. A review of these fields found that, despite not using the branching logic correctly, the evaluators identified the same issues in their comments that the original adjudicators identified. Unfortunately, while it appeared as though the evaluators performed the required case review and correctly identified derogatory information, because they used the branching questions incorrectly they bypassed the section on use of disqualifying and mitigating conditions and did not provide sufficient useful data on that dimension of the evaluations.

RESULTS

The Sample Information section of the results provides descriptive information regarding the sample and compares the actual sample to the planned sample. The next two sections (Missing Scope Item Documentation and Derogatory Information Documentation) summarize the results of the evaluations of the adjudication documentation (i.e., missing scope items and derogatory information). The following section (Compare 2010 and 2012 Evaluations) compares the results of the current evaluations to those from the 2010 analysis. The final section (Inclusion of Polygraph Results) reports on the frequency of polygraph results in background investigations. Future studies may examine adjudicator use of polygraph results, so the analysis assessed the prevalence of this information in the current sample of cases.

SAMPLE INFORMATION

The total number of cases in the sample was 651. The four largest CAFs provided similar numbers of cases (143 to 149 cases; see Table 2). WHS, with its smaller caseload, provided 63 cases (40% more than originally requested).

Table 2
CAF Representation

	Frequency	Percentage
Army CCF	148	22.7
DONCAF	148	22.7
AFCAF	143	22.0
DISCO	149	22.9
WHS	63	9.7
Total	651	100.0

The evaluations included three investigation types: SSBI, SSBI-PR, and PPR. See Table 3 for the distribution of cases across investigation type.

Table 3
Investigation Type

	Frequency	Percentage
SSBI	431	66.2
SSBI-PR	190	29.2
Phased PR	30	4.6
Total	651	100.0

RESULTS

Given that the sample included only SSIBs, SSIB-PRs, and PPRs, all eligibility determinations were either Top Secret or TS/SCI. Table 4 shows the distribution of eligibilities, as noted by the evaluators.

Table 4
Eligibility Determinations

	Frequency	Percentage
Top Secret	235	36.1
TS/SCI	416	63.9
Total	651	100.0

Comparing Actual Sample to Sampling Plan

The sampling plan targeted two main categories of cases: (a) SSIBs and SSIB-PRs or PPRs with potentially significant derogatory information and (b) SSIBs missing one or more scope items (e.g., credit check, law enforcement checks) but with little to no derogatory information. The strategy for identifying cases with derogatory information used the case seriousness code assigned by the ISP, which, in this case, was OPM-FIS. The strategy for identifying cases with missing scope items was more problematic and review of the final dataset found that the selected strategy was not very successful.

Cases with Derogatory Information

Cases with derogatory information consisted of those with B, C, and D case seriousness codes (moderate, substantial, and major issues, respectively). Overall, as shown in the column labeled “Issue” in Table 5, the sample met the targets for cases with derogatory information (target was 50 cases of each investigation type for the B, C, D column from Army CCF, DONCAF, AFCAF, and DISCO, and 15 from WHS).

Clean Cases Missing Standard Scope Items

The original sampling plan for cases missing standard scope items emphasized cases with minimal derogatory information because these cases did not otherwise require documentation. The first step in selecting this subset of the sample was to identify clean cases using the case seriousness code. Most of the cases selected had G or R case seriousness codes (no issues or no actionable issues, respectively). However, the Army CCF sample also included some A and E cases. The E code indicated that the case contained information that may affect a determination but that is not related to security/suitability considerations. The A code indicated potentially actionable issues which, standing alone, may not be disqualifying under security/suitability considerations. The analysis classified these cases as having little or no derogatory information. As shown in the columns labeled “Clean” in Table 5, the sample did not meet the sampling targets quite as well for the clean

cases as it did for cases with derogatory information. In particular, the Army CCF sample, despite the inclusion of A and E cases, included only 39 of the targeted 50 clean cases.

Table 5
Case Types in the Sample

	Clean		Issue	Total
	G or R	E or A	B, C, D	
Army CCF				
SSBI	11	28	59	98
SSBI-PR or PPR			50	50
DONCAF				
SSBI	48		50	98
SSBI-PR			50	50
AFCAF				
SSBI	43		50	93
SSBI-PR			50	50
DISCO				
SSBI	50		50	100
SSBI-PR or PPR			49	49
WHS				
SSBI	21		20	41
SSBI-PR or PPR			22	22
Total	173	28	450	651

The second step was to identify a subset of clean cases with missing scope items. As mentioned previously, the data did not contain a straightforward method for identifying cases with scope item deficiencies. The ISP did not assign a code such as that used for cases with derogatory information so the sampling strategy employed an electronic scan of the case closing transmittal form from the ROI or information provided by the original adjudicator.

The analysis used two approaches to assessing the effectiveness of this sampling strategy. The first was a review of the evaluator ratings of investigation completeness. Based on the RADAR data, evaluators identified only 11 cases as missing scope items. This was a surprisingly low number compared to what was prescribed by the sampling plan, so the next step was a scan of both adjudicator and evaluator comments and a spot-check of the ROIs. This step identified additional cases with missing scope items, but also corroborated the finding that many of the clean cases were not missing scope items (and should not have been included in the data). As a result, the available data did not provide a good evaluation of adjudicator documentation of missing scope items. Future data collection efforts should evaluate other options for identifying the necessary cases in order to better assess compliance with this documentation requirement.

RESULTS

MISSING SCOPE ITEM DOCUMENTATION

The sampling strategy for cases with missing scope items had limited success, so PERSEREC research staff reviewed documentation from the original adjudicators to identify any clean cases where the original adjudicator noted missing scope items. As Table 6 shows, few of the clean cases in the current sample included documentation of missing scope items. However, it is not possible to make definitive statements about adjudicator compliance with this documentation requirement, due to the deficiencies in the data. As mentioned earlier, the versions of CATS varied somewhat across CAFs and each CAF used different strategies to record and extract information from their version of CATS, so it is unclear whether information on missing scope items was not documented, not captured in the extraction, or not relevant to a case to begin with. One of the CAFs appears to have been consistent in its documentation, but without better information about the sampling strategy and better information about missing scope items, it would be incorrect to generalize from these findings.

Table 6
Clean SSBI Cases with Documentation of Missing Scope Items

	Frequency
Army CCF	39
DONCAF	11
AFCAF	1
DISCO	2
WHS	0

DEROGATORY INFORMATION DOCUMENTATION

RADAR assessed several aspects of adjudicator documentation of derogatory information. First, the evaluators assessed the original adjudicators' use of the disqualifying and mitigating conditions. Second, the evaluators made two overall assessments of the adjudication: (a) whether the documentation met DoD standards and (b) whether the adjudication decision was consistent with the national adjudicative guidelines.

Disqualifying and Mitigating Condition Ratings

There are two critical factors to keep in mind about the current evaluations of the use of disqualifying and mitigating conditions. First, as reported in the Methodology section, the evaluators used the open-text general comment fields rather than the checkboxes to report their evaluations of the original adjudicators' use of the disqualifying and mitigating conditions. As a result, only partial data was available for analysis (88 out of 450 cases).

The second critical factor is that adjudicators use judgment and interpretation to link specific investigative information to specific disqualifying and mitigating conditions and those judgments and interpretations can vary between adjudicators. For example, a report of investigation may state that a subject has a close friend who works in the same field but lives in a foreign country. Two adjudicators may both identify the Foreign Influence guideline as relevant to the adjudication decision. However, one adjudicator may apply disqualifying condition (a) while the other adjudicator may apply disqualifying condition (b) of the same guideline (disqualifying condition [a] the subject is at heightened risk for foreign exploitation and disqualifying condition [b] the relationship creates a potential conflict of interest for the subject, respectively). One disqualifying condition is not “wrong” and the other “right”; both are relevant to the facts of the case and allow the adjudicators to arrive at the same determination (i.e., grant or deny eligibility). Although these evaluations are informative, as mentioned, they are as likely, if not more so, to reflect differences in interpretation than to represent adjudicative errors. It is important to keep these factors in mind when reviewing the results of the disqualifying and mitigating condition evaluations reported in the following sections.

As noted in the data review section, evaluators did not use the branching logic correctly when identifying cases with potentially disqualifying information. The evaluators skipped the ratings of disqualifying and mitigating conditions for the majority of cases and only documented the disqualifying and mitigating conditions for 88 of approximately 450 cases. Table 7 shows the overall results for the ratings of the original adjudicators’ use of the disqualifying and mitigating conditions for those cases that the evaluators rated.

The evaluators showed more disagreement about the correct identification and documentation of the disqualifying and mitigating conditions than about whether documentation of the disqualifying and mitigating conditions met national standards. Overall, evaluators agreed with the original adjudicators on the relative strengths of the disqualifying and mitigating conditions for 95.5% of the cases with ratings. The evaluators also indicated that original adjudicator use of the disqualifying and mitigating conditions was consistent with national standards for 95.5% of the cases with ratings.

RESULTS

Table 7
Disqualifying and Mitigating Condition Ratings (n=88)

	Frequency¹	Percentage
Disqualifying Conditions NOT Correctly Identified and Documented	10	11.4
Mitigating Conditions NOT Correctly Identified and Documented	9	10.2
Relative Strengths of Disqualifying and Mitigating Conditions NOT Correctly Determined	4	4.5
Disqualifying and Mitigating Condition Usage Did NOT Meet National Standards	4	4.5

¹n=88.

Overall Adjudication Evaluation

The RADAR evaluation result of primary interest was the extent to which the adjudication documentation met DoD standards. Evaluators rated 649 of the 651 cases on this dimension (n=649). Both of the cases that evaluators did not rate were SSBI's with no issues (i.e., no potentially derogatory information). Out of the remaining 649 adjudication decisions, evaluators rated only one (0.2%) as having documentation that was unacceptable (see Table 8). According to the evaluator, the case that received the unacceptable rating received that rating because there were multiple issues present in the case that the adjudicator did not address. The evaluator did note that the original adjudicator could have mitigated the issues using information available in the ROI. In other words, the issue information did not warrant a negative eligibility determination.

Table 8
Quality of Adjudication Decision Documentation

	Frequency	Percentage
Total Meeting Documentation Standards (Acceptable or No Documentation Required)	648	99.8
Unacceptable	1	0.2
Total	649	100.0

The second overall assessment was whether the adjudication decision was consistent with national adjudication standards. Adjudicators failed to rate the same two cases as to whether the decision was consistent with national standards. As Table 9 shows, evaluators rated four of 649 decisions (0.6%) as NOT consistent with national adjudication standards (evaluators rated 99.4% of the cases as consistent with national adjudication standards). One of the four cases that received this rating was the case with the unacceptable documentation.

Table 9
Adjudication Decision Consistent with National Standards

	Frequency	Percentage
Consistent with Standards	645	99.4
Not Consistent with Standards	4	0.6
Total	649	100.0

PERSEREC research staff reviewed evaluator comments to understand the reasons evaluators rated the four adjudication decisions as not consistent with national standards. As summarized in Table 10, the reasons given for these ratings did not indicate that the original adjudicator should have denied eligibility. Instead, the ratings appeared to indicate that the evaluators disagreed with the strategies the original adjudicators used to mitigate disqualifying information, at least as described by the adjudication decision documentation.

Table 10
Detailed Reason Adjudication Decision Rated as Not Consistent with National Standards

Evaluator's Reason for Rating	Frequency
Evaluator disagreed with use of disqualifying or mitigating conditions <ul style="list-style-type: none"> • There were other undocumented, disqualifying, and mitigating conditions • Subject had outstanding debt that was not resolved but fell under the threshold 	2
There was no evidence in the investigation to support two of the issues identified by the adjudicator.	1
Documentation did not address all of the issues present in the case	1

Overall, the results of the RADAR evaluations indicated that over 99% of the adjudication decisions evaluated (a) met adjudication documentation standards and (b) were consistent with national adjudication standards.

COMPARE 2010 AND 2012 EVALUATIONS

Table 11 shows a comparison of the percentage of adjudication decisions from 2012 and 2010 that met documentation standards (L.C. Nelson & E. L. Lang, personal communication regarding 2010 information, May 2, 2011). In the 2012 analysis, a higher percentage of decisions met documentation standards. Overall, the percentage of decisions that met documentation standards increased from 95.5% in 2010 to 99.8% in 2012. In addition, the percentage of decisions meeting documentation standards increased for each of the participating CAFs.

RESULTS

Table 11
Compare Frequency and Percentage of Cases that Met Adjudication Decision Documentation Standards During 2010 and 2012

	2010 Evaluation			2012 Evaluation		
	N	Frequency	Percentage	N	Frequency	Percentage
Army CCF	158	143	90.5	148	148	100.0
DONCAF	160	153	95.6	148	148	100.0
AFCAF	148	143	96.6	143	142	100.0 ¹
DISCO	148	144	97.3	149	147	99.3 ¹
WHS	99	98	99.0	63	63	100.0
Total	713	681	95.5	651	648	99.8 ²

¹ One case in the provided sample was not rated on quality of documentation; thus, values were calculated using n=142 and n=148 for AFCAF and DISCO, respectively. ² Percentage was calculated using n=649.

Table 12 shows a comparison of the percentage of adjudication decisions from 2012 and 2010 that met national adjudication standards (2010 information from L.C. Nelson & E.L. Lang, personal communication, May 2, 2011). In the 2012 analysis, a higher percentage of decisions met adjudication standards. Overall, the percentage of decisions that met adjudication standards increased from 94.8% in 2010 to 99.4% in 2012. In addition, the percentage of decisions meeting documentation standards increased for each of the participating CAFs.

Table 12
Compare Frequency and Percentage of Adjudication Decisions Rated as Consistent with National Standards During 2010 and 2012

	2010 Evaluation			2012 Evaluation		
	N	Frequency	Percentage	N	Frequency	Percentage
Army CCF	158	144	91.1	148	148	100.0
DONCAF	160	154	96.3	148	147	99.3
AFCAF	148	140	94.6	143	140	98.6 ¹
DISCO	148	140	94.6	149	147	99.3 ¹
WHS	99	98	99.0	63	63	100.0
Total	713	676	94.8	651	645	99.4 ²

¹ One case in the provided sample was not rated on consistency with standards, thus values were calculated using n=142 and n=148 for AFCAF and DISCO, respectively. ² Percentage was calculated using n=649.

INCLUSION OF POLYGRAPH RESULTS

In preparation for potential future data collections, the analysis also looked at the prevalence of polygraph results in cases supplied for RADAR review. As shown in Table 13, only seven (1.1%) of the investigations in the sample included polygraph

results, and four (0.6% of the total sample) of those cases included those results with the rest of the investigation materials. For two (0.3% of the total sample) of the cases with polygraph results, a polygraph was included as a standard component of the investigation. For the remaining five (0.8% of the total sample) cases, the evaluator could not determine whether a polygraph was a standard component of the investigation or added to resolve an issue.

**Table 13
Inclusion of Polygraph Results**

	Frequency¹	Percentage
Included in Investigation Materials	7	1.1
Included with the Rest of the Investigation Materials	4	0.6
Included as a Standard Component or Added to Resolve an Issue	2	0.3
Don't Know Whether Included as a Standard Component or Added to Resolve an Issue	5	0.8

¹N=651.

DISCUSSION

DISCUSSION

This report summarizes the evaluation of the quality of the adjudication documentation of personnel security decisions made in 2012 at DoD CAFs. The assessment focused on documentation of a sample of cases with (a) potentially significant derogatory information (SSBIs, SSBI-PRs, PPRs) and (b) missing standard scope items (SSBIs only), as specified in DoD documentation standards.

DEROGATORY INFORMATION DOCUMENTATION

The RADAR evaluation showed that DoD adjudicators met documentation standards for virtually all cases in the sample with potentially derogatory information. This is a significant finding. It indicates that information about adjudicative issues and disqualifying and mitigating conditions is available for review by those who must make decisions based on the documentation and have access to the information through the Joint Adjudication Management System (JAMS) component of JPAS (the information may not be available through the Joint Clearance Access Verification System [JCAVS] component of JPAS).

One weakness of the quality assessment was evaluator use of the section of the RADAR tool that gathered information about disqualifying and mitigating conditions. This section of ratings aimed to collect detailed information about adjudicator use of these conditions, but evaluators chose to enter the information in open-text comment fields instead of using the checkboxes provided. The open-text fields were not amenable to quantitative analysis. Future evaluations will seek to prevent this problem with additional RADAR training and guidance for evaluators using the tool.

MISSING SCOPE ITEM DOCUMENTATION

The 2012 RADAR data collection was the first to evaluate documentation of missing scope items. However, study data did not allow for firm conclusions about adjudicator compliance with this documentation requirement because the sampling strategy did not successfully identify cases with missing scope items for all CAFs. A spot-check of the data found that many of the cases were not actually missing any scope items. In addition, the evaluators were not consistent in their identification of missing scope items. As a result, evaluation of the original adjudicators' compliance with this documentation requirement was not conclusive, although it appears there may be much room for improvement.

An analysis of notes by the original adjudicators did find that one CAF documented all cases in the missing scope sample. However, it was not possible to determine whether this was due to adjudicator compliance with the documentation requirement or because the sampling strategy differed for this CAF.

Future data collection efforts should evaluate other options for identifying the necessary cases in order to better assess compliance with this documentation

DISCUSSION

requirement. Consolidation of the DoD CAF and planned revisions to the CATS system will aid in preventing the issues faced in this study regarding potential differences in documentation and sampling methods.

RECOMMENDATIONS

RECOMMENDATIONS

Most of the recommendations aim to improve data collection to ensure that future RADAR evaluations are based on data that better represent cases with missing scope items and that evaluators use the RADAR tool as designed.

- (1) Recommend that the DoD CAF review policy and training for documenting missing scope items across all CAF divisions and ensure that they conform to the documentation requirements.
- (2) Recommend that PERSEREC and CATS staff work together to review the CATS adjudication database to identify any differences between DoD CAF divisions in the locations in which adjudication information is recorded. Use information from the review to ensure that the sampling strategy captures the correct data for future RADAR data collections.
- (3) Recommend that PERSEREC and CATS staff work together to review the CATS adjudication database to identify strategies for identifying cases with missing investigative scope items.
- (4) Recommend improvements to evaluator training to ensure that they are correctly noting missing investigative scope items with the RADAR tool.
- (5) Recommend review of the RADAR tool to ensure branching logic is functioning correctly.
- (6) Recommend improvements to evaluator training to ensure correct use of branching logic.

REFERENCES

Adjudicative Guidelines for Determining Eligibility for Access to Classified Information (1997); revised December, 2005.

Government Accountability Office. (2009, May). *DoD personnel clearances: Comprehensive timeliness reporting, complete clearance documentation, and quality measures are needed to further improve the clearance process*. GAO-09-400. Washington, DC: Author.

Nelson, L.C., Crawford, K.S., Richmond, D.A., Lang, E.L., Leather, J.E., Nicewander, P.P., Godes, O. (2009). *DoD personnel security program performance measures*, (MR 09-01). Monterey, CA: Defense Personnel Security Research Center.

Under Secretary of Defense for Intelligence. (2009, November 8). *Personnel security clearance adjudication documentation*. [Memorandum]. Washington, DC: Author.

DRAFT

**APPENDIX A:
RADAR ITEMS**

APPENDIX A

RADAR 2012 (09-12): RADAR INTRODUCTION

Background and Purpose

The purpose of RADAR (Review of Adjudication Documentation Accuracy and Rationales) is to gather information about adjudication decision documentation procedures in use at DoD Central Adjudication Facilities (CAFs).

RADAR asks you to review investigation case files and adjudication documentation and provide ratings about three components of adjudication decisions. You will rate the extent to which the decisions: a) were based on sufficient information, b) identified adjudicative issues and took into account relevant disqualifying and mitigating factors, and c) were adequately documented.

- (A) *Based on Sufficient Information:* The first step of the RADAR evaluation is to compare the contents of the case file to scope item checklists and note any missing investigative items. You will use the completed checklists to determine whether sufficient information was gathered to allow for adjudication decision making.
- (B) *Identified Adjudicative Issues:* The second step of the RADAR evaluation is to review the completed investigation to identify derogatory information and classify it by adjudicative issue. RADAR includes checklists for noting disqualifying and mitigating factors for each issue identified in the investigation. You will compare the completed checklists to the disqualifying and mitigating information noted by the original adjudicator to evaluate use of disqualifying and mitigating information.
- (C) *Adequately Documented:* The third step consists of evaluating the documentation of the adjudicative rationale to determine whether it provides enough detail to allow an outside reviewer to reconstruct the specific factors considered. Review the documentation to determine whether it meets the standards. The adjudicative rationale may appear in a separate file; if so, work with your supervisor to obtain the required information.

Background Information

- (1) Enter your Rater ID*
- _____
- (2) Enter Case Number*
- _____
- (3) Select the CAF that adjudicated the case.*
- () Army

APPENDIX A

- Navy
- Air Force
- DISCO
- WHS
- (4) Investigation Type*
 - SSBI
 - SSBI-PR
 - Phased PR
 - Other: _____
- (5) Adjudication Type*
 - Top Secret
 - Top Secret Periodic Reinvestigation
 - Top Secret/SCI
 - Top Secret/SCI Periodic Reinvestigation
 - Other: _____
- (6) OPM Issue Code
 - The Issue Code appears on Form 79A - Report of Agency Adjudicative Action.
 - The code is generally about 9 lines down on the right side of the page.*
 - F or G (no issues)
 - O or R (no actionable issues)
 - A
 - B
 - C
 - D
 - E
 - Q
 - W
 - Other: _____

Scope Items**Section 2: Evaluate Investigation Information**

(7) Was the investigation missing any scope items?*

Yes

No

Was the Subject Interview missing?*

Yes

No

Was the Subject deployed and not available to the investigator (e.g., overseas)?*

Yes

No

Don't Know

Missing Investigative Scope Items

Check the investigation against the Scope Item list. Place a check mark in the box in the Missing or Incomplete column if a scope item was not completed. Next, review the investigation to determine whether the investigator provided adequate explanation for the missing scope item. If an adequate explanation was not provided, place a check mark in the No Explanation box for that item.

The scope items are grouped into one of four categories (Standard, Conditional, Conditional: Spouse or Cohabitant, and By Request).

APPENDIX A

Standard Scope Items: Scope Items that are Always Included in a Specific Investigation Product

	Missing or Incomplete	No Explanation
App: Copy of completed application. For example, completed SF-86 or eQIP.	[]	[]
CRED: Credit check. Credit search of the National Credit Bureaus.	[]	[]
CRED DATE: Out-of-date Credit Report. Credit report was completed but report date more than one year prior to investigation close date.	[]	[]
DCII: Defense Clearance and Investigations Index. Check of DSS records of previous background investigations as well as other DoD conducted investigations (e.g., ACRD, OSI, etc.).	[]	[]
EDUC: Education. For all listed Registrars; to ensure complete coverage for timeframe additional personal or records may be obtained.	[]	[]
EMPL: Employment Record review (all employment) & personal testimonies (employed 6 months or more). For all part-time, intermittent, and self-employment. Records and corroboration for unemployment of more than 60 days. Former employment: Conduct through CONUS sources. Overseas: only checked if currently employed overseas.	[]	[]
FBIF/FBFN: FBI Identification (Criminal History). Classification attempted on all fingerprint submissions. Name check provided if results Unclassifiable.	[]	[]
LAW / LAC : Law Enforcement/Local Agency checks. Scheduled to appropriate jurisdictions for all locations of listed residence, employment, and education activities for the coverage period.	[]	[]
REFE: Reference check. Personal testimonies (2 minimum) from people who a) know Subject socially, b) have had significant contact with Subject, and c) span the scope. CONUS only. Scope: 5 years. : Notes: a) Reference coverage may be reported under other item types and b) at least one must be a developed character references.	[]	[]
RESI: Residence Check. Personal testimony for most recent CONUS residence of at least 6 months or more, as indicated on case papers. If current residence is less than 6 months, record, personal or collateral coverage is provided.	[]	[]
SII: Security/Suitability Investigations Index. Check of OPM historic record of investigations conducted for 16 years from the date of the last investigative activity.	[]	[]
SFBN: FBI Name check – Spouse/Cohabitant. Records Management Division (Investigations). Check of FBI maintained database of FBI conducted investigations for Spouse/Cohabitant names.	[]	[]

Conditional Scope Items: Scope items that are included in the investigation when defined conditions are met.

Place a check mark in the box in the Missing or Incomplete column for any scope items not completed. Place a second check mark in the No Explanation box, if the investigator did not provide an adequate explanation.

	Missing or Incomplete	No Explanation
CIAS: CIA Security check. Conducted when any of the following are true about the subject: a) foreign born; b) outside the U.S. for 90 days or more (other than for U.S. military service); c) outside the U.S. in excess of one year if on U.S. Government assignment; d) resided or traveled in certain countries identified by the requesting agency; or e) if marriage occurs during any of the above activities.	[]	[]
DCIF: Defense Clearance and Investigations Index File. Provide copies of available DCII files.	[]	[]
EMPL ER: Employment Inquiry. Follow-up for employment issues.	[]	[]
FBIN: FBI Records Management Division (Investigations). Check of FBI maintained database of FBI conducted investigations.	[]	[]
FINCEN: Financial Crimes Enforcement Network	[]	[]
FINL: Financial Issue follow-up. Follow-up review of creditor or bankruptcy records, including civil court actions such as judgments and liens. Conducted when Bankruptcy, Foreclosure, Credit Counseling, Judgments, Tax Liens, Civil Suits record(s) are identified; Student Loan, Child Support, and unpaid Government Overpayment reimbursement accounts identified as 120 days delinquent (or more) when total delinquency is \$1000 or greater; all other delinquent accounts (120 days or more) of \$1000 or more when total delinquency is \$7500 or greater, bankruptcy within the past two years or in years 3-5 if current delinquencies are identified, unless covered in prior investigation.	[]	[]
FORMER SPOUSE. Personal testimonies from all former spouses, unless former spouse is non-U.S. citizen residing overseas or a U.S. citizen residing overseas other than on a military base.	[]	[]
INS: INS/USCIS check. Includes check of “Systematic Alien Verification for Entitlements” program (SAVE) to confirm legal residency status. Conducted if subject claims he or she is NOT a U.S. citizen.	[]	[]
LAW PR: Police and/or Court Record review and follow-up. For all admitted arrests within the past 5 years.	[]	[]

APPENDIX A

	Missing or Incomplete	No Explanation
MEDI: Mental Health Treatment Record review and interview. Record review and interview with listed or developed mental/emotional health treatment provider, using specific release.	[]	[]
MILR: Military Personnel Records check. When military service, court martial, or disciplinary proceedings are shown, also anytime there is an indication of other than Honorable Discharge.	[]	[]
OUTS: Foreign Country Law Check. Interpol search. Conducted if Subject reports: a) Military service overseas (excluding Canada) for 90 days continuously or a combined six months or more in the last 5 years, or b) Foreign Residence, Education, or Employment for 90 days continuously or a combined six months or more in the last 5 years.	[]	[]
PUBR: Criminal or Civil Court Records review. For any cases involving the Subject, except when Subject is plaintiff and there is no indication of unfavorable information.	[]	[]
SESE: Selective Service check. Scheduled for all males born after 12/31/59 if currently at least 18 years of age	[]	[]
SIIF: Security/Suitability Investigations Index File. Provide copies of available SII files.	[]	[]
SPIN: Special Interview. Conducted with the Subject of investigation to allow the Subject to confirm, refute, provide additional information	[]	[]
STSC: State Department Security check. State Department Security check scheduled when SCI access 4 is requested and activities outside the U.S. exceed one year while on U.S. Government assignment, or exceed 90 days if outside the U.S. for other purposes.	[]	[]
SUBS: Substance Abuse Follow-up (Record Review and Interview). Record review and interview with listed or developed alcohol and/or drug treatment provider(s), using Specific Release.	[]	[]

Conditional Scope Items—Spouse or Cohabitant: Scope items that are included in the investigation when a current spouse or cohabitant is identified and other conditions are met.

Place a check mark in the box in the Missing or Incomplete column for any scope items not completed. Place a second check mark in the No Explanation box, if the investigator did not provide an adequate explanation.

	Missing or Incomplete	No Explanation
SDCF: DCII files - Spouse/Cohabitant. Provide copies of Spouse/Cohabitant DCII files.	[]	[]
SDCI: DCII check - Spouse/Cohabitant. DCII checked for trace records of DSS conducted Spouse/Cohabitant background investigations as well as other DoD conducted investigations (e.g. ACRD, OSI, etc)	[]	[]
SFBN: FBI Name check – Spouse/Cohabitant. Records Management Division (Investigations). Check of FBI maintained database of FBI conducted investigations for Spouse/Cohabitant names.	[]	[]
SFPN: FBI Fingerprint check – Spouse/Cohabitant. If Subject in Top Secret access, Spouse/Cohabitant FBI criminal history check. Classification attempted on all fingerprint submissions. Name check provided if results are unclassifiable.	[]	[]
SINS (COHAB/ FAMILY): INS/USCIS checks – Cohabitant, Family. Scheduled if Subject currently in Top Secret access, and cohabitant or family members are a) foreign born, b) currently residing in the US, and c) are listed on case papers.	[]	[]
SINS (SPOUSE): INS/USCIS check – Spouse. Scheduled if Subject’s spouse is foreign born AND access is 3,4, 5, or 6.	[]	[]
SSIF: SII files – Spouse/Cohabitant. Provide copies of Spouse/Cohabitant SII files.	[]	[]
SSII: SII check – Spouse/Cohabitant. Check of OPM’s historic record of investigations conducted for 16 years from the date of the last investigative activity for Spouse/Cohabitant.	[]	[]

APPENDIX A

By Request Scope Items: Scope items that are included only if the case includes documentation that the items were requested.

Place a check mark in the box in the Missing or Incomplete column for any scope items not completed. Place a second check mark in the No Explanation box, if the investigator did not provide an adequate explanation.

	Missing or Incomplete	No Explanation
BVS: Bureau of Vital Statistics. Requires specific request from CAF. Confirm birth record at listed State of birth. ONLY conducted if Mother's and Father's full names are provided.	<input type="checkbox"/>	<input type="checkbox"/>
SCIS: CIA Security check – Spouse. Conducted when any of the following are true: a) Spouse is foreign born, b) spouse resided or traveled in certain countries identified by the requesting agency. c) spouse currently lives outside the U.S.	<input type="checkbox"/>	<input type="checkbox"/>
STPA: State Dept Passport and/or Births Abroad check. Check of State Department maintained electronic files of births abroad. Search scheduled if case papers indicate foreign born and 240 data or Passport information is provided. May be used to verify U.S. citizenship.	<input type="checkbox"/>	<input type="checkbox"/>

Other Scope Missing

Was the investigation missing any scope items that did not appear in the preceding tables?*

Yes

No

Use the space below to list any missing scope items that did not appear in the tables.*

After reviewing the guidelines for adjudicating incomplete investigations, should the incomplete investigation have been returned to the investigation provider?*

Yes

No

Investigation Quality

- (8) After the CAF received the closed investigation, did someone at the CAF gather additional information or request additional information from the investigative service provider? (select all that apply)*

- Gathered additional information (CAF)
- Requested additional information from the investigative service provider (ISP)
- Don't Know
- No additional information gathered.

Was the additional information gathered by the CAF included in the case materials?*

- Yes
 - No
 - Don't Know
- (9) Rate the quality of the information available for the adjudication:*
- Complete** Investigation documentation contained every scope item and lead required by the national standards, included enough information to resolve all issues, and provided a thorough basis for the adjudication decision.
 - Adequate** Investigation was missing a few minor scope items or leads and/or the adjudicator was able to gather enough information to make an adjudication decision.
 - Unacceptable** Investigation did not include sufficient information for an adjudication decision.

Please indicate why the investigation was unacceptable. (select all that apply)

- It was missing key scope items without sufficient explanation.
- It did not include sufficient information to resolve issues.
- Other

Other reasons the investigation was unacceptable:*

- (10) Did the investigation materials include polygraph results?*
- Yes
 - No

Was the polygraph a standard component of the investigation or added to resolve an issue?*

- Standard

APPENDIX A

Added to the investigation to resolve an issue

Don't Know

Were the polygraph results included with the rest of the investigation materials?*

Yes

No

Adjudicative Issues

Section 3: Review Case for Disqualifying and Mitigating Factors

(11) Did the case include any potentially disqualifying information?*

Yes

No

Which of the following issues were identified by the disqualifying information? (select all that apply)*

a. Allegiance to U.S.

b. Foreign Influence

c. Foreign Preference

d. Sexual Behavior

e. Personal Conduct

f. Financial Considerations

g. Alcohol Consumption

h. Drug Involvement

i. Psychological Conditions

j. Criminal Conduct

k. Handling Protected Information

l. Outside Activities

m. Use of IT Systems

A. Allegiance to the United States

An individual must be of unquestioned allegiance to the United States. The willingness to safeguard classified information is in doubt if there is any reason to suspect an individual's allegiance to the United States.

Disqualifying Factors*

- a. involvement in, support of, training to commit, or advocacy of any act of sabotage, espionage, treason, terrorism, or sedition against the United States of America
- b. association or sympathy with persons who are attempting to commit, or who are committing, any of the above acts
- c. association or sympathy with persons or organizations that advocate, threaten, or use force or violence, or use any other illegal or unconstitutional means, in an effort to: 1) overthrow or influence the government of the United States or any state or local government; 2) prevent Federal, state, or local government personnel from performing their official duties; 3) gain retribution for perceived wrongs caused by the Federal, state, or local government; 4) prevent others from exercising their rights under the Constitution or laws of the United States or of any state.

Mitigating Factors

- a. the individual was unaware of the unlawful aims of the individual or organization and severed ties upon learning of these;
- b. the individual's involvement was only with the lawful or humanitarian aspects of such an organization;
- c. involvement in the above activities occurred for only a short period of time and was attributable to curiosity or academic interest;
- d. the involvement or association with such activities occurred under such unusual circumstances, or so much time has elapsed, that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or loyalty.

B. Foreign Influence

Foreign contacts and interests may be a security concern if the individual has divided loyalties or foreign financial interests, may be manipulated or induced to help a foreign person, group, organization, or government in a way that is not in U.S. interests, or is vulnerable to pressure or coercion by any foreign interest. Adjudication under this Guideline can and should consider the identity of the foreign country in which the foreign contact or financial interest is located, including, but not limited to, such considerations as whether the foreign country is known to target United States citizens to obtain protected information and/or is associated with a risk of terrorism.

APPENDIX A

Disqualifying Factors*

- [] a. contact with a foreign family member, business or professional associate, friend, or other person who is a citizen of or resident in a foreign country if that contact creates a heightened risk of foreign exploitation, inducement, manipulation, pressure, or coercion;
- [] b. connections to a foreign person, group, government, or country that create a potential conflict of interest between the individual's obligation to protect sensitive information or technology and the individual's desire to help a foreign person, group, or country by providing that information;
- [] c. counterintelligence information, that may be classified, indicates that the individual's access to protected information may involve unacceptable risk to national security;
- [] d. sharing living quarters with a person or persons, regardless of citizenship status, if that relationship creates a heightened risk of foreign inducement, manipulation, pressure, or coercion;
- [] e. 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;
- [] f. failure to report, when required, association with a foreign national;
- [] g. unauthorized association with a suspected or known agent, associate, or employee of a foreign intelligence service;
- [] h. indications that representatives or nationals from a foreign country are acting to increase the vulnerability of the individual to possible future exploitation, inducement, manipulation, pressure, or coercion;
- [] i. conduct, especially while traveling outside the U.S., which may make the individual vulnerable to exploitation, pressure, or coercion by a foreign person, group, government, or country.

Mitigating Factors

- [] a. the nature of the relationships with foreign persons, the country in which these persons are located, or the positions or activities of those persons in that country are such that it is unlikely the individual will be placed in a position of having to choose between the interests of a foreign individual, group, organization, or government and the interests of the U.S.;
- [] b. there is no conflict of interest, either because the individual's sense of loyalty or obligation to the foreign person, group, government, or country is so minimal, or the individual has such deep and longstanding relationships

and loyalties in the U.S., that the individual can be expected to resolve any conflict of interest in favor of the U.S. interest;

- [] c. contact or communication with foreign citizens is so casual and infrequent that there is little likelihood that it could create a risk for foreign influence or exploitation;
- [] d. the foreign contacts and activities are on U.S. Government business or are approved by the cognizant security authority;
- [] e. the individual has promptly complied with existing agency requirements regarding the reporting of contacts, requests, or threats from persons, groups, or organizations from a foreign country;
- [] f. the value or routine nature of the foreign business, financial, or property interests is such that they are unlikely to result in a conflict and could not be used effectively to influence, manipulate, or pressure the individual.

C. Foreign Preference

When an individual acts in such a way as to indicate a preference for a foreign country over the United States, then he or she may be prone to provide information or make decisions that are harmful to the interests of the United States.

Disqualifying Factors*

- [] a. exercise of any right, privilege or obligation of foreign citizenship after becoming a U.S. citizen or through the foreign citizenship of a family member. This includes but is not limited to: 1) possession of a current foreign passport; 2) military service or a willingness to bear arms for a foreign country; 3) accepting educational, medical, retirement, social welfare, or other such benefits from a foreign country; 4) residence in a foreign country to meet citizenship requirements; 5) using foreign citizenship to protect financial or business interests in another country; 6) seeking or holding political office in a foreign country; 7) voting in a foreign election.
- [] b. action to acquire or obtain recognition of a foreign citizenship by an American citizen;
- [] c. 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 interest;
- [] d. any statement or action that shows allegiance to a country other than the United States: for example, declaration of intent to renounce United States citizenship; renunciation of United States citizenship.

APPENDIX A

Mitigating Factors

- a. dual citizenship is based solely on parents' citizenship or birth in a foreign country;
- b. the individual has expressed a willingness to renounce dual citizenship;
- c. exercise of the rights, privileges, or obligations of foreign citizenship occurred before the individual became a U.S. citizen or when the individual was a minor;
- d. use of a foreign passport is approved by the cognizant security authority.
- e. the passport has been destroyed, surrendered to the cognizant security authority, or otherwise invalidated.
- f. the vote in a foreign election was encouraged by the U.S. Government

D. Sexual Behavior

Sexual behavior that involves a criminal offense, indicates a personality or emotional disorder, reflects lack of judgment or discretion, or which may subject the individual to undue influence or coercion, exploitation, or duress can raise questions about an individual's reliability, trustworthiness and ability to protect classified information. No adverse inference concerning the standards in this Guideline may be raised solely on the basis of the sexual orientation of the individual.

Disqualifying Factors*

- a. sexual behavior of a criminal nature, whether or not the individual has been prosecuted;
- b. a pattern of compulsive, self-destructive, or high risk sexual behavior that the person is unable to stop or that may be symptomatic of a personality disorder;
- c. sexual behavior that causes an individual to be vulnerable to coercion, exploitation, or duress;
- d. sexual behavior of a public nature and/or that reflects lack of discretion or judgment.

Mitigating Factors

- a. the behavior occurred prior to or during adolescence and there is no evidence of subsequent conduct of a similar nature;
- b. the sexual behavior happened so long ago, so infrequently, or under such unusual circumstances, that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;

c. the behavior no longer serves as a basis for coercion, exploitation, or duress.

d. the sexual behavior is strictly private, consensual, and discreet.

E. Personal Conduct

Conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations can raise questions about an individual's reliability, trustworthiness and ability to protect classified information. Of special interest is any failure to provide truthful and candid answers during the security clearance process or any other failure to cooperate with the security clearance process.

The following will normally result in an unfavorable clearance action or administrative termination of further processing for clearance eligibility:

- a. refusal, or failure without reasonable cause, to undergo or cooperate with security processing, including but not limited to meeting with a security investigator for subject interview, completing security forms or releases, including financial disclosure forms, if required, and cooperation with medical or psychological evaluation;
- b. refusal to provide full, frank and truthful answers to lawful questions of investigators, security officials, or other official representatives in connection with a personnel security or trustworthiness determination.

Disqualifying Factors*

- a. deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire, personal history statement, or similar form used to conduct investigations, determine employment qualifications, award benefits or status, determine security clearance eligibility or trustworthiness, or award fiduciary responsibilities;
- b. deliberately providing false or misleading information concerning relevant facts to an employer, investigator, security official, competent medical authority, or other official government representative;
- c. credible adverse information in several adjudicative issue areas that is not sufficient for an adverse determination under any other single guideline, but which, when considered as a whole, supports a whole-person assessment of questionable judgment, untrustworthiness, unreliability, lack of candor, unwillingness to comply with rules and regulations, or other characteristics indicating that the person may not properly safeguard protected information;
- d. credible adverse information that is not explicitly covered under any other guideline and may not be sufficient by itself for an adverse determination, but which, when combined with all available information supports a whole-

APPENDIX A

person assessment of questionable judgment, untrustworthiness, unreliability, lack of candor, unwillingness to comply with rules and regulations, or other characteristics indicating that the person may not properly safeguard protected information. This includes but is not limited to consideration of: 1) untrustworthy or unreliable behavior to include breach of client confidentiality, release of proprietary information, unauthorized release of sensitive corporate or other government protected information; 2) disruptive, violent, or other inappropriate behavior in the workplace; 3) a pattern of dishonesty or rule violations; 4) evidence of significant misuse of Government or other employer's time or resources.

- [] e. personal conduct, or concealment of information about one's conduct, that creates a vulnerability to exploitation, manipulation, or duress, such as (1) engaging in activities which, if known, may affect the person's personal, professional, or community standing, or (2) while in another country, engaging in any activity that is illegal in that country or that is legal in that country but illegal in the United States and may serve as a basis for exploitation or pressure by the foreign security or intelligence service or other group;
- [] f. violation of a written or recorded commitment made by the individual to the employer as a condition of employment;
- [] g. association with persons involved in criminal activity.

Mitigating Factors

- [] a. the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts;
- [] b. the refusal or failure to cooperate, omission, or concealment was caused or significantly contributed to by improper or inadequate advice of authorized personnel or legal counsel advising or instructing the individual specifically concerning the security clearance process. Upon being made aware of the requirement to cooperate or provide the information, the individual cooperated fully and truthfully.
- [] c. the offense is so minor, or so much time has passed, or the behavior is so infrequent, or it happened under such unique circumstances that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment;
- [] d. the individual has acknowledged the behavior and obtained counseling to change the behavior or taken other positive steps to alleviate the stressors, circumstances, or factors that caused untrustworthy, unreliable, or other inappropriate behavior, and such behavior is unlikely to recur;

- [] e. the individual has taken positive steps to reduce or eliminate vulnerability to exploitation, manipulation, or duress;
- [] f. the information was unsubstantiated or from a source of questionable reliability;
- [] g. association with persons involved in criminal activity has ceased or occurs under circumstances that do not cast doubt upon the individual's reliability, trustworthiness, judgment, or willingness to comply with rules and regulations.

F. Financial Considerations

Failure or inability to live within one's means, satisfy debts, and meet financial obligations may indicate poor self-control, lack of judgment, or unwillingness to abide by rules and regulations, all of which can raise questions about an individual's reliability, trustworthiness and ability to protect classified information. An individual who is financially overextended is at risk of having to engage in illegal acts to generate funds. Compulsive gambling is a concern as it may lead to financial crimes including espionage. Affluence that cannot be explained by known sources of income is also a security concern. It may indicate proceeds from financially profitable criminal acts.

Disqualifying Factors*

- [] a. inability or unwillingness to satisfy debts;
- [] b. indebtedness caused by frivolous or irresponsible spending and the absence of any evidence of willingness or intent to pay the debt or establish a realistic plan to pay the debt.
- [] c. a history of not meeting financial obligations;
- [] d. deceptive or illegal financial practices such as embezzlement, employee theft, check fraud, income tax evasion, expense account fraud, filing deceptive loan statements, and other intentional financial breaches of trust;
- [] e. consistent spending beyond one's means, which may be indicated by excessive indebtedness, significant negative cash flow, high debt-to-income ratio, and/or other financial analysis;
- [] f. financial problems that are linked to drug abuse, alcoholism, gambling problems, or other issues of security concern;
- [] g. failure to file annual Federal, state, or local income tax returns as required or the fraudulent filing of the same;
- [] h. unexplained affluence, as shown by a lifestyle or standard of living, increase in net worth, or money transfers that cannot be explained by subject's known legal sources of income;

APPENDIX A

- [] i. compulsive or addictive gambling as indicated by an unsuccessful attempt to stop gambling, “chasing losses” (i.e. increasing the bets or returning another day in an effort to get even), concealment of gambling losses, borrowing money to fund gambling or pay gambling debts, family conflict or other problems caused by gambling.

Mitigating Factors

- [] a. the behavior happened so long ago, was so infrequent, or occurred under such circumstances that it is unlikely to recur and does not cast doubt on the individual’s current reliability, trustworthiness, or good judgment;
- [] b. the conditions that resulted in the financial problem were largely beyond the person’s control (e.g., loss of employment, a business downturn, unexpected medical emergency, or a death, divorce or separation), and the individual acted responsibly under the circumstances;
- [] c. the person has received or is receiving counseling for the problem and/or there are clear indications that the problem is being resolved or is under control;
- [] d. the individual initiated a good-faith effort to repay overdue creditors or otherwise resolve debts;
- [] e. the individual has a reasonable basis to dispute the legitimacy of the past-due debt which is the cause of the problem and provides documented proof to substantiate the basis of the dispute or provides evidence of actions to resolve the issue;
- [] f. the affluence resulted from a legal source of income.

G. Alcohol Consumption

Excessive alcohol consumption often leads to the exercise of questionable judgment or the failure to control impulses, and can raise questions about an individual’s reliability and trustworthiness.

Disqualifying Factors*

- [] a. alcohol-related incidents away from work, such as driving while under the influence, fighting, child or spouse abuse, disturbing the peace, or other incidents of concern, regardless of whether the individual is diagnosed as an alcohol abuser or alcohol dependent;
- [] b. alcohol-related incidents at work, such as reporting for work or duty in an intoxicated or impaired condition, or drinking on the job, regardless of whether the individual is diagnosed as an alcohol abuser or alcohol dependent;

- [] c. habitual or binge consumption of alcohol to the point of impaired judgment, regardless of whether the individual is diagnosed as an alcohol abuser or alcohol dependent;
- [] d. diagnosis by a duly qualified medical professional (e.g., physician, clinical psychologist, or psychiatrist) of alcohol abuse or alcohol dependence;
- [] e. evaluation of alcohol abuse or alcohol dependence by a licensed clinical social worker who is a staff member of a recognized alcohol treatment program;
- [] f. relapse after diagnosis of alcohol abuse or dependence and completion of an alcohol rehabilitation program;
- [] g. failure to follow any court order regarding alcohol education, evaluation, treatment, or abstinence.

Mitigating Factors

- [] a. so much time has passed, or the behavior was so infrequent, or it happened under such unusual circumstances that it is unlikely to recur or does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;
- [] b. the individual acknowledges his or her alcoholism or issues of alcohol abuse, provides evidence of actions taken to overcome this problem, and has established a pattern of abstinence (if alcohol dependent) or responsible use (if an alcohol abuser);
- [] c. the individual who is a current employee who is participating in a counseling or treatment program, has no history of previous treatment and relapse, and is making satisfactory progress;
- [] d. the individual has successfully completed inpatient or outpatient counseling or rehabilitation along with any required aftercare, has demonstrated a clear and established pattern of modified consumption or abstinence in accordance with treatment recommendations, such as participation in meetings of Alcoholics Anonymous or a similar organization and has received a favorable prognosis by a duly qualified medical professional or a licensed clinical social worker who is a staff member of a recognized alcohol treatment program.

H. Drug Involvement

Use of an illegal drug or misuse of a prescription drug can raise questions about an individual's reliability and trustworthiness, both because it may impair judgment and because it raises questions about a person's ability or willingness to comply with laws, rules, and regulations.

APPENDIX A

- a. Drugs are defined as mood and behavior altering substances, and include:
1. Drugs, materials, and other chemical compounds identified and listed in the Controlled Substances Act of 1970, as amended (e.g., marijuana or cannabis, depressants, narcotics, stimulants, and hallucinogens), and
 2. inhalants and other similar substances;
- b. drug abuse is the illegal use of a drug or use of a legal drug in a manner that deviates from approved medical direction.

Disqualifying Factors*

- a. any drug abuse (see above definition);
- b. testing positive for illegal drug use;
- c. illegal drug possession, including cultivation, processing, manufacture, purchase, sale, or distribution; or possession of drug paraphernalia;
- d. diagnosis by a duly qualified medical professional (e.g., physician, clinical psychologist, or psychiatrist) of drug abuse or drug dependence;
- e. evaluation of drug abuse or drug dependence by a licensed clinical social worker who is a staff member of a recognized drug treatment program;
- f. failure to successfully complete a drug treatment program prescribed by a duly qualified medical professional;
- g. any illegal drug use after being granted a security clearance;
- h. expressed intent to continue illegal drug use, or failure to clearly and convincingly commit to discontinue drug use.

Mitigating Factors

- a. the behavior happened so long ago, was so infrequent, or happened under such circumstances that it is unlikely to recur or does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;
- b. a demonstrated intent not to abuse any drugs in the future, such as: 1) disassociation from drug-using associates and contacts; 2) changing or avoiding the environment where drugs were used; 3) an appropriate period of abstinence; 4) a signed statement of intent with automatic revocation of clearance for any violation
- c. abuse of prescription drugs was after a severe or prolonged illness during which these drugs were prescribed, and abuse has since ended;
- d. satisfactory completion of a prescribed drug treatment program, including but not limited to rehabilitation and aftercare requirements, without

recurrence of abuse, and a favorable prognosis by a duly qualified medical professional.

I. Psychological Conditions

Certain emotional, mental, and personality conditions can impair judgment, reliability, or trustworthiness. A formal diagnosis of a disorder is not required for there to be a concern under this guideline. A duly qualified mental health professional (e.g., clinical psychologist or psychiatrist) employed by, or acceptable to and approved by the U.S. Government, should be consulted when evaluating potentially disqualifying and mitigating information under this guideline. No negative inference concerning the standards in this Guideline may be raised solely on the basis of seeking mental health counseling.

Disqualifying Factors*

- a. behavior that casts doubt on an individual's judgment, reliability, or trustworthiness that is not covered under any other guideline, including but not limited to emotionally unstable, irresponsible, dysfunctional, violent, paranoid, or bizarre behavior;
- b. an opinion by a duly qualified mental health professional that the individual has a condition not covered under any other guideline that may impair judgment, reliability, or trustworthiness;
- c. the individual has failed to follow treatment advice related to a diagnosed emotional, mental, or personality condition, e.g., failure to take prescribed medication.

Mitigating Factors

- a. the identified condition is readily controllable with treatment, and the individual has demonstrated ongoing and consistent compliance with the treatment plan;
- b. the individual has voluntarily entered a counseling or treatment program for a condition that is amenable to treatment, and the individual is currently receiving counseling or treatment with a favorable prognosis by a duly qualified mental health professional;
- c. recent opinion by a duly qualified mental health professional employed by, or acceptable to and approved by the U.S. Government that an individual's previous condition is under control or in remission, and has a low probability of recurrence or exacerbation;
- d. the past emotional instability was a temporary condition (e.g., one caused by death, illness, or marital breakup), the situation has been resolved, and the individual no longer shows indications of emotional instability;

APPENDIX A

- e. there is no indication of a current problem.

J. Criminal Conduct

Criminal activity creates doubt about a person's judgment, reliability, and trustworthiness. By its very nature, it calls into question a person's ability or willingness to comply with laws, rules and regulations.

Disqualifying Factors*

- a. a single serious crime or multiple lesser offenses;
- b. discharge or dismissal from the Armed Forces under dishonorable conditions;
- c. allegation or admission of criminal conduct, regardless of whether the person was formally charged, formally prosecuted or convicted;
- d. individual is currently on parole or probation;
- e. violation of parole or probation, or failure to complete a court-mandated rehabilitation program.

Mitigating Factors

- a. so much time has elapsed since the criminal behavior happened, or it happened under such unusual circumstances that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment;
- b. the person was pressured or coerced into committing the act and those pressures are no longer present in the person's life;
- c. evidence that the person did not commit the offense;
- d. there is evidence of successful rehabilitation; including but not limited to the passage of time without recurrence of criminal activity, remorse or restitution, job training or higher education, good employment record, or constructive community involvement.

K. Handling Protected Information

Deliberate or negligent failure to comply with rules and regulations for protecting classified or other sensitive information raises doubt about an individual's trustworthiness, judgment, reliability, or willingness and ability to safeguard such information, and is a serious security concern.

Disqualifying Factors*

- a. deliberate or negligent disclosure of classified or other protected information to unauthorized persons, including but not limited to personal

or business contacts, to the media, or to persons present at seminars, meetings, or conferences;

- [] b. collecting or storing classified or other protected information at home or in any other unauthorized location;
- [] c. loading, drafting, editing, modifying, storing, transmitting, or otherwise handling classified reports, data, or other information on any unapproved equipment including but not limited to any typewriter, word processor, or computer hardware, software, drive, system, gameboard, handheld, “palm” or pocket device or other adjunct equipment;
- [] d. inappropriate efforts to obtain or view classified or other protected information outside one’s need to know;
- [] e. copying classified or other protected information in a manner designed to conceal or remove classification or other document control markings;
- [] f. viewing or downloading information from a secure system when the information is beyond the individual’s need-to-know;
- [] g. any failure to comply with rules for the protection of classified or other sensitive information;
- [] h. negligence or lax security habits that persist despite counseling by management.
- [] i. failure to comply with rules or regulations that results in damage to the National Security, regardless of whether it was deliberate or negligent.

Mitigating Factors

- [] a. so much time has elapsed since the behavior, or it has happened so infrequently or under such unusual circumstances, that it is unlikely to recur and does not cast doubt on the individual’s current reliability, trustworthiness, or good judgment;
- [] b. the individual responded favorably to counseling or remedial security training and now demonstrates a positive attitude toward the discharge of security responsibilities;
- [] c. the security violations were due to improper or inadequate training.

L. Outside Activities

Involvement in certain types of outside employment or activities is of security concern if it poses a conflict of interest with an individual’s security responsibilities and could create an increased risk of unauthorized disclosure of classified information.

APPENDIX A

Disqualifying Factors*

- a. any employment or service, whether compensated or volunteer, with: 1) the government of a foreign country; 2) any foreign national, organization, or other entity; 3) a representative of any foreign interest; 4) any foreign, domestic, or international organization or person engaged in analysis, discussion, or publication of material on intelligence, defense, foreign affairs, or protected technology;
- b. failure to report or fully disclose an outside activity when this is required.

Mitigating Factors

- a. evaluation of the outside employment or activity by the appropriate security or counterintelligence office indicates that it does not pose a conflict with an individual's security responsibilities or with the national security interests of the United States;
- b. the individual terminated the employment or discontinued the activity upon being notified that it was in conflict with his or her security responsibilities.

M. Use of Information Technology Systems

Noncompliance with rules, procedures, guidelines or regulations pertaining to information technology systems may raise security concerns about an individual's reliability and trustworthiness, calling into question the willingness or ability to properly protect sensitive systems, networks, and information. Information Technology Systems include all related computer hardware, software, firmware, and data used for the communication, transmission, processing, manipulation, storage, or protection of information.

Disqualifying Factors*

- a. illegal or unauthorized entry into any information technology system or component thereof;
- b. illegal or unauthorized modification, destruction, manipulation or denial of access to information, software, firmware, or hardware in an information technology system;
- c. use of any information technology system to gain unauthorized access to another system or to a compartmented area within the same system;
- d. downloading, storing, or transmitting classified information on or to any unauthorized software, hardware, or information technology system;
- e. unauthorized use of a government or other information technology system;

- f. introduction, removal, or duplication of hardware, firmware, software, or media to or from any information technology system without authorization, when prohibited by rules, procedures, guidelines or regulations;
- g. negligence or lax security habits in handling information technology that persist despite counseling by management;
- h. any misuse of information technology, whether deliberate or negligent, that results in damage to the national security.

Mitigating Factors

- a. so much time has elapsed since the behavior happened, or it happened under such unusual circumstances, that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment;
- b. the misuse was minor and done only in the interest of organizational efficiency and effectiveness, such as letting another person use one's password or computer when no other timely alternative was readily available;
- c. the conduct was unintentional or inadvertent and was followed by a prompt, good-faith effort to correct the situation and by notification of supervisor.

Use of Disqualifying and Mitigating Information

Issues identified by the original adjudicator:*

- Original Adjudicator did not identify any issues
- a. Allegiance to U.S.
- b. Foreign Influence
- c. Foreign Preference
- d. Sexual Behavior
- e. Personal Conduct
- f. Financial Considerations
- g. Alcohol Consumption
- h. Drug Involvement
- i. Psychological Conditions
- j. Criminal Conduct
- k. Handling Protected Information

APPENDIX A

l. Outside Activities

m. Use of IT Systems

Considering only the issues the original adjudicator identified, did you agree with the disqualifying factors the adjudicator identified?*

Yes

No

Why didn't you agree with the disqualifying factors the original adjudicator identified? (select all that apply)*

The adjudicator should have identified other disqualifying factors for that issue, as well.

The disqualifying factors identified were not supported by the information in the investigation.

Other

Other reasons you didn't agree with the original adjudicator's disqualifying factor choices:*

Considering only the issues the original adjudicator identified, did you agree with the mitigating factors the adjudicator identified?*

Yes

No

Why didn't you agree with the mitigating factors the original adjudicator identified? (select all that apply)*

The adjudicator should have identified other mitigating factors, as well.

The mitigating factors identified were not supported by the information in the investigation.

Other

Other reasons you didn't agree with the original adjudicator's mitigating factor choices:*

Use of Disqualifying and Mitigating (2)

Were the relative strengths of the disqualifying and mitigating factors correctly determined? (for example, if mitigating factors were judged as strong enough to overcome disqualifying factors, was the judgment consistent with the national standards?)*

Yes

No

If No, please explain:*

Evaluate the original adjudicator's use of disqualifying and mitigating factors.*

Acceptable. Evaluations of disqualifying and mitigating factors were in accordance with adjudicative guidelines, took into account all relevant information and were clearly linked to the guidelines.

Unacceptable.

Why was the original adjudicator's use of the disqualifying and mitigating factors unacceptable (select all that apply).*

Was not consistent with the adjudicative guidelines.

Did not take into account all relevant information.

Gave some information too much or too little emphasis.

The original adjudicator should have identified Personal Conduct as one of the issues present in the case.

Other

Other reasons the adjudicator's use of the disqualifying or mitigating factors was unacceptable:*

Other Disqualifying and Mitigating

Was a condition, deviation or waiver noted?*

Yes

No

Don't Know

In some cases, it may be possible to grant eligibility in the presence of disqualifying or derogatory information that is not clearly mitigated.

Did the most recent investigation include a disqualifying condition that was not clearly mitigated AND did the adjudicator grant eligibility?*

Yes

No

If yes, please describe the disqualifying condition that was not clearly mitigated (where possible, provide the approximate timeframe or date of occurrence and detailed information about the issue or event).*

APPENDIX A

Documentation Review

Section 4: Review the Adjudication Decision Documentation

Cases Requiring Documentation:

- (A) All cases that include significant derogatory information must be documented and the documentation must indicate the issue and the disqualifying and mitigating factors.
- (B) All SSBIs that are missing one or more standard investigative scope items and that are NOT returned to the investigative service provider (ISP) for additional work must be documented and that documentation must include an explanatory rationale.

Significant Derog, mitigated: only summary documentation required. For cases that include derogatory information that is clearly mitigated, the documentation may be in summary/abbreviation format, no additional rationale required (e.g., FORINF DIS-A MIT-A; CRIM/ALCH DIS-A MIT-A, DIS-A MIT-A).

Derog, NOT clearly mitigated: rationale required. For cases that include derogatory information that is NOT clearly mitigated by a standard mitigating condition, the documentation must include a rationale or explanation.

SSBI missing *standard* scope item(s) and not returned to ISP: rationale required. For SSBIs missing one or more *standard* scope items that were not returned to the ISP for additional work, the documentation must include a rationale or explanation.

Exception granted: rationale required. For cases where the adjudicator granted an exception, (condition, deviation, or waiver), the documentation must include a rationale or explanation.

Bond Amendment waiver granted: rationale required. For cases where the adjudicator granted a Bond Amendment waiver, the documentation must include a rationale or explanation for the waiver.

(12) Rate the quality of the adjudication decision documentation provided by the adjudicator:*

- () **Documentation not required.** The decision did not require documentation, in accordance with the standards laid out in the *Adjudication Documentation Standards* (October 27, 2009)
- () **Acceptable.** Documentation met the standards laid out in the *Adjudication Documentation Standards* (October 27, 2009)
- () **Unacceptable.** Documentation did not meet the standards laid out in the *Adjudication Documentation Standards* (October 27, 2009)

Reason the adjudication documentation was unacceptable:*

- Significant Derog, mitigated: No summary documentation or other explanation provided.
- Derog, NOT clearly mitigated: No rationale provided.
- SSBI missing *standard* scope item(s) and not returned to ISP: No rationale provided.
- Exception granted: No rationale provided.
- Bond Amendment waiver granted: No rationale provided.
- Other

Other reasons the documentation was unacceptable:*

- (13) Does the adjudication decision appear consistent with the national adjudicative standards?*
- Yes
 - No

If no, please explain.*

Higher Level Review

Section 5: Case Review Documentation

- (14) Did the case receive higher-level review?*
- Yes
 - No
 - Don't Know

Did all reviewers document their comments and/or review?*

- Yes
- No

Rate the quality of the case review documentation:*

- Acceptable.** Documentation detailed all factors considered and provided a clear explanation of information use and decision processes.
- Unacceptable.** Documentation was missing many key factors, did not explain decision rationale and/or was rambling and/or unclear.
- No Documentation Provided.**

If the case review documentation was unacceptable, please explain:*

APPENDIX A

SOR/LOI Documentation

Section 7: Statement of Reasons or Letter of Intent Documentation

(15) Was a Statement of Reasons, Letter of Intent or other denial or revocation issued?*

Yes

No

Don't Know

Rate the quality of the SOR, LOI or other denial or revocation documentation:*

Acceptable. Documentation detailed the relevant adjudicative guidelines and all factors considered and provided a clear explanation of information use and decision processes.

Unacceptable. Documentation was missing many key factors, failed to reference the adjudicative guidelines or did so incorrectly, did not explain decision rationale and/or was rambling and/or unclear.

No Documentation Provided.

If the denial or revocation documentation was unacceptable, please explain:*

Overall Comments

Section 8: Overall Comments (optional)

(16) Please use the space below to enter any additional comments.

Thank You!

YOU ARE FINISHED, THANK YOU!

Your information has been submitted into our database.

You may now return to the main page to [enter a new record](#), or close your browser and finish.
