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DoD Personnel Security Program Performance Measures

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BACKGROUND

This report describes Defense Personnel Security Research Center (PERSEREC) activities to develop and implement performance measures for the DoD Personnel Security Program. The measures were developed to (1) assess specific, long-term aspects of program performance and (2) meet Office of Management and Budget (OMB) Program Assessment Rating Tool (PART) requirements.

Three performance components were identified as important: cost, quality, and timeliness, and measures were developed for each component. Three stages of the DoD Personnel Security Program were assessed: (1) the Personnel Security Questionnaire (PSQ) submission stage, (2) the investigation stage, and (3) the adjudication stage. This report provides archival documentation of the project and guidance for future performance assessment efforts.

HIGHLIGHTS

Overall, significant progress was made toward development and implementation of performance measures for the DoD Personnel Security Program. Cost measures were developed and baseline data gathered for the investigation and adjudication stages of the program. PSQ submission cost measures will be developed in FY09. Quality measures were identified or developed for all three program stages. Baseline quality data were reported for the PSQ submission stage and will be collected for the investigation and adjudication stages in FY09. Timeliness measures were established and baseline data reported for all program stages. Where baseline data were collected, the results were used to set performance goals for FY09 and out-years.

PREFACE

The Department of Defense (DoD) Personnel Security Program plays an important role in national security, and DoD has a long-standing interest in program performance. The personnel security program has also received high-level attention from Congress, the Office of Management and Budget, the Government Accountability Office, and others, much of it concerned with the amount of time the process requires.

In addition to addressing timeliness concerns, the work described in the current report includes measures of program performance in the areas of cost and quality. The cost and quality measures provide useful information in and of themselves, and by including measures of cost and quality, DoD can ensure that timeliness improvements are not made at the expense of these other important aspects of program performance. The work described in this report makes important strides towards ensuring that all three important components of performance are taken into account.

James A. Riedel
Director

EXECUTIVE SUMMARY

The purpose of the work described in this report was to develop performance measures and gather baseline performance data for the Department of Defense (DoD) Personnel Security Program. The performance measures addressed DoD interest in program performance and also met requirements of the Office of Management and Budget (OMB) Program Assessment Rating Tool (PART).

Performance measures targeted three stages that of the personnel security program: (1) Personnel Security Questionnaire (PSQ) submission, (2) investigation, and (3) adjudication. For each stage, measures were identified or developed to measure cost, quality, and timeliness. The research further targeted three types of personnel security cases: 1) Secret cases, 2) Top Secret/ Sensitive Compartmented Information (SCI) – Initial cases, and 3) Top Secret/SCI – Periodic Reinvestigation (PR) cases. The data collection verified that the measures were useful and provided information about program performance in important areas.

Three key performance areas were identified for the DoD Personnel Security Program: (1) cost, (2) quality, and (3) timeliness to provide DoD with useful performance information for program oversight and management. Staff at the Office of the Under Secretary of Defense for Intelligence, Security Directorate, received updates and result summaries at earlier stages in the project, as needed to meet PART reporting requirements.

COST MEASURES

Cost measures were developed and baseline data collected for the investigation and adjudication stages of the DoD Personnel Security Program. PSQ submission cost measures will be developed in FY09. Investigation costs were computed for those investigations performed by the Office of Personnel Management (OPM) and included only direct charges from OPM to DoD. The OPM charges included the OPM Federal Investigations Notice (FIN) costs for each investigation type and the costs for supplemental work requested by DoD adjudicators and performed by OPM investigators.

The adjudication cost measure focused on labor and benefits costs because there was the most similarity among the DoD central adjudication facilities (CAFs) in the handling of these costs. CAFs differed in overhead cost handling, for example, because some of the CAFs were not directly responsible for overhead costs. Baseline data collection found that adjudication costs were fairly low per case, and that it was much less costly to adjudicate a case than it was to investigate a case.

Another observation from the data was that investigations for Secret cases generated significant numbers of requests for supplemental work. These requests resulted in increased investigative costs as well as significant delays in the adjudication process. Not only were cases delayed by the supplemental work, they were also delayed due to additional time spent in handling and transit.

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The difference in the relative costs of the investigation and adjudication stages suggests that the investigation stage and the requests for supplemental work may be the most likely point achieving greater cost effectiveness. The first step in the evaluation would be to gain a better understanding of the nature of the requests. The resulting information could be used to identify strategies for reducing those requests and, consequently, reducing program costs.

QUALITY MEASURES

Quality measures were identified or developed for all three stages of the DoD Personnel Security Program. The PSQ submission quality measure consisted of the PSQ submission results reported by OPM in National Security Oversight Reports. DoD has goals in place for PSQ submission quality, and the data from the National Security Oversight Reports showed that DoD was within a few percentage points of meeting those goals (e.g., the goal states that 100% of cases will be submitted using e-QIP, and for all three case types during the period of this study, between 94% and 98% were submitted with e-QIP). There are also plans to work with OPM to obtain more detailed data that can be used to identify and resolve recurring PSQ submission errors.

The investigation measure targeted information about two aspects of investigative performance: quality and supplemental. The quality part of the measure would assess investigative performance relative to the investigation provider's standards for investigations. Data from the quality measure would document that investigations met standards and identify any areas for improvement. The supplemental measure would assess investigative performance in areas in which adjudicators would like to see additional investigative work. Data from the supplemental measure would help identify additional investigative checks that DoD could request be added for DoD investigations.

DoD adjudicators were not available to pilot-test the investigative performance measure, but the CAFs provided copies of reports of investigation received from OPM. Contractor adjudicators conducted a preliminary evaluation of the investigation quality measure by using it to evaluate the reports of investigation provided by the CAFs and were able to verify the measure's usefulness. The measure will be used to collect baseline investigation quality data in FY09.

The adjudication quality measure was developed to assess how well adjudication decision documentation met standards. The measure was pilot-tested during the FY08 data collection period and employed the same group of experienced contractor adjudicators that reviewed the investigation quality measure. The pilot test demonstrated the usefulness of the measure but also highlighted the need for DoD-wide adjudication decision documentation standards. Work is underway to assist DoD in preparing and implementing the necessary standards and recording mechanisms (i.e., in JPAS). If the standards and recording mechanisms are implemented, baseline adjudication quality data will be collected in FY09.

TIMELINESS MEASURES

Timeliness data were available for one measure of PSQ submission timeliness and for two measures of investigation and adjudication timeliness. OPM supplied the data for the measure of PSQ submission timeliness because OPM handles PSQ submissions. The data provided a measure of the average timeliness of PSQ submissions for the different types of cases. The two measures for the investigation and adjudication stages focused on the fastest 90% of cases; that is, the data used to compute both timeliness measures did not include the 10% of cases that took the longest to complete. The first investigation and adjudication timeliness measure consisted of the *average* number of days to complete the fastest 90% of cases. The second measure consisted of the *maximum* number of days to complete a case from the same group of cases (the fastest 90%).

Of the performance measures discussed in this report, the timeliness measures have been the target of the most development work. Average timeliness results have been reported for the Intelligence Reform Terrorism Prevention Act of 2004 for several years, and the data used to compute the measures comes from data sources that have undergone extensive analysis.

The timeliness results indicated that there is room for improvement in both investigation and adjudication timeliness. In particular, maximum time requirements tend to be many times longer than average time requirements. It would be useful to gain a better understanding of the reasons for the differences between average and maximum timeliness measures and the percentage of cases that take significantly longer than the average.

CONCLUSION

Overall, DoD made significant progress in meeting PART metric requirements and establishing baseline performance status for critical stages of the DoD Personnel Security Program. DoD plans to develop short- and long-range performance goals and will gather data in FY09 to assess performance or develop baselines, as needed.

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INTRODUCTION

This report describes performance measure development for the Department of Defense (DoD) Personnel Security Program and summarizes initial data collection efforts. The performance measures addressed DoD interest in program performance and also met requirements of the Office of Management and Budget (OMB) Program Assessment Rating Tool (PART). PART is a diagnostic tool that federal government agencies use to assess and improve the performance of agency programs. Factors measured by PART include program purpose, design, management, and performance. This report describes efforts to develop performance measures for the DoD Personnel Security Program that: (1) reflect the personnel security program's purpose, (2) focus on specific, long-term aspects of performance, and (3) meet PART requirements.

DOD PERSONNEL SECURITY PROGRAM

The purpose of the DoD Personnel Security Program is to evaluate DoD military, civilian, and contractor personnel who require access to classified information. The evaluation is a multistage process that conforms to the requirements of Executive Order (E.O.) 12968, *Access to Classified Information* (1995). The end result of the process is a determination about an individual's eligibility for initial or renewed access to classified information. The next two sections describe components of the personnel security program and establish common terminology that will be used throughout the report.

Program Stages

The DoD Personnel Security Program consists of three primary stages: Stage 1: Personnel Security Questionnaire (PSQ) Submission, Stage 2: Investigation, and Stage 3: Adjudication. The stages are described in more detail below.

Stage 1: PSQ Submission

The PSQ required to initiate a background investigation is Standard Form 86 (SF-86), *Questionnaire for National Security Positions*. The PSQ asks applicants to provide personal history information, including information about citizenship status of self and relatives; residence, employment, and education history; criminal activity, if any; financial history, and other information. Individuals may complete the PSQ using one of two formats: online through the Office of Personnel Management (OPM) Electronic Questionnaire for Investigations Processing (e-QIP) or using the hard copy SF-86. The majority of PSQ submissions are made using e-QIP. After the applicant completes the PSQ, it is reviewed by a security manager and submitted to the investigation provider, which for DoD is nearly always OPM.

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Stage 2: Investigation

The investigation stage consists of background information gathering activities that may include automated record checks, interviews with the subject or references, and other information gathering activities. OPM conducts nearly all personnel security investigations for DoD.

Investigative requirements are outlined in the national *Investigative Standards for Background Investigations for Access to Classified Information* (1997); revised December 2004. The extent of the investigation varies with type of security clearance or level of access required and presence or absence of adjudicative issues. The following is a list of the three standards and the associated investigation types outlined in the *Investigative Standards* (1997; rev. 2004) that were the focus of the performance measures:

Standard A specifies that the National Agency Check with Local Agency Checks and Credit Check (NACLC) is the investigative standard for Confidential and Secret investigations and reinvestigations. In addition, OPM uses the Access National Agency Check with Written Inquiries (ANACI) in place of the NACLC for government employees. The ANACI meets Standard A requirements and includes additional written inquiries.

Standard B specifies that the Single Scope Background Investigation (SSBI) is the investigative standard for initial Top Secret investigations as well as initial investigations for any type of Sensitive Compartmented Information (SCI) access.

Standard C specifies that the SSBI Periodic Reinvestigation (SSBI-PR) or the Phased Periodic Reinvestigation (PPR) is the investigative standard for Top Secret reinvestigations as well as reinvestigations for any type of continued Sensitive Compartmented Information (SCI) access.

Stage 3: Adjudication

The adjudication stage refers to the process employed at DoD central adjudication facilities (CAFs) to review investigative information and evaluate it against the national *Adjudicative Guidelines for Determining Eligibility for Access to Classified Information* (1997); revised December 2005. The adjudication process results in a determination about applicant eligibility for access to classified information. Access may be: (1) granted or continued, (2) denied or revoked, or (3) the case may be closed for some other reason (e.g., access is no longer required). A positive access eligibility determination is also commonly referred to as a security clearance.

Table 1 provides a summary of the major stages of the DoD Personnel Security Program.

Table 1
Stages of the DoD Personnel Security Program

<i>Stage</i>	<i>Description</i>
<i>Stage 1: PSQ Submission</i>	Process for submitting the completed questionnaire for national security positions (SF-86).
<i>Stage 2: Investigation</i>	Process used by OPM or one of its contractors to gather background information.
<i>Stage 3: Adjudication</i>	Process used by DoD adjudicators to review and evaluate investigative information and make an access eligibility determination.

For PART purposes, DoD specified that the performance measures would only include the three stages described above and would not include the due process stage. Due process refers to the procedures individuals may use to appeal adverse adjudication decisions and occurs in only a very small proportion of cases. In addition, the exclusion of due process corresponds to the approach OPM uses when reporting data to OMB in the National Security Oversight Reports and helps keep the DoD data congruent with those reports.

Case Types

As described above, the DoD Personnel Security Program includes several types of personnel security investigations and several types of adjudication decisions and access eligibility determinations. Certain combinations of investigations and access eligibility determinations occur more frequently than others. These common combinations are outlined in Standard A, Standard B, and Standard C that appear in the description of the investigation stage. Throughout this report, the term "case type" will be used to refer to these common combinations of investigations and adjudication decisions. The three case type categories used in this report are: (1) Secret, (2) Top Secret/Sensitive Compartmented Information (SCI), and (3) Top Secret/SCI Periodic Reevaluation (PR). More information about the case types is provided below.

Secret

The Secret case type is equivalent to Standard A and includes all adjudication decisions that are based on initial NACLC investigations, NACLC reinvestigations, or ANACI investigations. Generally speaking, these are determinations about initial or renewed Secret or Confidential access eligibility.

Top Secret/SCI – Initial

The Top Secret/SCI – Initial case type is equivalent to Standard B and includes all adjudication decisions that are based on the SSBI. The vast majority of these access eligibility determinations are Top Secret or SCI determinations. On rare occasions the SSBI is also used to investigate an individual requiring Secret level eligibility (e.g., when more detailed background information is required out of concern about the individual's personal history, there may be a need to upgrade to

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Top Secret eligibility while the investigation is still current, or the individual requires SCI access but not Top Secret eligibility).

Top Secret/SCI – Periodic Re-evaluation (PR)

The Top Secret/SCI – PR case type is equivalent to Standard C and includes all adjudication decisions that are based on either the SSBI-PR or the PPR. The vast majority of these access eligibility determinations are for continued or renewed Top Secret or SCI eligibility.

PERFORMANCE MEASURES

Three key performance areas were identified for the DoD Personnel Security Program: (1) cost, (2) quality, and (3) timeliness. Information about program performance in these three areas will provide DoD with useful information for program oversight and management. The performance areas are defined as follows:

- (1) Cost: the total average cost for the different DoD security clearances, including the average cost of the PSQ submission process, investigation, and adjudicative determination.
- (2) Quality: the extent to which E.O. 12968 standards are met when processing DoD security clearances, including the PSQ submission, the investigation, and the adjudication.
- (3) Timeliness: the average and total time for processing the fastest 90% of DoD security clearances, including the PSQ submission process, investigation, and adjudicative determination.

Cost, quality, and timeliness will be measured for each of the three stages of the process (PSQ submission, investigation, adjudication) for each of three types of personnel security cases (i.e., Secret, Top Secret/SCI - Initial, and Top Secret/SCI - PR) addressed in this report. The methodology for accomplishing this is described in the next section.

METHODOLOGY

Performance measure development and data collection efforts varied by performance area and sometimes by program stage. The data collection focused on the four largest DoD CAFs that handle over 99% of the DoD personnel security adjudications that are funded as part of the primary DoD Personnel Security Program. The data collection did not include DoD intelligence CAFs because they receive funding under a different class of appropriations and are subject to separate PART requirements. If needed, however, the performance measures could be used by intelligence community CAFs. The DoD CAFs that participated in the current data collection include the Army Central Personnel Security Clearance Facility (Army CCF), the Department of the Navy Central Adjudication Facility (DONCAF), the Air Force Central Adjudication Facility (AFCAF), and the Defense Industrial Security Clearance Office (DISCO).

COST MEASURES

The Introduction section of this report described an overall definition of the cost measures that served as the basis of the more detailed cost definitions required for the three stages of the DoD Personnel Security Program. The definitions and performance measures for each stage are described below. APPENDIX A provides additional information about the cost measure methodology.

Stage 1: PSQ Submission

The PSQ submission cost measure was defined as follows:

The average total labor cost for person/applicant completing the PSQ submission and the security managers who support the PSQ submission process.

Applicant labor cost will include the cost of the time required to (1) learn how to complete the submission (e.g., meet with the security manager to learn about e-QIP), (2) gather documents necessary for completing the PSQ, and (3) complete the PSQ. Security manager time would include time required to (1) assist applicants and (2) review and submit completed PSQs.

As indicated in the DoD PART plan, development work will begin in FY09 for the PSQ submission cost measure. A survey methodology will be used to gather cost data from representative samples that account for the great diversity of pay scales and pay grades for PSQ applicants and security managers at DoD and Defense industry organizations all over the world.

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Stage 2: Investigation

The investigation cost measure was defined as:

The average total investigative cost per case for each case type where cost includes only monies paid to OPM.

Investigation costs were computed only for investigations performed by OPM and included only direct charges from OPM to DoD. The costs included the initial billing rate from the OPM Federal Investigations Notice (FIN), plus any additional costs generated from supplemental investigative activities initiated by DoD CAFs and performed by OPM investigative services (e.g., nonstandard national agency checks or additional investigative work to gather information for resolving issues).

For each investigation type and type of service (standard or priority), the following steps were followed to calculate average cost per-investigation type. First, total cost was computed for each type of investigation by (1) adding the total FIN costs billed by OPM for each type of service (where total FIN costs consist of the FIN cost of one investigation multiplied by the total number of investigations scheduled), then (2) adding actual supplemental costs billed by OPM for each investigation type. Next, average cost for each type of investigation was computed by dividing the total cost for that investigation type by the total number of scheduled investigations. The resulting average cost included both OPM FIN costs and other OPM investigative costs borne by DoD for each type of investigation. (The Defense Security Service [DSS] handles OPM investigation billings for DoD and provided the cost data for this study). Note: The investigation cost measure does not include resources expended by DoD investigative and counterintelligence agencies when cases are referred to them by the CAFs.

Stage 3: Adjudication

The adjudication cost measure was defined as:

The average adjudicative cost per case for each case type where cost includes all CAF labor and benefits required to make an adjudication determination.

An adjudication determination could consist of a number of possibilities, including a decision to grant eligibility, a decision to initiate due process procedures for a case, or a decision that the case is no longer part of the CAF's jurisdiction. Labor costs include all salary and benefits for government and military personnel assigned to the CAF as well as all costs for contractors working for the CAF. The measure did not include overhead costs.

The study focused on labor plus benefit costs and did not include overhead items, such as facilities, utilities, contracting, and human resources management because many of the CAFs are not directly responsible for these costs. Particularly for the service CAFs, costs for items such as facilities or utilities are embedded in the

budgets of host installations and component headquarters, and there is no way to accurately and reliably measure these expenditures at the CAF level.

It is also the case that the service CAFs do not budget for the labor costs of the military personnel working at the facility. However, it was possible to identify the relevant personnel and time spent on adjudication tasks and use service-specific composite rates consisting of salary and benefits by pay grade to estimate military labor plus benefits costs.

Data from both the CAFs and the Joint Personnel Adjudication System (JPAS) were used to estimate the average cost of adjudication for the three case types. JPAS provided information on the number of eligibility determinations made by the CAFs during the first 6 months of FY08. The CAFs reviewed the JPAS data and, based on their input, small adjustments were made to accommodate the unique aspects of each CAF's adjudicative process. For example, DISCO cases that result in a recommendation to deny or revoke access eligibility are forwarded to the Defense Office of Hearing and Appeals (DOHA) and JPAS attributes the entire adjudication to DOHA. However, the initial adjudicative work is actually performed by DISCO and, in accordance with the cost definition proposed above, DISCO labor charges, not DOHA labor charges, should be applied. JPAS data were adjusted to reflect this.

QUALITY MEASURES

Quality measurement also required more detailed definitions for each of the three stages, as described below. APPENDIX B provides a more detailed discussion of the data underlying the PSQ submission quality measure and the methodology used to develop the investigation and adjudication quality measures.

Stage 1: PSQ Submission

A two-part definition was developed for the PSQ submission quality performance measure:

The percentage of (1) PSQ forms submitted using e-QIP rather than manually and (2) percentage of completed forms returned by OPM to the security manager for correction.

DoD already had goals in place for the PSQ submission quality measures: (1) 100% of PSQ forms submitted using e-QIP, unless a waiver is obtained, and (2) no more than 5% of the completed forms returned by OPM to the security manager for correction (i.e., no more than 5% that are incomplete or contain errors).

The PSQ submission quality measures and goals are congruent with governmentwide efforts to improve the security clearance process that emphasize electronic submission of the PSQ. OPM currently tracks both percentage of forms submitted through the automated e-QIP process and percentage returned, and reports those results in the National Security Oversight Reports to OMB. OPM also tracks reasons PSQ submissions are returned and, although this information does

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not appear in the National Security Oversight Reports, data were obtained from OPM and are included in quality results reported in the next section. The Defense Personnel Security Research Center (PERSEREC) is also following up with OPM to find out more about PSQ submissions that have problems but are resolved by OPM and are not returned to the security manager or applicant.

Stage 2: Investigation

Initially, the investigation quality performance measure was defined as follows:

The percentage of investigations that meet investigative coverage requirements specified in E.O. 12968 and the associated *Investigative Standards* (1997, rev. 2004).

However, review of the national *Investigative Standards* and discussions with the investigation provider (OPM) and DoD adjudicators found that interpretations of the investigative coverage requirements vary. To account for the differences, two investigation performance measures were identified and defined: (1) quality and (2) supplemental.

Quality Measure

When the personnel security investigation function transferred to OPM, DoD accepted the investigative standards that appear in the OPM Investigative Product Tables as well as the OPM standards for issue information gathering. Since the transfer, DoD and OPM have negotiated some changes to accommodate DoD needs, and the current product tables specify the checks that make up each investigation type and the conditions and timeframes for conducting those checks. The OPM standards were used to define the investigation quality measure. The goal of the investigation quality measure was to identify:

The percentage of cases that were *complete*, as specified by the OPM investigation product tables.

An example of an investigation with a quality problem might be a NACLIC that is missing a local agency check. The OPM NACLIC Investigative Product Tables include local agency checks; therefore, the report of investigation should include the results of the local agency check or provide an explanation for the missing check.

Supplemental Measure

The supplemental measure was developed in order to gather information about additional checks that adjudicators believe are useful or necessary for making adjudication decisions. The goal of the supplemental measure was to identify:

The percentage of cases that met investigation requirements as specified in the OPM product tables, but did not meet adjudicator needs.

One example of an additional check that adjudicators often request is a U.S. Citizenship and Immigration Service (USCIS) check as part of a NACLCL investigation of an applicant who was not born in the United States. The OPM NACLCL investigation does not include citizenship checks except by special request and adjudicators return many investigations to OPM for USCIS checks for applicants who were not born in the United States.

An ideal investigation measure gathers information about adjudicators' perceptions of investigative practices to facilitate discussion about whether additional investigative checks are necessary and to ensure adjudicators receive the information they need to make determinations. For example, it may be useful to negotiate with OPM to include additional checks. Alternatively, DoD may choose to educate adjudicators about the need for these checks.

Combined Measure

The measure that was developed to assess investigation performance gathers information about both quality and supplemental concerns. The measure is called the Rapid Assessment of Incomplete Security Evaluations (RAISE), and it is available on-line for adjudicator use. RAISE was not fully implemented during the current data collection effort due to heavy demands already faced by DoD CAFs. The goal to develop an investigation quality measure was met, and plans were made to collect investigation quality baseline data in 2009.

Stage 3: Adjudication

The measure of adjudication quality performance was defined as:

The percentage of adjudication decisions for which decision documentation meets DoD standards.

Decision documentation was identified as the measurement target for adjudication quality because it is a representation of the factors considered during adjudication. The adjudication decision itself was not chosen because these decisions are complex and require consideration of both the whole-person concept and the adjudicative guidelines. In addition, a simple distinction of eligible/not eligible (i.e., the adjudication decision) is not sufficiently detailed to allow for evaluation of factors considered during decisionmaking.

The performance measure also had to apply across DoD CAFs. However, no detailed DoD-wide requirements or standards for adjudication documentation were identified. Standards are necessary for quality measurement. Guidelines existed for making adjudication decisions (i.e., *Adjudicative Guidelines* [1997; rev. 2005]) and adjudicators received extensive training in the guidelines. However, little policy guidance exists describing how to document decisions.

The first step to developing a quality measure despite the missing DoD-wide standards was to gather information about the way adjudicators were documenting

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their decisions. A measure called the Review of Adjudication Documentation Accuracy and Rationales (RADAR) was developed for this purpose. RADAR gathers information about three components of adjudication decisions: whether they (1) were based on sufficient information, (2) identified adjudicative issues and took into account relevant disqualifying and mitigating factors, and (3) were adequately documented.

DoD CAFs were asked to provide copies of investigation case files for evaluation and the corresponding JPAS adjudication documentation was obtained. The information was sent to Protection Strategies, Inc., a contractor organization that assists the U.S. Coast Guard with personnel security adjudications. Personnel from Protection Strategies served as a source of experienced adjudicators who had received DoD adjudication training but were outside the DoD system. The Protection Strategies adjudicators used RADAR to evaluate the case files and JPAS data.

TIMELINESS MEASURES

Timeliness definitions and performance measures for each of the three stages are described below and additional information appears in APPENDIX C. Before discussing in detail the timeliness measure definitions for each stage, some similarities between the measures are described.

The investigation and adjudication timeliness measures shared a focus on the fastest 90% of cases. The reason for this was two-fold. First, it corresponded to the performance measures in the Intelligence Reform Terrorism Prevention Act (IRTPA) of 2004 and those reported by OPM. Second, it served as a useful strategy for handling outliers or those cases that took a great deal longer to complete. Removing the slowest 10% from the analysis also has the advantage of helping to minimize the influence of random factors on the timeliness measures.

Another similarity was the decision to compute two timeliness measures for the investigation stage and two for the adjudication stage. The first timeliness measure was the computation of the *average* number of days required to complete the stage. The second timeliness measure was the *maximum* number of days required to complete the stage. Both measures were computed using only the fastest 90% of cases. The *average* timeliness measure was computed as an arithmetic mean. The number of days required to complete each case in the group of cases of interest was summed across all cases. The total was then divided by the number of cases in the group. The result was the number of days, on average, required to complete a case. The *maximum* timeliness measure was much simpler: it was equal to the maximum number of days it took to complete a case from the group of cases of interest (e.g., the case that required the largest number of days to complete from the fastest 90% of cases).

There were several reasons for computing two timeliness measures. To begin, the average is most informative when values (e.g., time requirements) are normally

distributed. However, the distribution of investigation and adjudication time requirements is likely to be skewed (i.e., not normally distributed). Skewness is likely because time requirements cannot be less than zero and past data indicate that there will always be a subset of investigations and adjudications that require a lot of time to complete. The result is a non-normal distribution with a long tail to the right.

Also, the average does not provide information about the difference between the minimum and maximum time requirements. If the difference between the minimum and maximum is small, then the average is a good indicator of how long it will take to complete any given case. If the difference is large (i.e., there is a big difference between the minimum number of days required to complete a case and the maximum number of days), then the average is not a good indicator of how long it will take to complete a particular case.

As will be seen in the results section, the difference between the average number of days required to complete a case and the maximum number is quite large. This finding led to the conclusion that the maximum number of days provides important information beyond that provided by measuring the average number of days.

Stage 1: PSQ Submission

PSQ submission performance data did not focus on the fastest 90% because DoD only had access to summary data provided by OPM. For similar reasons, only the average PSQ submission timeliness measure was computed. The performance measure for timeliness of PSQ submissions was defined as:

The average number of days required to complete the PSQ submission process for each case type, measured from the date the applicant signs and releases the PSQ submission (i.e., the SF-86) to the security manager to the date OPM accepts the PSQ submission.

The PSQ submission process may either be electronic through e-QIP or manual through the mail. The mailing option takes considerably longer than the e-QIP option, so a weighted average was computed for each case type taking into account the proportion of PSQs submitted using each of the submission options. Data from the first two quarters of the FY08 OPM National Security Oversight Reports were used to compute the PSQ submission timeliness estimates.

Stage 2: Investigation

Two performance measures were computed for investigation timeliness:

- (1) The *average* number of days to complete the fastest 90% of investigations for each case type, measured from the date OPM opens the investigation to the date OPM closes the investigation as complete. This measure corresponds to the measure specified by IRTPA.

METHODOLOGY

(2) The *maximum* number of days to complete the fastest 90% of investigations for each case type, measured from the date OPM opens the investigation to the date OPM closes the investigation as complete.

Data from JPAS were used to compute both investigation timeliness metrics. It should be noted that the investigations used in these analyses were those that were directly linked to the adjudications completed during the baseline period.

Stage 3: Adjudication

Two performance measures were computed for adjudication timeliness:

(1) The *average* number of days to complete the fastest 90% of adjudications for each case type, measured from the date OPM closes the investigation as complete to the date the CAF enters an eligibility determination in JPAS, and

(2) The *maximum* number of days to complete the fastest 90% of adjudications for each case type, measured from the date OPM closes the investigation as complete to the date the CAF enters an eligibility determination in JPAS.

JPAS data were used to compute both adjudication timeliness metrics. Both adjudication timeliness metrics include the period of time that completed investigations spend in transit between OPM and the CAFs. Ideally, time required for transit would be treated as distinct from the time required for adjudication because it is out of the control of the CAFs and adjudicators. However, the CAFs do not systematically record in JPAS the date investigations are received. As a result, transit time is included in the computation of adjudication timeliness and is estimated to account for approximately 15 days.

End-to-End Timeliness

The end-to-end time was calculated as the sum of the PSQ submission timeliness measure and a combined investigation and adjudication timeliness measure. The PSQ submission stage was represented by the submission timeliness measure from the National Security Oversight Reports. The investigation and adjudication stages were combined and the timeliness measure consisted of the number of days between the date the investigation was opened and the date the adjudication decision was made. JPAS data were used to identify the date the investigation opened and the date the adjudication decision was made.

RESULTS

The results section presents the data by performance area (cost, quality, and timeliness) and program stage (PSQ submission, investigation, and adjudication). Table 2 lists the measures for which baseline data were collected, including the time period covered and the criteria used to select cases.

Table 2
Baseline Data Collection

Measure	Time Period	Selection Criteria
Cost : Investigation and Adjudication	1 October 2007 to 31 March 2008	All Scheduled Investigations and All Completed Adjudications
Quality: PSQ Submission	1 July 2008 to 30 September 2008.	All Completed PSQ Submissions
Timeliness: PSQ Submission, Investigation, and Adjudication	1 October 2007 to 30 September 2008	All Completed Adjudications

COST RESULTS

Stage 1: PSQ Submission

Baseline data for this stage will be gathered beginning in FY09.

Stage 2: Investigation

Table 3 presents average investigation cost results, where cost includes both the initial billing rate plus supplemental costs resulting from additional investigative requests from DoD CAFs. For Top Secret/SCI – Initial cases and Top Secret/SCI – PR cases, the final average cost per case is very close to the OPM FIN cost (less than 1% higher). However, for Secret investigations, the final average cost is approximately 39% higher than the initial FIN cost, primarily due to requests by DoD adjudicators for additional information for cases involving adjudicative issues. The supplemental work is generally performed after the case reaches the adjudication facility and can result in significant delays in the adjudication process.

Table 3
Average Investigative Cost Per Case of OPM Investigations for DoD
(1 October 2007 to 31 March 2008)

PART Case Type	Number of Investigations Billed	Total Amount Billed by OPM (\$)	OPM “FIN” Cost Per case (\$)	Final Average Cost Per Case for DoD (\$)	Percent Increase over FIN
Secret	251,933	74M	212*	294*	39%
Top Secret/SCI – Initial	35,594	134M	3,719	3,773	<1%
Top Secret/SCI – PR/PPR	39,202	84M	2,121**	2,131**	<1%

* Weighted average for NACLCS and ANACIs combined

** Weighted average for SSBI-PR and PPRs combined.

RESULTS

Stage 3: Adjudication

Table 4 presents average adjudicative cost results. The case types that include field interviews (Top Secret/SCI - Initial and Top Secret/SCI - PR) cost about twice as much to adjudicate as Secret cases that rely almost exclusively on records checks.

Table 4
Average Labor Plus Benefit Cost for DoD Adjudications
(1 October 2007 to 31 March 2008)

PART Case Type	Number of Completed Adjudications	Total Cost (\$)*	Average Cost Per Case (\$)*
Secret	264,706	9.1M	34
Top Secret/SCI - Initial	58,890	3.7M	63
Top Secret/SCI - PR/PPR	51,000	3.6M	70

*Costs include labor and benefits for CAF government and military personnel and costs for contractors working for the CAFs.

QUALITY RESULTS

Stage 1: PSQ Submission

Table 5 presents the results for the PSQ submission quality measures. The first PSQ submission quality measure was the percentage of PSQs that were submitted electronically and the second was the percentage of PSQ submissions that were correct and complete. The vast majority of DoD PSQ submissions during the measurement period were electronic (94% to 98%) and the vast majority were correct and complete (93% to 98%).

Top Secret/SCI - PR cases were more likely to be submitted electronically and more likely to be correct and complete than either Secret or Top Secret/SCI - Initial cases. The OPM National Security Oversight Reports were the source of the data in Table 5. However, the National Security Oversight Reports report percentage returned for correction, which is the inverse of the percentage correct and complete that appears as the last column in Table 5.

Table 5
PSQ Submission Quality Metrics

PART Case Type	Percent Submitted Electronically	Percent Correct and Complete
Secret	94%	93%
Top Secret/SCI - Initial	94%	93%
Top Secret/SCI - PR/PPR	98%	98%

OPM has indicated that many PSQ submissions that have problems are not returned to the applicant for correction. Instead, OPM staff does the work to obtain

the missing information. Detailed data describing these additional problems were not available, but PERSEREC will work with OPM to gather additional information.

Stage 2: Investigation

Baseline investigation quality data will be gathered in FY09.

Stage 3: Adjudication

The first step for measuring the quality of the documentation of adjudication decisions was to gather information about documentation strategies currently in use. The results of this step are reported below. The data represent a snapshot of the current status of adjudication decision documentation. Baseline data will be gathered in FY09.

A total of 705 cases adjudicated by DoD CAFs in July and August 2008 were evaluated by Protection Strategies staff using RADAR. The first result of interest was an analysis of the extent to which adjudication decisions included documentation. As seen in Table 6, between two thirds and three fourths of the adjudication decisions did include documentation that linked case information with the adjudicative guidelines.

Table 6
Percentage of Adjudication Decisions with Documentation

PART Case Type	All Cases	Percent With Documentation
Secret	227	66%
Top Secret/SCI – Initial	260	73%
Top Secret/SCI – PR/PPR	218	67%

Next, the evaluators rated the overall quality of adjudication decision documentation using standards described in the RADAR assessment tool. The evaluators were instructed to rate the quality of documentation as acceptable if it detailed all factors considered and provided a clear explanation of information use and decision processes. The evaluators were instructed to rate the quality of documentation as unacceptable if it was missing many key factors, did not explain decision rationale, or was unclear. As shown in Table 7, between 60% and 67% of the cases included acceptable documentation. For the rest of the cases, either no documentation was provided or the documentation was unacceptable. When only those cases that included documentation were considered, documentation quality was acceptable for 88% to 93% of all cases (93% of Secret cases, 91% of Top Secret/SCI Initial cases, and 88% of Top Secret/SCI – PR cases).

RESULTS

Table 7
Percentage of Documented Decisions with Acceptable Documentation

PART Case Type	N of All Cases	Percent of All Cases with Acceptable Documentation	N of Subset of Cases with Documentation	Percent of Subset with Documentation that have Acceptable Documentation
Secret	227	61%	149	93%
Top Secret/SCI – Initial	260	67%	191	91%
Top Secret/SCI – PR/PPR	218	60%	147	88%

TIMELINESS RESULTS

Timeliness Results for All Three Stages

Table 8 presents data for the *average* number of days required to complete the fastest 90% of cases for three stages of the clearance process, plus the average end-to-end time required. As shown in Table 8, for the PSQ submission stage, Top Secret/SCI – PR cases have the fastest average PSQ submission time, while Secret cases have the fastest average investigation time and the fastest average adjudication time. Secret cases also have the fastest average end-to-end time.

Table 8
Average Number of Days to Complete Fastest 90% of Cases
(1 October 2007 to 30 September 2008)

PART Case Type	Number of Cases in the Fastest 90%	Stage 1: PSQ Submission*	Stage 2: Investigation	Stage 3: Adjudication	Average End-to-End time**
Secret	405,504	16	57	28	109
Top Secret/SCI – Initial	79,776	21	112	38	184
Top Secret/SCI (SSBI-PR)	39,229	12	217	71	312
Top Secret/SCI (PPR)	49,932	12	101	70	192

*Number of days based on average PSQ submission time for different case types.

** Average end-to-end time does not equal the sum of three stages because different cases can comprise the fastest 90% for each stage.

The data in Table 9 were compiled by identifying the longest, or *maximum*, number of days required to complete a case for the investigation and adjudication stages of the clearance process. The PSQ submission stage still shows the *average* number of days because data were not available for computing maximum number of days required to complete PSQ submissions. Maximum end-to-end time was also computed. Although this analysis focused on the maximum number of days, it looked at the maximum for only the fastest 90% of cases, which means that 10% of the cases completed during 1 October 2007 and 30 September 2008 actually took more time than reported here.

Results for maximum number of days required appear in Table 9. Secret cases again have the fastest investigation time, but Top Secret/SCI – Initial cases have the fastest adjudication time. Available data do not provide information to explain the longer adjudication time for Secret investigations, but Secret cases are much more likely to be returned to the investigation provider because the adjudicator would like to have additional information gathered, which may extend the time required to adjudicate.

Table 9
Maximum Number of Days to Complete Fastest 90% of Cases
(1 October 2007 to 30 September 2008)

PART Case Type	Number of Cases in the fastest 90%	Stage 1: PSQ submission*	Stage 2: Investigation	Stage 3: Adjudication	Max End-to-End time**
Secret	405,504	16	183	142	300
Top Secret/SCI – Initial	79,776	21	454	121	555
Top Secret/SCI (SSBI-PR)	39,229	12	488	166	611
Top Secret/SCI (PPR)	49,932	12	249	170	387

*There was only one measure for PSQ submission timeliness (average number of days).

*Number of days based on average application time for different case types

**Maximum end-to-end time does not equal the sum of the three stages because different cases can comprise the fastest 90% at each stage.

A comparison of the Stage 2: Investigation, Stage 3: Adjudication, and End-to-End columns from Table 8 and Table 9 shows that the *maximum* number of days required to complete the fastest 90% of cases is significantly greater than the *average* number of days required to complete the fastest 90% of cases. For example, the average number of days required to complete a Secret adjudication is 28 days. The maximum number of days to complete a Secret adjudication is 142 days, which is over five times longer than the average of 28 days. The implication is that a significant portion of the Secret adjudications take longer than the average to complete. Similar differences are observed when comparing average and maximum days required for investigation, adjudication, and end-to-end for all case types. Knowledge of the difference between average and maximum time required is useful for understanding complaints from the field that clearances take much longer to obtain than reported in the IRTPA numbers (the average of the fastest 90%).

SUMMARY

SUMMARY

The work described in this report was performed in response to DoD interest in and PART requirements for measuring the performance of the DoD Personnel Security Program. Cost measures were developed and baseline data collected for the investigation and adjudication stages of the DoD Personnel Security Program. Cost measures for the PSQ submission stage will be developed in FY09. Quality measures were identified or developed for all three stages of the DoD Personnel Security Program. Timeliness results were reported for the PSQ submission stage and computed for the investigation and adjudication stages.

CONCLUSION

Overall, DoD made significant progress in meeting PART requirements for establishing baseline performance status for critical stages of the DoD Personnel Security Program. DoD plans to develop short- and long-range performance goals and will gather data in FY09 to assess performance or develop baselines, as needed.

REFERENCES

Adjudicative Guidelines for Determining Eligibility for Access to Classified Information (1997). Revised December 2005.

Executive Order 12968, *Access to Classified Information*, August 2, 1995.

Intelligence Reform and Terrorism Prevention Act of 2004, S. 2845, 108th Cong. (2004).

Investigative Standards for Background Investigations for Access to Classified Information (1997). Revised December 2004.

**APPENDIX A:
COST MEASURE COMPUTATION**

APPENDIX A

COST MEASURE COMPUTATION

This appendix describes the steps and data used to compute the average cost per case for Department of Defense (DoD) personnel security investigations and adjudications. The data represent costs from 1 October 2007 to 31 March 2008. The data collection focused on the Army Central Personnel Security Clearance Facility (Army CCF), the Department of the Navy Central Adjudication Facility (DONCAF), the Air Force Central Adjudication Facility (AFCAF), and the Defense Industrial Security Clearance Office (DISCO). These are the four largest DOD central adjudication facilities (CAFs) and they are all funded as part of the primary DoD Personnel Security Program. The data collection did not include DoD intelligence CAFs because they receive funding under a different class of appropriations and are subject to separate PART requirements.

STAGE 1: PSQ SUBMISSION COST

Personnel Security Questionnaire (PSQ) submission cost measures will be developed in FY09.

STAGE 2: INVESTIGATION COST

Investigation costs were computed for those DoD personnel security investigations performed by the Office of Personnel Management (OPM) and included only costs charged by OPM. The bulk of OPM charges came from per-investigation costs specified in OPM Federal Investigations Notices (FINs) each year for each investigation type. Additional OPM charges resulted when DoD adjudicators requested supplemental investigative activities from OPM investigative services. Supplemental requests were typically made when adjudicators needed additional information to resolve adjudicative issues and make eligibility determinations. Examples of supplemental requests included Special Investigative Interviews (SPINs) or other investigative checks such as checks of U.S. Customs and Immigrations Service databases. The investigation cost measure did not include resources expended by DoD investigative and counterintelligence agencies when cases were referred to them by the CAFs.

The data in Table A-1 through Table A-3 include actual billing information from OPM for the period 1 October 2007 to 31 March 2008, and demonstrate how the data were used to determine cost per case. (The Defense Security Service [DSS] handles OPM investigation billings for DoD and provided the cost data for this study.) As reflected in the tables, investigations may be requested with either standard service or priority service, and investigative cost differed with level of service requested. The number of investigations at each level of service and total cost appear in the first two rows of each table. The next two rows show additional charges associated with each investigation type.

APPENDIX A

For each investigation type, the total number of investigations was computed by adding the number of standard service investigations and the number of priority service investigations. The total cost was determined by adding: (1) total FIN costs for Standard service, (2) total FIN costs for Priority service, (3) additional charges, and (4) other billing costs. The resulting total cost for each case type included all charges associated with a given investigation type, including both the OPM billing rates and charges for any additional work that DoD requested.

The average investigative cost per case was determined by dividing the total cost of investigations by the total number of that type of investigations scheduled by OPM during the baseline period. Both Secret and Top Secret/SCI –PR case types subsumed two types of investigations. To account for this, a weighted average of the two case types were computed to arrive at an overall cost per case for both Secret and Top Secret/SCI –PR cases.

Table A-1 shows the average cost per case for the two types of Secret investigations included in the study: National Agency Check Local Agency Check and Credit Check investigations (NACLCL) and Access National Agency Checks with Written Inquiries (ANACI). For the first half of FY08, the average cost per case for NACLCLs was \$295 and the average cost per case for ANACIs was \$280. The weighted average cost across both types of Secret investigations was \$294.

**Table A-1
Secret Investigations: Cost Per Case Data
(1 October 2007 to 31 March 2008)**

OPM Billing Category	NACLCL		ANACI	
	Number	Cost (\$)	Number	Cost (\$)
Standard Service	232,433	48,916,940	18,565	4,450,303
Priority Service	781	202,910	154	46,381
Additional Charges (RSIs, SPINS, Etc)	n/a	14,858,992	n/a	36,754
Other Billing Costs*	n/a	4,761,407	n/a	699,531
Total	233,214	68,740,249	18,719	5,232,969
Cost Per Case		\$295/case		\$280/case

* Case cost adjustments

Table A-2 shows the average cost per case for Top Secret/SCI – Initial cases. Only one investigation type is used for Top Secret/SCI – Initial cases: Single Scope Background Investigation (SSBI). For the first half of FY08, the average cost per case for SSBIs was \$3,773.

Table A-2
Top Secret/SCI – Initial: Cost Per Case Data
(1 October 2007 to 31 March 2008)

OPM Billing Category	SSBI	
	Number	Cost (\$)
Standard Service	31,910	117,885,224
Priority Service	3,684	14,992,794
Additional Charges (RSIs, SPINS, Etc)	n/a	368,485
Other Billing Costs*	n/a	1,044,269
Total	35,594	134,290,772
Cost Per Case	\$3,773/case	

* Case cost adjustments

Table A-3 shows the average cost per case for Top Secret/SCI – PR cases. Two investigation types are used for Top Secret/SCI – PR cases: Single Scope Background Investigation – Periodic Reinvestigation (SSBI-PR) and Phased Periodic Reinvestigation (PPR). For the first half of FY08, the average cost per case for SSBI-PRs was \$2,539 and the average cost per case for PPRs was \$1,867. The weighted average cost across both types of Top Secret/SCI - PR investigations was \$2,131.

Table A-3
Top Secret/SCI – PR: Cost Per Case Data
(1 October 2007 to 31 March 2008)

OPM Billing Category	SSBI-PR		PHASED PR	
	Number	Cost (\$)	Number	Cost (\$)
Standard Service	15,178	38,086,970	23,378	43,538,880
Priority Service	253	691,976	393	823,633
Additional Charges (RSIs, SPINS, Etc)	n/a	73,615	n/a	43,813
Other Billing Costs*	n/a	326,055	n/a	(33,494)
Total	15,431	39,178,616	23,771	44,372,832
Cost Per Case	\$2,539/case		\$1,867/case	

* Case cost adjustments

STAGE 3: ADJUDICATION COST

The data used to calculate adjudication costs were gathered by working directly with representatives of the four DoD central adjudication facilities (CAFs) listed earlier (Army CCF, DONCAF, AFCAF, and DISCO).

APPENDIX A

STEP 1

- Gather data from CAFs on manning levels and the allocation of CAF personnel work time by functional area for the baseline time period. For the current study that time period ran from 1 October 2007 to 31 March 2008. Data included government, military, and contractor personnel.

In April 2008, the four CAFs were asked to complete Data Sheet A-1 (see Appendix D): Allocation of CAF Personnel Work Time by Functional Area. (See Appendix D for a copy of the data sheet.) CAFs were asked to list all personnel assigned to the CAF and the proportion of time spent working in the following five areas:

(1) Core Adjudication: This category refers to adjudications of investigations for access eligibility decisions, including all SSBI, SSBI-PRs, Phased PRs, and NACLCs/ANACIs and is the first of two CAF product areas.

(2) All Other CAF products: This category includes adjudications for such products as interim access eligibility, special adjudicative actions, nonadjudicative actions required to maintain, transfer, or terminate clearances, and all due process requirements. This is the second CAF product area.

(3) Indirect Facility Support: This includes personnel, financial, facilities, and information technology (IT) support activities required to operate the facility.

(4) Management/Supervision/Liaison: This category includes planning, coordination and control of facility activities, as well as employee supervision.

(5) Other: This includes work that is not directly linked to the CAF mission (e.g., promotion boards, inspections, industrial security, etc.). Personnel costs in this category are not included in the computation of adjudication costs.

Three of the CAFs completed Form A-1. The other CAF only provided information on number of personnel and allocation of time to the two product areas: Core Adjudication and All Other CAF Products, but the information was sufficient for adjudication cost calculations. Table A-4 presents a summary of the manning-level data gathered from the CAFs. It shows the number of personnel, expressed as Full-Time Equivalent (FTEs) at the CAFs as of April 2008.

Table A-4
CAF Manning by Type of Personnel (N of FTEs as of April 2008)
(1 October 2007 to 31 March 2008)

Category of Personnel	ARMY CCF	DONCAF	AFCF	DISCO	TOTAL	% of Total
Government Civilian	130	137	72	99	438	76%
Military	21	0	37	0	58	10%
Contractor	0	13	48	22	83	14%
Total	151	150	157	121	579	100%

Table A-5 shows the distribution of the CAF personnel by the five different functional work areas.

Table A-5
Allocation of CAF Personnel by Different Functional Work Areas
(FTEs as of April 2008)
(1 October 2007 to 31 March 2008)

Functional Work Area	Army CCF*	DONCAF	AFCAF	DISCO
Core Adjudications	103.9	76.5	41.4	53.4
All Other CAF Products	47.1	39.5	44.0	31.2
Indirect Facility Support	n/a	22.8	34.6	28.6
Management/Supervision/Liaison	n/a	8.1	32.0	7.8
Other	n/a	3.1	5.0	0
Total	151	150	157	121

*Army CCF reported the number of their total staff who worked in or supported (indirect facility support and management/supervision/liason) either core adjudications or all other CAF products.

STEP 2

- Obtain budget data from the CAFs for all labor plus benefit expenditures for government personnel as well as the total costs for contractor personnel for the baseline time period.
- Determine the CAF military labor/benefit costs by using composite rates for each military service.
- Allocate the total CAF labor budget to the two main product areas: (1) core adjudication and (2) all other CAF products. Base this allocation on the proportion of CAF personnel assigned to each of the two product areas (i.e., core adjudications and all other CAF products).

This step was used to determine the relative proportions of the CAF labor/benefit budget used for Core Adjudications and for All Other CAF Products. The proportion used for Core Adjudication served as the baseline budget number for determining the cost per case. Also, since personnel working in the Other category area do not directly contribute to the CAF mission, their costs were removed from the CAF budget numbers. Labor costs associated with Indirect Facility Support and Supervision were allocated to the two product areas in proportion with the percentage of personnel assigned to each area. Table A-6 shows the results of the allocation, including military labor costs, to the two product areas.

APPENDIX A

Table A-6
Allocation of All CAF Labor/Benefit Costs across the Two Product Areas
(1 October 2007 to 31 March 2008)

Functional Work Area	Army CCF (\$)	DONCAF (\$)	AFCAF (\$)	DISCO (\$)
Core Adjudications*	4,172,297	4,185,896	4,174,611	3,873,410
All Other CAF Products	2,974,709	2,161,344	4,436,784	2,266,743
Total	7,147,006	6,347,240	8,611,395	6,140,153

* Total DoD labor and benefit cost for all core adjudications was \$16,406,213

STEP 3

- Use the Joint Personnel Adjudication System (JPAS) to determine number of completed adjudications for each case type for each of the four CAFs during the baseline time period.
- Define completed adjudications as eligibility determinations in JPAS that (1) were based on an OPM investigation and (2) resulted in a determination to either (a) grant access eligibility, (b) record loss of jurisdiction, (c) record no determination made, or (d) initiate due process.
- Validate JPAS data for the number of completed adjudications, using data maintained by the CAFs and make adjustments as necessary.

Table A-7 presents data on the number of cases adjudicated by the four CAFs during the baseline time period. Both DONCAF and AFCAF agreed that the JPAS data accurately reflected completed adjudication numbers. JPAS adjudication numbers for DISCO were adjusted by adding in the number of cases forwarded to the Defense Office of Hearings and Appeals (DOHA) for due process. DISCO due process cases appear in JPAS as DOHA adjudications, but all work leading up to due process is actually performed by DISCO and should be included in DISCO totals. Based on input from DISCO and DOHA, the DISCO numbers were increased by 5,417 across the three case types. Finally, based on input from Army CCF, data from the Army Computer Assisted Tracking System (CATS) were identified as providing a more accurate representation of adjudication numbers than JPAS.

Table A-7
Number of Cases Adjudicated by DoD CAFs
(1 October 2007 to 31 March 2008)

PART Case Type	Army CCF	DONCAF	AFCAF	DISCO	Total
Secret	94,877	65,106	45,700	59,023	264,706
Top Secret/SCI - Initial	17,846	11,314	11,534	18,196	58,890
Top Secret/SCI - PR/PPR	6,712	8,291	19,835	16,162	51,000

STEP 4

- Gather CAFs' estimates of the amount of time (in hours) required to adjudicate issue and nonissue NACLs, ANACIs, SSBI, SSBI, and Phased PRs during the baseline time period.
- Use CAFs' estimate of the proportion of nonissue and issue cases for each case type to get the overall estimated weighted adjudicative times for each case type.

Using the CAF data, it was possible to calculate the weighted average time required by each CAF to adjudicate each of the three case types, independent of whether the case was issue or nonissue. These data are presented in Table A-8.

Table A-8
Average Number of Hours Required for Eligibility Determinations by CAF
(1 October 2007 to 31 March 2008)

PART Case Type	DoD CAF			
	Army CCF	DONCAF	AFCAF	DISCO
Secret	.51	.23	.28	.25
Top Secret/SCI - Initial	.87	.62	.56	.31
Top Secret/SCI - PR/PPR	.82	.85	.52	.31

STEP 5

- Determine total core work hours for each CAF by multiplying the number of completed adjudications for each case type by the average number of hours to complete the case type.
- Determine the total core work hours available to the CAF during the first 6 months of FY08 by multiplying the number of FTE CAF personnel performing and/or supporting core adjudications times 888 hours (1776 hours/2).
- Adjust the average number of hours to adjudicate each case type so that the number of completed cases times this new average is equal to the total core work hours available to the CAF when 888 (1776 hours/2) hours is used as the productive hours for a 6-month period for a FTE CAF employee.

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Additional calculations were conducted to normalize CAF case work hours to the Office of Management and Budget (OMB) standard of 1776 annual productive work hours (OMB Circular A-76, 2003; rev. 2006). First, total cases for each CAF were multiplied by the hours per case reported by the CAF. Next, the FTEs for each CAF were multiplied by 888 (1776 divided by two since we were only looking at the first 6 months of FY08). The CAF estimates for hours per case were then normalized to a new estimate that ensured that all productive work hours were taken into account.

It should be noted that these normalized hours per case included more hours than the actual time the adjudicator worked on a case. It included all available time for that adjudicator, some of which could be spent in meetings, training, etc. However, from the point of view of activity-based costing, these hours should be used to determine the actual cost of the adjudications if the CAF were providing adjudicated cases on a fee-for-service basis.

Table A-9 presents the results of these calculations. When compared to Table A-8, Table A-9 shows that when available hours are normalized to OMB standards there is a significant increase in the estimated hours per case.

Table A-9
Average Number of Hours to Adjudicate Cases by CAF
(Adjusted to 1776 Available Hours Per Person)
(1 October 2007 to 31 March 2008)

PART Case Type	Normalized Average Hours Per Case			
	Army CCF	DONCAF	AFCAF	DISCO
Secret	.68	.69	.64	.67
Top Secret/SCI - Initial	1.17	1.89	1.29	.81
Top Secret/SCI - PR/PPR	1.10	2.60	1.19	.81

STEP 6

- Compute the total cost for each CAF to adjudicate all completed cases for each case type during the first 6 months of FY08.
- Aggregate these costs for each case type to determine the total cost of these adjudications for the four CAFs combined.

Table A-10 provides data on the total cost for each CAF to complete all adjudications for a given case type for the first 6 months of FY08. It shows that by multiplying the number of completed cases by the estimated hours per case, summing these data across case types, and then dividing the total cost of all completed cases (i.e., the total cost of Core Adjudications as shown in Table A-6), it was possible to determine the average cost for a productive hour for each of the CAFs. This amount can then be multiplied by the total number of hours for each

case type to get the total cost for adjudicating all completed cases in a given case type.

Table A-10
PART Case Type Total Cost Computations by CAF
(1 October 2007 to 31 March 2008)

CAF	PART Case Type	Number of Cases	Normalized Hours/Case	Total Case Hours	Total Case Cost (\$)
ARMY CCF	Secret	94,877	.68	64,058	2,896,517
	TS/SCI - Initial	17,846	1.17	20,812	941,050
	TS/SCI - PR/PPR	6,712	1.10	7,403	334,730
(Cost Per Productive Hour = \$4,172,297/92,273 hours = \$45.22)					
DONCAF	Secret	65,106	.69	44,902	2,139,648
	TS/SCI - Initial	11,314	1.89	21,382	1,018,872
	TS/SCI - PR/PPR	8,291	2.60	21,560	1,027,376
(Cost Per Productive Hour = \$4,185,896/87,844 hours = \$47.65)					
AFCAF	Secret	45,700	.64	29,088	1,796,666
	TS/SCI - Initial	11,534	1.29	14,912	921,083
	TS/SCI - PR/PPR	19,835	1.19	23,586	1,456,862
(Cost Per Productive Hour = \$4,174,611/67,586 hours = \$61.77)					
DISCO	Secret	59,023	.67	39,823	2,275,684
	TS/SCI - Initial	18,196	.81	14,807	846,149
	TS/SCI - PR/PPR	16,162	.81	13,152	751,577
(Cost Per Productive Hour = \$3,873,410/67,782 hours = \$57.15)					
DOD TOTAL	Secret	264,706	N/A	177,871	9,108,515
	TS/SCI - Initial	58,890	N/A	71,913	3,727,154
	TS/SCI - PR/PPR	51,000	N/A	65,701	3,570,544
(Cost Per Productive Hour = \$16,406,214/315,485 hours = \$52.00)					

STEP 7

- Compute the average DoD cost per case for each case type.

The final step was to use the data in Table A-10 and for each case type and sum the Total Case Cost across CAFs (e.g., Total Case Cost for Secret Cases for Army CCF, DONCAF, AFCAF, and DISCO). Next, for each case type, the total cost for completing cases was divided by the total number of cases (summed across CAFs). Table A-11 shows the resulting DoD average cost per case for each case type and represents the FY08 PART baseline data for average adjudicative cost per case for the three case types: Secret, Top Secret/SCI - Initial, and Top Secret/SCI - PR.

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Table A-11
Average DoD Cost Per Case for Adjudicating Each Case Type
(1 October 2007 to 31 March 2008)

Type of Case	Number of Completed Cases	Total Cost of Completed Cases (\$)	Average Cost Per Case (\$)
Secret	264,706	9,108,515	34.41
Top Secret/SCI - Initial	58,890	3,727,154	63.29
Top Secret/SCI - PR/PPR	51,000	3,570,544	70.01

REFERENCES

OMB Circular A-76, Performance of Commercial Activities (05/29/2003) including changes made by OMB Memorandum M-07-02 (10/31/2006).

**APPENDIX B:
QUALITY MEASURE DEVELOPMENT**

APPENDIX B

QUALITY MEASURE DEVELOPMENT

This appendix describes the development of quality measures for the Personnel Security Questionnaire (PSQ) submission, investigation, and adjudication stages of the Department of Defense (DOD) Personnel Security Program. The PSQ submission quality measure was based on existing data collection efforts carried out by the Office of Personnel Management (OPM) as part of OPM Electronic Questionnaires for Investigations Processing (e-QIP). Existing measures of investigation quality and adjudication quality were not readily available and were developed by the Defense Personnel Security Research Center (PERSEREC).

STAGE 1: PSQ SUBMISSION QUALITY

The PSQ submission quality measures tapped two aspects of submissions: (1) whether submissions were made in the preferred format and (2) whether submission content was accurate and complete. Both submission format (electronic through the on-line OPM e-QIP tool) and submission accuracy and completeness are tracked by OPM. DoD does not have direct access to the data, but OPM reports the tracking results in quarterly National Security Oversight Reports to OMB and these reports served as the source of the results reported in Table B-1. The vast majority of DoD PSQ submissions during the measurement period were electronic (94% to 98%) and the vast majority were correct and complete (93% to 98%). Top Secret/SCI – PR cases were more likely to be submitted electronically and more likely to be accurate and complete than either Secret or Top Secret/SCI – Initial cases.

Table B-1
FY08 4th Quarter: PSQ Submission Quality Metrics
(1 July 2008 to 30 September 2008)

PART Case Type	Percent Submitted Electronically	Percent Accurate and Complete
Secret	94%	93%
Top Secret/SCI – Initial	94%	93%
Top Secret/SCI – PR/PPR	98%	98%

STAGE 2: INVESTIGATION QUALITY

All personnel security investigations must meet coverage requirements specified in Executive Order (E.O.) 12968 and the associated *Investigative Standards* (1997, rev. 2004). In keeping with these requirements, the investigation quality performance measure was initially defined as:

The percentage of investigations that met investigative coverage requirements specified in E.O. 12968 and the associated *Investigative Standards* (1997, rev. 2004).

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However, review of the national *Investigative Standards* and discussions with the investigation provider (OPM) and DoD adjudicators found differences in interpretations of E.O. 12968 and the *Investigative Standards*. To account for the differences, two investigation performance measures were identified and defined: (1) a quality measure and (2) a supplemental measure.

Quality Measure

When the personnel security investigation function transferred from DoD to OPM, DoD accepted the OPM standards for investigation scope and issue information gathering. OPM documents its investigation scope standards in investigation product tables it produces for each investigation type. The product tables specify the checks that make up each investigation type and the conditions and timeframes for conducting those checks. Additionally, a set of Special Investigation (SPIN) triggers specify the situations where OPM investigators will gather follow-up information for adjudicative issues. The OPM investigation scope and issue standards were used to define the investigation quality measure. The goal of the investigation quality measure was to identify:

The percentage of cases that *met* the OPM investigation standards.

An example of an investigation that met OPM investigation standards would be an investigation where the following checks from the OPM product tables were completed: all standard scope checks, all conditional scope checks where the conditions specified by OPM were met, as well as any additional items requested when the investigation was originally submitted.

An example of an investigation that did not meet the OPM investigation standards might be a NACLIC that is missing a local agency check. The OPM NACLIC Investigative Product Table includes local agency checks. Therefore, the report of investigation should have included the results of the local agency check or provided an explanation for the missing check. As stated in the definition, an investigation with this problem would not be included in the percentage that met the standards.

Supplemental Measure

Since the transfer of the investigative function, DoD and OPM have negotiated some changes to the OPM standards to accommodate DoD needs, and these changes are reflected in current OPM product tables. However, DoD adjudicators return many investigations to OPM for additional work that is not covered in the OPM standards and report that there are additional checks they would like to see become part of the OPM investigative standards. The supplemental measure was aimed at gathering data about these types of additional checks. The goal of the supplemental measure, stated in positive terms, was to identify:

The percentage of cases that did not require additional work by either the adjudicator or OPM.

The goal is stated in positive terms as an acknowledgement that by far the largest percentage of cases do not have problems. The data collected with the supplemental measure will also be examined to identify patterns of additional work requests. One example of additional work is a request for a U.S. Citizenship and Immigration Service (USCIS) check for a NACLC for an applicant who is not born in the United States. The OPM investigative standards do not include citizenship checks for NACLCs unless a special request is made. However, many adjudicators would like to see a USCIS check for applicants who were not born in the United States.

DoD is interested in tracking additional adjudicator information needs in order to identify possible changes to the standards followed by the investigation provider or to identify additional adjudicator training needs. It is particularly important to understand the supplementary information adjudicators request because such requests tend to significantly increase the time required to adjudicate cases as well as the cost to investigate.

RAISE

PERSEREC developed an evaluation tool called the Rapid Assessment of Incomplete Security Evaluations (RAISE) that addresses the requirements of both the quality measure and the supplemental measure. RAISE gathers specific information from adjudicators about personnel security investigations that fail to meet adjudicator needs through significant scope deficiencies or deficiencies in information available for resolving issues. Some of the deficiencies may be due to quality problems while others may be due to supplemental concerns.

RAISE assesses three aspects of investigations: (1) scope, (2) issue information, and (3) utility. There may be quality or supplemental concerns in any of these three areas. Branching strategies built into the program allow adjudicators to focus on the RAISE items that are relevant to the investigation under review. The number of questions varies due to branching and RAISE can be completed quickly, depending on the deficiencies and adjudicator responses. More detail about RAISE appears in Table B-2.

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Table B-2
RAISE Description

1) Section 1: Scope	<ul style="list-style-type: none">● Adjudicators will use this section to identify incomplete scope items. The Scope section consists of three pages plus a page for optional comments and is skipped entirely if adjudicators indicate that the investigation did not have any scope problems.● Scope items are assigned to categories and investigation types based on the OPM Product Tables because these tables represent the tasks OPM has agreed to perform. RAISE is based on the OPM Product Tables so that DoD and OPM have a common basis for discussing changes.
2) Section 2: Issue Information	<ul style="list-style-type: none">● Adjudicators will use this section to provide information about issues that could not be adjudicated because the investigation did not provide enough information.● The Issue section includes up to six questions plus room for optional comments and is skipped entirely if adjudicators indicate that the investigation provided enough information to resolve all issues.
3) Section 3: Utility	<ul style="list-style-type: none">● This sections asks adjudicators about any additional investigative work performed at the CAF and for feedback about the documentation provided with the report of investigation. It consists of one page with up to three questions plus room for optional comments.
4) Section 4: Comments	<ul style="list-style-type: none">● The final section of the RAISE provides space for optional overall comments.

RAISE Pilot Test

DoD CAFs did not have sufficient free capacity to participate directly in the investigation quality data collection during the FY08 data collection period. Despite the unavailability of DoD adjudicators, PERSEREC decided to collect preliminary investigation quality information to evaluate the usefulness of RAISE. A pilot test was conducted using contract adjudicators and reports of investigation supplied by the CAFs. The pilot test is summarized below.

Investigation Quality Evaluators

Sixteen adjudicators from a contractor organization, Protection Strategies, Inc. served as quality evaluators for the FY08 RAISE data collection. Protection Strategies staff were chosen because they receive the training the Defense Security Service Academy provides for all DoD adjudicators, are trained to DoD standards, and routinely perform adjudication tasks for the U.S. Coast Guard. Adjudicators from Protection Strategies also participated in the adjudication quality assessment.

Procedure

The RAISE data collection was completed in two phases between the months of August 2008 and September 2008. In Phase I, PERSEREC requested deficient background investigation cases from AFCAF, DISCO, and DONCAF. Upon receipt of each case, PERSEREC staff logged it into an in-house electronic database, that

contained fields for OPM case number, social security number, investigation type, and adjudication facility.

In Phase II, Protection Strategies adjudicators were trained by a senior adjudicator to use RAISE. During the training session the adjudicators had an opportunity to make practice ratings with RAISE and to ask questions about unclear items. After completing the training, adjudicators reviewed the deficient investigations and rated them with RAISE.

To access the tool, the adjudicators were instructed to go to the RAISE secure website where they read a brief set of instructions before proceeding to rate cases with RAISE. After each case was rated, staff at Protection Strategies logged the cases in an electronic database, analogous to the one maintained at PERSEREC.

After all RAISE ratings were completed, PERSEREC research staff reviewed the data to identify any problems or errors. The review identified two types of problems: multiple ratings of the same case and ratings of the wrong investigation in situations where a case file contained multiple investigations. These problems were resolved by having Protection Strategies staff re-rate cases where necessary, and deleting ratings of the wrong investigations.

Sampling

Three DoD CAFs (DONCAF, AFCAF and DISCO) provided copies of 270 investigation case files that showed scope or issue problems and the adjudicators evaluated these files using RAISE. The original data collection goal was to collect all deficient cases during a one-week window and use them as a representative sample to estimate deficiencies for the entire year. However, it did not prove feasible for the CAFs to provide all cases from an entire week. Therefore, the data presented in the results section should not be viewed as an accurate estimate of investigative problems. However, they do illustrate the types of problems that can occur.

Analysis Considerations

The definitions proposed for the quality measure and the supplemental measure focused on the positive: cases that met standards and cases that did not have supplemental problems. Cases that met quality standards included those cases that included all required standard scope items and had no issues that were unresolved in the presence of a relevant SPIN trigger. A stricter definition of quality standards would also include an evaluation of whether conditional scope items were included when relevant conditions were met. However, there was no way to evaluate whether conditions were met so incomplete conditional scope items were categorized as supplemental problems, not as failures to meet quality standards.

The group of cases without supplemental problems were identified by first identifying all supplemental problems. If a case had one or more supplemental problems, it was subtracted from the total. The remaining cases made up the group of cases without supplemental problems. It was possible for cases to have both

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supplemental and quality problems. However, the sample selection criteria included only cases with problems, so that all cases included one or more problems.

Results

Table B-3 shows the results of the analysis of cases that met quality standards and were without supplemental problems. Secret investigations had the highest percentage of cases that met the quality standards (52%) and Top Secret/SCI – PR had the highest percentage of cases without supplemental problems (70%). An important note for interpreting the table: the totals may not equal 100% across the two problem areas because cases could have both quality and supplemental problems.

Table B-3
Cases That Met Quality Standards and Cases Without Supplemental Problems from a Sample of Deficient Investigations

PART Case Type	Overall Sample Size	Met Quality Standards		No Supplemental Problems	
		Frequency	%	Frequency	%
Secret	263	136	52	125	45
Top Secret/SCI - Initial	71	24	34	30	37
Top Secret/SCI – PR/PPR	43	11	26	33	70

* Note: an investigation could have both quality and supplemental problems.

Conclusion

Both quality and supplemental problems are important, but the steps to resolving them are quite different. The quality problems would be best resolved by the investigation provider and the supplemental problems require either improved DoD understanding of adjudicator needs or better training for adjudicators in what to expect from a completed background investigation. The data described above are useful for gaining a better understanding of the types of investigative problems adjudicators report. However, they are not a representative sample of investigations and, therefore, should not be interpreted as descriptive of all investigations.

STAGE 3: ADJUDICATION QUALITY

DoD adjudicators review background investigation information to reach a determination of eligibility for access to classified information. The information is evaluated in accordance with national *Adjudicative Guidelines* (1997; rev. 2005) that were developed in accordance with E.O. 12968. The purpose of the evaluation is to determine whether an individual is an acceptable security risk and whether to grant that individual eligibility for access to classified information.

DoD provides extensive training for adjudicators and is currently in the process of implementing an adjudicator certification program to standardize knowledge requirements and skill standards (e.g., Fischer, Marshall-Mies, Turner &

Bosshardt, 2008). However, although adjudicators are well trained to make adjudication decisions, they are given little in the way of guidance or requirements for documenting decisions.

Guidelines or standards are an essential need for quality evaluation. If there are no standards or requirements that define quality, it is difficult to identify something as having poor quality. Because documentation standards were not available, it was determined that the first step for developing a measure of adjudication documentation quality was to establish a better understanding of procedures currently in use and to develop guidelines specifying documentation requirements.

RADAR

PERSEREC developed an adjudication documentation quality measure called Review of Adjudication Documentation Accuracy and Rationales (RADAR) to gather information about adjudication decision documentation procedures in use at DoD CAFs. RADAR should also prove useful for subsequent evaluations of adjudication documentation quality once standards are set. RADAR gathers information about three components of adjudication decisions, whether they (1) were based on sufficient information, (2) identified adjudicative issues and took into account relevant disqualifying and mitigating factors, and (3) were adequately documented. Refer to Table B-4 for more information the content of RADAR.

**Table B-4
RADAR Description**

<p>Section 1: Sufficiency of Information</p>	<ul style="list-style-type: none"> ● Adjudicators will use this section to identify missing scope items. The Scope section consists of three pages plus a page for optional comments and is skipped entirely if adjudicators indicate that the investigation was not missing any scope items. ● For each missing scope item, adjudicators will have to determine whether an adequate explanation was provided.
<p>Section 2: Identified Adjudicative Issues</p>	<ul style="list-style-type: none"> ● Adjudicators will use this section to review the completed investigation, identify derogatory information, classify it by adjudicative issue, and then use the accompanying checklists to document any disqualifying and mitigating factors for each identified issue. ● The completed checklists will be compared to the disqualifying and mitigating information noted by the original adjudicator. ● Finally, the adjudicators will evaluate the original adjudicator’s documentation and use of disqualifying and mitigating information.
<p>Section 3: Adequate Documentation</p>	<ul style="list-style-type: none"> ● Adjudicators will evaluate the quality of documentation of adjudicative rationale to determine whether it took into account all relevant information. ● They will also evaluate whether the adjudication decision appeared consistent with the national standards.
<p>Section 4: Comments</p>	<ul style="list-style-type: none"> ● The final section of the RADAR provides space for optional overall comments.

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RADAR Data Collection

The purpose of the FY08 RADAR data collection was to gather information about adjudication decision documentation procedures currently in use at DoD CAFs. RADAR is an on-line tool designed to be completed in under 5 minutes. Actual completion time varies with the number of the adjudicative deficiencies in the case, because they require further elaboration.

Adjudication Quality Evaluators

Because adjudication documentation quality evaluations would be most useful if made independently by adjudicators outside the DoD CAFs, 17 contractor adjudicators from Protection Strategies also provided the adjudication quality evaluations using RADAR.

Procedure

The RADAR data collection occurred in two phases between the months of August 2008 and September 2008. In Phase I, PERSEREC requested background investigation cases from AFCAF, CCF, DISCO, and DONCAF¹. Upon receipt of the cases, PERSEREC staff requested JPAS data for them from DSS, showing eligibility information, adjudicator comments, and decision rationale. The JPAS data served as the adjudication decision documentation. Finally, PERSEREC staff logged each case into an electronic database and made a copy of each case closing transmittal (CCT) for internal records and tracking.

In Phase II, Protection Strategies adjudicators received extensive training in how to use RADAR, after which they applied it to the actual cases. The adjudicators accessed RADAR electronically via a URL link that was provided to them. The RADAR website informed adjudicators that the purpose of the tool was to gather information about adjudication decision documentation procedures in use at DoD CAFs. After reading a brief set of instructions on the first page, adjudicators proceeded to rate each case with RADAR. After rating each case, adjudicators logged it into an electronic database maintained by Protection Strategies.

After the RADAR data collection was complete, PERSEREC staff conducted a preliminary examination of the data, which revealed two types of problems. First, Protection Strategies adjudicators identified 18 cases with violations of the Adjudicative Issue K "Handling Protected Information." This number seemed unusually high, so PERSEREC research staff asked the adjudicators to re-rate the affected cases. Adjudicators re-rated the cases and identified only 15 Issue K violations during their second attempt. The second problem involved multiple ratings of the same case. Protection Strategies adjudicators resolved this problem by identifying the most recent case ratings and deleting all early versions that were also in the data file.

¹ The National Geospatial-Intelligence Agency contributed to the data collection as well, but those cases will be handled separately.

Results

From 31 July to 7 September 2008, Protection Strategies adjudicators rated 705 background investigation cases based on the adequacy of their documentation of adjudicative rationale. Data were analyzed at the level of investigation type (Secret, Top Secret/SCI – Initial, and Top Secret/SCI – PR). Similar numbers of each investigation type were included in the ratings, as shown in Table B-5.

Table B-5
Investigations Evaluated with RADAR

Investigation Type	Freq	% of Total
Secret	227	32%
Top Secret/SCI – Initial	260	37%
Top Secret/SCI – PR/PPR	218	31%

In the interest of including a variety of cases in the pool of ratings, participating CAFs were asked to send both clean cases that involved no issues and issue cases that involved issues ranging from minor to major seriousness. Table B-6 shows that between 71 % and 79% of the cases evaluated involved issues.

Table B-6
Issue and Clean Cases by Investigation Type

PART Case Type	Total Sample Size	Clean		Issue	
		Freq	%	Freq	%
Secret	227	67	30%	160	71%
Top Secret/SCI – Initial	260	64	25%	196	75%
Top Secret/SCI – PR/PPR	218	45	21%	173	79%

As shown in Table B-7, raters indicated that for 66% of Secret investigations, 73% of Top Secret/SCI – Initial investigations, and 67% of Top Secret/SCI – PR investigations, the adjudicator provided a narrative summary linking case information with adjudicative guidelines.

Table B-7
Percentage of Adjudication Decisions with Documentation

PART Case Type	Total Sample Size	Percent With Documentation
Secret	227	66%
Top Secret/SCI – Initial	260	73%
Top Secret/SCI – PR/PPR	218	67%

As shown in Table B-8, for those cases that did include a narrative summary, between 88% and 94% of the rationales took into account all relevant information.

**Table B-8
Decision Rationale Took All Relevant Information Into Account**

PART Case Type	%
Secret	94%
Top Secret/SCI – Initial	89%
Top Secret/SCI – PR/PPR	88%

Next, the analyses examined adjudicators’ ratings of overall quality of adjudication decision documentation for the cases that included a narrative summary. As shown in Table B-9, quality was acceptable for 93% of Secret investigations, 91% of Top Secret/SCI – Initial investigations, and 88% of Top Secret/SCI – PR investigations.

**Table B-9
Percentage of Documented Decisions with Acceptable Documentation**

PART Case Type	N of Subset of Cases with Documentation	Percent of Subset with Documentation that have Acceptable Documentation
Secret	149	93%
Top Secret/SCI – Initial	191	91%
Top Secret/SCI – PR/PPR	147	88%

Conclusion

The adjudication documentation quality data represented a snapshot of adjudication documentation quality and consisted of evaluations of cases adjudicated by DoD CAFs in July and August 2008.

SUMMARY: QUALITY MEASURE DEVELOPMENT

The investigation and adjudication quality measures and data collection procedures are at an earlier stage of development than the measures for cost, timeliness, and PSQ submission quality, and the results described above for investigation and adjudication quality are still a step removed from baseline data. However, DoD will use the above results to inform upcoming baseline data collection efforts and is planning improvements based on the results to date. For example, DoD has already drafted guidance for improving documentation of adjudication decisions and has developed pages that can be added to the adjudication documentation system to further standardize documentation of adjudication decisions.

REFERENCES

- Adjudicative Guidelines for Determining Eligibility for Access to Classified Information, (1997). Revised December 2005.
- Executive Order 12968, *Access to Classified Information*, August 2, 1995.
- Fischer, L.F., Marshall-Mies, J.C., Turner, A.S., & Bosshardt, M.J. (2008). *DoD Level 1 adjudicator training program assessment* (MR 08-01). Monterey, CA: Defense Personnel Security Research Center.
- Investigative Standards for Background Investigations for Access to Classified Information (1997). Revised December 2004.

**APPENDIX C:
TIMELINESS MEASURE COMPUTATION**

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TIMELINESS MEASURE COMPUTATION

This appendix outlines the methodology used to compute the PART baseline data for the timeliness of the stages of the Department of Defense (DoD) Personnel Security Program during FY08. In addition to the three stages of the DoD Personnel Security Program (Personnel Security Questionnaire [PSQ] submission, investigation, and adjudication), one additional time period was defined as end-to-end timeliness and covered the time period from the date the subject signed the PSQ submission to the date the adjudication decision was entered into JPAS.

STAGE 1: PSQ SUBMISSION TIMELINESS

PSQ submission times were estimated using the Quarterly National Security Oversight Report (NSOR) published by OPM. The NSOR contains PSQ submission (request) and adjudication timeliness as well as the overall end-to-end time for various types of investigations of interest (Secret, Top Secret/SCI - Initial, and Top Secret/SCI - PR).

JPAS SUBMISSION DATA

Although adjudications were easily linked to investigations in JPAS using the *Investigation ID*, linking investigations to the investigation requests that spawned them was not as straightforward. The Investigation Request table contains only a *Person ID* to link records to other tables. Using the *Person ID* as the linking key to investigation requests is not practical because there may be multiple requests per person, and no definitive criteria exist for matching the correct request and investigation. In addition, an examination of the Investigation Request table showed that, with the exception of Industry, all the CAF fields were null.

NSOR SUBMISSION DATA

Since JPAS did not contain sufficient submission data, we used the quarterly NSOR from OPM to approximate submission timeliness. Table C-1 presents a sample of the information contained in the NSOR. As shown in the table, information from the row labeled *Submission Timeliness* includes number of cases and average days for hardcopy and e-QIP versions of the SF-86 for Secret, Top Secret/SCI - Initial, and Top Secret/SCI - PR. It should be noted that the NSOR does not distinguish between initial and renewal Secret and Confidential Investigations.

Investigations in our sample could have been initiated as early as 1 October 2005. As a result, ideal submission time data would come from as far back as 2005. However, the earliest available NSOR application (submission) data for all case types were for the first and second quarters of FY08. Therefore, the submission times could only be considered rough approximations of the actual submission times.

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In order to best approximate submission times for our population, we used the NSOR reports to calculate the weighted averages for each case type of e-QIP and hard copy submission times for all SF-86s submitted during the first two quarters of FY08 and then calculated an overall weighted average across the four DoD CAFs.

**Table C-1
Excerpt from OPM National Security Oversight Report**

Investigation/Clearance Type:		Top Secret/Q (SBI's)	Secret/Conf/L (NACLCL, ANACI, MBI, LBI, & BI)	Top Secret Reinvestigations (SBIPR & PPR)
^[1] Submission Timeliness <i>Standard - Average 14 Days or less</i>	Hardcopy	623 @ 38 days	3,923 @ 33 days	229 @ 37 days
	e-QIP	3,049 @ 20 days	45,115 @ 6 days	1,882 @ 11 days
^[2] Monthly Timeliness Performance (Received on or after 10/01/06) <i>Standard - Average Age of 80% - 30 days or less</i>	Actions Reported	3,081	25,654	1,445
	Average Adjudication Time	60 days	54 days	52 days
	Average Age of 80% Completed Adjudication Actions	43 days	32 days	37 days
Monthly END TO END Measures: Applicant Signature Date (Form Date) to Adjudication Date (Received on or after 10/01/06) <i>Standard - Average Age of 80% - 120 days or less</i>	Average END to END Age	214 days	135 days	247 days
	Average END to END Age of 80%	172 days	90 days	197 days
	Average END to END Age of 85%	179 days	99 days	205 days
	Average END to END Age of 90%	187 days	109 days	214 days

Note: Investigation and clearance types are in the terminology used by OPM.

^[1] Excludes reopens.

^[2] Adjudication time posted is for all reported actions and includes mail/handling time, estimated up to 15 days, between OPM and adjudicating agency.

STAGES 2 & 3: INVESTIGATION & ADJUDICATION TIMELINESS

Data were drawn primarily from the Joint Personnel Adjudication System (JPAS), which is the system of record for recording and providing personnel security eligibility and access information for DoD. The JPAS database contains current and historical data on the timing of investigations and adjudications, as well as limited data on the submission process. Adjudication and investigation data were easily linked together, but the submission data could not be directly linked to investigations and adjudications.

JPAS INVESTIGATIVE DATA

The JPAS Investigation table contains data on specific investigations associated with specific adjudications to include *Investigation Type* and elements corresponding to the start (*Investigation Open*) and end of the investigation (*Investigation Close*). The adjudicated cases were linked to associated investigations using the *Investigation ID* contained in both tables. Cases were only selected where

no previous adjudication based on the same investigation existed. Only those cases with a *Closed Date Type Code*, indicating that the investigation had closed, and with an *Investigating Agency Code*, indicating that OPM had conducted the investigation, were included. The open and close dates also had to be logically consistent, with investigations opened no earlier than 2 years from the adjudication close and investigations closed no earlier than 1 year from the adjudication close. Table C-2 summarizes investigation selection criteria for the third quarter, FY08 report.

**Table C-2
JPAS Case Selection**

Investigation Table Item	Conditions
Investigation ID	Link to Adjudication Action Table
Investigation Types	Secret (ANACI , NACLIC); Top Secret/SCI - Initial (SSBI); Top Secret/SCI PRs (SBPR, PPR)
Investigating Agency	OPM
Investigation Open Date	No earlier than 2 years from the adjudication close date; Earlier than or the same as the Investigation Close Date; No null values
Investigation Close Date	No earlier than 1 year from the adjudication close date; Earlier than or the same as the (Adjudication) Close Date; No null values
Close Date Type Code	Closed

JPAS ADJUDICATION DATA

Adjudications completed during FY08 were selected using the JPAS Adjudication Action table. Only those cases associated with a personal security investigation and access eligibility consistent with Top Secret/SCI, Secret and Confidential adjudicated by the following DoD CAFs were selected: (1) Army Central Clearance Facility (Army CCF), (2) Department of the Navy Central Clearance Facility (DONCAF), (3) Air Force Central Clearance Facility (AFCAF), and (4) Defense Industrial Security Clearance Office (DISCO). In addition, data were aggregated to develop trends for DoD (all four of the above CAFs combined), and for the military services (the three service CAFs combined).

The Adjudication Action table in JPAS contains data elements corresponding to the start (*Begin Date*) and end (*Close Date*) of the adjudication. It also contains a data element corresponding to the date the case was received at the CAF (*Arrived at CAF Date*). The *Close Date* proved to be the only date accurate enough for a CAF timeliness measure and was used to mark the end of an adjudication action. The complete set of criteria for selecting adjudication cases is presented in Table C-3.

APPENDIX C

**Table C-3
JPAS Adjudication Case Selection**

Table	Data Element	Conditions
Adjudication Action	Close Date	Between 1 Oct 2007 and 30 September FY08; No null values.
Adjudication Action	Adjudication Type	Personnel security investigations only.
Adjudication Action	Eligibility	Confidential; Favorable; Ineligible for SCI; Loss of Jurisdiction; No Determination Made; SCI-DCID 6/4; Secret; Top Secret.
Adjudication Action	Assigned Granting CAF	Army CCF, DONCAF, AFCAF, DISCO.
Adjudication Action	User ID	Linked to Adjudication Action using User ID.
JPAS User	CAF Code	Army CCF, DONCAF, AFCAF, DISCO.
Adjudication Action	Investigation ID	Linked to Investigation Table.

APPENDIX D:
DATA SHEET 1: ALLOCATION OF CAF PERSONNEL

DATA SHEET 1: ALLOCATION OF CAF PERSONNEL

INSTRUCTIONS FOR DOD PART DATA SHEET 1 ALLOCATION OF CAF PERSONNEL WORK TIME BY FUNCTIONAL AREA

Definitions of Different Functional Work Area

Core Adjudication of Access Eligibility Investigations. This category includes all adjudicator work time, as defined by the DoD Program Assessment Rating Tool (PART), up to the point where a decision is made to grant eligibility for access to classified information or all work time up to the point where a decision is made to initiate due process. It includes adjudications for TS/SCI, TS, Secret, and Confidential access eligibility using the following investigations: SSBIs, SSBI-PRs and Phased SSBI-PRs, and NACLCS /ANACIs/NACLCS PRs. Adjudicative actions include case management, initial case review, minor and major derogatory review, and JPAS entries. It also includes extra time spent because a case has a suspense action.

All Other CAF Adjudicative Work (including Due Process and Component Support). This category refers to work on all interim access eligibility decisions, special adjudication actions (e.g., fraudulent enlistments, positions of trust, responses to informational inquiries (incoming status checks, Congressional inquiries, freedom of information requests), and nonadjudicative actions required to maintain, transfer, or terminate clearances. It also includes time spent on due process to write SORs and review rebuttals. In addition, it includes time reviewing and adjudicating continuing evaluation/incident reports, recertification, and research on and upgrading access eligibility, as well as time spent on any unique actions or tasks required by component headquarters. Finally, it includes work on cases that are administratively closed or closed because of loss of jurisdiction.

Indirect Facility Support. This includes personnel, procurement, financial, facilities, and IT personnel support required to operate the facility. If support in any of these areas is provided by component personnel not assigned to your facility, then do not include them on this form.

Management/Supervision. This category includes the planning, coordination, and control of facility activities as well as employee supervision. It also includes time spent attending outside meetings of direct relevance to the CAF mission.

Other. This includes any nonpersonnel security work performed to support the component as well as any work performed outside the facility to support DoD on activities that are not directly related to the CAF mission (e.g., promotion boards, inspections, and other headquarter assignments). For DISCO, this also would include all work time spent in support of the Defense Industrial Security Program that was not directly related to the DoD Personnel Security Program.

Steps for Completing DoD PART Data Sheet 1

- (1) Group separately all military and government civilian personnel assigned to the adjudication facility by series, grade, and full-time or part-time status.
- (2) Within each series, grade and status (full-time or part-time) group, identify any subgroups that perform essentially the same tasks. Do not combine positions with different series or different grades or military personnel with civilian personnel.
- (3) List the series of each of the groupings identified in Step 2 in the first column of the worksheet. Note that a series may appear on multiple rows if the series includes subgroups that perform different sets of tasks (e.g., one subgroup mostly works on interims and due process and another subgroup mostly does initial adjudications).
- (4) In the second column of each worksheet, write the grade or rank of personnel in the grouping. In the third column, enter the number of personnel in the grouping.
- (5) For each of the groupings listed on the worksheet, estimate the percentage of work time devoted to each of the five categories of work (described above). Note that each row must total 100%.

Examples (See PART Data Sheet 1)

1. At Facility A, five full-time GS-11 adjudicators (080s) spend 50% of their work time on adjudicating SSBIs and Phased PRs and 50% of their time on due process requirements and interims. These individuals are listed as 40 hours per week annually and reported as 50% Core Adjudication and 50% All Other Adjudicative Work and Component Support.

2. At Facility A, a full-time GS-9 CAF computer programmer works on the CAF IT system 36 hours a week and provides four hours a week support to another agency only indirectly benefiting Facility A. This person is reported as 40 hours per week with 90% Indirect Facility Support and 10% Other.

3. At Facility A, a full-time GS-13 adjudicator (080) spends 20% of his or her time reviewing other adjudicators' work and 80% managing adjudicators. This person is reported as 40 hours per week with 20% Core Adjudication and 80% Management.

4. At Facility A, a military 0-4 psychologist is available for case consultation 4 hours per week. This would be recorded as four average hours per week annually and 100% Core Adjudication.

5. At Facility A, two E-7 reservists divide their time evenly between Core Adjudication and All Other CAF Adjudicative Work once a year during a two-week tour.

This would be recorded as 1.6 average hours week annually (80 hrs divided by 50 weeks) and 50% Core Adjudication and 50% All Other CAF Adjudicative Work.

Example Completed Data Sheet 1

CAF NAME:									
ALLOCATION OF CAF PERSONNEL WORK TIME BY FUNCTIONAL AREA (DOD PART DATA SHEET 1)									
POSITION INFORMATION				ALLOCATION OF % OF WORK TIME BY FUNCTION					TOTAL TIME
Series/ Service	Grade/ Rank	Number of Personnel	Average Hours Per Week Annually	Core Adj./ Due Process	All Other CAF Adjudication Work	Indirect Facility Sup.	Management/ Supervision	Other	Sum (%)
080	GS-11	5	40	50	50				100%
XXX	GS-9	1	40			90		10	100%
080	GS-13	1	40	20			80		100%
Air Force	O-4	1	4	100					100%
Air Force	E-8	2	1.6	50	50				100%
									100%
									100%

Sample Blank Data Sheet 1

CAF NAME:									
ALLOCATION OF CAF PERSONNEL WORK TIME BY FUNCTIONAL AREA (DOD PART DATA SHEET 1)									
POSITION INFORMATION				ALLOCATION OF % OF WORK TIME BY FUNCTION					TOTAL TIME
Series/ Service	Grade/ Rank	Number of Personnel	Average Hours Per Week Annually	Core Adj./ Due Process	All Other CAF Adjudication Work	Indirect Facility Sup.	Management/ Supervision	Other	Sum (%)
									100%
									100%
									100%
									100%
									100%
									100%
									100%