



INTELLIGENCE AND
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ALLIANCE



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Improving Security Clearance Mobility

*How to Save Time and Resources and
Enhance Mission Outcomes*

Presented by
INSA'S SECURITY POLICY REFORM COUNCIL

Building a Stronger Intelligence Community

EXECUTIVE SUMMARY

Government-imposed impediments to moving cleared people among projects and among facilities hinder contractors' ability to support critical national security missions. The absence of clear, uniform policy guidance on all elements that impact the mobility of personnel with security clearances means that each intelligence agency and Department of Defense (DoD) component has unique requirements and procedures for accepting these personnel and approving access to their facilities. For contractors—which have personnel who move from contract to contract and agency to agency on a regular basis—this jumble of inconsistent processes across 43 DoD components and 17 Intelligence Community (IC) agencies creates delays, increases costs, and obstructs hiring.¹

Data on the problem is limited. The government does measure the basic elements of the main clearance processes, (initiation, investigation, adjudication, and reciprocity decisions); however, no publicly available data exists to measure the full mobility process, which includes processes related to acquisition, acceptance of non-reciprocity clearances, and access procedures. An informal poll suggests that the number of mobility requests—applications to assign new cleared hires to a contract or move cleared employees from one classified program/agency to another—may represent more than 15% of a company's cleared population annually. There are nearly one million cleared contractors, meaning processing delays could undermine the efficiency of more than 150,000 personnel each year. Among the roughly 333,000 contractors holding TS/SCI clearances, the population that is most significantly affected by personnel mobility delays, processing delays could hinder the work of roughly 45,000 personnel.

Removing these impediments is difficult because no one below the level of a Cabinet official or agency director is responsible for all the contributing factors. Nevertheless, several policy, program and process reforms are needed to facilitate personnel mobility across the cleared community and ensure compliance with the intent of the 5-day processing goal specified by reciprocity policy. Among them:

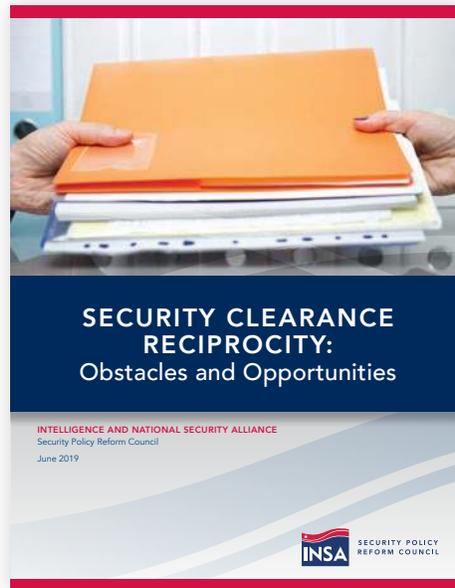
- The Director of National Intelligence (DNI) and the Secretary of Defense (SecDef) should each appoint and empower a senior official to oversee the implementation of consistent, uniform, and timely practices across the IC and DoD. If policies need to change, these officials should recommend needed reforms.
- Agencies requiring polygraphs should allow TS/SCI-cleared personnel to begin work while waiting for their polygraphs to be scheduled, which would significantly reduce processing delays, increase the qualified talent pool, and reduce mission execution gaps. Given that the government now has tools to manage this risk, including continuous vetting and user activity monitoring, such a step would be a low-risk proposition.
- For the cases currently adjudicated by DoD, the Department should adjudicate all Tier 5 (Top Secret) investigations to include SCI eligibility where possible. This would eliminate the need for duplicative and time-consuming processes if/when the employee requires SCI access later.
- Contractors could avoid delays and inefficiencies if they could assess whether their personnel meet contractually specified security requirements before submitting a mobility request. Companies with agency-sponsored access to the Scattered Castles personnel security database could make such an assessment if they are allowed to view polygraph information and the existence of adjudications by exception in this database. The Office of the DNI (ODNI) should direct that agencies grant contractors such access.

INTRODUCTION

The government's "Trusted Workforce 2.0" initiative, which aims to improve the management of the cleared workforce, made greater personnel mobility a key objective. To effectively execute national security missions, the government must make it easier for skilled people with the appropriate clearances to get to the jobs where they can add value. Industry is eager to partner with government to resolve obstacles to personnel mobility and ensure mission success.

MOBILITY: A CONTINUING IMPEDIMENT

In June 2019, the Intelligence and National Security Alliance (INSA) published 14 recommendations to overcome obstacles to the smooth and timely movement of cleared federal contractors and employees from one agency or contract to another. It was the latest in a series of analyses over the past decade identifying challenges to the process of clearance “crossovers, reciprocity or mobility” that hamper both government and industry from efficiently and cost effectively executing critical national security missions.



Improving personnel mobility is a key element of the government’s “Trusted Workforce 2.0” initiative, which aims to manage the cleared workforce more effectively and efficiently. While progress has been made, the movement of cleared personnel with Top Secret Sensitive Compartmented Information (TS/SCI) eligibility remains problematic. (Fewer obstacles and delays exist to movement of personnel with collateral Secret and Top Secret clearances.)

Current policy and practices restrict industry’s ability to hire new talent and drive companies to use already cleared employees to meet contractual obligations. Such a decision simply creates another vacancy somewhere else—robbing Peter to pay Paul. This dynamic, which drives salaries higher in an effort to entice people to change jobs, is particularly true for the limited pool of individuals holding clearances with polygraphs—a population in very high demand.

Federal agencies and subcomponents are allowed to add unique clearance or vetting requirements that further impede the ability to move and hire this highly cleared talent without time-consuming review by agency security officials, acquisition officers, and other staffs. This is especially true at DoD, ODNI and the principal IC agencies.

Most importantly, since the publication of the INSA paper almost three years ago, it has become clear that those responsible for security policy and oversight cannot solve these challenges on their own. If contractors are to deliver people and products to support national security missions, government and industry acquisition, personnel vetting, legal, and human resources stakeholders must act in full partnership.

This multi-stakeholder challenge means that this paper is not directed solely to the implementers of security policy,

but towards the directors and heads of agencies, who are the only leaders able to bridge the gaps between what are sometimes internally stovepiped functions. The challenges described here are generally understood by government security leadership, but they are most keenly observed day-to-day by cleared industry. Individual agencies only do things one way but cleared contractors—who have personnel working for every government agency—must accommodate inconsistent procedures imposed by multiple agencies.

WHY ARE WE DISCUSSING PERSONNEL MOBILITY AND NOT “CLEARANCE RECIPROCITY”?

“Reciprocity” is the acceptance by one agency of a clearance and/or investigation conducted by another agency.² It is a narrow slice of the overall personnel mobility process and has a five-day processing goal. Because so many time-consuming steps involved in moving an individual from one project to another are not in the government’s formal definition of “clearance reciprocity,” the challenge is most accurately described as one of personnel “mobility.” This term encompasses the entire time it takes to move a cleared person to a new project rather than only the amount of time to move clearance eligibility information from one agency’s system to another’s.

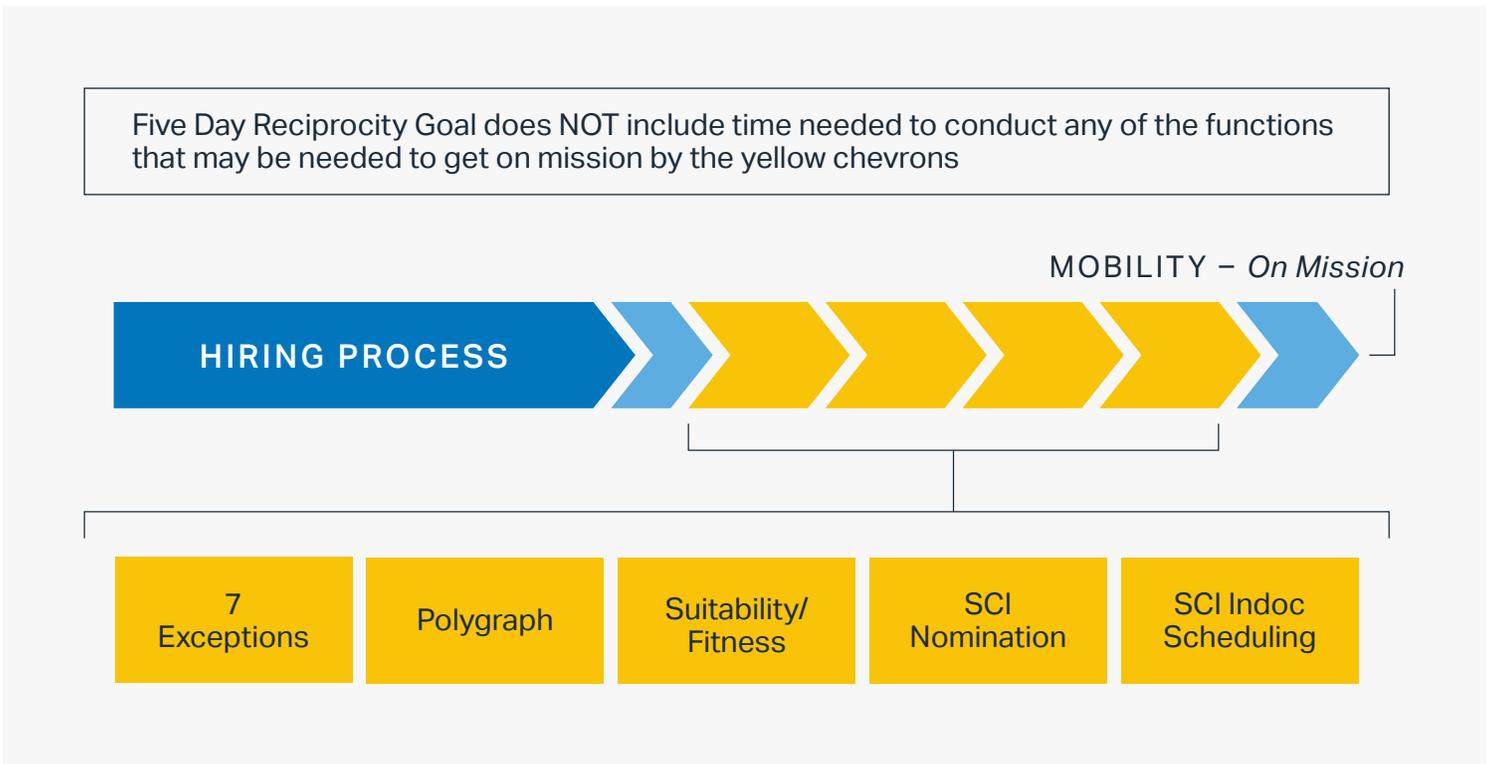
Mobility of cleared personnel, however, can be hindered by a number of conditions, many of which (as illustrated by Figure 1) are not counted against the five-day processing goal. Agencies can:

- Use their own process and performance standards for cases that fall into one of seven exceptions.
- Deprioritize certain polygraphs, with the frequent outcome that polygraphs for some personnel with clearances can take months longer than for those with no clearance at all. The resulting delays do not violate any requirements because agencies have not established timeliness requirements governing how long an agency can take to conduct a polygraph.
- Add suitability or fitness requirements without providing those standards to the contractor—causing the contractor to recommend or hire personnel who do not meet the unknown standard.

- Direct a second SCI nomination process, even when a candidate has SCI access at another agency.
- Require individuals to be debriefed by their current sponsoring agency and be briefed back into the exact same information at the new sponsoring agency. In many cases, agencies will not authorize industry to perform this function even though they permit industry to brief employees in and out of collateral Top Secret access.

Undertaking these additional actions can take days, weeks, months, and in some cases, well over one year. Because these steps are not considered part of "reciprocity," the time required to undertake them is not counted against the five-day goal for processing reciprocity requests. As a result, agency leaders do not have meaningful visibility into the burdens created by these additional requirements, and formal statistics of reciprocity processing timelines appear favorable.

Figure 1: Clearance Reciprocity vs. Personnel Mobility



THE PROBLEM: INCONSISTENT RULES AND PRACTICES

At a high level, both the DNI and the Secretary of Defense (SecDef) play key roles in driving change, managing risk, and ensuring mission success. The DNI, as the government's Security Executive Agent, is responsible for setting national level policy in the executive branch for security clearances. However, she also has responsibility for overseeing the implementation of these policies by distinct staffs within the IC responsible for security, counterintelligence, insider threat, acquisition, and human resources.

Because of these shared and delegated responsibilities, no one in the IC is singularly responsible for managing and connecting the various silos that would enable the efficient mobility of cleared contractors. The result is that the managers of each siloed function report doing their part without consideration for the efficiency of the full end-to-end process. It also appears that the ODN's National Counterintelligence and Security Center (NCSC) lacks the resources needed to oversee the implementation of its own policies. Even the Security, Suitability and Credentialing Performance Accountability Council (PAC)—which is charged with aligning security clearance and suitability processes across the Executive Branch—has limited authority in implementation management.

Similarly, the SecDef has adjoining and subordinate but similar responsibilities for both the DoD and its 43 subcomponents. Through the Under Secretary of Defense for Intelligence and Security [USD(I&S)], the SecDef also exercises oversight of the Defense Counterintelligence and Security Agency (DCSA), the principal agency managing the investigations, adjudications, and Information Technology (IT) systems for security clearances for most of government. Despite this, the USD(I&S) does not appear to be organized or staffed for this mission. A May 2021 Government Accountability Office (GAO) report found that "78 percent of USD(I&S)'s workforce across the four directorates were non-permanent personnel" and that "the office is not well-postured to assess the effectiveness of the intelligence and security enterprises because it lacks tools to ensure accountability...[and] has not established clear expectations for oversight activities."³

This lack of guidance and oversight partially explains why subordinate DoD elements often impose additional requirements beyond those called for by department and national level policies. Such measures often require additional documentation for those who already have clearances; others allow agencies to use different types of polygraph exams (or none at all) for access to the same level of information. While each DoD agency will accept the others' clearance decisions where appropriate, there is a "rest of the story." For example, someone without a polygraph may have access to classified intelligence on Air Force IT systems but may require a polygraph—which could take a year or more to obtain—to access the same level of information at the National Security Agency (NSA), where policies require polygraphs to access to the Agency's networks. Cleared contractors—which have personnel who move from contract to contract and agency to agency on a regular basis, sometimes even working on multiple contracts at once—must follow inconsistent processes across 43 DoD components, 17 IC agencies, and more.

Personnel mobility complications and delays could be mitigated if security and acquisition officials work together to define requirements. IC contracts often require that personnel hold high-level clearances regardless of the work performed. During the pandemic, when health and safety measures prevented Sensitive Compartmented Information Facilities (SCIFs) from being used at 100 percent occupancy, some agencies authorized discrete unclassified tasks to be performed off-site—in some cases by uncleared personnel—with no negative impact on performance. Such experiences demonstrate that personnel security flexibility enables industry to fill vacant contract positions in a timely manner.

Personnel mobility hurdles also make it harder to increase diversity in the cleared workforce and bring in people with cutting-edge STEM skills. Burdensome requirements eliminate large swaths of talented candidates, including those from under-represented backgrounds; many new university graduates, including those with advanced STEM skills; and retired and separated military personnel who are already cleared. In short, if industry can only move already fully cleared personnel from one cleared role to another, the diversity of the IC is unlikely to change.

Personnel security operations do not need to be consolidated across government, but executive branch leadership should commission a review to determine the most efficient personnel mobility practices and oversee their implementation across government. The following section outlines several premises that agency directors and executive branch leadership might start with.

EXAMPLES OF AGENCY-SPECIFIC RULES AND OBSTACLES

Here are examples of questions that heads of agencies could ask their staffs to better understand their own practices and performance:

- **The Director of DIA might ask:**
 - > Why can CIA accept and approve the movement of someone with a TS/SCI clearance and an appropriate polygraph into their agency within 1-3 days, but it takes us 2-4 weeks?
 - > Why can we not onboard cleared contractors while their polygraph is pending like NGA does?
- **The Director of the CIA might ask:**
 - > Why does NSA allow those with counterintelligence (CI) polygraphs to start working before their full scope polygraph is done, but we do not?
 - > Why can DIA get a polygraph done in about 30 days for someone who already has clearance eligibility, but it takes us more than a year in some cases?
 - > Why have we implemented a supplemental 18-page/173-question form for contractors seeking staff-like access that asks questions about routine mental health counseling and seeks information on medical issues that have nothing to do with trustworthiness or reliability, such as menstrual cycles, biopsies, and prescribed medications?
- **The Secretary of the Army might ask:**
 - > Why does the Army require industry to use two separate systems for processing clearances—an Army-created IT system for processing SCI clearances and the Defense Information System for Security (DISS)—while the other Services do not?
- **The Secretary of the Navy and the Commandant of the Marine Corps might ask:**
 - > Why do we require already cleared industry contractors to submit an SCI nomination package containing a copy of their previous investigation request forms and an update to those forms before scheduling indoctrination briefings and onboarding?
- **The Directors of DIA, NSA, NGA, NRO and CIA might ask:**
 - > Why can DoD complete Top Secret SCI investigations and adjudications in less than five months (on average), according to January 2021 published data from the Office of Management and Budget (OMB),⁴ while it takes us much longer?
- **The Director of National Intelligence might ask:**
 - > Why must cleared industry negotiate with individual agencies to get the appropriate level of access to Scattered Castles—the database listing individuals' clearance eligibility levels, types, and polygraphs—and often not get the level of access needed?
 - > Why did we end the policy that someone could be out of access for 24 months before having to start the clearance process over again without replacing it with a new affirmative statement? The result is that each agency now decides on its own how long someone can be out of access without having to undergo a new initial investigation—and currently, enrollment in another agency's continuous evaluation (CE) program is not a standard mitigator.

- > How long does it take each federal agency to move a cleared contractor from one cleared job to another, including all processes from contract award to onboarding (such as polygraph, clearance transfer and indoctrination)? All data should be evaluated to answer this question, without, for example, excluding the slowest ten percent or other special categories.
- > Have ODNI Security Executive Agent staff reviewed implementation practices to understand why agencies operate so differently from one another? Have ODNI Security Executive Agent staff assessed the merits of agency-specific requirements that significantly delay mission?
- > Does the ODNI acquisition executive know how many TS/SCI contractor vacancies exist in government agencies at any given time and the average time it takes to fill those vacancies? Without such data, it is difficult to understand the scope of the cleared workforce shortage, including the lost mission hours and the impact of writing contracts that only allow nomination of personnel who are already cleared to the level necessary.

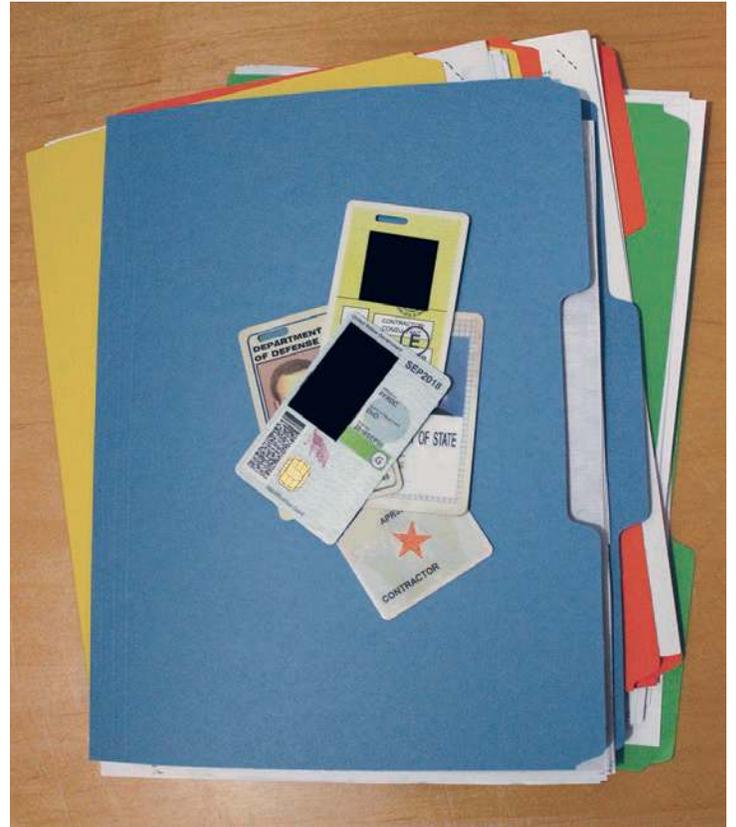


Photo credit: CJ Hanauer

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Government-imposed impediments to this most basic personnel function—moving people among projects and among facilities—hinders contractors' execution of critical national security missions.

As these myriad challenges show, cleared contractors face significant obstacles when trying to move cleared staff from one role to another to support work the government hires them to perform. Government-imposed impediments to this most basic personnel function—moving people among projects and among facilities—hinders contractors' execution of critical national security missions.

Eliminating these obstacles is difficult because no one below the DNI, SecDef, and agency directors is responsible for all the contributing factors. As a result, one of the greatest requirements is to improve implementation oversight. The DNI, the SecDef, IC agency leaders, and the Directors of the 43 DoD components should work collaboratively with industry to develop uniform, efficient, and cost-effective personnel security policies, and practices.

RECOMMENDATIONS TO IMPROVE MOBILITY OUTCOMES

FOR THE DEPARTMENT OF DEFENSE

1. ELIMINATE COMPONENT-SPECIFIC REQUIREMENTS:

Each of DoD's 43 components (including the military services and defense agencies) have different processes for granting SCI access even after clearance eligibility is documented in DoD's system of record. Some agencies/security offices attribute these additional requirements to suitability/fitness decisions; in reality, the majority of these offices have no relevant written guidelines or restrictions and require the additional actions only as part of a long-standing practice.

- Some components require a multi-page nomination package.
- Some (e.g., Army) require industry to use an IT system separate from DoD's system of record to request and process contractors for SCI access.
- Most components do not allow companies to perform SCI indoctrinations—requiring two indoctrination sessions (one for TS by the company and one for SCI by the government).
- Some require a multi-page nomination package, a copy of an individual's previous security questionnaire and multi-page foreign national questionnaires—which can take days to collect and prepare with the cooperation of the subject.

All these additional and disparate actions delay the process by two to five weeks above and beyond the goal of processing reciprocity requests in five days, even though they are required before cleared personnel can begin work.

RECOMMENDATION: DoD should assign a primary lead official to unify the approach, forms, processes, and performance necessary to ensure that all department components comply with the five-day processing goal specified by reciprocity policy.

Outcome: With 43 DoD agencies and components processing clearances and personnel mobility requests in different ways, DoD needs a senior policy official to oversee reforms that lead to consistency, efficiency, and compliance with timelines specified by existing policy. While USD(I&S) could play this role, it is unclear if USD(I&S) has the broad cross-functional authority needed to lead and direct these improvements across security, personnel, and acquisition functions. If necessary, the Deputy Secretary of Defense could appoint and empower a “czar” to drive comprehensive reforms across the department.

RECOMMENDATION: Army should use the same single IT system for processing contractor requests for SCI access as other agencies. If the DoD system does not meet the Army's needs, it should be adapted to do so—especially given the fact that the new replacement system (the National Background Investigation Services, or NBIS) is currently under development.

Outcome: Contractors and Army personnel would save time and resources by using a single IT system instead of processing requests on duplicate networks.

RECOMMENDATION: Instead of requiring long waits to indoctrinate contract employees beginning new projects, DoD should allow contractors with the appropriate cleared facilities to indoctrinate personnel at the SCI level, as it already does for Top Secret.

Outcome: If DOD will allow contractors to indoctrinate personnel for SCI access, industry personnel can begin work immediately at an industry facility and report for work at a government facility on the following day. The elimination of several weeks' processing time will save resources for the government and will reduce government's labor shortages.

2. STREAMLINE SCI TIER 5 ADJUDICATIONS:

While the DoD Consolidated Adjudication Facility (DoDCAF) has made stellar improvements in its processes for moving clearance eligibility from other government agencies into DoD, it still has one significant challenge in this space. For completion of Tier 5 investigations used to grant eligibility up to Top Secret and TS/SCI, the DoDCAF will only adjudicate to the level of access required at the moment. This means that if the individual only needs Top Secret access now but is expected to need TS/SCI access in the future, the contractor must later submit a new request for the individual's eligibility to be upgraded to TS/SCI. This practice requires additional time-consuming steps; industry must submit a new nomination request, and the DoDCAF must re-review the same information. Given that the investigative and adjudicative standards for TS and TS/SCI eligibility are essentially identical,⁵ SCI-level mission execution is often delayed for no discernable security benefit.⁶

RECOMMENDATION: Adjudicate all investigations to the highest level possible during the first review. If SCI cannot be granted because of a Bond amendment restriction, grant TS if that is all that is required and mark the case with an exception code. If the reason is not related to Bond, standard denial/revocation processes can be used, even at the TS level. If a legal determination suggests this is prohibited by EO, change the EO at a suitable opportunity and in the interim, rewrite policy to state that a TS eligibility without an exception is sufficient to grant SCI access, when necessary, without additional adjudication.

Outcome: This measure would maximize the eligibility level of current personnel, making them immediately available for additional missions, while reducing administrative burdens on both industry and government security personnel.

FOR THE CIA, DIA, NGA, NRO & NSA

3. CONSIDER CI POLYGRAPHS SUFFICIENT TO BEGIN WORK:

Each of these agencies has adopted a different approach to its polygraph program. These inconsistencies significantly delay the movement of personnel from one cleared position to another. These delays are endorsed by current reciprocity policy that exempts these programs from timeline performances and prevents polygraphs from counting against the time it takes to move a cleared person from one job to another.

- **NGA:** NGA tailored its Counterintelligence Scope Polygraph (CSP) program to streamline onboarding in the face of limited resources. NGA will allow contractors with TS/SCI clearance eligibility to begin working while waiting for their polygraphs, typically within 30-60 days. This best practice allows contractors to assign TS/SCI-cleared personnel to NGA contracts without delay. The outcome is enhanced mission performance in exchange for the small risk of entrusting sensitive information to people who have already been approved for access to TS/SCI intelligence for a short period of time.
- **DIA:** DIA requires personnel to pass a polygraph before reporting to work, and it takes 30-60 days to schedule and perform the exam. The result is that TS/SCI-cleared personnel who are ready to fill mission gaps must wait—often in another DoD SCIF with access to the same level of information—an additional 1-2 months before they can work for DIA.
- **NRO:** NRO locations can schedule polygraphs within 7 to 30 days, but those who have had any foreign connection appear to be in an adjudicative backlog extending in some cases for over six months.

- **NSA & CIA:** NSA and CIA typically require Expanded Scope Polygraphs (ESP), also known as full-scope or lifestyle polygraphs. Personnel already TS/SCI-cleared can wait anywhere from 9 to 24 months to obtain an ESP. NSA's program, however, allows those with a CSP to start working while they wait for their ESP. As a result, many companies staff CIA and NSA contracts by hiring from the finite pool of people who have already been polygraphed. These military, civilian and contractor personnel are already working on other classified government programs that require a polygraph, and typically demand a salary premium for their access and for switching employers. These limitations mean that qualified people are not even considered for employment, thereby limiting the talent pool available to the government.

RECOMMENDATION: DIA and NRO should adopt the NGA approach of allowing TS/SCI-cleared personnel to begin work while they wait to take a polygraph, which will reduce their mission gaps and encourage industry to propose new talent. NSA and CIA should take the same approach or consider alternatives. For instance, CIA could reduce its polygraph burden by having people begin work after a less-intensive counterintelligence polygraph and conducting the ESP as time and resources allow. In a perfect world, all agencies would be resourced to conduct polygraphs in a timely manner and thereby prevent polygraph requirements from excluding the best talent.

Outcome: All agencies will reduce mission gaps by allowing TS/SCI-cleared personnel to begin work and take polygraphs when resources allow. Because agencies can monitor the activities of such personnel through continuous vetting and user activity monitoring, such a step would create minimal, if any, additional risk.

4. **PROVIDE INDUSTRY EXPANDED ACCESS TO CLEARANCE REPOSITORY:**

As a rule, contracts clearly articulate needed clearance and polygraph requirements. However, most IC agencies will not provide industry sufficient levels of access to Scattered Castles to verify that their candidates meet these requirements. The general level of access granted does not provide visibility to polygraph information (date and type completed), nor does it show whether an adjudication was granted by exception. This lack of information often causes industry to submit personnel who do not have a qualifying polygraph, which can lead to either rejection of the candidate or an unexpected 8-24 month wait for a new polygraph. For individuals adjudicated by exception, each agency can order a copy of the previous investigation and readjudicate. Depending on the agency this can delay the individual's ability to advance the government's mission by as long as a year.

RECOMMENDATION: CIA, DIA, NGA, NRO and NSA, should grant appropriately cleared industry security personnel the level of access needed in Scattered Castles to determine whether their companies' employees meet contract requirements.

Outcome: If industry security officers can determine right away whether contractor employees meet specified contract requirements, companies will be able to nominate qualified personnel faster, thereby filling critical government contract positions faster.

FOR THE ODNI & USD(I&S)

5. UNIFY EFFORTS TO IMPROVE TIMELINESS:

Table 1 provides a high-level generalization of reciprocity performance across several agencies based on industry experience from a cross-section of companies. (Note: In most cases, it does not include the time needed to compile and complete SCI nomination paperwork for personnel who are already SCI cleared. It also does not include the time needed to schedule and perform a second clearance indoctrination, which can take an additional two to five weeks.)

The differences among agency timelines illustrate the inconsistencies that plague mobility across agencies and suggest the need for continuing collaboration between government and industry. Because government does not publish or provide industry reporting on “exception or polygraph cases,” this data cannot distinguish between “normal” cases and those requiring extra attention. Because contractors never know whether an individual candidate will glide through the approval process or be held up, companies must use these average figures to plan hiring, staffing assignments, and budgets.

Table 1: Reciprocity Timelines by Agency and Access

CURRENT ELIGIBILITY	REQUIRED ELIGIBILITY/ACCESS AND AGENCY											
	CIA TS/SCI w/FSP	CIA TS/SCI No Poly	ODNI TS/SCI w/CI Poly	ODNI TS/SCI w/No Poly	NSA TS/SCI w/FSP	DIA TS/SCI w/CI Poly	NGA TS/SCI w/CI Poly	NRO TS/SCI w/CI Poly	NRO TS/SCI No Poly ⁴	DoD TS/SCI (No Poly)	DoD TS	DoD S
TS/SCI with FSP	1-3 Days	1-3 Days	1-3 Days	1-3 Days	2-4 weeks ³	2-4 weeks	2-4 Weeks	1-2 Days	1-2 Days	1 Week	Same Day	Same Day
TS/SCI with CSP	9-18 Months	1-3 Days	1-3 Days	1-3 Days	2-4 weeks	2-4 weeks	2-4 Weeks	1-2 Days	1-2 Days	1 Week	Same Day	Same Day
TS/SCI with No Poly	9-18 Months	1-3 Days	9-18 Months	1-3 Days	18-24 Months	1-2 Months	2-4 Weeks	1-3 month	1-2 Days	Same Day	Same Day	Same Day
TS Only	9-18 Months	1-3 Days	9-18 Months	1-3 Days	18-24 Months	1-3 Months	1-3 Months	1-3 month	1-2 Days	1-2 Weeks	Same Day	Same Day
Secret	9-18 Months	9-18 Months	9-18 Months	9-18 Months	9-18 Months	4-6 months	9-18 Months	9-18 months	9-18 months	180 Days ²	180 Days	Same Day
Uncleared	9-18 Months	9-18 Months	9-18 Months	9-18 Months	9-18 Months	4-6 months	9-18 Months	9-18 months	9-18 months	180 Days ²	180 Days	90 Days ¹

Note: Estimates are generalizations of pre-COVID timelines to get government approval for indoctrination, but it does not include the time to schedule or perform the indoctrination which varies from agency to agency but can add several weeks and require additional paperwork in what appears to violate current policy. The timelines also do not consider other factors that could significantly change the timeline such as: location of the current eligibility (JPAS vs Scattered Castles (SC), etc); age of current eligibility and/or polygraph; date of last access; conditions placed on eligibility (Waiver, Deviation, Exception, Scope) that we cannot see in SC; status of continuous evaluation (Enrolled or not - which agency - compliant?); or the existence of a qualifying FSP that is not currently visible in our internal system; or several other factors.

Note 1: Interim Clearance for DOD TS or S may be granted in several weeks

Note 2: Interim TS/SCI could be granted but is rare and acceptance varies

Note 3: Those being reinstated to NSA because they already had a FSP and left NSA less than 24 months ago can have a timeline of less than 1 week.

Note 4: While some NRO assignments at a Industry site may ultimately require a polygraph, it is not needed to start working.

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RECOMMENDATION: ODNI and DoD should charge a single person or team with overseeing the implementation of all policies that impact mobility of cleared personnel. Such official(s) should have authority regarding all aspects of the process (clearances, polygraph, acquisition/contract language, suitability/fitness, industry coordination) to authoritatively determine the full amount of time needed to move a contractor from one classified project to another (“seat to seat”). Most importantly, such official(s) should be empowered to standardize processes across DoD and the IC and ensure agencies implement what should be the intent of reciprocity policy—the effective and efficient placement of appropriately cleared contractor personnel on government classified national security missions (mobility). The goal is to drive the uniform application of best practices wherever practicable, not to consolidate roles in one organization.



Empowering a single official or team to resolve inconsistent agency practices will drive a more efficient end-to-end personnel mobility process.

Outcome: Empowering a single official or team to resolve inconsistent agency practices will drive a more efficient end-to-end personnel mobility process. Improving personnel mobility will facilitate the success of the government’s plan for managing the cleared workforce effectively and efficiently, the “Trusted Workforce 2.0” initiative.

SOLUTION: THE CONSISTENT ADOPTION AND USE OF BEST PRACTICES

Despite years of dialogue about how to fix the problem, burdensome rules and inconsistent practices hinder the movement of cleared contractor personnel across government agencies. These obstacles create delays, increase costs, hinder growth of the cleared workforce, and—most importantly—negatively impact mission effectiveness. The appointment of senior IC, DoD, and agency officials to evaluate policies and practices and direct uniform implementation across the government will enable improved industry support to critical missions and improve the efficiency and effectiveness of the cleared workforce.

REFERENCES

¹This problem does not just affect personnel with security clearances needed to access classified information. Inconsistent standards and practices amongst (and even within) agencies regarding suitability, fitness, and public trust determinations also pose challenges to personnel mobility. Because the Trusted Workforce 2.0 initiative, which aims to streamline the personnel security process across government, will address many of these inconsistencies, this paper focuses on personnel mobility challenges for personnel with security clearances.

²Security Executive Agent Directive (SEAD) 7 states, "Reciprocity is the acknowledgement and acceptance of an existing background investigation conducted by an authorized investigative agency; the acceptance of a national security eligibility adjudication determined by an authorized adjudicative agency; and the acceptance of an active national security eligibility determination granted by an executive branch agency." See Security Executive Agent Directive 7, Reciprocity of Background Investigations and National Security Adjudications (November 9, 2018), para E.1., p. 2. As of February 20, 2019: https://www.dni.gov/files/NCSC/documents/Regulations/SEAD-7_BI_ReciprocityU.pdf

³Government Accountability Office, Defense Intelligence and Security: DOD Needs to Establish Oversight Expectations and to Develop Tools That Enhance Accountability, GAO-21-295, May 6, 2021, pp. 15, 18. At <https://www.gao.gov/products/gao-21-295>.

⁴See "Personnel Vetting Reform Quarterly Progress Update (FY22, Quarter 1)," Performance.gov, no date. At https://www.performance.gov/assets/files/Personnel_Vetting_Reform_Progress_2022_Q1.pdf.

⁵Of those individuals who have secured a Top Secret clearance, adjudicative standards disqualify only a minute number from securing SCI access. The Bond Amendment (Sec. 3002 of the FY2008 National Defense Authorization Act, 50 U.S.C. 435c) prevents the granting or renewal of SCI, SAP, or RD accesses to individuals who were: (1) convicted of a crime and served one year or more in prison, (2) dishonorably discharged from the military, or (3) deemed mentally incompetent. Very few people who have successfully secured collateral Top Secret clearances meet these criteria.

⁶Executive Order (EO) 12968 does state that ... "approving eligibility in excess of actual requirements is prohibited." However, it is clear the intent was to prevent granting unnecessary access to sensitive information, and approving eligibility to prevent future duplicative work does not provide unnecessary access.



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