

May 2009

PERSONNEL  
SECURITY  
CLEARANCES

An Outcome-Focused  
Strategy Is Needed to  
Guide Implementation  
of the Reformed  
Clearance Process



GAO

Accountability \* Integrity \* Reliability



Highlights of [GAO-09-488](#), a report to congressional requesters

## Why GAO Did This Study

Personnel security clearances are used to verify that national security information—which in some cases could cause exceptionally grave damage to national security if disclosed—is entrusted only to those who have proven reliability and loyalty to the nation. In response to long-standing problems with timeliness and backlogs, Congress mandated clearance reforms as part of the Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA), and since 2005 the Department of Defense's (DOD) clearance program has remained on GAO's high-risk list despite improvements in timeliness. In 2007, a Joint Reform Team, led by the Office of Management and Budget (OMB), was established to improve the clearance process across the government. GAO was asked to review the extent to which reform efforts (1) align with key practices for organizational transformations and (2) address identified factors for reforming the personnel security clearance process. To assess these objectives, GAO compared joint reform reports to key transformation practices and essential factors for reform.

## What GAO Recommends

GAO recommends that OMB establish a strategic framework that includes outcome-focused performance measures, clear roles and responsibilities for information technology implementation, and estimated long-term costs. In commenting on this draft, OMB partially concurred with GAO's recommendation.

View [GAO-09-488](#) or [key components](#). For more information, contact Brenda S. Farrell at (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov).

# PERSONNEL SECURITY CLEARANCES

## An Outcome-Focused Strategy Is Needed to Guide Implementation of the Reformed Clearance Process

### What GAO Found

Initial joint reform efforts have, in part, aligned with key practices for organizational transformation, such as having committed leadership and a dedicated implementation team, but reports issued by the Joint Reform Team do not provide a strategic framework that contains important elements of successful transformation, including long-term goals with related outcome-focused performance measures to show progress, or identify obstacles to progress and possible remedies. To communicate plans of the reform efforts, the Joint Reform Team issued three reports, including an initial reform report in April 2008 that presented a new 7-step process design, a December 2008 update, and a March 2009 Enterprise Information Technology Strategy. Consistent with practices that GAO has previously identified, the executive branch established a Performance Accountability Council to achieve reform goals, drive implementation, and oversee the reform. Membership on this council currently includes senior executive leaders from 11 federal agencies. Further, an executive order designates OMB's Deputy Director for Management as the chair of this council. However, it is difficult to gauge progress of reform, or determine if corrective action is needed, because the council, through the Joint Reform Team, has not established a method for evaluating the progress of the reform efforts. In the absence of a strategic framework that is outcome focused, with clearly defined performance measures, the Joint Reform Team is not in a position to demonstrate to decision makers the extent of progress that it is making toward achieving its desired outcomes.

The personnel security clearance joint reform reports that GAO reviewed collectively do begin to address essential factors for reforming the security clearance process, which represents positive steps. GAO's prior work and IRTPA identified several factors key to reforming the clearance process. These include (1) developing a sound requirements determination process, (2) engaging in governmentwide reciprocity, (3) building of quality into every step of the process, (4) consolidating information technology, and (5) identifying and reporting long-term funding requirements. However, the Joint Reform Team's information technology strategy does not yet define roles and responsibilities for implementing a new automated capability which is intended to be a cross-agency collaborative initiative. GAO's prior work has stressed the importance of defining these roles and responsibilities when initiating cross-agency initiatives. Also, the joint reform reports do not contain any information on initiatives that will require funding, determine how much they will cost, or identify potential funding sources. Without long-term funding requirements, decision makers in both the executive and legislative branches will lack important information for comparing and prioritizing proposals for reforming the clearance processes. The reform effort's success will be dependent upon the extent to which the Joint Reform Team is able to fully address these key factors moving forward.

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### Abbreviations

DOD	Department of Defense
GPRA	Government Performance and Results Act of 1993
IRTPA	Intelligence Reform and Terrorism Prevention Act of 2004
OMB	Office of Management and Budget
OPM	Office of Personnel Management
ODNI	Office of Director of National Intelligence

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United States Government Accountability Office  
Washington, DC 20548

May 19, 2009

The Honorable Silvestre Reyes  
Chairman  
Permanent Select Committee on Intelligence  
House of Representatives

The Honorable Anna G. Eshoo  
Chairwoman  
Subcommittee on Intelligence Community Management  
Permanent Select Committee on Intelligence  
House of Representatives

Personnel security clearances are used to verify that national security information—which in some cases could cause exceptionally grave damage to U.S. national defense or foreign relations if disclosed—is entrusted only to individuals who have proven reliability and loyalty to the nation. Following the terrorist attacks on September 11, 2001, the nation's defense and intelligence needs grew, prompting increased demand for personnel with security clearances. According to officials from the Joint Reform Team, about 2.4 million people—excluding some of those with clearances who work in areas of national intelligence—currently hold clearances, and the Office of Personnel Management (OPM) conducted about 750,000 national security investigations in fiscal year 2008. We have previously reported on delays and backlogs in security clearance processing, lack of reciprocity,<sup>1</sup> and incomplete investigations. As a result of these long-standing issues, we have designated the Department of Defense's (DOD) personnel security clearance program a high-risk area since 2005.<sup>2</sup>

In response to concerns about delays in processing clearances and other issues, Congress set goals and established requirements for improving the clearance process in the Intelligence Reform and Terrorism Prevention

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<sup>1</sup> Reciprocity is an agency's acceptance of a background investigation or clearance determination completed by another authorized investigative or adjudicative agency.

<sup>2</sup> GAO, *High-Risk Series: An Update*, [GAO-05-207](#) (Washington, D.C.: January 2005); *High-Risk Series: An Update*, [GAO-07-310](#) (Washington, D.C.: January 2007); and *High-Risk Series: An Update*, [GAO-09-271](#) (Washington, D.C.: January 2009).

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Act of 2004 (IRTPA).<sup>3</sup> Those requirements include, among other things, improving the timeliness of the clearance process, achieving interagency reciprocity, establishing an integrated database to track investigative and adjudicative information,<sup>4</sup> and evaluating available technology for investigations and adjudications. While DOD and other executive branch agencies responsible for investigating or adjudicating clearances for federal personnel, military servicemembers, and government contractors have made significant progress in improving timeliness and evaluating the use of available technology in clearance processing, problems related to the quality of security clearance investigations and adjudication determinations, reciprocity of clearance determinations, and information technology persist.

In 2007, the Joint Reform Team—which currently consists of cognizant entities within the Office of Management and Budget (OMB), Office of Personnel Management (OPM), Office of the Director of National Intelligence (ODNI), and the Under Secretary of Defense (Intelligence)—was established by the Director of National Intelligence through a Memorandum of Agreement to execute joint reform efforts to achieve IRTPA timeliness goals and improve the processes related to granting security clearances and determining suitability for government employment.<sup>5</sup> In its April 2008 report, the Joint Reform Team called for an executive branch governance structure to ensure accountability and sustain reform momentum. Subsequently, in June 2008, Executive Order 13467 established a Suitability and Security Clearance Performance Accountability Council, commonly known as the Performance Accountability Council, to be the governmentwide governance structure responsible for driving implementation and overseeing these reform efforts. Furthermore, the order appointed the Deputy Director for Management at OMB as the chair of the council and designated Executive

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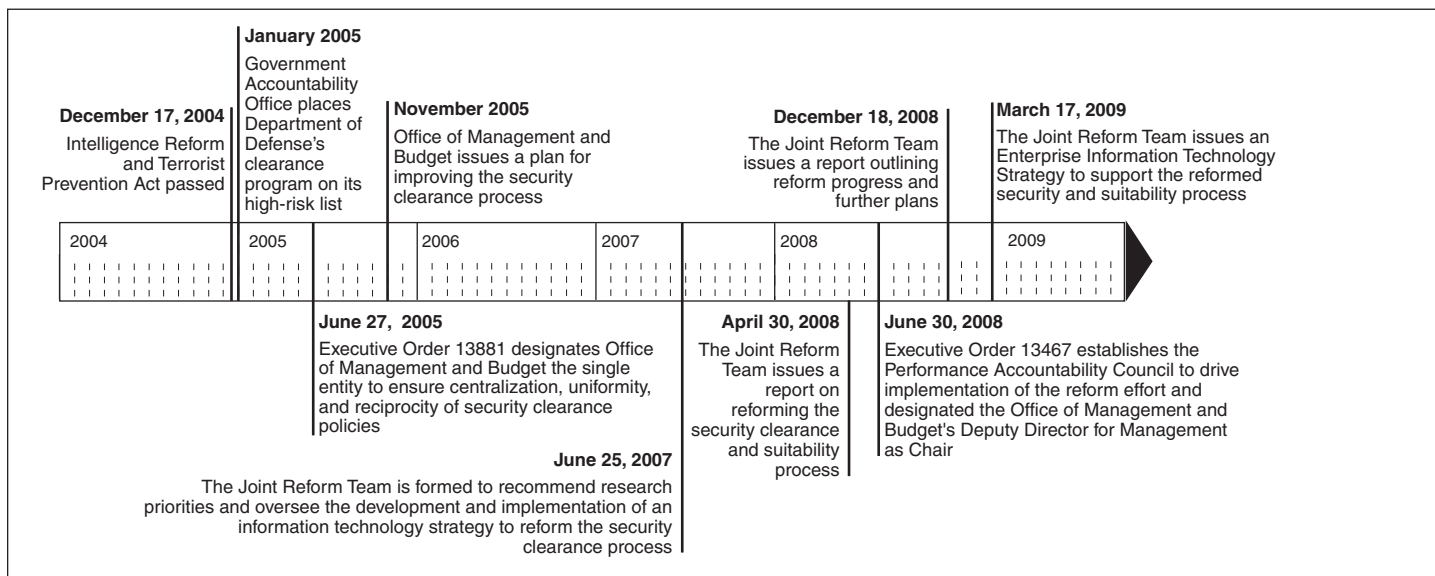
<sup>3</sup> Pub. L. No. 108-458, § 3001 (2004).

<sup>4</sup> The security clearance process currently consists of six phases: requirements setting, application submission, investigation, adjudication, appeal, and renewal.

<sup>5</sup> Determinations of suitability for government employment in positions in the competitive service and for career appointment in the Senior Executive Service include consideration of aspects of an individual's character or conduct that may have an impact on the integrity or efficiency of their service. Exec. Order No. 13467, *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information*, at § 1.2(1) (June 30, 2008) (citing 5 C.F.R. Part 731).

Agents for Suitability and Security.<sup>6</sup> The Joint Reform Team continues to work on the reform effort under the Performance Accountability Council by providing progress reports, recommending research priorities, and overseeing the development and implementation of an information technology strategy, among other things. In addition to its April 2008 report, the Joint Reform Team provided two other key reports, which collectively communicate the reform effort's plans for reforming the security clearance process. First, in December 2008, the Joint Reform Team issued a report on the progress of the reform efforts and provided further details on the plans to implement reforms. Most recently, in March 2009, the Joint Reform Team finalized an Enterprise Information Technology Strategy to support the reformed security and suitability process and its associated milestones described in the April and December reports. Figure 1 highlights key events related to security clearance reform.

**Figure 1: Key Events Related to the Security Clearance Reform Effort**



Source: GAO analysis.

<sup>6</sup> The Director of OPM was designated as the Executive Agent for Suitability, and the Director of National Intelligence was designated Executive Agent for Security.

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Congressional oversight through hearings held by the Subcommittee on Intelligence Community Management, House Permanent Select Committee on Intelligence, in February and July 2008 has helped focus attention on the need for security clearance reform.<sup>7</sup> In addition, the Chairman of the House Permanent Select Committee on Intelligence and the Chairwoman of the Subcommittee on Intelligence Community Management asked us to examine the ongoing reforms relative to key practices GAO has used to evaluate other reform efforts, and to review the criteria that the executive branch is using to assess the effectiveness of its efforts. Specifically, in this report we address the following questions: (1) To what extent are joint efforts to reform the personnel security clearance process consistent with key practices—including setting outcome-focused implementation goals to show progress—that GAO has identified for successful organizational transformations? (2) To what extent do the three security clearance joint reform reports address essential factors for reforming the security clearance process?

To assess the extent to which efforts to reform the personnel security clearance process are consistent with key practices that GAO has identified for successful organizational transformations,<sup>8</sup> we collected and analyzed reports and documents related to the reform effort. We also conducted interviews with relevant officials from the Performance Accountability Council, the Joint Reform Team, and other federal agencies involved in the reform effort. We then compared our analysis of the reform efforts with key practices for organizational transformations. To assess the extent to which security clearance reform plans address essential factors for reforming the security clearance process, we reviewed the April and December 2008 progress reports and the March 2009 information

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<sup>7</sup> In the past two years, GAO has also testified on concerns with the timeliness of the security clearance process, among other things, before (1) the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia of the Senate Committee on Homeland Security and Governmental Affairs, (2) the Subcommittee on Government Management, Organization, and Procurement, House Committee on Oversight and Government Reform, and (3) the Subcommittee on Readiness, House Committee on Armed Services.

<sup>8</sup> GAO, *Highlights of a GAO Forum: Mergers and Transformation: Lessons Learned for a Department of Homeland Security and Other Federal Agencies*, [GAO-03-293SP](#) (Washington, D.C.: Nov. 14, 2002), and *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, [GAO-03-669](#) (Washington, D.C.: July 2, 2003).



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technology strategy report,<sup>9</sup> which collectively communicate the reform plans developed since the establishment of the Joint Reform Team in 2007. We then conducted interviews to discuss those plans with agency officials from the Performance Accountability Council, the Joint Reform Team, and agencies affected by reform efforts. We also analyzed additional guidance and executive branch policies, including executive orders and recently issued federal investigative standards. Specifically, we compared the reports to factors we previously identified<sup>10</sup> and two additional criteria established in IRTPA<sup>11</sup> that are essential to reforming the clearance process. We conducted this performance audit from August 2008 through May 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Since 1997, federal agencies have followed a common set of personnel security investigative standards and adjudicative guidelines for determining whether servicemembers, federal workers, private industry personnel, and others are eligible to receive security clearances.<sup>12</sup> Security clearances are required for access to certain national security information, which is classified at one of three levels: top secret, secret, or confidential. The level of classification denotes the degree of protection required for information and the amount of damage that unauthorized disclosure could

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<sup>9</sup> Joint Security and Suitability Reform Team, *Security and Suitability Process Reform Initial Report* (Washington, D.C., Apr. 30, 2008); *Security and Suitability Process Reform* (Washington, D.C., Dec. 17, 2008); *Enterprise Information Technology Strategy* (Washington, D.C., Mar. 17, 2008).

<sup>10</sup> GAO, *Personnel Clearances: Key Factors to Consider in Efforts to Reform Security Clearance Processes*, [GAO-08-352T](#) (Washington, D.C.: Feb. 27, 2008).

<sup>11</sup> Pub. L. No. 108-458, § 3001.

<sup>12</sup> Memorandum from Samuel Berger, Assistant to the President for National Security Affairs, to George J. Tenet and John P. White, Co-Chairmen, Security Policy Board, *Implementation of Executive Order 12968*, Mar. 24, 1997. This memorandum approves the adjudication guidelines, temporary eligibility standards, and investigative standards required by Exec. Order No. 12968, *Access to Classified Information* (Aug. 2, 1995). The standards were later published in 32 C.F.R. Part 147. New federal investigative standards were issued by the Security and Suitability Executive Agents on December 13, 2008. The new federal investigative standards have not been implemented yet.

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reasonably cause to national security. The degrees of expected damage that unauthorized disclosure could reasonably be expected to cause are “exceptionally grave damage” for top secret information, “serious damage” for secret information, and “damage” for confidential information.<sup>13</sup>

We have previously reported problems—including significant delays in processing clearances—associated with DOD’s security clearance processes, and in 2005, 2007, and again in 2009, we identified not only delays in completing the end-to-end clearance processing but also incomplete investigative and adjudicative reports.<sup>14</sup> More recently, we reported that although the executive branch has met current IRTPA timeliness requirements—under which adjudicative agencies are to make a determination on at least 80 percent of all applications for a security clearance within 120 days, on average, after the date of receipt of the application—executive branch reports to Congress do not capture the full range of time that OPM and DOD took to make clearance determinations.<sup>15</sup> Further, we found that those reports provided decision makers little information on quality, and that the majority of OPM-provided investigative reports, which DOD adjudicators (agency employees who decide whether to grant a clearance to an applicant based on the investigation and other information) used to grant initial top secret clearances in July 2008, were missing required documentation.<sup>16</sup>

In June 2005, the President issued an executive order as part of the administration’s efforts to improve the security clearance process and to

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<sup>13</sup> 5 C.F.R. § 1312.4 (2009).

<sup>14</sup> GAO, *DOD Personnel Clearances: Comprehensive Timeliness Reporting, Complete Clearance Documentation, and Quality Measures Are Needed to Further Improve the Clearance Process*, [GAO-09-400](#) (Washington, D.C.: May 19, 2009); [GAO-09-271](#); [GAO-07-310](#); and [GAO-05-207](#).

<sup>15</sup> IRTPA (Pub. L. No. 108-458, § 3001(g) (2004)) currently requires that the 120-day average period for clearance determinations include no longer than 90 days for the investigation and 30 days for the adjudication. IRTPA also requires the executive branch to implement a plan by December 17, 2009, under which adjudicative agencies, to the extent practical, must make a determination on at least 90 percent of all applications for a security clearance within 60 days, on average, after the date of receipt of the application, with no longer than 40 days allotted for the investigation and 20 days allotted for the adjudication.

<sup>16</sup> [GAO-09-400](#), and GAO, *DOD Personnel Clearances: Preliminary Observations about Timeliness and Quality*, [GAO-09-261R](#) (Washington, D.C.: Dec. 19, 2008).

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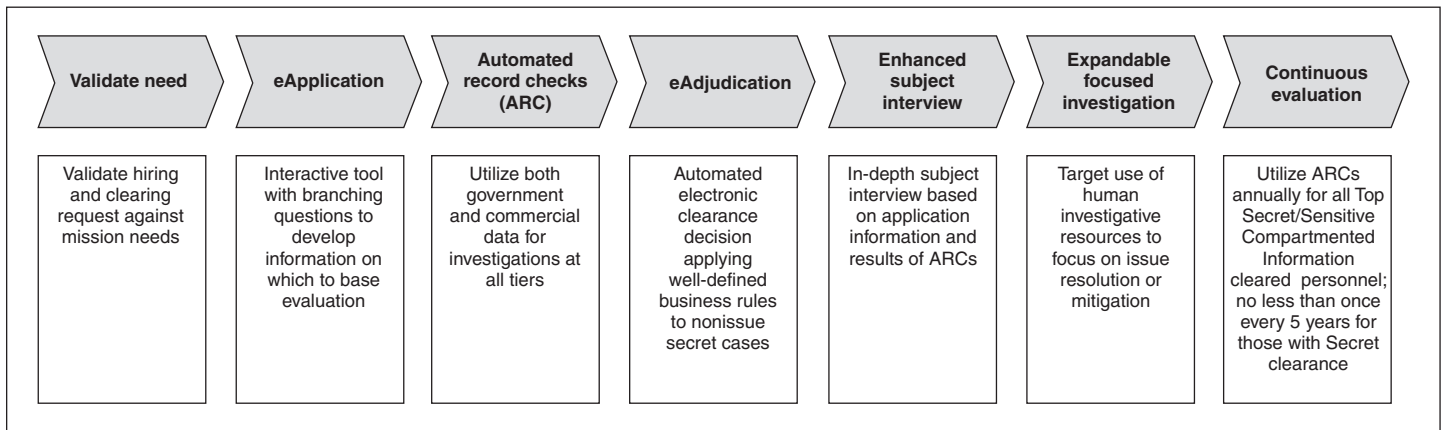
implement the statutory clearance requirements in IRTPA.<sup>17</sup> This order tasked the Director of OMB with a variety of functions in order to ensure that agency processes relating to determining eligibility for access to classified national security information were appropriately uniform, centralized, efficient, effective, timely, and reciprocal. Since 2005, OMB's former Deputy Director for Management has taken several actions to improve the security clearance process. These actions include establishing an interagency working group to improve the reciprocal acceptance of clearances issued by other agencies and taking a lead role in preparing a November 2005 plan to improve the timeliness of personnel security clearance processes governmentwide. The November 2005 plan included quarterly timeliness goals for initial investigations of clearances from November 2005 through December 2006 and an action plan for improving the security clearance process to meet the requirements of IRTPA, such as timeliness, reciprocity, and the establishment of an integrated database to track investigative and adjudicative information.

The Joint Reform Team submitted its first reform plan to the President on April 30, 2008; the plan presented a proposed transformed security clearance and suitability process. (See fig. 2.) The plan also presented a new 7-step process for determining eligibility: (1) validating the need for security or suitability investigation and adjudication, (2) an electronic application, (3) automated records checks, (4) electronic adjudication, (5) an enhanced subject interview, (6) an expandable focused investigation, and (7) continuous evaluation of persons with security clearances. The key differences between this design and the current process are more extensive use of information technology from beginning to end and a more customized approach to investigations through in-depth personal interviews and targeted use of human investigative resources.

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<sup>17</sup> Exec. Order No. 13381, *Strengthening Processes Relating to Determining Eligibility for Access to Classified National Security Information* (June 27, 2005). This order was revoked by Exec. Order No. 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).

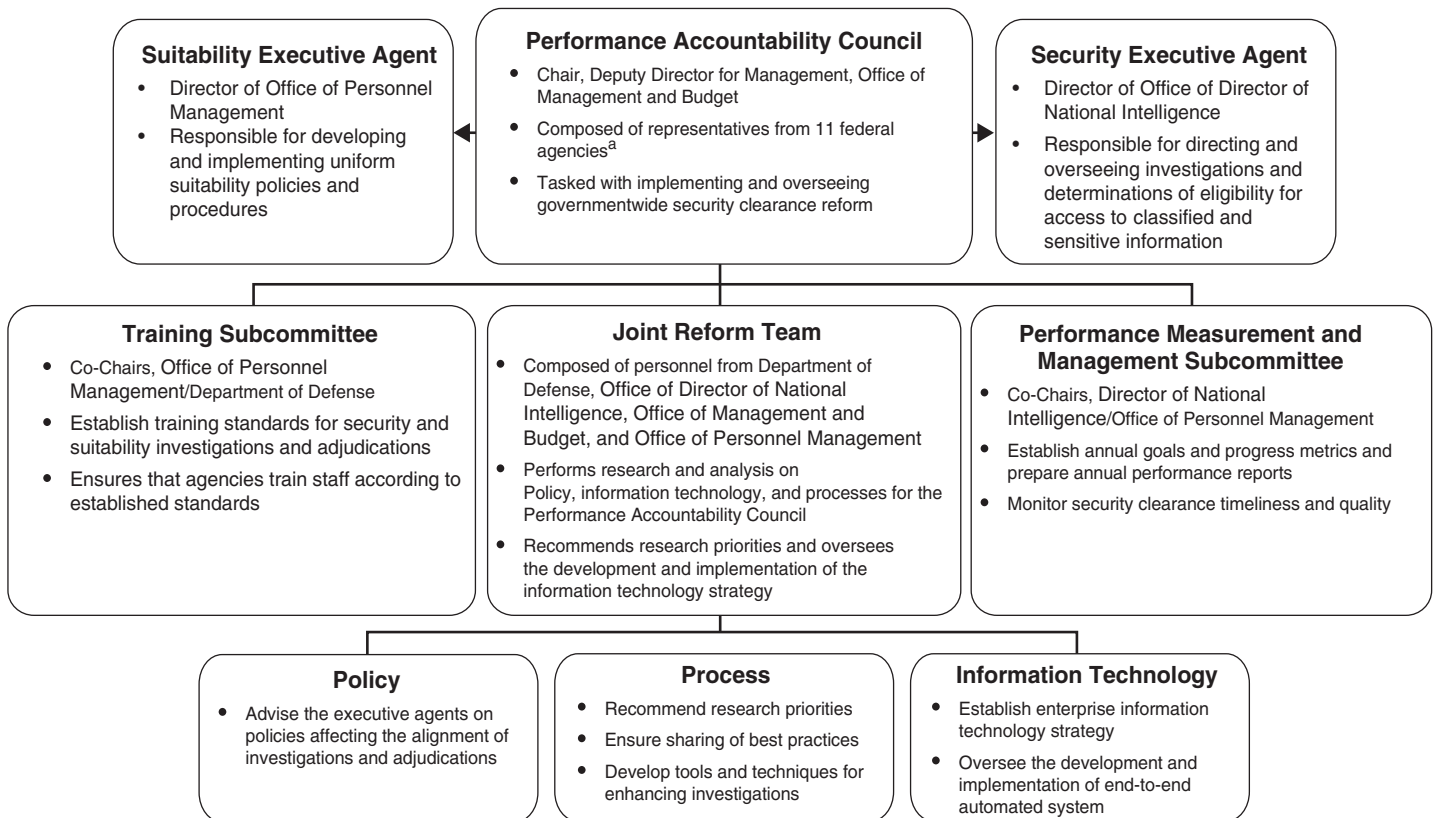
**Figure 2: Transformed Suitability and Security Clearance Process Design**



Source: Joint Reform Team.

The Joint Reform Team’s April 2008 plan also proposed a new executive branch governance structure for coordinating security clearance and suitability decisions, and on June 30, 2008, the President issued Executive Order 13467 that established the Performance Accountability Council. In accordance with Executive Order 13467, the Performance Accountability Council is accountable to the President to achieve reform goals, drive implementation, and oversee clearance reform. The council comprises representatives from 11 executive agencies. (See fig. 3.) The Joint Reform Team—composed of staff from OPM, DOD, and ODNI—is not formally part of the governance structure established by Executive Order 13467 but in practice reports to the Performance Accountability Council and is responsible for policy, process, and information technology in accordance with the council’s charter. In addition, two subcommittees at the working level also report to the council. The Training Subcommittee is developing training standards that will be used to help align security and suitability processes, and the Performance Measurement and Management Subcommittee is developing performance metrics that the council will use to assess the timeliness and quality of the investigative and adjudicative processes, among other things. Following implementation of the performance metrics, subcommittee members will continue to assess the metrics and update them to inform policymakers on the reform process.

**Figure 3: Governance of Security and Suitability Clearance Processes**



Source: GAO analysis of the Joint Reform Team data.

Note: The Joint Reform Team is not formally part of the governance structure established by Executive Order 13467, but in practice reports to the Performance Accountability Council.

<sup>a</sup>The 11 federal agencies represented on the Performance Accountability Council are OMB, ODNI, OPM, DOD, the Department of State, the Federal Bureau of Investigations, the Department of Homeland Security, the Department of Energy, the Department of Health and Human Services, the Department of Veterans Affairs, and the Department of the Treasury.

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## Initial Reform Efforts Have Partially Aligned with Key Practices but Lack a Fully Developed Strategic Framework with Outcome-Focused Performance Measures to Show Progress

Although initial reform efforts have, in part, aligned with established key practices for organizational transformation, it is difficult to assess the progress of reform or determine if corrective action is needed. In September 2002, GAO convened a forum to identify and discuss practices and lessons learned from major private and public sector organizational mergers, acquisitions, and transformations that can serve as a guide as federal agencies transform their processes in response to governance challenges.<sup>18</sup> Consistent with some of these key practices, the Performance Accountability Council's membership currently includes senior executive leaders from 11 federal agencies. However, because the reform efforts are missing important elements of a strategic framework that are also consistent with the Government Performance and Results Act of 1993 (GPRA), such as long-term goals with related outcome-focused performance measures that show progress or identify obstacles to progress and possible remedies, the reform effort is not able to demonstrate incremental progress toward strategic goals, and the effort runs the risk of losing momentum and governmentwide buy-in.

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## Key Practices for Large-Scale Transformations

Planning and implementing a large-scale transformation such as reforming the personnel security clearance process is not a simple endeavor and requires the concentrated efforts of both leadership and employees across government. Participants in a forum GAO convened in 2002 generally agreed on a number of practices that can serve as a guide for organizational mergers, acquisitions, and transformations, including committed leadership, a mission with strategic goals, implementation goals and a timeline, and a formal communication strategy. These key practices, among others, are as follows:

- Ensure that top leadership drives the transformation. Leadership must set the direction, pace, and tone and provide a clear, consistent rationale that brings everyone together behind a single mission.
- Dedicate an implementation team to manage the transformation process. A strong and stable team is important to ensure that the transformation receives the needed attention to be sustained and successful.
- Establish a coherent mission and integrated strategic goals to guide the transformation. Together, these define the culture and serve as a vehicle for employees to unite and rally around.

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<sup>18</sup> [GAO-03-293SP](#) and [GAO-03-669](#).

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- Focus on a key set of principles and priorities at the outset of the transformation. A clear set of principles and priorities serves as a framework to help the organization create a new culture and drive employee behaviors.
  - Use the performance management system to define responsibility and ensure accountability for change. This system shows how team, unit, and individual performance can contribute to overall organizational results.
  - Set implementation goals and a timeline to build momentum and show progress from day one. Goals and a timeline are essential because the transformation could take years to complete.
  - Establish a communication strategy to create shared expectations and report related progress. The strategy must reach out to employees, customers, and stakeholders and engage them in a two-way exchange.
  - Involve employees to obtain their ideas and gain their ownership for the transformation. Employee involvement strengthens the process and allows employees to share their experiences and shape policies.

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### The Reform Effort Has Benefited from Committed Leadership and a Dedicated Implementation Team, but Sustainment Is Key

High-level leaders—including senior officials from OMB, DOD, OPM, ODNI, and seven other federal agencies—have made a commitment to the governmentwide security clearance reform efforts. In a February 2008 memo, the President directed OMB, OPM, ODNI, and DOD to submit an initial security clearance reform proposal by April 30, 2008. Executive Order 13467 further demonstrated leadership commitment to security clearance reform by creating a governance structure—the Performance Accountability Council. The council is accountable to the President to achieve the goals of reform stated in Executive Order 13467, drive implementation, and sustain reform momentum. The council’s governance structure is permanent, unless it is altered by a new executive order or law. The Chair of the council provides direction and has control over its functions and the authority to make final decisions and appoint members. The council has met monthly since July 2008 to share information and make decisions to drive the reform process, although, as of this report’s issue date, the chair position, which is held by OMB’s Deputy Director for Management, has remained vacant since January 2008, and no presidential appointee has yet been named. Without continued committed leadership and sustained support from the new administration, it will be difficult to complete the reform efforts and sustain the interagency collaboration that is needed to move this effort forward.

In addition to high-level leadership, the reform effort has benefited from a dedicated implementation team to manage the transformation process from the beginning. The Joint Reform Team—composed of staff from multiple agencies, including OMB, DOD, OPM, and ODNI—is a dedicated

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team that works full-time on security clearance reform.<sup>19</sup> The Joint Reform Team is responsible for day-to-day management of the reform effort, and it produces the key reports to the President that update the status of the efforts and lay out future plans, such as the April and December 2008 reports and the March 2009 information technology strategy report. Within the reform team, four senior executives—one from each agency—guide the effort to streamline and modernize the security clearance process. Under the senior executives are senior leaders who manage the reform effort on a daily basis, including approximately 17 full-time staff members—some with backgrounds in personnel security and others with DOD business transformation experience—who work in the areas of policy, process improvement, and information technology development. These staff members are “on loan” from the parent agencies, and although the Joint Reform Team currently does not have an end date, officials told us that they expect the team to stay in place at least through 2010.

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### The Reform Effort Lacks a Strategic Framework That Includes Important Elements of a Successful Transformation

It is unclear how the planned transformation of the security clearance process will identify success or how long the reform effort will take because the effort lacks a strategic framework that includes important elements of successful transformations such as a coherent mission statement, long-term strategic goals, outcome-focused performance measures, and a comprehensive communication strategy.

*Mission and strategic goals:* Neither the Joint Reform Team’s April nor December 2008 reports to the President define the mission or strategic goals of the reform effort. In its April 2008 report, the Joint Reform Team articulated principles for the reformed process: (1) more relevant information is collected and validated at the beginning of the security clearance process, (2) automation is used to make the process faster, (3) field investigative activity is focused, (4) risk decisions rely on modern analytic methods rather than practices that avoid risk, (5) relevant data are better used for subsequent hiring and clearing decisions, and (6) continuous evaluation techniques replace periodic reinvestigations. These principles help explain the purpose of the reformed 7-step clearance process, but they do not articulate a mission statement that concisely summarizes the main purposes for the reform effort’s major functions and operations or strategic goals that encompass the long-term outcomes that

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<sup>19</sup> According to the Joint Reform Team, over 70 personnel from DOD, OPM, and ODNI currently support its initiatives (including full and part-time support).



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the governmentwide reform effort is intended to achieve. Strategic goals explain what results are expected and when to expect those results, should correspond to the purposes set forth in an organization's mission statement, and develop with greater specificity how the organization will carry out its mission. Strategic goals cannot exist without a mission statement to drive and tie them together.<sup>20</sup>

In designing a new personnel security clearance system, GPRA may be a useful resource for both the team designing the system and the congressional committees overseeing the design and implementation. GPRA provides a framework for strategic performance planning and reporting intended to improve federal program effectiveness and hold agencies accountable for achieving results. Agencies that effectively implement GPRA's results-oriented framework clearly establish performance goals for which they will be held accountable, measure progress toward those goals, determine strategies and resources to effectively accomplish the goals, use performance information to make the programmatic decisions necessary to improve performance, and formally communicate results in performance reports.

Furthermore, in a successful transformation effort, developing, communicating, and constantly reinforcing the effort's mission and strategic goals helps employees understand how their positions fit in with the new organization and what they need to do differently to help the new organization achieve success. When we asked leaders, staff members, and stakeholders of the reform effort to define the reform effort's strategic goals, they identified different goals, such as IRTPA requirements and making the security clearance process more timely, more cost-efficient, and higher quality. Moreover, strategic goals are an integral part of the performance management systems for leaders and employees. Although senior leaders from the Joint Reform Team told us that their agencies respective performance management systems assessed their performance according to the contributions they make to the reform efforts, without a clear mission and strategic goals to align with individual expectations, employees are not necessarily held accountable for whether they are achieving desired results.

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<sup>20</sup> GAO, *Agencies' Strategic Plans Under GPRA: Key Questions to Facilitate Congressional Review*, [GAO/GGD-10.1.16](#) (Washington, D.C.: May 1997).

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*Timeline for implementation and outcome-focused performance measures:* Although the December 2008 report contains a timeline for implementation of aspects of the reformed process through December 2009 and cites estimated operational dates for elements of the reformed process through 2010, leaders of the Joint Reform Team acknowledged that they are in the initial stages of reaching out to agencies across the federal government, including the intelligence agencies, to determine how and when the reformed process will be implemented governmentwide. In addition, the reform effort currently lacks outcome-focused performance measures to assess whether it is achieving the desired results (i.e., its strategic goals). Consequently, the leaders of the reform effort—as well as Congress and the administration—have no way of measuring whether the reform effort is making progress toward resolving long-standing problems with the security clearance process, and the effort runs the risk of losing momentum. According to key practices for transformations, implementation goals and a timeline are essential to show progress from day one because transformations could take many years to complete.

Although neither the Joint Reform Team nor the Performance Accountability Council developed metrics to assess the progress of the reform effort, the key reform reports discuss several metrics that the council developed to evaluate factors like timeliness and quality once the reformed process is implemented. The council is working to finalize these metrics. Concerning timeliness, the reports describe the IRTPA requirement to complete 90 percent of security clearance determinations within an average of 60 days, to the extent practical, as their target. According to the key reports, the Performance Accountability Council established measures for end-to-end, initiation, investigation, and adjudication times.<sup>21</sup> Concerning quality, the reports describe two measures that the council is developing. First, the council developed a measure of investigative quality that tracks the number of deficient investigative cases that adjudicators return for further investigation. We have previously reported that deficient cases alone are not a valid indicator of quality because adjudication officials told us that they were

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<sup>21</sup> The December 2008 report defines the following timeliness measures: end-to-end is the time from the date of the submission by the applicant to the date of the adjudicative decision; initiation is the time from the date of submission by the applicant to the receipt date of all information/forms (e.g., fingerprint cards) required to conduct an investigation by the investigative service provider; investigation is the time from the receipt date of the completed package (forms, releases, fingerprints, etc.) to the date the adjudicative unit receives the complete investigative product; and adjudication is the time from the receipt date of the final report of investigation to the date of the adjudicative decision.

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reluctant to return incomplete investigations as they anticipated this could lead to delays.<sup>22</sup> Second, the reform effort plans to require adjudicators to complete a survey about the quality of investigations. Clearly defined timeliness and quality metrics can improve the security clearance process by enhancing oversight of the time required to process security clearances and the quality of the investigation and adjudicative decisions. Further, in our May 2009 report on DOD's personnel clearances, we recommended that OMB provide Congress with results of metrics on comprehensive timeliness and the quality of investigations and adjudications as part of the IRTPA-required annual reports on personnel security clearances.<sup>23</sup> Until the Performance Accountability Council finishes developing metrics to evaluate efficiency and effectiveness of the clearance process, Congress and the council will be limited in their ability to effectively oversee the reformed process and identify problems with delays in the processing of clearances or inadequate quality.

*Formal communication strategy and stakeholder involvement:* The Performance Accountability Council and Joint Reform Team have communicated with executive branch agencies that request and grant security clearances and suitability determinations, but they lack a formal, comprehensive communication strategy that reaches out to their stakeholders and engages them in the reform process. According to transformation key practices, a two-way exchange between leadership, employees, and stakeholders early and often helps build trust and shared expectations. The Joint Reform Team used its April and December 2008 reports as its primary vehicles to communicate plans for the new process with all stakeholders. In addition, the council holds monthly meetings and updates high-level leadership from its 11 member agencies on the progress of the reform efforts. Further, senior reform leaders have communicated with stakeholders governmentwide through a series of briefings that involve senior officials and personnel. Still, some stakeholders at agencies not represented on the Joint Reform Team told us that they are unclear how they will implement the new process. For example, they were not sure how the reform would affect their day-to-day operations or if they would be responsible for funding some of the automated aspects of the

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<sup>22</sup> GAO, *DOD Personnel: Inadequate Personnel Security Investigations Pose National Security Risks*, [GAO/NSIAD-00-12](#) (Washington, D.C.: Oct. 27, 1999), and *DOD Personnel Clearances: Government Plan Addresses Some Long-standing Problems with DOD's Program, But Concerns Remain*, [GAO-06-233T](#) (Washington, D.C.: Nov. 9, 2005).

<sup>23</sup> [GAO-09-400](#).

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reformed process. More recently, in January 2009, the Joint Reform Team held a governmentwide meeting to assess agencies' ability to implement the new process. The Joint Reform Team administered a questionnaire, which included questions regarding federal agencies' ability to use existing information technology systems to process clearances. Except for the January 2009 meeting and questionnaire, the communication efforts have not promoted the kind of two-way communication necessary to ensure the successful completion of the transformation. Without a formal communication strategy for reaching out to stakeholders, including a built-in mechanism for two-way communication between those leading reform efforts and the stakeholders, the reform effort risks undermining support for the transformation by creating uncertainty and mistrust among stakeholders about planned changes. In addition, the Joint Reform Team may not be able to identify barriers or obstacles to achieving their goals and identify mitigation strategies.

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## Joint Reform Reports Have Begun to Address Factors That Are Critical to Reforming the Security Clearance Process

The joint reform reports—issued by the Joint Reform Team to the President and signed by the former Deputy Director of Management at OMB in his capacity as Chair of the Performance Accountability Council—include plans that begin to address factors that are critical to reforming the security clearance process. Our prior work identified factors key to reforming the clearance process, and IRTPA identified two additional criteria, that are also essential to reforming the clearance process. These factors include (1) a sound requirements determination process, (2) governmentwide reciprocity, (3) the building of quality into every step of the process, (4) consolidated information technology, and (5) the identification and reporting of long-term funding requirements.<sup>24</sup> Key reports from the Joint Reform Team begin to address four of these essential factors for reform, although they do not contain any information on roles and responsibilities for the information technology strategy or long-term funding requirements. Table 1 summarizes the results of our comparison of the joint reform reports against these five factors for reform.

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<sup>24</sup> Establishing a sound requirement determination process, building quality into every step of the process, and providing Congress with long-term funding requirements are identified in our previous work. See [GAO-08-352T](#). We previously identified having a valid set of metrics to evaluate efficiency and effectiveness as an additional factor, which is addressed in this report as part of our discussion of key practices for government transformations. Establishing governmentwide reciprocity and developing and consolidating information technology are derived from sections 3001(d) and (f) of IRTPA.

**Table 1: Summary of the Degree to Which Joint Reform Plans Address Factors Critical to Reforming the Personnel Security Clearance Process**

<b>Factors critical to reform</b>	<b>Completed</b>	<b>In process</b>	<b>Not addressed</b>	<b>Summary of findings</b>
Establish a sound requirement determination process		X		The reports establish a process for eliminating duplicative applications and investigations. The Joint Reform Team estimated that this would be operational by 2010. However, the reports do not provide a mechanism or requirement for federal agencies to review their positions to help ensure their clearance levels and numbers accurately reflect mission needs.
Establish governmentwide reciprocity		X		One of the key reports specifies that employers or agencies will check the appropriate databases to determine if individuals selected for federal positions or to work as contractor employees have qualifying clearances or open investigations that meet current requirements. However, the measures established by the reports for reciprocity are limited to ensuring that agencies rely on existing questionnaires and investigations when available. Further, there are no enforcement mechanisms to help ensure that agencies comply with reciprocity requirements. Also, it is unclear how the intelligence community plans to implement reciprocity.
Build quality into every step of the process		X		According to one of the key reports, most of the phases of the reformed process design incorporate quality control mechanisms. For example, the electronic adjudication phase will incorporate an audit function for continuous assurance and quality control of its results. It is unclear how quality will be incorporated into the enhanced subject interview and expandable focused investigation steps.
Develop and consolidate information technology		X		Through reform, the Joint Reform Team has evaluated and incorporated new technology to automate the process. The key reports provide a basic timeline for implementing a new automated process. Further, at present, there are three separate database platforms storing the majority of clearance information; however there is the ability to access two of the systems from a single access point. The Joint Reform Team developed an Enterprise Information Technology Strategy to support the advancement of the reformed process, but it did not define roles and responsibilities for the agencies involved in the reform effort.
Provide Congress with long-term funding requirements			X	The reports do not detail what reform objectives require funding, how much they will cost, or where funding will come from. Furthermore, the reports do not estimate potential cost savings resulting from the streamlined process. Senior reform leaders stated that cost estimates have not been completed by the Joint Reform Team or the agencies affected by reform as it is too early. Officials from DOD and OPM noted that they would cover costs for major information technology acquisitions.

Source: GAO analysis.

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As table 1 shows, the reform reports show that the Joint Reform Team is in the process of addressing four out of five of these factors critical to reforming the security clearance process:

*Establish a sound requirement determination process:* The key reform reports begin to address the need for agencies to request the appropriate number of clearances at the appropriate levels; however, the reports do not provide a mechanism for ensuring that the number and level of clearances being requested reflect the mission needs of the requesting agencies. By establishing an initial phase in the revised clearance process by which agencies will validate that each application and investigation they request is required to carry out their missions, the reform team expects to eliminate duplicative applications and investigations.<sup>25</sup> If an existing federal employee or contractor with an active security clearance accepts a position that requires a clearance of the same level at a different federal agency, the new agency is expected to first verify that the applicant has an existing clearance. Additionally, the reports stress the importance for agencies to request clearances at the appropriate clearance levels—that is, confidential, secret, or top secret—for their positions. However, we have previously reported, for example, that a growing percentage of DOD requests for clearances are at the top secret level.<sup>26</sup> According to OPM, top secret clearances require about 10 times more hours, in the current clearance process, to investigate than secret or confidential clearances. Further, each standard top secret investigation cost DOD \$3,888 as part of the current process. According to the Joint Reform Team, of the approximately 2.4 million DOD civilians, military, and contractor personnel who hold security clearances, approximately 387,000 of those clearances are top secret.<sup>27</sup> However, the reports do not require the agencies to assess the numbers and levels of clearances needed to fulfill their missions. Without a sound process for determining security clearance requirements, clearance requests could result in wasteful spending of government resources if clearances are requested at levels that are not

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<sup>25</sup> OPM conducts security clearance investigations for most federal agencies except for some intelligence agencies, such as the Central Intelligence Agency, and some other agencies, such as the Federal Bureau of Investigations, which conduct their own investigations.

<sup>26</sup> GAO, *DOD Personnel Clearances: Additional Steps Can Be Taken to Reduce Backlogs and Delays in Determining Security Clearance Eligibility for Industry Personnel*, [GAO-04-632](#) (Washington, D.C.: May 26, 2004).

<sup>27</sup> These numbers are as of March 17, 2009, and are approximate. In addition, they do not include the number of clearance holders for part of the intelligence community.

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necessary to meet the needs of some missions. Conversely, if agencies or military services do not request enough clearances at the appropriate levels, they may not have enough staff with sufficient clearances to manage their classified workloads.

*Establish governmentwide reciprocity:* One of the key reform reports states that reciprocity—an agency’s acceptance of a clearance and access level granted by another department, agency, or military service—will be measured by the number of agencies that ask newly hired personnel, who already have security clearances, to complete personnel security clearance questionnaires and then request new investigations for those same personnel. IRTPA states that all security clearance determinations shall be accepted by all agencies, with limited exceptions when necessary for national security purposes. According to one of the key reports, employers or agencies are to check the appropriate databases to determine if individuals selected for federal positions or to work as contractor employees already have qualifying clearances or open investigations. However, the reports do not contain any measures related to the reciprocal acceptance of previous adjudications—which are the final determinations as to whether to grant a clearance to an applicant.<sup>28</sup> Furthermore, the plans do not contain an enforcement mechanism to ensure that agencies comply with reciprocity requirements, and no information exists on who will monitor reciprocity or how noncompliant agencies will be addressed. In addition, the key reform reports indicate that the Performance Accountability Council is taking steps to make investigations and adjudications more consistent across the government by standardizing the training of investigators and adjudicators and automating parts of the process. For example, the reports discuss the development of core courses as well as a formalized certification for investigators and adjudicators. According to senior leaders of the reform effort, these steps will enable reciprocal acceptance of clearance decisions governmentwide. However, the key reports do not address plans to implement reciprocity among the intelligence agencies, which require more information—such as a polygraph of the applicant as part of an applicant’s investigation—than agencies that are outside the intelligence community. Officials told us that they are in the initial phase of reaching out to intelligence agencies to address their concerns. Until all federal agencies begin to practice reciprocity of clearance investigations and

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<sup>28</sup> Each agency requesting a clearance investigation is responsible for making its own adjudicative decision.

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adjudications—barring specific concerns—unnecessarily duplicative clearance investigations and adjudications will continue to slow the investigative and adjudicative process for all clearances and waste government resources.

*Build quality into every step of the process:* The key reform reports are beginning to incorporate quality control mechanisms in certain steps of the reformed 7-step security clearance process. For example, one step in the reformed process is “e-Adjudication” which involves automated electronic clearance decisions for applicants whose automated records checks did not reveal any issues that require further investigation before being forwarded to an adjudicator. According to key reform reports, to build quality into e-Adjudication, DOD issued guidance in November 2008 that required DOD adjudicators to simultaneously adjudicate files electronically (or automated) and manually (by a person reviewing an investigation file) as part of initial implementation of electronic adjudication. This simultaneous approach to adjudication is to evolve into a long-term program for continuous assurance and quality control. However, it is unclear how the reform team will incorporate quality into the other six steps of the reformed process, such as the enhanced subject interview (step 5 in the reformed process) in that the reform reports do not describe how these interviews will be structured and monitored to ensure consistency and quality control. Officials within various executive branch agencies raised this as an area of concern, citing that the information gathered during the interview and investigative portion of the process is essential for making adjudicative decisions.

*Develop and consolidate information technology:* According to our analysis of key reform reports, the reform effort is beginning to use information technology to improve the clearance process. IRTPA requires OMB to evaluate the use of available technology in security clearance investigations and adjudications. To improve the security clearance process, the Joint Reform Team conducted demonstration activities to determine how to automate the process and has issued an Enterprise Information Technology Strategy to support the advancement of the reformed security and suitability process. This strategy provides a framework for federal agencies to collaborate on leveraging existing systems and capabilities currently in operation. In addition, this strategy is intended to establish a new end-to-end governmentwide capability to support the reformed 7-step security and suitability process. Agencies requesting and investigating clearances are expected to use this new automated application, adjudication, monitoring, and record-check process, which the Joint Reform Team expects to improve the timeliness



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of clearances governmentwide by the end of 2010, according to key reports. The reform team is currently working with individual agencies to assess their information technology capabilities and assist with the development of agency information technology implementation plans to determine how to transition all agencies to the automated capability described in key reports. In addition, the Joint Reform Team is in the process of weighing options for the architecture of the future automated system that it is planning to implement throughout government during 2009 and 2010.

However, the strategy does not define the roles and responsibilities for the agencies involved in the reform effort. Our prior work has stressed the importance of defining clear roles and responsibilities before the implementation of information processing systems.<sup>29</sup> Establishing clearly defined roles and responsibilities on a cross-agency initiative helps to ensure that responsible agencies have a clear understanding of what they are expected to contribute and produce in support of the initiative. These roles and responsibilities for cross-agency programs are generally documented in memorandums of understanding between agencies. Because the Joint Reform Team has not established clear roles and responsibilities for the agencies involved, it will be difficult to hold agency leadership accountable and achieve a joint vision.

IRTPA also requires OPM to establish an integrated database that tracks investigation and adjudication information, and authorizes the appropriation of necessary funding for that database's implementation. However, at present, no single database exists, and the key reports that we reviewed do not discuss any plans for meeting the single database requirement. Executive branch agencies currently use three separate database platforms (the Joint Personnel Adjudication System, Clearance Verification System, and Scattered Castles)<sup>30</sup> to house clearance information. The Joint Reform Team's December 2008 report discusses plans to improve access to records through the Clearance Verification System in order to enhance the reciprocity of investigations and clearance

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<sup>29</sup> GAO, *Information Technology: Customs Automated Commercial Environment Program Progressing, But Need for Management Improvements Continues*, [GAO-05-267](#) (Washington, D.C.: Mar. 14, 2005).

<sup>30</sup> The Joint Personnel Adjudication System is used by DOD (not including DOD's intelligence agencies), Clearance Verification System is used by OPM (including all agencies for which OPM is responsible for investigations), and Scattered Castles is used by the intelligence agencies.

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determinations. However, it is not possible, according to senior reform leaders, to determine the total number of personnel with security clearances through any one of these platforms. The platforms are intended to allow security professionals to search for information on individuals who have clearances, but not to aggregate data on the total number of clearance holders. Further, some officials we spoke with expressed concerns about the potential security risks involved in the event of the unauthorized disclosure of names and other sensitive information about cleared intelligence agency personnel contained in Scattered Castles. Currently the Joint Reform Team is working with intelligence agencies to develop a solution that aligns with IRTPA while addressing those agencies' concerns. However, this outreach is in its early stages, and according to reform team members, it will take time to develop an information technology solution for sharing information between classified and unclassified databases.

*Provide Congress with long-term funding requirements:* Although senior reform leaders have stated that primary reform costs will be paid by DOD and OPM, key reform reports do not contain any information regarding the Joint Reform Team's plans to identify what initiatives require funding, specify how much funding will be required, specify when funding will be needed and how it will be budgeted, or estimate any potential cost savings that could result from the reformed system. Further, some agencies have expressed concern that they will be responsible for funding elements of reform from within their budgets, yet these organizations do not know what they may have to fund or where the money will come from. Without long-term funding requirements, leaders of the reform effort will be unable to compare and prioritize alternative proposals for reforming the clearance processes. Further, the omission of long-term funding requirements limits the ability of decision makers in the executive branch to carry out their budgetary development and oversight functions and limits Congress's ability to oversee the reform process and fully assess appropriation requests. This is especially critical given the long-term fiscal constraints that the nation faces. In particular, federal agencies may be faced with tough future budgetary trade-offs for competing demands for resources within the department.

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## Conclusions

The ongoing governmentwide security clearance reform effort involves the transformation and integration of multiple processes and policies, as well as the development of a new automated system, to make the security clearance process more efficient and effective. Under the leadership of OMB, the Joint Reform Team has taken several actions to improve the

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security clearance process during the past year. Further, the April 2008, December 2008, and March 2009 reform reports collectively are a step forward. However, the Joint Reform Team will be limited in its ability to demonstrate progress without a strategic framework that can serve as a roadmap by identifying intended outcomes of the reform, key outcome-based performance measures with which to measure progress, and any costs associated with the reformed process. With an outcome-based strategic framework in place that includes two-way communication with stakeholders, the degree of ultimate success of the reform effort depends on the extent to which the Joint Reform Team is able to fully address, among other things, ensuring the numbers and levels of investigations reflect agencies' missions, achieving reciprocity, identifying funding requirements, developing and implementing an information technology strategy, and making other much-needed improvements to the clearance process as the reforms move forward. The security clearance reform process has already been underway for several years, and various agencies involved have created and revised several plans for improvement. Although the high-level leadership and governance structure of the current reform effort distinguish it from previous efforts, without a strategic framework that fully addresses the long-standing security clearance problems and incorporates key practices for transformation—including the ability to demonstrate progress leading to desired results—the effort is at risk of losing momentum and not being fully implemented.

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## Recommendation for Executive Action

To further align the reform effort with key practices for organizational transformations and better address the long-standing problems, we recommend that the OMB Deputy Director of Management in the capacity as Chair of the Performance Accountability Council, ensure that the appropriate entities—such as the Performance Accountability Council, its subcommittees, or the Joint Reform Team—take the following action:

Establish a strategic framework for the joint reform effort to include

- a mission and strategic goals;
- outcome-focused performance measures to continually evaluate the progress of the reform effort toward meeting its goals and addressing long-standing problems with the security clearance process;
- a formal, comprehensive communication strategy that includes consistency of message and encourages two-way communication between the Performance Accountability Council and key stakeholders;
- clear roles and responsibilities for the implementation of the information technology strategy, for example, by establishing memorandums of

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understanding delineating the roles and responsibilities of all agencies responsible for developing and implementing components of the information technology strategy; and

- long-term funding requirements for security clearance reform, including estimates of potential cost savings from the reformed process, to be provided to decision makers in Congress and the executive branch.

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## Agency Comments and Our Evaluation

In oral comments on a draft of this report, OMB stated that it partially concurred with our recommendation to establish a strategic framework for the joint reform effort and that the views contained in written agency comments on our draft report provided to us jointly by DOD and ODNI were in alignment with those of OMB. In those written comments, DOD and ODNI also partially concurred with our recommendation to establish a strategic framework for the joint reform effort. While DOD and ODNI stated that many observations in our report provided a fair assessment of the current state of clearance reform, they also stated that our review appears to draw overly broad conclusions from limited evidence and noted their view that our report did not take into account that some important components of reform remain in different stages of development and will therefore follow a phased implementation plan. To address our objectives during the course of our review, we collected and analyzed reports and documents related to the reform effort produced by the Joint Reform Team and the Performance Accountability Council, and conducted interviews with relevant officials from the Joint Reform Team, Performance Accountability Council, and other agencies in the federal government involved in the reform effort. We then compared our analysis of the reform effort to GAO's previously issued key practices for organizational transformations. We agree that components of the reform are in different stages of development and in places specifically characterized efforts as being in their initial stages. The combined DOD and ODNI official comments are reprinted in appendix II. Additionally, DOD and ODNI commented on the specific elements of the strategic framework that we included as part of our recommendation.

- *Mission and strategic goals:* DOD and ODNI stated that we had faulted the reform effort for failing to define its mission or strategic goals in the April and December 2008 reports and that we had implied that the effort had none. They added that their July 2007 Terms of Reference—a memorandum from the Director of National Intelligence to the Under Secretary of Defense for Intelligence and the Deputy Director of National Intelligence for Policy, Plans, and Requirements—articulated the aims of the reform effort. These aims were to achieve comprehensive reform of the end-to-end security clearance process delivering high-assurance

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security clearances fairly, efficiently, and at the lowest reasonable cost to the federal government. DOD and ODNI also stated that the reform effort aims were reiterated and supported by additional detail in the April and December 2008 reports. While this statement could serve to communicate the reform effort's strategic goals, we continue to note that the reform team has not communicated strategic goals in its publicly issued joint reform reports that collectively communicate the reform plans. Further, as we discussed in our report, members of the Joint Reform Team and others involved in the reform effort did not consistently identify the same goals of the reform effort. Accordingly, we believe that the mission and strategic goals of the reform effort should be clearly identified and stated as part of the strategic framework as the reform effort moves forward.

- *Outcome-focused performance measures:* In their comments, DOD and ODNI agreed that the reform effort must contain outcome-focused performance measures, but added that these metrics must evolve as the process improvements and new capabilities are developed and implemented because the effort is iterative and in phased development. They also stated that our report claims a lack of metrics to assess the progress of the reform effort, and disagreed with us that it will be difficult to measure whether the reform effort is making progress, stating that the December 2008 report details key milestones and an implementation timeline that the Performance Accountability Council will oversee to monitor and drive progress. While we are encouraged that DOD and ODNI agree that outcome-focused performance measures are needed, we continue to believe that these metrics should be identified now. We acknowledge that the reform effort is iterative and that the reform team has developed timelines for implementation. We agree that timelines and milestones are useful. However, we also continue to believe that outcome-focused performance measures are a critical tool that in addition to timelines can be used to guide the reform effort and allow overseers to determine when the reform effort has accomplished its goals and purpose. Further, performance measures can help the leaders assess if the effort is getting off track or not moving toward accomplishing its goals so that the leaders can take corrective actions, which is important during an iterative or phased development effort such as the reform effort.
- *Comprehensive communication strategy:* In response to our finding that the reform effort lacks a formal, comprehensive communication strategy, DOD and ODNI agreed with us that communication is essential. They acknowledged that the reform effort has not had a formal, written communication strategy, but added that the leadership of the reform effort has aggressively pursued strategic communication opportunities at each phase of the reform effort and continues to do so. They encouraged us to give full consideration to extensive and repeated efforts undertaken by several individuals involved in the process. We do state in our report that

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leaders of the reform team have made multiple efforts to communicate with stakeholders about the reform effort. Furthermore, we also agree with DOD and ODNI statements in their agency comments that stakeholders may be resistant to change. During our interviews with agency officials we heard some of that resistance voiced. Therefore, we continue to believe it is essential that the Joint Reform Team develop a formal communication strategy to ensure that information is consistently and accurately provided to stakeholders, including federal agencies governmentwide that will be implementing the reformed process.

- *Information technology implementation roles and responsibilities:* DOD and ODNI stated that information technology has always been used in the clearance process, and that the reform effort's approach to improving the use of information technology is to leverage existing systems and capabilities, where applicable, and develop new tools where necessary. We agree and state that the Joint Reform Team is currently working with individual agencies to assess their information technology capabilities, and that the reform team is in the process of weighing options for the architecture of the future automated system that it is planning to implement during 2009 and 2010. DOD and ODNI agreed with our report that clearly defined roles and responsibilities are key to the success of cross-agency information technology initiatives. They asserted that considerable work has already been done, but added that even clearer roles and responsibilities will be identified moving forward. Regarding our finding that at present no single database exists in accordance with IRTPA that requires OPM to establish an integrated database that tracks investigations and adjudication information, DOD and ODNI stated that the reform effort continues its iterative implementation of improvements to systems that improve access to information that agencies need.
- *Long-term funding requirements:* Regarding our finding that key reform reports do not contain long-term funding requirements, DOD and ODNI concurred that there is much more work to be done in this area, and stated their intention to plan for and address additional funding requirements, as required.

DOD and ODNI also provided technical comments, which we have incorporated in the report as appropriate.

In addition, OPM provided written comments on a draft of this report, which are reprinted in appendix III, and technical comments, which we have incorporated in the report as appropriate. As part of its written comments, OPM stated that it met the timeliness goals of security clearance investigations set by IRTPA. Although timeliness was not the focus of this review, we acknowledge this in our report. OPM also noted that the suitability and security process should be aligned where

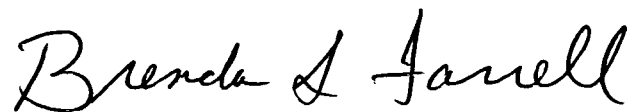
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appropriate, and stated that the governance structure established by Executive Order 13467 and the reform initiatives discussed in this report are under review by the new administration. OPM, therefore, concluded that while our findings and recommendations merit consideration, it would not be productive to address the concerns about the “past management of the reform process.”

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As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the Director of the Office of Management and Budget, the Secretary of Defense, the Director of the Office of the Director of National Intelligence, and the Director of the Office of Personnel Management. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions on the information discussed in this report, please contact me at (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Brenda S. Farrell, Director  
Defense Capabilities and Management

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# Appendix I: Scope and Methodology

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## Scope

The scope of our work included governmentwide reform efforts that were initiated by the Joint Reform Team. These reform efforts will affect the suitability and security clearance investigation and adjudication decisions of all federal employees, including military servicemembers and federal contractors from private industry.

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## Methodology

To determine the extent to which efforts to reform the personnel security clearance process are consistent with key practices that GAO has identified for organizational transformations, we collected and analyzed reports and documents related to the reform effort produced by the Joint Reform Team and the Performance Accountability Council. Specifically we reviewed documents regarding the structure of the Performance Accountability Council, including the charter and membership documentation. We reviewed key legislation and executive policies, including the Intelligence Reform and Terrorist Prevention Act of 2004 and Executive Order 13467. Additionally, we reviewed key reports on the reform effort such as the Joint Reform Team's April and December 2008 progress reports and its March 2009 Enterprise Information Technology Strategy report. Together, these documents communicate the reform plans developed since the establishment of the Joint Reform Team in 2007. In addition to the document analysis, we conducted interviews with relevant officials from the Performance Accountability Council, Joint Reform Team, and other federal agencies involved in the reform effort, such as the Departments of Homeland Security, Veterans Affairs, Treasury, and Energy. On the Joint Reform Team and the Performance Accountability Council, we interviewed individuals from all four of the agencies leading the reform effort, including DNI, OPM, OMB, and DOD and we also interviewed officials from the team's three areas of policy, process improvement, and information technology. We also compared GAO's previously issued key practices to our analysis of the reform efforts, including documentary and testimonial evidence, to determine the extent to which those practices are being incorporated into the reform efforts.

To determine the extent to which the Joint Reform Team's key security clearance reports address factors essential to reforming the security clearance process, we collected and analyzed reports and documents related to the reform effort produced by the Joint Reform Team and the Performance Accountability Council. Specifically we reviewed documents regarding the structure of the Performance Accountability Council, including the charter and membership documentation. We reviewed key legislation and executive policies, including the Intelligence Reform and Terrorist Prevention Act of 2004 and Executive Order 13467. Additionally,



we reviewed key reports on the reform effort such as the Joint Reform Team's April and December 2008 progress reports and its March 2009 information technology strategy report. Together, these documents communicate the reform plans developed since the establishment of the Joint Reform Team in 2007. In addition to the document analysis, we conducted interviews with relevant officials from the Performance Accountability Council, Joint Reform Team, and other federal agencies involved in the reform effort, such as the Departments of Homeland Security, Veterans Affairs, Treasury, and Energy. On the Joint Reform Team and the Performance Accountability Council, we interviewed individuals from all four of the agencies leading the reform effort, including DNI, OPM, OMB, and DOD and we also interviewed officials from the team's three areas of policy, process improvement, and information technology. Finally, we interviewed officials from DOD's Personnel Security Research Center. We then developed a list of factors critical to reforming the security clearance process by leveraging the factors we previously identified<sup>1</sup> and two additional criteria that we derived from IRTPA.<sup>2</sup> We compared our analysis of the key reform reports and testimonial information collected to the problems essential to reforming the clearance process that we identified.

We conducted this performance audit from August 2008 through May 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>1</sup> GAO, *Personnel Clearances: Key Factors to Consider in Efforts to Reform Security Clearance Processes*, [GAO-08-352T](#) (Washington, D.C.: Feb. 27, 2008).

<sup>2</sup> Pub. L. No. 108-458 (2004).

# Appendix II: Comments from the Department of Defense and the Director of National Intelligence



11 May 2009

Ms. Brenda S. Farrell  
Director, Defense Capabilities and Management  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington DC 20548

Dear Ms. Farrell:

This is the joint Department of Defense (DoD) and Director of National Intelligence (DNI) response to the GAO draft report 09-488, "PERSONNEL SECURITY CLEARANCES: An Outcome-Focused Strategy is Needed to Guide Implementation of the Reformed Clearance Process," dated April 24, 2009, (GAO Code 351263). Detail comments on the report recommendations are enclosed.

We recognize that many observations in the report are a fair assessment of the current state of clearance reform, but note some areas where the report appears to draw overly broad conclusions from limited evidence. We note that the report does not take into account that some important components of reform remain in different stages of development and therefore will follow a phased implementation plan.

We appreciate the support of GAO as DoD and DNI, together with our other Federal partners, further improve the overall security clearance process, and look forward to continuing our partnership in achieving our shared goals.

Sincerely,

Elizabeth A. McGrath  
Assistant Deputy Chief Management Officer  
Department of Defense

John P. Fitzpatrick  
Acting Assistant Deputy Director  
of National Intelligence for Security

Enclosure:  
As stated

**Appendix II: Comments from the Department  
of Defense and the Director of National  
Intelligence**

GAO Draft Report Dated April 24, 2009  
GAO-09-488 (GAO CODE 351263)

“PERSONNEL SECURITY CLEARANCES: An Outcome-Focused Strategy  
is Needed to Guide Implementation of the Reformed Clearance Process”

DEPARTMENT OF DEFENSE AND DIRECTOR OF NATIONAL INTELLIGENCE  
COMMENTS  
TO THE GAO RECOMMENDATIONS

RECOMMENDATION 1: To further align the reform effort with key practices for organizational transformations and better address the long-standing problems, we recommend that the OMB Deputy Director of Management in the capacity as Chair of the Performance Accountability Council, ensure that the appropriate entities—such as the Performance Accountability Council, its subcommittees, or the Joint Reform Team—take the following actions:

Establish a strategic framework for the joint reform effort to include:

- A mission and strategic goals;
- Outcome-focused performance measures to continually evaluate the progress of the reform effort toward meeting its goals and addressing long-standing problems with the security clearance process;
- A formal, comprehensive communication strategy that includes consistency of message and encourages two-way communication between the Performance Accountability Council and key stakeholders;
- Clear roles and responsibilities for the implementation of the information technology strategy, for example, by establishing memorandums of understanding delineating the roles and responsibilities of all agencies responsible for developing and implementing components of the information technology strategy; and
- Long-term funding requirements for security clearance reform, including estimates of potential cost savings from the reformed process and provide them to decision makers in Congress and the executive branch.

DOD AND DNI RESPONSE: Partially concur.

**Mission Statement and Strategic Goals**

The GAO faults the reform effort for failing to define its mission or strategic goals in the April and December 2008 reports, implying that the effort had none. However, the aims of the reform effort—to “[a]chieve comprehensive reform of the end-to-end security clearance process delivering high-assurance security clearances, fairly, efficiently and at the lowest reasonable cost to the federal government”—were articulated in the July 2007 Terms of Reference, and were reiterated and supported by additional detail in the April and December 2008 reports.

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**Appendix II: Comments from the Department  
of Defense and the Director of National  
Intelligence**

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**Outcome-Focused Performance Measures**

We agree that the reform effort must contain outcome-focused performance measures, but we believe that these metrics must evolve as the process improvements and new capabilities are developed and implemented. The Performance Accountability Council (PAC) formed a standing Performance Measurement and Management subcommittee (PM&M) whose primary responsibility is to develop standardized measures for timeliness, investigative and adjudicative quality and reciprocity. However, because the reform effort is an iterative, phased development process, some measures of reform's effectiveness cannot be completely developed or collected until the process and capability improvements have reached maturity. That said, the timeliness metrics in the Intelligence Reform and Terrorism Prevention Act of 2004 are still in effect, and progress toward reaching those goals will continue to be reported to Congress.

The report claims a lack of metrics to assess the progress of the reform effort. We do not agree that it will be difficult to measure whether the reform effort is making progress. The December 2008 report details key milestones and an implementation timeline which the Performance Accountability Council will oversee to monitor and drive progress in both the development of new capabilities and the adoption of new practices by agencies.

We agree with the report that the number of deficient investigations returned to OPM should not be the sole measure of investigative quality. This is precisely why the PAC's Performance Measurement and Management subcommittee is developing a suite of tools to identify, collect and report the root causes of deficient investigations, not solely the number of deficient investigations returned to OPM.

**Comprehensive Communication Strategy**

We agree that communication is essential for the success of all reform efforts. The leadership of the reform effort has aggressively pursued strategic communication opportunities at each phase of the reform effort, and continues to do so. While it is true that the communication strategy is not contained in a formal, written plan, strategic communication has been employed from the project's inception. The strategy employs different vehicles to convey relevant information to both government and industry stakeholders. The reform effort's periodic reports are one (but not the sole) means of communication. We encourage GAO to give full consideration to the extensive and repeated efforts undertaken by (at various times) Reform Champions, the Joint Reform Team Leadership or sub-teams, the PAC and its subcommittees, different *ad hoc* working groups, and individual Joint Reform Team members.

The report attributes the risk of failure to the lack of a written communications strategy, citing that some stakeholders may be unclear or concerned about implementation. These stakeholder observations could also be attributed to other factors, such as resistance to change and agencies organizational "ownership" of the status quo, which are certainly present in the environment but not factored in GAO analysis.

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**Appendix II: Comments from the Department  
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Intelligence**

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**Information Technology Implementation Roles and Responsibilities**

The report notes that the reform effort is beginning to use information technology to improve the clearance process. We note that information technology has always been used in the clearance process, and that the reform effort's approach to improving the use of information technology is to leverage existing systems and capabilities where applicable, and develop new tools where necessary.

We agree with the report that clearly-defined roles and responsibilities are critical to the success of cross-agency information technology initiatives, and assert that considerable work has been done to date to identify and clarify those roles. The Joint Reform Team performed analysis of information technology in use in personnel security processes across the federal space to identify best of breed capabilities that would be candidates for inclusion in the information technology strategy. As the Joint Reform Team works with agencies to assess their information technology capabilities and develop implementation plans, even clearer roles and responsibilities will be identified and documented.

Regarding IRTPA's single database requirement, the reform effort continues its iterative implementation of improvements to systems that improve access to information agencies need. These improvements include greater access to suitability data and to reach multiple organizations' data from a single access point. Additionally, the effort is addressing the complex issues regarding sharing information from classified systems on data systems that cannot contain classified information.

**Long-Term Funding Requirements**

We concur there is much more work to be done in this area. We will continue to plan for and address additional funding requirements, as required.

# Appendix III: Comments from the Office of Personnel Management



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT  
Washington, DC 20415

The Director

May 11, 2009

Ms. Brenda S. Farrell  
Director, Defense Capabilities and Management  
General Accountability Office  
Washington, DC 20548

Dear Ms. Farrell:

Thank you for the opportunity to comment on GAO's proposed report entitled *PERSONNEL SECURITY CLEARANCES: An Outcome-Focused Strategy is Needed to Guide Implementation of the Reformed Clearance Process* (GAO-09-488). The report discusses GAO's assessment of the work of the "Suitability and Security Clearance Performance Accountability Council" (also referred to as the "PAC") and the "Joint Reform Team" ("JRT"). The PAC was established on June 30, 2008 by Executive Order 13467. The purpose of the PAC was, among other things, to ensure agencies implement the suitability and security clearance reforms of the Director of OPM (the Suitability Executive Agent) and the Director of National Intelligence (the new Security Executive Agent).

OPM has a critical interest in both the suitability and security clearance processes. By statute and regulation, OPM conducts suitability background investigations for the competitive civil service and the career Senior Executive Service (SES); prescribes suitability standards and procedures; and makes final suitability determinations. With respect to excepted service appointments, agencies may enter into agreements with OPM to conduct required investigations.

OPM also has significant responsibility in connection with the security clearance process. By long-standing executive order, OPM has had primary responsibility for conducting security clearance investigations for competitive service employees, maintaining an index of investigations, and reporting on agencies' compliance with personnel security requirements. As with suitability investigations, agencies may enter agreements to have OPM conduct security clearance investigations for their excepted service employees. OPM has issued substantive regulations and guidance establishing the appropriate level of a security clearance investigation based on a position's national security sensitivity, and establishing privacy requirements for investigations. OPM also can and does conduct the background investigations required to permit agencies to issue security clearances to employees of contractors who perform work for Federal agencies.

Further, in 2003, Congress authorized a transfer to OPM of the personnel investigation functions then being conducted by the Department of Defense (DoD) to OPM, effective February 2005. As a result, OPM now conducts security clearance investigations for military personnel, Defense Department civilians, and Defense contractors. As described in my letter responding to a separate GAO report, *"DOD PERSONNEL CLEARANCES: Comprehensive Timeliness Reporting, Complete Clearance Documentation, and Quality Measures are Needed to Further*

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**Appendix III: Comments from the Office of  
Personnel Management**

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*Improve the Clearance Process*” (GAO-09-400) (hereafter “*DOD PERSONNEL CLEARANCES*”), the transfer of responsibility to OPM has resulted in the elimination of a backlog of pending background investigations; further, OPM has met all of the timeliness goals for security clearance investigations set by the Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA), often ahead of statutory deadlines.

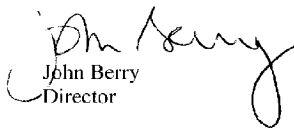
The examination of whether an individual is suitable for Federal employment is, of course, distinct from the process for determining whether an individual should be entrusted with classified information. There are certain basic assessments that must be made with respect to all Federal employees. For example, all competitive service and career SES must be examined to determine their “suitability” for Federal employment generally, as well as for the position that they seek. On the other hand, not every Federal employee is required to possess a security clearance. Further, although the factors used to determine “suitability” and those relevant to the granting of a security clearance can overlap, the determination whether an individual should be granted a security clearance may require particularly intrusive inquiries into matters that might not be relevant to the suitability determination.

OPM believes that it is important not to conflate the suitability and security clearance processes. Nonetheless, it recognizes that there are areas of commonality between the two and agrees that both processes should be administered efficiently and aligned where appropriate. The means by which these goals are accomplished, however—whether through the governance structure established by Executive Order 13467 (and studied by the GAO) or in some other fashion—is currently under review by the new Administration, as are the reform initiatives discussed in the draft report. This review may result in a new governance structure and/or new goals and standards. For that reason, while the critiques discussed in GAO’s report will certainly merit consideration going forward, I do not believe that it would be productive at this time to address with greater specificity the concerns it expresses about the past management of the reform process.

Attached as you requested are technical comments prepared by OPM staff in response to the draft report. Please note that OPM has already issued a separate response to GAO’s related draft report, *DOD PERSONNEL CLEARANCES*. Some of the comments made in response to observations contained in that draft report are pertinent here, as well

We appreciate the opportunity to respond to your report and look forward to working with GAO in the future.

Sincerely,

  
John Berry  
Director

Attachment

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Brenda S. Farrell, (202) 512-3604 or farrellb@gao.gov

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## Acknowledgments

In addition to the contact named above, David Moser (Assistant Director), Lori Atkinson, David M. Adams, Sara Cradic, Susan Ditto, Cindy Gilbert, Greg Marchand, Shannin O'Neill, and Sarah Veale made key contributions to this report.



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# Related GAO Products

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*DOD Personnel Clearances: Comprehensive Timeliness Reporting, Complete Clearance Documentation, and Quality Measures Are Needed to Further Improve the Clearance Process.* [GAO-09-400](#). Washington, D.C.: May 19, 2009.

*High-Risk Series: An Update.* [GAO-09-271](#). Washington, D.C.: January 2009.

*DOD Personnel Clearances: Preliminary Observations about Timeliness and Quality.* [GAO-09-261R](#). Washington, D.C.: December 19, 2008.

*Personnel Security Clearance: Preliminary Observations on Joint Reform Efforts to Improve the Governmentwide Clearance Eligibility Process.* [GAO-08-1050T](#). Washington, D.C.: July 30, 2008.

*Personnel Clearances: Key Factors for Reforming the Security Clearance Process.* [GAO-08-776T](#). Washington, D.C.: May 22, 2008.

*Employee Security: Implementation of Identification Cards and DOD's Personnel Security Clearance Program Need Improvement.* [GAO-08-551T](#). Washington, D.C.: April 9, 2008.

*Personnel Clearances: Key Factors to Consider in Efforts to Reform Security Clearance Processes.* [GAO-08-352T](#). Washington, D.C.: February 27, 2008.

*DOD Personnel Clearances: Improved Annual Reporting Would Enable More Informed Congressional Oversight.* [GAO-08-350](#). Washington, D.C.: February 13, 2008.

*DOD Personnel Clearances: Delays and Inadequate Documentation Found For Industry Personnel.* [GAO-07-842T](#). Washington, D.C.: May 17, 2007.

*DOD Personnel Clearances: Additional OMB Actions Are Needed to Improve the Security Clearance Process.* [GAO-06-1070](#). Washington, D.C.: September 28, 2006.

*DOD Personnel Clearances: Questions and Answers for the Record Following the Second in a Series of Hearings on Fixing the Security Clearance Process.* [GAO-06-693R](#). Washington, D.C.: June 14, 2006.

*DOD Personnel Clearances: New Concerns Slow Processing of Clearances for Industry Personnel.* [GAO-06-748T](#). Washington, D.C.: May 17, 2006.

*DOD Personnel Clearances: Funding Challenges and Other Impediments Slow Clearances for Industry Personnel.* [GAO-06-747T](#). Washington, D.C.: May 17, 2006.

*DOD Personnel Clearances: Government Plan Addresses Some Long-standing Problems with DOD's Program, But Concerns Remain.* [GAO-06-233T](#). Washington, D.C.: November 9, 2005.

*Industrial Security: DOD Cannot Ensure Its Oversight of Contractors under Foreign Influence Is Sufficient.* [GAO-05-681](#). Washington, D.C.: July 15, 2005.

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