



PERSEREC

Management Report 17-06
September 2017

2015 RADAR Adjudication Quality Evaluation

Leissa C. Nelson
*Defense Personnel and Security Research Center
Office of People Analytics*

Donna L. Tadler
Northrop Grumman Technology Services



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Released by – Eric L. Lang

PREFACE

In 2005, the Government Accountability Office (GAO) listed the Department of Defense (DoD) personnel security clearance program as “high risk,” citing a lack of quality metrics for adjudication determinations as one of the reasons. Since then, DoD has undertaken several efforts to address this issue. Specifically, DoD prepared related policy and developed a quality measurement tool to help ensure that DoD adjudicators provide documentation that reflects the factors taken into account during decision-making. This tool is the Review of Adjudication Documentation Accuracy and Rationales (RADAR).

RADAR evaluations have been conducted annually for the past several years. The current report presents the results of RADAR evaluations for adjudication decisions documented in fiscal year 2015, and is the third in a series of reports documenting adjudication quality evaluation. As the analysis presented in this report shows, the evaluations found that well over 90% of adjudication determinations were consistent with national adjudication guidelines and correctly documented.

Eric L. Lang
Director, PERSEREC

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

This report outlines the results of the latest Review of Adjudication Documentation Accuracy and Rationales (RADAR) evaluation, conducted on adjudication decisions made during fiscal year (FY) 2015. It is part of an ongoing effort to ensure adjudication documentation quality within the Department of Defense (DoD). The RADAR FY15 evaluation builds upon previous RADAR work by assessing continued compliance with standards and providing recommendations for improved metrics and adjudication documentation practice.

EVALUATION METHODOLOGY

Independent evaluators with adjudication experience and who were familiar with DoD adjudication training used the online RADAR tool to review case information and evaluate the quality of adjudication decisions and decision documentation provided by adjudicators at the DoD Consolidated Adjudication Facility (CAF). The sample of cases included only those used to make personnel security determinations in FY15: National Agency Check with Law and Credit (NACLC), Access National Agency Check and Inquiries (ANACI), Single-Scope Background Investigation (SSBI), SSBI Periodic Reinvestigation (SSBI-PR), and Phased Periodic Reinvestigation (PPR). Every case in the sample contained derogatory investigative information.

OVERALL RESULTS

The primary results of interest are a) the evaluations of the quality of the documentation (i.e., adjudicator compliance with DoD adjudication documentation standards) and b) the evaluations of the extent to which the adjudication decisions are consistent with the national adjudicative guidelines. The overall documentation quality assessment was lower than in the previous year's evaluation (83.5%, as opposed to 89.2% in 2014; Nelson & Tadler, 2014).

In reviewing the cases with unacceptable documentation ratings, there were a number of cases with unacceptable ratings where the adjudicator identified an issue but failed to show in his/her documentation how the concern was mitigated. In most instances, however, evaluators indicated that the unacceptable rating was due to either a) the failure to note that previously adjudicated and documented information had been reviewed or b) re-documenting previously adjudicated and documented information unnecessarily (e.g., the information was not used to reach the most recent determination).

With regard to the extent to which adjudication decisions were consistent with the national security adjudicative guidelines, the results from this evaluation indicate that 95.3% of the adjudication decisions sampled for this iteration were consistent with those guidelines. Like the overall documentation evaluation, this overall

evaluation was also slightly lower than the FY14 finding that 98.8% of decisions were consistent with the national adjudicative guidelines.

RECOMMENDATIONS AND FUTURE ASSESSMENTS

Recommendations to improve compliance with documentation standards include:

- Provide reminders or refresher training to adjudicators about documenting the review of previous investigations (see November 8, 2009 adjudication documentation memorandum).
 - During evaluator training, reinforce that a case shouldn't be rated negatively if it includes documentation of past issue information.
- Provide reminders or refresher training to adjudicators about documenting mitigating information in addition to issues and disqualifiers. Most documentation is enabled through check boxes on the adjudication screen of the Case Adjudication Tracking System (CATS), but if the adjudicator does not select a mitigation check box, he or she must provide typed comments in the Rationale area.

Recommendations to improve future RADAR assessments include:

- Request early compliance with the requirement to extract investigation and adjudication documentation data to ensure evaluations can be completed in a timely manner.
- Continue to require a minimum of five evaluators, each completing approximately equal numbers of evaluations.
- Continue to conduct periodic discussions with one or more DoD CAF adjudicator representatives during the evaluation period to identify unacceptable ratings that may be incorrect or due to differences in policy understanding (e.g., financial thresholds).
 - If such policy differences are identified, work with the DoD CAF representative and the evaluators to provide clarification.
- Conduct RADAR evaluations in-house at the DoD CAF so adjudicators can review each other's work and address issues in a more tailored fashion.
- Conducting RADAR evaluations in-house at the DoD CAF may also provide a better assessment of adjudication documentation and decision outcomes. Adjudicators reviewing the work of peers with the same training, guidance, and experience would provide the CAF with a closer look at its work and put it in a position to address issues sooner and in a more directed manner. This would also make the RADAR process more efficient by eliminating the CAF's need to review outside evaluators' work, provide feedback regarding disagreements with ratings, and receive results based on data it has already examined.

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INTRODUCTION

The purpose of this project was to perform a quality evaluation of the adjudication component of the Department of Defense (DoD) personnel security program. In the context of personnel security, adjudication refers to the process of determining whether an individual is *eligible* to access classified information or perform sensitive duties. Adjudication requires the review of completed background investigations by specially trained personnel (adjudicators). Adjudicators assess the information in the context of national adjudicative guidelines (at the time of this project the guidelines were: *Adjudicative Guidelines for Determining Eligibility for Access to Classified Information*, 1997; revised December 2005¹) to make a whole person evaluation of the subject's eligibility. The eligibility determination is used by federal agencies, security managers, and related DoD entities to either grant access to classified information or assign sensitive duties to properly screened individuals. Given the importance of adjudicative decisions, it is critical that adjudicators thoroughly document the key adjudicative elements.

BACKGROUND AND DEVELOPMENT OF STANDARDS

The Government Accountability Office (GAO) periodically publishes a list of agencies and programs that are labelled "high risk" due to vulnerabilities to fraud, waste, abuse, and mismanagement, or are most in need of transformation. GAO placed the DoD personnel security program on the High Risk List in January of 2005, citing delays in completing hundreds of thousands of background investigations and adjudications. Additionally, GAO identified concerns about the lack of quality measurement in the adjudication process. Without quality measurement, it is difficult to ensure that adjudicative information is properly considered and that derogatory information is mitigated appropriately before a favorable determination is made. As GAO states, effective use of quality metrics can "promote oversight and positive outcomes such as maximizing the likelihood that individuals who are security risks will be scrutinized more closely (GAO, 2014)."

The Defense Personnel and Security Research Center (PERSEREC) addressed the need for quality metrics with the assistance of a working group consisting of adjudicators and other subject matter experts (SMEs). The effort resulted in a) the development of standards that spelled out the information that must be included to correctly document adjudication determinations, as well as b) guidance clarifying when an adjudication determination could be made despite one or more missing investigative scope items (e.g., an education check, a neighbor interview). Following development of both sets of standards, PERSEREC designed a tool for evaluating the extent to which the standards were met, the Review of Adjudication

¹ The 2005 Adjudicative Guidelines will be replaced by Security Executive Agent Directive 4, *National Security Adjudicative Guidelines*, effective 08 June 2017.

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Documentation Accuracy and Rationales (RADAR; Nelson et al., 2009). Since its development, DoD has regularly assessed whether adjudication decisions have been documented according to these quality standards. RADAR will be described in more detail below.

In February 2011, GAO removed DoD's personnel security clearance program from the high-risk list. Among the reasons cited for this was DoD's development and implementation, not only of standards for adjudication documentation and adjudicating incomplete investigations (Under Secretary of Defense for Intelligence [USD(I)], 2009, 2010), but also DoD's implementation of a tool to evaluate the quality of adjudication documentation.

DoD Adjudication Quality Standards

The quality standards established by DoD for adjudication documentation are outlined in a policy memorandum (Under Secretary of Defense for Intelligence (USD[I]), November 8, 2009, *Personnel Security Clearance Adjudication Documentation*). Adjudicators at adjudication facilities are expected to document their adjudication decisions based on the criteria and format indicated by the standards. The guidance covering adjudication of incomplete personnel security investigations appears in a separate policy memorandum (Under Secretary of Defense for Intelligence (USD[I]), March 10, 2010, *Adjudicating Incomplete Personnel Security Investigations*).

The documentation standards specifically call out two types of cases that must be documented: a) cases with significant derogatory information as defined by the national adjudicative guidelines, and b) Single Scope Background Investigations (SSBIs) where the current investigation is missing one or more standard scope item(s), and was not returned to the investigative service provider (ISP) for additional investigative work.

The documentation standards for cases with significant derogatory information require documentation of:

- (a) adjudicative issues,
- (b) disqualifying factors,
- (c) mitigating factors,
- (d) review of previously adjudicated information, if relevant, and
- (e) rationale for mitigating an issue if the mitigating factor is not one of those found in the adjudicative guidelines.

The documentation standards for SSBIs that are missing one or more standard investigative scope items (e.g., neighborhood check, education check) require documentation of:

- (a) a brief description of the missing scope item and
- (b) a brief description of the reason the investigation was not returned.

However, there is an important caveat. To date, there is no method for identifying cases that are missing one or more scope items, so this standard is not assessed directly. That is, RADAR includes items that capture missing scope items, but the sample doesn't specifically target cases that are missing scope items.

Adjudication Documentation Process

Adjudicators at the DoD Consolidated Adjudication Facility (DoD CAF) use the Case Adjudication Tracking System (CATS)² to complete adjudicative tasks. CATS facilitates adjudication documentation through a set of check boxes that list the thirteen adjudicative guidelines (i.e., issues). If an issue is present in a case, the adjudicator clicks on the check box to select that issue. Once an issue is selected, the associated disqualifying and mitigating conditions appear and the adjudicator selects all that are relevant. In addition, there is a check box to indicate that previously adjudicated information was reviewed, as well as two free text fields for typed comments (e.g., for use when mitigation requires additional documentation).

EVALUATION TOOL: RADAR

PERSEREC developed RADAR to assess the standards described above. RADAR is accessed online and evaluators complete their quality evaluations by answering multiple-choice questions, reviewing checklists, and entering responses in text boxes. Depending on the answers evaluators provide regarding a particular case, the tool's built-in branching logic presents appropriate follow-up questions and skips questions irrelevant to the case.

RADAR is organized to mirror the order of steps in the adjudication process. That is, when conducting a quality evaluation in RADAR, evaluators must first review the investigative information, note any missing scope items, assess the disqualifying and mitigating information the adjudicator identified, make two overall assessments. The first overall assessment looks at the extent to which the adjudicator complied with the documentation standards and the second looks at whether the final determination was consistent with the national security adjudicative guidelines. In other words, evaluators are not asked to "re-adjudicate" the case using RADAR, but rather to determine whether the original adjudication was justified, given the information in the investigation and the documentation provided by the original adjudicator.

² At the time of this evaluation, each DoD CAF division used its own version of CATS, but their functions were largely similar.

INTRODUCTION

BENEFITS OF QUALITY EVALUATION

Implementation of quality standards and metrics of compliance helps ensure that adjudicative decisions support the national security mission and proper screening of individuals in national security sensitive positions. Ensuring adjudication quality also supports reciprocal acceptance of adjudication determinations by other organizations, as is mandated by Executive Order (EO) 12968, *Access to Classified Information*, August 2, 1995 and EO 13467, *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information*, June 30, 2008.

Adjudication documentation is also important for efficient implementation of continuous evaluation strategies, which focus on new information that has not yet been adjudicated. It can be difficult to determine whether derogatory information identified by continuous evaluation has previously been adjudicated, but adjudicators can assist with this by thoroughly documenting the information that informed their decision.

PRESENT EVALUATION AND REPORT

As part of ongoing efforts to ensure adjudication documentation quality, RADAR was employed to evaluate quality of cases adjudicated in fiscal year 2015 (FY15). The version of RADAR used in the current evaluation was slightly modified to address response pattern issues discovered in the previous evaluation (e.g., changes to skip logic to ensure items are completed correctly). However, it did not change in terms of the evaluation metric itself (i.e., RADAR still measures adjudication documentation compliance with standards and whether the final determination was consistent with national security adjudicative guidelines).

The present report also includes two appendices documenting results from previous evaluations that have not been published elsewhere: Appendix A provides the results of the FY14 RADAR evaluation and Appendix B provides the results of the FY13 RADAR evaluation. Due to differences in data across the years, trend analyses are not appropriate but some snapshot comparisons are provided in a later section of the report.

METHODOLOGY

Overall, the methodology for collecting RADAR evaluations has largely remained the same over the years. The data required for evaluation purposes have not changed, nor has the need for evaluators with adjudication training, to include DoD adjudication training. There have been, however, revisions to the RADAR tool itself and to the sampling strategy.

REVISIONS TO RADAR

For this iteration of evaluations, minor changes were made to the existing RADAR tool to increase readability and to improve the branching logic of multiple questions. The FY14 evaluation revealed that the sections related to missing investigative scope items were incorrectly skipped, so revisions were made to prevent this. This included modifications to question order and skip logic, making responses to certain questions mandatory, and reordering the questions in the “Scope Items” and “Other Scope Missing” sections. In the revised RADAR tool, respondents must completely review the investigative scope item checklist before indicating whether an investigation was missing any scope items.

Additionally, a few questions were reworded for clarity and some were supplemented with guidance for locating certain investigative information (e.g., directing the evaluators to find the OPM case ID on the certificate of investigation [COI]). Another modification was the addition of a “N/A” option to the now-required “Mitigating Conditions” checklist for each issue identified. Question 12—the question regarding adjudication documentation—was altered by adding a response option stating that the adjudicator should have identified other issues and corresponding disqualifying factors. The content of RADAR appears in Appendix C.

DATA

Evaluators must have all of the materials that were available to the original adjudicator, as well as the documentation record of that decision in order to ensure accurate RADAR evaluations. Complete investigative data are generally found in the report of investigation (ROI; also known as a Distributed Investigative File [DIF]), including any additional investigative material gathered by the ISP after the original investigation was completed. In addition, the materials must include any information gathered by the adjudicator after the original investigation was completed. Both the adjudicative and investigative information is provided from the Defense Information Systems for Security (DISS). DISS included the Case Adjudication Tracking System (CATS) that adjudicators use to manage their workload and document final determinations³.

³ Information about the final determination is transferred from CATS to the DoD adjudication system of record, the Joint Personnel Adjudication System (JPAS).

METHODOLOGY

SAMPLING PLAN

All cases that had been assigned a case seriousness code of B, C, or D (indicating the presence of moderate, substantial, or major issues, respectively) were identified from the population of personnel security cases adjudicated by the DoD CAF in FY15. As in previous years, attempts to identify SSBI cases that were missing one or more investigative scope items were unsuccessful and the current evaluation focuses only on cases with potentially significant derogatory information.

From this population of cases, a stratified random sample was identified. Primary stratification factors included a) DoD CAF division (Army, Navy, Air Force, Defense Agencies [WHS], and Industry), b) investigation type (Access National Agency Check and Inquiries [ANACI], National Agency Check with Law and Credit [NACLC], Single Scope Background Investigation [SSBI], Single Scope Background Investigation-Periodic Reinvestigation [SSBI-PR], and Phased-PR).

In addition, the sampling plan targeted cases that either granted or denied eligibility (or continued eligibility) for access to classified information. Cases where a final determination was not made (e.g., No Determination Made or Loss of Jurisdiction) were not included in the sample. The sampling plan also excluded non-national security case types that are not subject to the documentation standards, such as Position of Trust. The sample had to include a minimum of 20 different adjudicators.

Table 1 displays the numbers and types of cases that were ultimately requested from the DoD CAF divisions. The size of this stratified sample (N=1,887) was based on an assumption (from previous work) that at least 95% of the adjudications were documented correctly, allowing for confidence that the evaluation's findings are within one percent of actual results.

Table 1
RADAR Sampling Plan

CAF Division	Proposed Sample Size					Total
	ANACI	NACLC	SSBI	Phased-PR	SSBI-PR	
Army	95	78	74	77	74	398
Navy	94	78	74	77	74	397
Air Force	94	77	73	77	74	395
Industry	N/A ¹	77	74	77	74	302
Defense Agencies	94	77	73	77	74	395
Total	377	387	368	385	370	1,887

¹ The Industry division does not adjudicate ANACI cases.

After the sample was identified, the CATS data team pulled a) the electronic investigation files and b) the associated adjudication documentation. Both the spreadsheets containing the adjudication documentation and zip files containing

the investigative information were sent to PERSEREC via secure transfer through U.S. Army Aviation and Missile Research Development and Engineering Center, Safe Access File Exchange (AMRDEC SAFE) which is compliant with DoD policy guidelines regarding exchange of sensitive information (e.g., personally identifiable information [PII]).

Once PERSEREC researchers received the adjudication and investigation information, they created a log documenting the data received. After the log was created, the data was sent via secure online transfer (also AMRDEC SAFE) to the organization employing the evaluators. The evaluators conducted the RADAR evaluations from April 2016 to September 2016, as the CATS team provided investigative files from the participating DoD CAF divisions.

EVALUATORS

RADAR evaluators made objective judgments as to whether the original adjudicators properly and effectively adjudicated cases and documented the determination. In order to do this, they were required to have both DoD personnel security adjudication training and experience performing adjudication. They were also to have had thorough knowledge of the national adjudication guidelines and DoD adjudication documentation standards.

All evaluators had either Top Secret eligibility based on a favorably adjudicated Single Scope Background Investigation (SSBI) or equivalent (e.g., a Q clearance granted by the Department of Energy [DoE]) and had worked for the same contractor organization used in previous evaluations. Although the evaluators had DoD adjudication training and certification, they also worked for the Department of Energy and performed the RADAR evaluations as an additional task.

EVALUATOR PREPARATION

Before beginning evaluations, the research team held a meeting with the evaluators to discuss use of the RADAR tool and best practices for performing the evaluations. The team reviewed training material from previous evaluations, which included background information on the tool and important notes regarding adjudication practice at the DoD CAF. Evaluators were reminded to assess whether the original adjudication was justified given the case information. They were also instructed that DoD CAF adjudicators are trained not to re-document issue information that was previously documented (however, DoD CAF adjudicators are required to note that they reviewed the information), and to limit use of the “Personal Conduct” guideline when other guidelines may be applied to a particular issue.

The meeting also covered quality control procedures for ensuring data are accurate and exchanged appropriately. PERSEREC instructed the evaluators to distribute cases evenly so that one evaluator did not perform the majority of evaluations and

METHODOLOGY

to keep a record of cases that have been evaluated for comparison to PERSEREC's record.

As the evaluation process began, evaluator feedback indicated that they needed clarification about certain adjudicative outcomes (e.g., a condition or waiver that was granted) and application of the Bond Amendment (for drug use). The research team provided reference documents and conducted periodic discussions to review evaluations as necessary and to clarify any other questions.

EVALUATION DATA REVIEW

As a lesson learned from previous RADAR evaluations, evaluation results were reviewed after completion to identify a) duplicate or incomplete evaluations, b) evaluations in which sections were incorrectly skipped (i.e., that the branching logic worked correctly), and c) data entry errors for case identifiers (e.g., CAF division, investigation type).

Duplicate or Incomplete Evaluations

If incomplete evaluations were identified, the data was further examined to determine whether a complete evaluation for that case was performed at another time. If not, the evaluator team was notified. If there was a completed evaluation, the partial evaluation was deleted. Duplicate ratings were reviewed with the evaluator team and only one rating per case was retained.

Incorrect Skipping

As mentioned in the method section, in the previous evaluation (FY14), evaluators incorrectly skipped some questions. Review of the data showed that this problem had not reoccurred.

Data Entry Errors

Research staff reviewed evaluator entries for case identifiers for accuracy and corrected any errors. This review covered the values entered for CAF division, OPM case ID, CATS case ID, investigation type, and adjudication type.

EVALUATION RESULTS REVIEW

Another lesson learned from prior evaluations was the need to monitor evaluation results (e.g., cases that receive "unacceptable" ratings for adjudication documentation quality). The reason for this was to allow for opportunities to discuss the evaluation process with evaluators to determine whether they were using the correct criteria for their evaluations. As an example, in a previous evaluation, evaluators were rating cases as unacceptable because the original adjudicator did not cite personal conduct as an issue. However, DoD adjudication training teaches that in most cases it is not necessary to cite personal conduct as an issue, if the derogatory information is covered by another guideline. The

evaluations should reflect DoD practice, so this finding allowed researchers to work with evaluators to better calibrate their evaluations.

In the current evaluation, the review discovered a couple of evaluation problems. First, it was discovered that a single evaluator was responsible for rating a large number of cases as “unacceptable.” Second, it was discovered that in many cases raters were using the same rationale for making two unrelated ratings (i.e., the rating of documentation quality and the rating of adjudicative consistency with the national security adjudicative guidelines). This indicated that the evaluators did not understand that they were rating two distinct aspects of the adjudication. These problems were discussed with evaluators to better understand them and to ensure the evaluators were using the correct criteria in their evaluations.

DoD CAF Review

As a final aspect of the review, the research team examined the reasons provided by evaluators as to why a case had documentation or a decision that was not consistent with the respective standards, and/or required further examination (e.g., had explanations more appropriate for an adjudicator to address). The results of this were compiled for review by the DoD CAF.

The DoD CAF divisions reviewed the negative documentation and decision ratings the evaluators gave for their cases and advised whether they were in line with CAF or division guidance. In most cases the adjudicators agreed with the ratings and provided feedback on those they disagreed with. PERSEREC discussed this feedback with evaluators, which helped refine the evaluation approach.

RESULTS

RESULTS

This section provides descriptive information about the sample and the results of the evaluations of adjudicators' use of disqualifying and mitigating factors. Key results are the evaluations of the extent to which the adjudication documentation met documentation standards and the extent to which the overall decision was consistent with the national security adjudication guidelines.

SAMPLE INFORMATION

The data provided by the CATS team varied somewhat from the sampling plan; it included different numbers of cases per CAF division and some of the case files provided did not include any data. In addition, evaluators were not able to complete evaluations for all cases due to delays in receiving the data. As a result, a total of 1,615 cases were evaluated (i.e., our actual sample). This number represents 93.8% of the sample provided and 85.6% of the sample identified in the sampling plan and allows for a margin of error of +/- 5%. Table 2 shows the distribution of cases in the actual sample by investigation type for each CAF division.

Table 2
Actual Sample/Cases Evaluated

CAF Division	ANACI Cases	NACLC Cases	SSBI Cases	Phased-PR Cases	SSBI-PR Cases	Total
Army	96	64	59	102	88	409
Navy	49	50	83	99	1	282
Air Force	94	77	86	101	92	450
Industry	N/A ¹	77	76	75	78	306
Defense Agencies	53	46	34	13	22	168
Total	292	314	338	390	281	1,615

¹ The Industry division does not adjudicate ANACI cases.

Table 3 presents the total number of evaluations and percentages by CAF division. The Defense Agencies division adjudicates a smaller number of cases than other divisions; as a result, the available sample was smaller than that for the other divisions.

Table 3
Evaluations per DoD CAF Division

CAF Division	Frequency	Percentage
Army	409	25.3
Navy	282	17.5
Air Force	450	27.9
Defense Agencies	168	10.4
Industry	306	18.9
Total	1,615	100.0

Table 4 shows the distribution of eligibility types that were in the sample. Most of the determinations were Secret, Top Secret, or Top Secret/Sensitive Compartmented Information (TS/SCI), but the sample also included a few cases with denials or revocations.

Table 4
Eligibility Determinations

	Frequency	Percentage
Secret - Initial	598	37.0
Denied	5	0.3
Revoked	6	0.4
Secret - Continued	2	0.1
Revoked	2	0.1
Top Secret - Initial	120	7.4
Top Secret - Continued	193	12.0
TS/SCI - Initial	217	13.4
TS/SCI - Continued	468	29.0
Revoked	4	0.2
Total	1,615	100.0¹

¹Values may not total to 100 due to rounding.

Table 5 shows the number of cases that included polygraph results. The number was quite small, only 13 (0.8%) of the cases in the sample included polygraph results. For 12 (0.7%) cases, the polygraph results were included as part of the investigation package. In six (0.4%) cases, a polygraph was included as a standard component of the investigation or added to resolve an issue. For the remaining seven (0.4%) cases, the evaluator could not determine whether a polygraph was a standard component of the investigation or added to resolve an issue.

RESULTS

Table 5
Inclusion of Polygraph Results

	Frequency	Percentage
Included in Investigation Materials	13	0.8
Included with the Rest of the Investigation Materials	12	0.7
Included as a Standard Component or Added to Resolve an Issue	6	0.4
Don't Know Whether Included as a Standard Component or Added to Resolve an Issue	7	0.4

ADJUDICATION DOCUMENTATION

The first set of adjudication quality results are the evaluations of the original adjudicators' use of disqualifying and mitigating conditions. It is important to note that identification and use of disqualifying and mitigating conditions can vary from adjudicator to adjudicator. For example, one adjudicator may assign to a particular issue a disqualifying condition of "a single serious crime or multiple lesser offenses," while another may assign one of "allegation or admission of criminal conduct, regardless of whether the person was formally charged, formally prosecuted or convicted". While adjudicators may disagree on specific disqualifying or mitigating factors, they may still agree on the overall adjudication decision (i.e., to grant or deny eligibility). Given this, the most useful results are those that serve as measures of adjudication documentation quality (i.e., adjudicator compliance with DoD adjudication documentation standards) and the extent to which the adjudication decisions are consistent with the national security adjudicative guidelines.

Ratings of the Original Adjudicators' Use of Disqualifying and Mitigating Conditions

Table 6 shows the percentages of cases rated as correctly using disqualifying and mitigating conditions. That is, evaluators rated whether the adjudicative issues identified by the original adjudicator were supported by the disqualifying conditions and mitigating conditions the adjudicator selected from the national adjudicative guidelines. In cases that received a favorable eligibility determination, evaluators also rated whether the adjudicator provided any mitigating conditions or written explanations justifying why that decision was made. Overall, adjudicators' use of disqualifying and mitigating conditions was rated as meeting national adjudication guidelines in 70.3% (n = 1,135) of cases. Table 6 displays these results by DoD CAF division and the overall sample.

Table 6
Disqualifying and Mitigating Condition Ratings - Percentages (%)

	Army	Navy	Air Force	Defense	Industry	Overall
Disqualifying Conditions Correctly Identified and Documented	63.6	60.6	81.6	77.4	72.2	71.1
Mitigating Conditions Correctly Identified and Documented	64.8	64.5	84.4	82.7	69.6	73.0
Disqualifying and Mitigating Conditions Correctly Used	61.9	60.3	82.4	75.6	69.9	70.3

Overall Ratings of the Original Adjudicators' Decision Documentation

Table 7 displays the ratings of the extent to which adjudication documentation aligned with DoD standards. As seen in the last column, 86.5% (n = 1,397) of cases were rated as meeting documentation standards (i.e., documentation was evaluated as Acceptable or No Documentation Required).

Table 7
Quality of Adjudication Decision Documentation - Percentages (%)

	Army	Navy	Air Force	Defense	Industry	Overall
Met Documentation Standards	88.0	86.5	94.0	83.9	74.8	86.5
Unacceptable	12.0	13.5	6.0	16.1	25.2	13.5
Total	100.0	100.0	100.0	100.0	100.0	100.0

Evaluators were asked to provide a rationale when rating the adjudication documentation as unacceptable (n = 218; 13.5% of the total sample). Forty-six (21.1%) of those cases were noted as missing documentation that previously adjudicated and documented information had been reviewed. Sixty-six (30.3%) cases had derogatory information that was not clearly mitigated in the documentation; this was the only reason indicated for 30 (45.0%) of those 66 cases.

About one-third (n = 84; 38.5%) of the cases that received negative documentation ratings had "Other" as the sole reason as to why the documentation was unacceptable. Analysis of the comments provided by the evaluators found that in most cases, the unacceptable rating was due to the adjudicator documenting disqualifying information that had previously been adjudicated and documented.⁴

Overall Ratings of the Original Adjudicators' Adjudication Decision

Each DoD CAF division, and the DoD CAF as a whole, were rated as making adjudication decisions consistent with standards in a majority of cases (n = 1,539;

⁴ Upon review of these cases, the DoD CAF indicated that it is better to over-document than to under-document issues. In these instances, re-documenting concerns or issues should not be penalized.

RESULTS

95.3% at the DoD CAF level). Table 8 presents the ratings regarding adjudication decision for each DoD CAF division and the DoD CAF as a whole.

Table 8
Adjudication Decision Consistent with National Adjudication Guidelines - Percentages (%)

	Army	Navy	Air Force	Defense	Industry	Overall
Consistent with Nat'l Adjud Guidelines	96.3	95.1	96.5	96.4	91.8	95.3
Not Consistent with Nat'l Adjud Guidelines	3.7	4.9	3.5	3.6	8.2	4.7
Total	100.0	100.0	100.0	100.0	100.0	100.0

COMPARISON ACROSS YEARS

Overall, the results of the 2015 RADAR evaluations indicated that a) over 86% of the adjudication decisions evaluated met adjudication documentation standards, and b) over 95% were consistent with national adjudication guidelines.

Table 9 shows a comparison of the percentage of adjudication decisions across the FY13, FY14, and FY15 evaluations that met documentation standards. However, bear in mind that this comparison of each year's evaluation used different versions of the RADAR tool and had unique sampling and rating biases that affected results. It is unclear whether the perceived improvement in adjudication documentation practices can be attributed to better DoD CAF practices, improvement of the RADAR tool and rating training, or both.

Table 9
Comparison of Frequency and Percentage of Cases that Met Adjudication Decision Documentation Standards FY13–FY15

	2013 Evaluation		2014 Evaluation		2015 Evaluation	
	Frequency	Percentage	Frequency	Percentage	Frequency	Percentage
Met Documentation Standards	1,145	78.1	1,664	89.2	1,397	86.5
Unacceptable	322	21.9	201	10.8	218	13.5
Total	1,467	100.0	1,865	100.0	1,615	100.0

Table 10 shows a comparison of the percentage of adjudication decisions from 2013 to 2015 that met national adjudication guidelines. In the 2014 analysis, a higher percentage of decisions met adjudication guidelines.

Table 10
Comparison of Frequency and Percentage of Adjudication Decisions Consistent
with National Adjudication Guidelines 2013–2015

	2013 Evaluation		2014 Evaluation		2015 Evaluation	
	Frequency	Percentage	Frequency	Percentage	Frequency	Percentage
Consistent with Nat'l Adjud Guidelines	1,407	95.9	1,842	98.8	1,539	95.3
Not Consistent with Nat'l Adjud Guidelines	60	4.1	23	1.2	76	4.7
Total	1,467	100.0	1,865	100.0	1,615	100.0

DISCUSSION

DISCUSSION

Quality evaluation of adjudication documentation is important because a number of significant decisions rely on adjudicative results (e.g., decisions to grant access to classified information or assign sensitive duties, decisions to accept DoD adjudication decisions in a reciprocal manner). Given the important role of adjudication, it is important to conduct on-going quality assessments of these decisions.

OVERALL RESULTS

The current RADAR evaluation found that a majority (86.5%) of cases in the sample met documentation standards. For those cases that did not meet documentation standards, many were noted for missing documentation that previously adjudicated and documented information in the case had been reviewed. Relatedly, a large number of cases were rated negatively for re-documenting disqualifying information that had previously been adjudicated and documented. Upon review of these cases, the DoD CAF advised that re-documenting issues in an investigative record should not be viewed as poor practice; rather, it is a way to account for derogatory information from previous investigations that may be relevant in a current investigation (e.g., to establish a pattern of behavior). It should be noted, however, that in previous RADAR evaluations, the research team was advised that DoD CAF adjudicators are instructed against re-documenting adjudicative information that had previously been documented.

Overall, adjudication decisions made at the DoD CAF were consistent with national adjudication guidelines (95.3% of the cases in the sample were rated as consistent). Given the challenging task of reviewing investigation information, coming to an adjudicative decision based on interpretation of adjudicative guidelines, and recording one's decision rationale, it is a significant finding that eligibility determinations are made appropriately and with high confidence.

PREVIOUS RADAR EVALUATIONS

Previous RADAR evaluations have had varying results (see "Comparing the 2013 and 2014 Evaluations" section in Appendix A). From 95.5% in 2010 and 99.8% in 2012, to 78.1% in 2013 and 89.2% in 2014, the percentage of cases in a RADAR sample that met adjudication documentation standards has fluctuated in unexpected ways. There may be several reasons for this. Each year of RADAR has been faced with methodological challenges. This includes issues of uneven distribution of cases and rater bias; different sets of evaluators with varying adjudicative training and experience conducting RADAR evaluations; and in every iteration of RADAR, problems with pulling the required data from CATS. The RADAR tool itself was changed in 2014 to better focus the evaluators' ratings on the work of the original adjudicator. This has helped reduce the number of issues in evaluations.

RECOMMENDATIONS AND FUTURE ASSESSMENTS

Recommendations to improve compliance with documentation standards include:

- Provide reminders or refresher training to adjudicators about documenting the review of previous investigations (see November 8, 2009 adjudication documentation memorandum).
 - During evaluator training, reinforce that a case shouldn't be rated negatively if it includes documentation of past issue information.
- Provide reminders or refresher training to adjudicators about documenting mitigating information in addition to issues and disqualifiers. Most documentation is enabled through check boxes on the adjudication screen of the Case Adjudication Tracking System (CATS), but if the adjudicator does not select a mitigation check box, he or she must provide typed comments in the Rationale area.

Recommendations to improve future RADAR assessments include:

- Request early compliance with the requirement to extract investigation and adjudication documentation data to ensure evaluations can be completed in a timely manner.
- Continue to require a minimum of five evaluators, each completing approximately an equal numbers of evaluations.
- Continue to conduct periodic discussions with one or more DoD CAF adjudicator representatives during the evaluation period to identify unacceptable ratings that may be incorrect or indicate differences in policy understanding (e.g., financial thresholds).
 - If such policy differences are identified, work with the DoD CAF representative and the evaluators to provide clarification.
- Conduct RADAR evaluations in-house at the DoD CAF so adjudicators can review each other's work and address issues in a more tailored fashion.
- Conducting RADAR evaluations in-house at the DoD CAF may also provide a better assessment of adjudication documentation and decision outcomes. Adjudicators reviewing the work of peers with the same training, guidance, and experience would provide the CAF with a closer look at its work and put it in a position to address issues sooner and in a more directed manner. This would also make the RADAR process more efficient by eliminating the CAF's need to review outside evaluators' work, provide feedback regarding disagreements with ratings, and receive results based on data it has already examined.

REFERENCES

REFERENCES

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**APPENDIX A:
RADAR 2014 RESULTS**

APPENDIX A

RADAR 2014 RESULTS

The results of this study are divided into sections to present different sets of descriptive and comparative analyses. The first section outlines descriptive data and the following section details the results of the RADAR evaluations of adjudicators' adjudication documentation.

SAMPLE INFORMATION

The sample for the current evaluation included 1,873 cases. Of these, eight cases (one ANACI and one PPR from Army, four NACLCS from WHS/Defense Agencies, and two PPRs from Air Force) did not receive an evaluation by the end of the evaluation period. This resulted in an actual sample consisting of 1,865 (99.5%) cases, 22 (1.2%) less than what was indicated in the revised sampling plan (1,887 cases). Table A-1 describes the current sample, by the types and numbers of evaluations completed for each division. The numbers of evaluations completed per division are seen in Table A-2.

Table A-1
RADAR FY14 Actual Sample/Cases Evaluated

CAF Division	Revised Sample Size					Total
	ANACI Cases	NACLCS Cases	SSBI Cases	Phased-PR Cases	SSBI-PR Cases	
Army	92 ¹	78	74	75 ¹	74	393
Navy	94	77	73	76 ²	74	394
Air Force	94	77 ¹	73	75	74	393
Defense Agencies	94	73 ¹	73	77	74 ¹	391
Industry	N/A	77 ³	73	76 ¹	68	294
Total	375	387	366	383	365	1,865

¹One (n = 1) duplicate rating was not included in the sample. ²Two (n = 2) duplicate ratings were not included in the sample. ³Three (n = 3) duplicate ratings were not included in the sample.

Table A-2
Evaluations per DoD CAF Division

	Frequency	Percentage
Army	393	21.1
Navy	394	21.1
Air Force	393	21.1
Defense Agencies	391	21.0
Industry	294	15.8
Total	1,865	100.0

¹Values may not total to 100 due to rounding.

APPENDIX A

Table A-3 shows the distribution of eligibility types included in the sample, as well as the distribution of cases that were granted or denied eligibility, or had eligibility revoked. Given the types of investigations sampled, all eligibility determinations were Secret, Top Secret, or Top Secret/Sensitive Compartmented Information (TS/SCI).

**Table A-3
Eligibility Determinations**

	Frequency	Percentage
Secret	754	40.4
Denied	8	0.4
Revoked	8	0.4
Top Secret - Initial	152	8.2
Top Secret - Continued	298	16.0
TS/SCI - Initial	206	11.0
Denied	1	0.0
Revoked	1	0.0
TS/SCI - Continued	436	23.4
Revoked	2	0.1
Total	1,865	100.0

INCLUSION OF POLYGRAPH RESULTS

In preparation for potential future data collections, the analysis also looked at the prevalence of polygraph results in cases supplied for RADAR review. As shown in Table A-4, only three (0.2%) of the investigations in the sample included polygraph results; all three of those cases were included with the rest of the investigation materials. Additionally, the evaluator could not determine whether the polygraphs were a standard component of the investigation or added to resolve an issue.

**Table A-4
Inclusion of Polygraph Results**

	Frequency¹	Percentage
Included in Investigation Materials	3	0.2
Included with the Rest of the Investigation Materials	3	0.2
Don't Know Whether Included as a Standard Component or Added to Resolve an Issue	3	0.2

¹N = 1,865.

ADJUDICATION DOCUMENTATION

Evaluators used RADAR to examine several components of adjudicator documentation. First, evaluators were asked to assess the original adjudicators' identification of disqualifying and mitigating conditions, followed by how the original adjudicators used those conditions in making an adjudication determination. Evaluators then conducted overall evaluations on: (a) the adjudication documentation's compliance with DoD standards and (b) whether the adjudication decision was consistent with the national adjudicative guidelines.

Ratings of the Original Adjudicators' Use of Disqualifying and Mitigating Conditions

Ratings for the use of disqualifying and mitigating conditions and for decision documentation quality were generally high (above 90%; see Table A-5). Across all CAF divisions, the ratings for use of disqualifying and mitigating conditions were well over 90%.

Table A-5
Disqualifying and Mitigating Condition Ratings - Percentages (%)

	Army	Navy	Air Force	Defense Agencies	Industry
Disqualifying Conditions Reasonably Identified and Documented	93.4	95.2	95.9	96.2	98.6
Mitigating Conditions Reasonably Identified and Documented	93.4	94.9	93.1	95.1	98.6
Disqualifying and Mitigating Condition Usage Met National adjudication guidelines	96.4	97.5	91.1	96.4	99.0

Overall Ratings of the Original Adjudicators' Decision Documentation

The same DoD CAF division (Air Force) that was rated lowest on its use of disqualifying and mitigating conditions was also rated lower on the quality of their decision documentation (see Table A-6). The Navy DoD CAF division also scored noticeably lower than the other divisions (below 90%). Of the total sample, 1,664 cases (89.2%) were rated as meeting documentation standards.

Table A-6
Quality of Adjudication Decision Documentation - Percentages (%)

	Army	Navy	Air Force	Defense	Industry	Total
Total Meeting Documentation Standards (Acceptable or No Documentation Required)	91.6	88.0	76.6	92.8	99.7	89.2
Unacceptable	8.4	11.9	23.4	7.2	0.3	10.8
Total	100.0	100.0	100.0	100.0	100.0	100.0

APPENDIX A

Unacceptable Ratings - Decision Documentation

For the 201 (10.8%) cases that received unacceptable ratings of the adjudication documentation, the most common reason (n = 139, 69.2%) was that the original adjudicator did not indicate that previously adjudicated disqualifying information was reviewed. The reasons for most of the remaining unacceptable ratings were written in by the evaluators and typically indicated that either a) issues that were identified and/or documented were not supported by the investigation and were not documented, or b) issues/guidelines were documented, but disqualifying and/or mitigating factors were not. Table A-7 breaks down the explanatory rationales selected by evaluators as to why they rated adjudication documentation as unacceptable. Table A-8 breaks those rationale percentages by CAF division.

**Table A-7
Unacceptable Adjudication Decision Documentation Ratings - Reasons**

	Frequency	Percent
No annotation indicating that previously adjudicated and documented disqualifying information had been reviewed	139	69.2
<i>Significant Derog, mitigated</i> : No summary documentation or other explanation provided	18	9.0
Other	15	7.5
<i>Significant Derog, NOT clearly mitigated</i> : No rationale provided	10	5.0
<i>Significant Derog, mitigated</i> : No summary documentation or other explanation provided; Other	5	2.5
<i>Exception granted</i> : No rationale provided	5	2.5
No annotation indicating that previously adjudicated and documented disqualifying information had been reviewed; Other	3	1.5
<i>Significant Derog, mitigated</i> : No summary documentation or other explanation provided; No annotation indicating that previously adjudicated and documented disqualifying information was reviewed	2	1.0
<i>SSBI missing standard scope item(s) and not returned to ISP</i> : No rationale provided	2	1.0
<i>Significant Derog, mitigated</i> : No summary documentation or other explanation provided; <i>Significant Derog, NOT clearly mitigated</i> : No rationale provided; Other	1	0.5
<i>Significant Derog, NOT clearly mitigated</i> : No rationale provided; No annotation indicating that previously adjudicated and documented disqualifying information had been reviewed	1	0.5
Total	201	100.0

Table A-8
Unacceptable Adjudication Decision Documentation Ratings - Percentages (%)

	Army	Navy	Air Force	Defense	Industry
No annotation indicating that previously adjudicated and documented disqualifying information had been reviewed	20	37	66	16	0
<i>Significant Derog, mitigated</i> : No summary documentation or other explanation provided	5	3	8	2	0
Other	3	2	7	3	0
<i>Significant Derog, NOT clearly mitigated</i> : No rationale provided	1	1	4	3	1
<i>Significant Derog, mitigated</i> : No summary documentation or other explanation provided; Other	0	0	5	0	0
<i>Exception granted</i> : No rationale provided	2	3	0	0	0
No annotation indicating that previously adjudicated and documented disqualifying information had been reviewed; Other	0	0	1	2	0
<i>Significant Derog, mitigated</i> : No summary documentation or other explanation provided; No annotation indicating that previously adjudicated and documented disqualifying information had been reviewed	0	0	0	2	0
<i>SSBI missing standard scope item(s) and not returned to ISP</i> : No rationale provided	2	0	0	0	0
<i>Significant Derog, mitigated</i> : No summary documentation or other explanation provided; <i>Significant Derog, NOT clearly mitigated</i> : No rationale provided; Other	0	0	1	0	0
<i>Significant Derog, NOT clearly mitigated</i> : No rationale provided; No annotation indicating that previously adjudicated and documented disqualifying information had been reviewed	0	1	0	0	0
Total	33	47	92	28	1

Overall Ratings of the Original Adjudicators' Adjudication Decision

Ratings on agreement with adjudication decision were very high across all DoD CAF divisions. Raters in the current evaluation determined that each DoD CAF division, and the DoD CAF as a whole, made adjudication decisions consistent with standards in a vast majority of its cases (n = 1,842; 98.8% at the DoD CAF level). Table 8 presents ratings on this dimension at the CAF division as well as DoD CAF level.

Table A-9
Adjudication Decision Consistent with National Adjudication Guidelines - Percentages (%)

	Army	Navy	Air Force	Defense	Industry	Total
Consistent with Standards	98.5	98.7	98.2	99.0	99.7	98.8
Not Consistent with Standards	1.5	1.3	1.8	1.0	1.3	1.2
Total	100.0	100.0	100.0	100.0	100.0	100.0

APPENDIX A

Research staff reviewed evaluator comments to understand the reasons evaluators rated 23 of the total 1,865 adjudication decisions as not consistent with national adjudication guidelines. In most cases, evaluators indicated that they disagreed with the strategies the original adjudicators used to mitigate disqualifying information, or that they should have gathered additional information regarding an issue to determine whether it was mitigatable. Table A-10 provides a summary of the reasons given for why the adjudication decisions made in these cases were not in accordance with national adjudication guidelines.

Table A-10
Detailed Reason Adjudication Decision Rated as Not Consistent with National Adjudication Guidelines

Evaluator's Reason for Rating	Frequency
Evaluator disagreed with use of disqualifying or mitigating conditions	
There were other undocumented disqualifying and mitigating conditions	
Subject was not interviewed, though most issues were mitigatable	
Clearance was granted in the presence of disqualifying information, but no mitigating factors were identified.	
Based on the recency and severity of certain derogatory information, clearance should not have been granted	8
There was insufficient evidence in the investigation to support issues identified by the adjudicator or items noted in the rationale	6
No rationale was provided	2
The original adjudicator should have followed up on an issue in order to assess whether it was indeed mitigatable	7

COMPARING THE 2013 AND 2014 EVALUATIONS

Overall, the results of the 2014 RADAR evaluations indicated that (a) over 89% of the adjudication decisions evaluated met adjudication documentation standards, and (b) over 98% were consistent with national adjudication guidelines. Table A-11 shows a comparison of the percentage of adjudication decisions from the 2013 and the 2014 evaluation that met documentation standards. However, bear in mind that this comparison of each year's evaluation used different versions of the RADAR tool and had unique sampling and rating biases that affected results. It is unclear whether the perceived improvement in adjudication documentation practices can be attributed to better DoD CAF practices, improvement of the RADAR tool and rating training, or both.

Table A-11
Comparison of Frequency and Percentage of Cases that Met Adjudication Decision Documentation Standards in 2013 and 2014

	2013 Evaluation		2014 Evaluation	
	Frequency	Percentage	Frequency	Percentage
Total Meeting Documentation Standards (Acceptable or No Documentation Required)	1,145	78.1	1,664	89.2
Unacceptable	322	21.9	201	10.8
Total	1,467	100.0	1,865	100.0

Table A-12 shows a comparison of the percentage of adjudication decisions from 2013 and 2014 that met national adjudication guidelines. In the 2014 analysis, a higher percentage of decisions met adjudication guidelines.

Table A-12
Comparison of Frequency and Percentage of Adjudication Decisions Consistent with National Adjudication Guidelines in 2013 and 2014

	2013 Evaluation		2014 Evaluation	
	Frequency	Percentage	Frequency	Percentage
Consistent with Standards	1,407	95.9	1,842	98.8
Not Consistent with Standards	60	4.1	23	1.2
Total	1,467	100.0	1,865	100.0

APPENDIX B

**APPENDIX B:
RADAR 2013 RESULTS**

APPENDIX B

RADAR 2013 RESULTS

The results of this study are divided into sections to present different sets of descriptive and comparative analyses. The first section outlines descriptive data and comparisons of the actual sample to the planned sample. The following section presents the results of the RADAR evaluations of FY13 adjudication documentation. It also provides frequency data of the presence of polygraph results in background investigations.

SAMPLE INFORMATION

The sampling plan called for the evaluation of 1,848 cases. Each DoD CAF division provided the requested number of cases per investigation type, but not all cases were evaluated due to delays in receiving these data. Only 1,485 (80.4%) cases of the projected sample (n = 1,848) were evaluated by the end of the evaluation period. Of these, 18 (1.0%) were deleted for having an adjudicative outcome indicated as “Action Pending” (n = 4) or “WHS Closed Without Action” (n = 14); all of these cases were adjudicated by the Defense Agencies division. This resulted in a final sample consisting of 1,467 (79.4%) cases, 381 (20.6%) less than what was indicated in the sampling plan. Table B-1 describes the subset of the sample that was evaluated by the types and numbers of evaluations completed for each division. The total number of completed evaluations per division appear in Table B-2.

**Table B-1
RADAR FY13 Actual Sample/Cases Evaluated**

	Revised Sample Size					
	ANACI Cases	NACLC Cases	SSBI Cases	Phased-PR Cases	SSBI-PR Cases	Total
Army	77	74	77	57	75	360
Navy	77	77	71	77	67	369
Air Force	6	0	77	0	0	83
Defense Agencies	72	71	76	57	71	347
Industry	N/A	77	77	77	77	308
Total	232	299	378	268	290	1,467 ¹

¹ This number is still sufficient to receive a margin of error of +/- 5%.

Table B-2
Evaluations per DoD CAF Division

	Frequency	Percentage
Army	360	24.5
Navy	369	25.2
Air Force	83	5.7
Defense Agencies	347	23.7
Industry	308	21.0
Total	1,467	100.0

Table B-3 shows the distribution of eligibility types included in the sample. Given the types of investigations sampled, all eligibility determinations were Secret, Top Secret, or Top Secret/Sensitive Compartmented Information (TS/SCI).

Table B-3
Eligibility Determinations

	Frequency	Percentage
Secret	533	36.3
Top Secret	448	30.5
TS/SCI	486	33.1
Total	1,467	100.0

INCLUSION OF POLYGRAPH RESULTS

As in the previous evaluation, the current evaluation assessed the prevalence of polygraph results in the cases that were reviewed. As shown in Table B-4, only 10 (0.7%) of the investigations in the sample included polygraph results; five (0.3% of the total sample) of those cases included those results with the rest of the investigation materials. In one (0.1% of the total sample) case, a polygraph was included as a standard component of the investigation. For the remaining four (0.3% of the total sample) cases, the evaluator could not determine whether a polygraph was a standard component of the investigation or added to resolve an issue.

APPENDIX B

Table B-4
Inclusion of Polygraph Results - RADAR FY12 and FY13

	FY12		FY13	
	Frequency ¹	Percentage	Frequency ²	Percentage
Included in Investigation Materials	7	1.1	10	0.7
Included with the Rest of the Investigation Materials	4	0.6	5	0.3
Included as a Standard Component or Added to Resolve an Issue	2	0.3	1	0.1
Don't Know Whether Included as a Standard Component or Added to Resolve an Issue	5	0.8	4	0.3

¹N = 651; ²N = 1,467.

ADJUDICATION DOCUMENTATION

RADAR asks evaluators to assess several facets of adjudicator documentation of derogatory information. Evaluators first assessed adjudicator identification and use of disqualifying and mitigating conditions. Then they conducted overall evaluations on: a) the adjudication documentation's compliance with DoD standards and b) whether the adjudication decision was consistent with the national adjudicative guidelines.

The results in this section are presented according to the types of evaluations made regarding the adjudicators' decision documentation. The first subsection describes the ratings made on how original adjudicators used the disqualifying and mitigating conditions identified in each case. The following subsection discusses the overall evaluation of adjudicators' decision documentation (i.e., whether documentation met DoD standards). The last subsection reviews the overall evaluation of adjudicators' adjudication decisions and assesses the possible rater bias that may have affected these evaluations.

Ratings of the Original Adjudicators' Use of Disqualifying and Mitigating Conditions

Table B-5 shows the results of the evaluations of adjudicator use of the disqualifying and mitigating conditions to document their decisions. Each issue identified in the cases should be supported by a disqualifying condition from the national adjudicative standards (e.g., inability or unwillingness to satisfy debts). For cases that have favorable eligibility determinations, each disqualifying condition should be accompanied by either a mitigating condition or a written explanation as to why the adjudicator made a favorable determination. Use of the disqualifying and mitigating conditions involves individual judgment and adjudicators may differ in the specific disqualifiers and mitigators they use. For example, one adjudicator may select "inability or unwillingness to satisfy debts" whereas another adjudicator might select "a history of not meeting financial obligations." Additionally,

adjudicators may differ in their perception of the strength or impact these conditions have in influencing the review of certain issues.

Overall, evaluators indicated that adjudicators' use of disqualifying and mitigating conditions met national adjudication guidelines in 67.2% of cases (see Table B-5). Results by DoD CAF division are also presented in the table.

Table B-5
Disqualifying and Mitigating Condition Ratings - Percentages (%)

	Army	Navy	Air Force	Defense	Industry	Total
Disqualifying Conditions Correctly Identified and Documented	82.2	76.2	67.5	86.7	86.4	81.8
Mitigating Conditions Correctly Identified and Documented	80.3	75.3	66.3	84.1	84.7	84.0
Relative Strengths of Disqualifying and Mitigating Conditions Correctly Determined	89.7	77.8	65.1	85.9	86.4	83.7
Disqualifying and Mitigating Condition Usage Met National adjudication guidelines	65.3	70.7	48.2	64.3	73.7	67.2

Overall Ratings of the Original Adjudicators' Decision Documentation

Table B-6 presents overall ratings of the extent to which the adjudication documentation met DoD standards. As shown in the last column, 78.1% (n = 1,145) of cases in the total sample were rated as meeting documentation standards. These ratings were also lower than in previous years.

Table B-6
Quality of Adjudication Decision Documentation - Percentages (%)

	Army	Navy	Air Force	Defense	Industry	Total
Total Meeting Documentation Standards (Acceptable or No Documentation Required)	88.1	81.8	54.2	67.1	80.5	78.1
Unacceptable	11.9	18.2	45.8	32.9	19.5	21.9
Total	100.0	100.0	100.0	100.0	100.0	100.0

For the 322 (21.9%) out of the total 1,467 cases that were rated as having unacceptable adjudication documentation, the majority (n = 300; 93.2%) have only the "Other" checkbox marked under the subsequent question asking for the specific reason as to why the documentation was unacceptable. To understand better why these ratings of unacceptable documentation were given, research staff analyzed the comments provided by the evaluators.

Approximately 100 (33.3%) of these unacceptable ratings were associated with comments by evaluators that indicated that either a) the original adjudicator identified and documented issues or disqualifying conditions that were not

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supported by information in the investigation⁵, or b) that the original adjudicator did not identify or document issues or disqualifiers that were present in the case.

These ratings indicate errors in the documentation and probably contributed to the low ratings of the use of disqualifying and mitigating conditions; for the most part, evaluators that indicated unacceptable documentation had also previously indicated unacceptable use of disqualifying and mitigating conditions. These 100 cases are likely the most “valid” ratings of unacceptable decision documentation.

Based on the analysis of the comments and the adjudicative guidelines, approximately 141 (47.0%) of the unacceptable ratings may have been due to differences in understanding of DoD CAF policy between the evaluators and original adjudicators (e.g., policy for thresholds for financial issues, adjudication of employment issues, definition of foreign contacts). Another 83 (27.7%) of the unacceptable ratings looked to stem from differences in requirements for documenting issues identified in previous investigations. DoD CAF adjudicators are only required to document that previous adjudication and investigation information was reviewed; they are not required to re-document issues that occurred only in previous investigations (as the evaluators may have been trained to do in their own adjudications). A final set of approximately 22 (7.3%) unacceptable ratings may have been incorrect (e.g., the evaluator’s comments cited issues as not documented when the issues were clearly documented).

Overall Ratings of the Original Adjudicators’ Adjudication Decision

Despite the relatively low ratings on adjudication decision documentation, ratings evaluating whether the adjudication decision was consistent with national guidelines were high across DoD CAF divisions. Raters in the FY13 RADAR evaluation determined that each DoD CAF division, and the DoD CAF as a whole, made adjudication decisions consistent with standards in a majority of its cases (n = 1,407; 95.9% at the DoD CAF level). Table B-7 presents ratings on this dimension at the DoD CAF division as well as DoD CAF level.

⁵ The original adjudicator may have considered information that came from other information sources that were not drawn from CATS for the RADAR evaluation (e.g., JPAS data, RSI information, etc.).

Table B-7
Adjudication Decision Consistent with National Adjudication Guidelines -
Percentages (%)

	Army	Navy	Air Force	Defense	Industry	Total
Consistent with Standards	96.7	93.5	98.8	96.5	96.4	95.9
Not Consistent with Standards	3.3	6.5	1.2	3.5	3.6	4.1
Total	100.0	100.0	100.0	100.0	100.0	100.0

It should be noted that most of the cases in the sample (962 out of 1,467; 65.6%) were evaluated by the same evaluator. He/she rated the majority (77 out of 83; 92.8%) of the Air Force division's cases and all 347 of the Defense division's cases in the sample (see Table B-8).

Table B-8
Evaluations Completed by a Single Rater

	Frequency	Sample Size	Percentage
Army	111	360	30.8
Navy	187	369	50.7
Air Force	77	83	92.8
Defense Agencies	347	347	100.0
Industry	240	308	77.9
Total	962	1,467	65.6

Notably, this evaluator was also responsible for most of the "unacceptable" documentation ratings in the sample (313 out of 322; 97.2%). Table B-9 outlines the number of "unacceptable" decision documentation ratings each DoD CAF division received from him/her.

Table B-9
Unacceptable Documentation Ratings Completed by a Single Rater

	Frequency	Total Unacceptable Ratings	Percentage
Army	43	43	100.0
Navy	59	67	88.1
Air Force	38	38	100.0
Defense Agencies	114	114	100.0
Industry	59	60	98.3
Total	313	322	97.2

Statistical tests conducted by PERSEREC researchers identified the influence this rating pattern had on ratings. There was a significant difference among documentation ratings, depending on who the evaluator was (chi square = 434.28, $p = .00$). The association between rater/evaluator and rating was also relatively

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strong ($\phi = .544$, $p = .00$). Essentially, the more ratings this particular evaluator completed for a division, the lower the division's overall rating of documentation quality (this was not the case for ratings on the decision itself). With this said, it is difficult to interpret the findings regarding documentation practice, given the significant impact the evaluators themselves had on the nature of these data. Since cases were not more equally distributed among evaluators, it cannot be discerned whether the unacceptable ratings were attributable to the quality of adjudication documentation or to one evaluator's personal opinion regarding documentation practices.

**APPENDIX C:
RADAR 2015 TOOL**

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RADAR 2015⁶

RADAR Introduction

BACKGROUND AND PURPOSE

The purpose of RADAR (Review of Adjudication Documentation Accuracy and Rationales) is to gather information about adjudication decision documentation procedures in use at the DoD Consolidated Adjudication Facility (CAF).

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

A. Based on Sufficient Information

The first step of the RADAR evaluation is to compare the contents of the case file to scope item checklists and note any missing investigative items. You will use the completed checklists to determine whether sufficient information was gathered to allow for adjudication decision making.

B. Identified Adjudicative Issues

The second step of the RADAR evaluation is to review the completed investigation and assess the disqualifying and mitigating information noted by the original adjudicator. Based on the information in the investigation, you will determine whether the original adjudicator was justified in the disqualifying and mitigating conditions he/she noted and whether he/she made reasonable use of the disqualifying and mitigating information.

C. Adequately Documented

The third step consists of evaluating the documentation of the adjudicative rationale to determine whether it provides enough detail to allow an outside reviewer to reconstruct the specific conditions considered. Review the documentation to determine whether it meets documentation standards. The adjudicative rationale may appear in a separate file; if so, work with your supervisor to obtain the required information.

****Note on editing an evaluation or saving your progress on an evaluation****

DO NOT start a new evaluation if a completed evaluation needs editing or work must be continued at a later time. Please take one of the following actions:

- 1) At the top of each page of the tool, there is a link that reads, "Save and continue survey later". Clicking it will prompt you to enter your e-mail, where a link to continue/finish your work will be sent. This link is unique for every submission. You may do this at any point during an evaluation; it will take you to the page where you left off.**
- 2) If you complete an evaluation and reach the "Thank You" page, the "Save and continue later" link will no longer appear. Instead, a designated link will take you to the beginning of the tool, with all of your responses saved.**

⁶ Note: this appendix depicts only the content, not the formatting of the survey.

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3) If you'd like to edit an evaluation that has already been submitted, do not start a new evaluation for that case. Instead, please send a message to donna.l.tadle.ctr@mail.mil.

BACKGROUND INFORMATION

1) Enter your Rater ID*

2) Enter CATS Case ID

*This is the title of the folder containing the investigative materials for each case/subject.**

3) Enter OPM Case ID

*This is found on the Certificate of Investigation (COI) for each case.**

4) Select the DoD CAF division that adjudicated the case.*

- Army
- Navy
- Air Force
- Industry
- Defense Agencies

5) Investigation Type*

- ANACI
- NACLC
- SSBI
- SSBI-PR
- Phased PR
- Other:

BACKGROUND INFORMATION (continued)

6) Adjudication Type*

- Secret
- Top Secret
- Top Secret Periodic Reinvestigation
- Top Secret/SCI
- Top Secret/SCI Periodic Reinvestigation
- Other:

7) OPM Issue Code

The Issue Code appears on Form 79A - Report of Agency Adjudicative Action.

*The code is generally about 10 lines down on the right side of the page.**

- B
- C
- D
- F or G (no issues)
- O or R (no actionable issues)
- Other:

SCOPE ITEMS

Section 2: Evaluate Investigation Information

Missing Investigative Scope Items

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

The first Scope Item list focuses on standard scope items. For any other missing scope items, they are listed in one of three other Scope Item lists (Conditional, Conditional: Spouse or Cohabitant, and By Request).

Standard Scope Items
Scope items that are always included in a specific investigation product.*

	Complete	Missing or Incomplete	No Explanation
App: Copy of completed application. For example, completed SF-86 or eQIP.	[]	[]	[]
CRED: Credit check. Credit search of the National Credit Bureaus.	[]	[]	[]
CRED DATE: Out-of-date Credit Report. Credit report was completed but report date more than one year prior to investigation close date.	[]	[]	[]
DCII: Defense Clearance and Investigations Index. Check of DSS records of previous background investigations as well as other DoD conducted investigations (e.g., ACRD, OSI, etc.).	[]	[]	[]
EDUC: Education. For all listed Registrars; to ensure complete coverage for timeframe additional personal or records may be obtained. (Conditional for NACLIC)	[]	[]	[]

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<p>EMPL: Employment Record review (all employment) & personal testimonies (employed 6 months or more).For all part-time, intermittent, and self-employment. Records and corroboration for unemployment of more than 60 days. Former employment: Conduct through CONUS sources. Overseas: only checked if currently employed overseas. (Conditional for NACLC)</p>	<p>[]</p>	<p>[]</p>	<p>[]</p>
<p>FBIF/FBFN: FBI Identification (Criminal History). Classification attempted on all fingerprint submissions. Name check provided if results Unclassifiable.</p>	<p>[]</p>	<p>[]</p>	<p>[]</p>
<p>LAWL/LAC : Law Enforcement/Local Agency checks. Scheduled to appropriate jurisdictions for all locations of listed residence, employment, and education activities for the coverage period.</p>	<p>[]</p>	<p>[]</p>	<p>[]</p>
<p>REFE: Reference check. Personal testimonies (2 minimum) from people who a) know Subject socially, b) have had significant contact with Subject, and c) span the scope. CONUS only. Scope: 5 years. Notes: a) Reference coverage may be reported under other item types and b) at least one must be a developed character references. (Conditional for NACLC)</p>	<p>[]</p>	<p>[]</p>	<p>[]</p>
<p>RESI: Residence check. Personal testimony for most recent CONUS residence of</p>	<p>[]</p>	<p>[]</p>	<p>[]</p>

at least 6 months or more, as indicated on case papers. If current residence is less than 6 months, record, personal or collateral coverage is provided. (Conditional for NACLC)			
SII: Security/Suitability Investigations Index. Check of OPM historic record of investigations conducted for 16 years from the date of the last investigative activity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SFBN: FBI Name check – Spouse/Cohabitant. Records Management Division (Investigations). Check of FBI maintained database of FBI conducted investigations for Spouse/Cohabitant names.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

8) Based on the review and the above Scope Item checklist, was the investigation missing any **standard** scope items?

*If the investigation was a NACLC and is missing only the conditional scope items noted in the list (EDUC, EMPL, REFE, RESI), select No.**

- Yes
- No

Was the investigation missing any other scope items?*

- Yes
- No

Was the Subject Interview missing?*

- Yes
- No

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

- Yes
- No
- Don't Know

Conditional Scope Items

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

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

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	Missing or Incomplete	No Explanation
<p>CIAS: CIA Security check. Conducted when any of the following are true about the subject: a) foreign born; b) outside the U.S. for 90 days or more (other than for U.S. military service); c) outside the U.S. in excess of one year if on U.S. Government assignment; d) resided or traveled in certain countries identified by the requesting agency; or e) if marriage occurs during any of the above activities.</p>	[]	[]
<p>DCIF: Defense Clearance and Investigations Index File. Provide copies of available DCII files.</p>	[]	[]
<p>EMPL ER: Employment Inquiry. Follow-up for employment issues.</p>	[]	[]
<p>FBIN: FBI Records Management Division (Investigations). Check of FBI maintained database of FBI conducted investigations.</p>	[]	[]
<p>FINCEN: Financial Crimes Enforcement Network</p>	[]	[]
<p>FINL: Financial Issue follow-up. Follow-up review of creditor or bankruptcy records, including civil court actions such as judgments and liens. Conducted when Bankruptcy, Foreclosure, Credit Counseling, Judgments, Tax Liens, Civil Suits record(s) are identified; Student Loan, Child Support, and unpaid Government Overpayment reimbursement accounts identified as 120 days delinquent (or more) when total delinquency is \$1000 or greater; all other delinquent accounts (120 days or more) of \$1000 or more when total delinquency is \$7500 or greater, bankruptcy within the past two years or in years 3–5 if current delinquencies are identified, unless</p>	[]	[]

covered in prior investigation.		
FORMER SPOUSE. Personal testimonies from all former spouses, unless former spouse is non-U.S. citizen residing overseas or a U.S. citizen residing overseas other than on a military base.	[]	[]
INS: INS/USCIS check. Includes check of "Systematic Alien Verification for Entitlements" program (SAVE) to confirm legal residency status. Conducted if subject claims he or she is NOT a U.S. citizen.	[]	[]
LAW PR: Police and/or Court Record review and follow-up. For all admitted arrests within the past 5 years.	[]	[]
MEDI: Mental Health Treatment Record review and interview. Record review and interview with listed or developed mental/emotional health treatment provider, using specific release.	[]	[]
MILR: Military Personnel Records check. When military service, court martial, or disciplinary proceedings are shown, also anytime there is an indication of other than Honorable Discharge.	[]	[]
OUTS: Foreign Country Law check. Interpol search. Conducted if Subject reports: a) Military service overseas (excluding Canada) for 90 days continuously or a combined six months or more in the last 5 years, or b) Foreign Residence, Education, or Employment for 90 days continuously or a combined six months or more in the last 5 years.	[]	[]
PUBR: Criminal or Civil Court Records review. For any cases involving the Subject, except when	[]	[]

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Subject is plaintiff and there is no indication of unfavorable information.		
SESE: Selective Service check. Scheduled for all males born after 12/31/59 if currently at least 18 years of age	[]	[]
SIIF: Security/Suitability Investigations Index File. Provide copies of available SII files.	[]	[]
SPIN: Special Interview. Conducted with the Subject of investigation to allow the Subject to confirm, refute, provide additional information	[]	[]
STSC: State Department Security check. State Department Security check scheduled when SCI access 4 is requested and activities outside the U.S. exceed one year while on U.S. Government assignment, or exceed 90 days if outside the U.S. for other purposes.	[]	[]
SUBS: Substance Abuse Follow-up (Record Review and Interview). Record review and interview with listed or developed alcohol and/or drug treatment provider(s), using Specific Release.	[]	[]

Conditional Scope Items: Spouse or Cohabitant

Scope items that are included in the investigation when a current spouse or cohabitant is identified and other conditions are met.

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

	Missing or Incomplete	No Explanation
SDCF: DCII files - Spouse/Cohabitant. Provide copies of Spouse/Cohabitant DCII files.	[]	[]
SDCI: DCII check -	[]	[]

<p>Spouse/Cohabitant. DCII checked for trace records of DSS conducted Spouse/Cohabitant background investigations as well as other DoD conducted investigations (e.g., ACRD, OSI, etc.)</p>		
<p>SFBN: FBI Name check - Spouse/Cohabitant. Records Management Division (Investigations). Check of FBI maintained database of FBI conducted investigations for Spouse/Cohabitant names.</p>	<p>[]</p>	<p>[]</p>
<p>SFPN: FBI Fingerprint check - Spouse/Cohabitant. If Subject in Top Secret access, Spouse/Cohabitant FBI criminal history check. Classification attempted on all fingerprint submissions. Name check provided if results are unclassifiable.</p>	<p>[]</p>	<p>[]</p>
<p>SINS (COHAB/ FAMILY): INS/USCIS checks – Cohabitant, Family. Scheduled if Subject currently in Top Secret access, and cohabitant or family members are a) foreign born, b) currently residing in the U.S., and c) are listed on case papers.</p>	<p>[]</p>	<p>[]</p>
<p>SINS (SPOUSE): INS/USCIS check - Spouse. Scheduled if Subject's spouse is foreign born AND access is 3, 4, 5, or 6.</p>	<p>[]</p>	<p>[]</p>
<p>SSIF: SII files - Spouse/Cohabitant. Provide copies of Spouse/Cohabitant SII files.</p>	<p>[]</p>	<p>[]</p>
<p>SSII: SII check - Spouse/Cohabitant. Check of OPM's historic record of investigations conducted for 16 years from the date of the last investigative activity for Spouse/Cohabitant.</p>	<p>[]</p>	<p>[]</p>

By Request Scope Items

Scope items that are included only if the case includes documentation that the items were

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requested.

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

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

OTHER SCOPE MISSING

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

- () Yes
- () No

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

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

- Yes
 No

INVESTIGATION QUALITY

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

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

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

- Yes
 No
 Don't Know

10) Rate the quality of the information available for the adjudication:*

- Complete.** Investigation documentation contained every scope item and lead required by the national standards, included enough information to resolve all issues, and provided a thorough basis for the adjudication decision.
 Adequate. Investigation was missing a few minor scope items or leads and/or the adjudicator was able to gather enough information to make an adjudication decision.
 Unacceptable. Investigation did not include sufficient information for an adjudication decision.

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

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

Other reasons the investigation was unacceptable:*

11) Did the investigation materials include polygraph results?*

- Yes
 No

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

- Standard
 Added to the investigation to resolve an issue
 Don't Know

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

- Yes
 No

USE OF DISQUALIFYING AND MITIGATING INFORMATION

Section 3: Review Case and Use of Disqualifying and Mitigating Conditions

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Mark the check box(es) indicating the issue(s) identified by the original adjudicator:*

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

When answering the following questions, please note that DoD CAF adjudicators are trained to limit use of the "Personal Conduct" adjudicative guideline when an issue can be tied to another adjudicative guideline.

Considering only information in the current investigation, did the original adjudicator reasonably identify appropriate disqualifying conditions?*

- Yes
- No

Why do you believe the disqualifying conditions identified by the original adjudicator were not appropriate? (select all that apply)*

- The adjudicator should have identified other disqualifying conditions for that issue, as well.
- The disqualifying conditions identified were not supported by the information in the investigation.
- The adjudicator did not identify any issues, but should have identified issues and corresponding disqualifying conditions.
- Other

Other reasons you didn't find the original adjudicator's disqualifying condition choices to be appropriate:*

Considering only information in the current investigation, did the original adjudicator reasonably identify appropriate mitigating conditions?*

- Yes
- No

Why do you believe the mitigating conditions identified by the original adjudicator were not appropriate? (select all that apply)*

- The adjudicator should have identified other mitigating conditions, as well.
- The adjudicator did not identify any mitigating conditions, but should have.
- The mitigating conditions identified were not supported by the information in the investigation.
- The adjudicator did not identify any issues, but should have identified issues as well as corresponding disqualifying and mitigating conditions.
- Other

Other reasons you didn't find the original adjudicator's mitigating condition choices to be appropriate:*

USE OF DISQUALIFYING AND MITIGATING INFORMATION (continued)
Evaluate the original adjudicator's use of disqualifying and mitigating conditions.*

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

Unacceptable.

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

Was not consistent with the adjudicative guidelines.

Did not take into account all relevant information.

Gave some information too much or too little emphasis.

The original adjudicator should have identified Personal Conduct as one of the issues present in the case. (Note: DoD CAF adjudicators are trained to limit use of the "Personal Conduct" guideline if an issue can be tied to another adjudicative guideline.)

Other

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

OTHER DISQUALIFYING AND MITIGATING INFORMATION
Was a condition, deviation or waiver noted?*

Yes

No

Don't Know

In some cases, it may be possible to grant eligibility in the presence of disqualifying or derogatory information that is not clearly mitigated.**Did the most recent investigation include a disqualifying condition that was not clearly mitigated AND did the adjudicator grant eligibility?***

Yes

No

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

DOCUMENTATION REVIEW
Section 4: Review the Adjudication Decision Documentation**Cases Requiring Documentation**

(1) All cases that include significant derogatory information must be documented and the documentation must indicate the issue and the disqualifying and mitigating conditions.

(2) All SSBI's that are missing one or more standard investigative scope items and that are NOT returned to the investigative service provider (ISP) for additional work must be documented

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and that documentation must include an explanatory rationale.

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

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

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

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

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

Previous Issues

Adjudicative information that has previously been documented should not be re-documented. In these cases, adjudicators are instructed to annotate that previously adjudicated and documented disqualifying information has been reviewed.

Appendix A

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

Appendix B This question is in specific reference to the DoD adjudication documentation standards provided in the *Adjudication Documentation Standards* (October 27, 2009).

Appendix C () **Documentation not required.** The decision did not require documentation, in accordance with the standards laid out in the *Adjudication Documentation Standards* (October 27, 2009)

Appendix D () **Consistent with standards.** Documentation met the standards laid out in the *Adjudication Documentation Standards* (October 27, 2009)

Appendix E () **Not consistent with standards.** Documentation did not meet the standards laid out in the *Adjudication Documentation Standards* (October 27, 2009)

Reason the adjudication documentation was not consistent with standards:*

[] *Significant Derog, mitigated*: No summary documentation or other explanation provided.

[] *Significant Derog, NOT clearly mitigated*: No rationale provided.

[] *SSBI missing standard scope item(s) and not returned to ISP*: No rationale provided.

[] *Exception granted*: No rationale provided.

[] *Bond Amendment waiver granted*: No rationale provided.

[] (If applicable) No annotation indicating that previously adjudicated and documented disqualifying information had been reviewed.

[] Other

Other reasons the documentation was not consistent with standards:*

13) Does the adjudication decision appear consistent with the national adjudicative standards?*

() Yes

() No

If No, please explain.*

HIGHER LEVEL REVIEW

Section 4: Case Review Documentation

14) Did the case receive higher-level review?*

- Yes
- No
- Don't Know

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

- Yes
- No

Rate the quality of the case review documentation:*

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

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

SOR/LOI DOCUMENTATION

Section 5: Statement of Reasons or Letter of Intent Documentation

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

- Yes
- No
- Don't Know

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

- Acceptable.** Documentation detailed the relevant adjudicative guidelines and all conditions considered and provided a clear explanation of information use and decision processes.
- Unacceptable.** Documentation was missing many key conditions, failed to reference the adjudicative guidelines or did so incorrectly, did not explain decision rationale and/or was rambling and/or unclear.
- No Documentation Provided.**

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

OVERALL COMMENTS

Section 6: Overall Comments (optional)

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

Thank You!

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YOU ARE FINISHED, THANK YOU!

Your information has been submitted to our database.

If you wish to go back and edit your response, please click [here](#). You may also e-mail us at donna.l.tadle.ctr@mail.mil for a link to edit your response, or for any other questions/concerns you may have.

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