National Industrial Security Program Policy Advisory Committee (NISPPAC)

Meeting Minutes

March 13, 2019

The NISPPAC held its 61th meeting on Wednesday, March 13, 2019, at the National Archives and Records Administration (NARA), 700 Pennsylvania Avenue, NW, Washington, DC. Mark Bradley, Director, Information Security Oversight Office (ISOO), served as Chair. The minutes were finalized on May 30, 2019.

I. Welcome:

The Chair welcomed everyone, and reminded participants that this was a public meeting and was being recorded. The Chair recognized Jeffrey Spinnanger as the new representative from the Department of Defense (DoD) and Elizabeth O'Kane from the Department of Army (Army). The Chair also recognized Brian Mackey as the new representative from Industry. In addition, the Chair thanked David Lowy from the Department of Air Force (Air Force) who would be retiring very shortly. The Chair recognized the services of the Air Force alternate, Sharon Dondlinger, who will serve as the Air Force representative until there is a new appointment. Finally, the Chair recognized Alegra Woodard from ISOO who would be retiring very shortly, and thanked her for her valuable service to the NISPPAC.

II. Administrative Items
Greg Pannoni, (Designated Federal Official (DFO) mentioned that all of the committee members should have received the presentations and handouts in electronic format prior to the meeting and that the transcript, along with the minutes and presentations for this meeting, would be posted to the ISOO website. He apologized for the delay in producing the minutes to the November, 2018 meeting, which was caused by the partial government shutdown. He also mentioned that NISPPAC meeting announcements are posted on the federal register approximately 30 days prior to the meeting.

III. Old Business

Action Items from Previous Meetings

Mr. Bradley reiterated that his goal is to make the NISPPAC not only an organization that hears concerns, but also, one that will address concerns. He stated that he is interested in making the NISPPAC a more visible body than it has been in the past. In particular, he brought up the issue of information sharing. While strides have been made with security clearances, there is still a great need for improvement.

Mr. Pannoni addressed and provided updates to the NISPPAC action items from the November 18, 2018 meeting;
- Provide feedback as to how the Technology Protection Task Force will interact with Industry.

STATUS: <u>OPEN</u>. The task force is participating meetings that the Undersecretary of Defense for acquisition and sustainment periodically holds with various Industry CEO's.

- Defense Federal Acquisition Regulation Supplement (DFARS) Clause and Requirements
  STATUS: <u>OPEN</u>. DoD has initiated an effort for the evaluation of NIST 800-171 implementation by Defense Contractors. DCMA, DoD, CIO, DSS, and other key DoD components are working to validate a common standard for oversight of oversight of compliance with the DFARS clause.

- NISPOM, Change 3 Implementation.
  STATUS: <u>OPEN</u>. DoD is continuing to assess how to implement Change 3, noting they have provided a draft to ISOO on this subject. In addition, DoD is continuing to do the assessment particularly for industry regarding how the preapproval process would work. Mr. Pannoni suggested to move rapidly on the Change 3, and offered his assistance to the CSA's (Cognizant Security Agencies) to move this along. Dan McGarvey, Industry, stated that he didn't want anything pushed to Industry until they can fully understand the new requirements, and observed that not much progress has been made.

- The creation of the NISPPAC Resolution Meeting. The purpose of this meeting is to address the issues that are continually discussed at every meeting, but never seem to be resolved.
  STATUS: <u>OPEN.</u> The first meeting occurred on February 12 in which Industry was invited to voice their top 10 issues or problem areas. A spreadsheet was created to further specify the issues. Also, there was a follow-up to this at the CWG (Clearance Working Group) Meeting on February 28. The spreadsheet was sent to each of the participants to send back to their agencies to determine if senior agency leadership would agree to the recommended changes. One positive outcome of this meeting is it led to Office of the Director of National Intelligence (ODNI) hosting a meeting on March 28 to discuss Industry's inclusion in the development of Trusted Work Force 2.0 vetting efforts.

- ISOO was to schedule the next two NISPPAC meetings.
  STATUS: <u>CLOSED</u>: ISOO scheduled the next two NISPPAC meetings to be held in the McGowan Theater on July 18, 2019 and November 20, 2019.

IV. Reports and Updates

NBIB update (Attachment 1)
Charles Phalen, NBIB, provided an update on the personnel security clearance metric data. He explained the inventory as of that date is 542,000, down 25% from it's peak of 725,000 cases last April. There were 176,000 tier three investigations, and 80,000 tier five investigations, of which approximately 25,000 are Industry investigations. Of the 256,000 initial national security investigations, about 103,000 of those are operating on an interim basis. Mr. Phalen explained the new manner in which NBIB examines cases and that the median case completion time was 184 days. He added that field work is the longest part of the investigation, and that the investigative workforce capacity has been about 8,800 for the last several months.

Mr. Phalen addressed Trusted Work Force 2.0, and mentioned that there is an ODNI and OPM led-approach to examine what it means to be trusted person. He further explained the level of effort is focused on what can be done quickly to impact the inventory and initiating cases faster.

Kim Baugher, State, inquired if there will be a change in process for contractors on September 30. Mr. Phalen answered that they will be changing the process, but wasn't sure whether this will shift to DoD, noting that over time, NBIB employees will become DoD employees. They anticipate moving the internal fund sources from a revolving fund at OPM to a working capital fund at DoD. Dennis Keith, Industry asked if there is some sort of guideline for timeliness, and Mr. Phalen answered the target date is the end of 2019. Carole D'Amati, Industry, asked if the inventory will be down to about 300,000 by the end of the year, and Mr. Phalen answered that a standing caseload should be about 250,000.

NISS (National Industrial Security System) Update (Attachment 2)
Ryan Deloney, Defense Security Service, (DSS), provided an update on the National Industrial Security System (NISS). Mr. Deloney reminded the audience that this is the system of record for industrial security oversight for DoD. He observed that the user base has been consistently growing, and there are approximately 8,000 cage codes represented.

NISS created an operational requirements committee, and they coordinated membership though the NISPPAC. The committee consists of about 30 members and advisors across industry, government and DSS. Mr. Deloney stated the committee initiated the Personnel Security Investigation for industry projection survey in March, and it was performed in a system now operated in the NISS. Currently, there are 500 submissions.

Mr. Deloney added that they are continuing to update training in schools, and they have quadrupled the size of the frequently asked questions for users. They also have been working with the knowledge center staff to expand the responsiveness beyond providing lock and unlock support and to provide functional health.

Mr. Pannoni inquired if this is the only and automated system of record for the NISP and Mr. Deloney replied that is correct in terms of the core records for facility clearances for those facilities under cognizance of the DoD and the associated signatory agencies for which the DoD provides industrial security oversight services. Mr. Pannoni also inquired about the approximately 5,000 contractors who are not part of the system, and what is the strategy for bringing them on board. Mr. Deloney replied that they are tracking usage. They are also exploring some type of clearance working group and towards the end of the fiscal year of producing an Industrial Security Letter, ISL, to further clarify the requirement for using registration.

Industry update (Attachment 3)
Quinton Wilkes, the Industry spokesperson for the NISPPAC provided an update. He welcomed Brian Mackey as the newest Industry representative to the NISPPAC and thanked departing member Kirk Poulsen for his service to the NISPPAC.

Mr. Wilkes suggested to leverage industry expertise as they are moving forward, because some of the necessary experts are not attending meetings. He stated Industry is facing challenges with Controlled Unclassified Information, CUI, particularly concerning the DFAR clause, and

requested guidance when it pertains to DSS assessments moving forward. He requested a meeting to discuss DSS in transition and added that Industry had met the previous day to discuss items such as the new rating system.

Mr. Wilkes requested that ISOO bring back the meetings for both Insider Threat and National Interest Determinations, (NIDS). He noted that there isn't any NISPPAC representation to the Trusted Work Force meeting, and requested that a NISPPAC member be able to attend the meeting, so they can provide guidance to the rest of Industry. He added that Industry needs specific guidance on policy to address security consultants.

Mr. Wilkes mentioned that he is also awaiting implementation guidelines for Security Executive Agent Directive 3, (SEAD), and industry requests the opportunity to review and comment on the ISL before it is released to Industry. The Chairman asked if there was a way to better integrate the NISPPAC into the process. Ms. Kerben discussed the Executive Steering Group. Dan McGarvey, Industry interjected that Industry is not concerned about writing policy, but instead, is more focused on the impact of policies.

DSS Update
Keith Minard provided the update for DSS, and began his presentation by referencing a memo from OUSDI, about reclassification training, and that the memo applies to DoD. Secondly, Mr. Minard referenced that the SF-328, "Certificate Pertaining to Foreign Interest," has been revised for its use. The SF-328 does not include use for the Defense Enhanced Security Program and for use by DHS as a NISP CSA. It was noted that the questions have not been changed

He added that on February 5, an ISL was published concerning SEAD 4 and the return of foreign passports. Currently, DSS is in the process of internal and formal coordination of an ISL to replace the current ISL 016-02. DSS views the ISL as part of a package that would require the update of Center for Development of Security Excellence, CDSE, products and tools relative to insider threat and job aids.

Mr. Keith was asked if there is a current position within DSS for the evaluation of CUI. Mr. Minard replied DoD is establishing an approach to DFARS compliance. The department is in the process of developing a CUI instruction. Mr. McGarvey encouraged DSS to consider that as the policy is developed that impact meetings should be held to discuss the effects on Industry.

CUI update (Attachment 4)
Mark Riddle, ISOO, began his presentation by announcing there would be a CUI stakeholder's meeting in April as well as on July 17. He added that there is a CUI Industry blog, and there will be more vendors at this year's event than at last year's event. Furthermore, on June 21, there is going to be a CUI Industry day.

Next, he mentioned that they are just over two years into implementation and agencies have made great strides to implement the program. Currently, there are seven government agencies that have asserted full implementation of the program. There are an additional 101 agencies that are in an advanced state of implementation and while they don't have a completed policy, these same agencies anticipate having one in the summer or fall.

Mr. Riddle mentioned that the Federal Acquisition Regulation, (FAR), clause for CUI is being circulated among agencies for comment. This draft will be ready for public comment in the near future. He estimated the FAR clause will be completed sometime in October/November, 2019.

Ms. Sutphin, Industry inquired when the NIST SP 800-171-Rev. 2 will be available for public comment, and Mr. Riddle replied that it is not ready yet, but will be on the CUI blog, emphasizing that is where they do their communication to the stakeholders.

Defense Vetting Directorate (DVD) DSS Update (Attachment 5)
Patricia Stokes, DSS, began her presentation by providing a background of her office in terms of putting the vetting under the same directorate, and saying that the PSMO1 (Personnel Security Management Office-Industry) is now the Vetting Risk Operations Center. She explained the process of how her landing team prepared for the merger. Ms. Stokes advised that the DVD now owns the DTMAC (DoD Insider Threat Management and Analysis Center). She believes that the insider threat mission will be continuous vetting.

Ms. Stokes mentioned that DVD has recently established Enhanced Screening Protocol, which is about following up foreign associations on the SF 86, and are going to observe the emerging process. They will be looking at acquiring the appropriate information to mitigate risks. This office will be a part of the "enterprise business support office" where they will be interacting with all of the customers, in terms of building the requirements, working with the PEO (Program Executive Officer), working with strategy, and working all strategic engagements with the customer. It is being started with the military sessions. She added that DVD is also involved with Trusted Work Force 2.0 and they also have representation on the steering committee group that is forming policy.

PSMOI Update
Heather Green, DSS, provided an update on the metrics. She noted that so far this year, they have submitted approximately 55,000 investigation requests, and they carry an average inventory of 10-12,000. At the time of the meeting, they had deferred over 16,000 investigations into continuous evaluation, and have processed over 40,000 interim determinations. She requested that fingerprints be submitted simultaneously or prior to the eQIP (Electronic Questionnaires for Investigation Processing) submission. She added that there will be more information coming out in the near future concerning continuous evaluation and the deferment process, and anticipate posting on the DSS website. They would like to ensure they are capturing the major questions, and there will be additional FAQ's explaining the reciprocity process.

DoD CAF (Central Adjudication Facility) Update
Ned Fish, DSS, provided the update on the CAF. He said that they have prioritized their work on readiness and threat. They are also prioritizing receipts of both incident reports and the CE that are validated by Ms. Stokes' team and then forwarded to the DoD. In addition, they are prioritizing higher risk PRs.

Mr. Fish observed the progress that is being made, and that there are 60,000 fewer cases in the pipeline of the NBIB from last June. About two-thirds of these cases are due to the deferred submission. The other third is the result of the CAF trying to stay ahead of the flow of cases coming from NBIB. As evidence of the case of the progress being made, Mr. Fish observed 24,000 cases were closed out the week before the NISPPAC meeting. In addition, he observed that Tier one cases will be electronically adjudicated. Mr. Fish addressed the timelines, noting that initial investigations are trending downward. Still, PR timelines are continuing to be very long, largely because they are not prioritized.

Robert Lilje, Industry inquired about reciprocity timeliness. Mr. Fish deferred the question to Valerie Kerben, ODNI. Ms. Kerben stated that the SEAD was signed in November and reminded agencies to collect the information for reporting requirements. She didn't have a specific timeframe, but added that they are starting to collect the reports and examine how agencies are in compliance.

Ms. Baugher raised the issue of procedures for employees who leave the State Department and then wish to work for companies because these people experience tremendous difficulty in obtaining their clearances. She asked about statistics of when a company submits a request and when they actually receive an answer. Mr. Fish replied that if the issue is reciprocity, that there might be a deviation. Historically, when it went to the CAF, they would have an issue if there was a waiver or deviation in the file. Ms. Green followed up by saying that she believes there will be a shift in their business operations which could affect timeliness in the future.

Ms. Baugher's second question concerned the DISS, and how this affects non-DoD users. Ms. Green replied that the ESBO (Enterprise Business Support Office) is set up specifically for strategic engagements with all customers, including government agencies. She also offered to meet with Ms. Baugher to lay out a satisfactory roadmap for this issue. Mr. Fish observed that the functional management for the DISS and JPAS (Joint Personnel Adjudication System) have shifted from USDI down into the DVD.

Mr. Pannoi said there is an issue of lack of training for DISS users and wondered if there will come a time when a mandated DISS user must have received the necessary training. Ms. Green responded that currently there are 6,000 industry individual provisions and there are still another 7,000 that need to be provisioned. She recognizes that at some point, they will need to have a timeline to shut off certain functionality. When that decision occurs, they will issue a 90 day notice that specific functionality will be shut off.

Mr. Pannoni continued to ask about the training and Ms. Green stated that they have tasked CDSE to produce some initial training. She also stated that once a user receives a provision and is in the system, the user manuals are in the system. PSMO has moved forward with training that is available to staff as well as hosting a few webinars.

Ms. Baugher inquired if there is an organizational chart available. Ms. Green replied that while she can't speak to other parts of DSS her organizational chart is available.

Zudayyah Taylor-Dunn, National Aeronautics and Space Administration (NASA), voiced her concern about information sharing, and asked about the timeline to start addressing the agencies collectively. Mr. Fish responded that there are many requirements, CAF, component, and security management all being addressed in a system of prioritization. He added that as they move forward with DISS, parts of DISS will be deployed within the system. If a user is in DISS, they will be part of that graduation into eQIP. There will be no sunset date for DISS in order to share the right information.

Ms. Green stated she is going to take an action item for the ESBO to hold a stakeholders group meeting to ensure to send those questions to the right people. The Chairman requested to be kept apprised of what is going on with the last action item.

ODNI Update
Ms. Valerie Kerben of ODNI provided an update and provided that ODNI will be hosting the trusted workforce meeting briefing two weeks after the NISPPAC meeting.

NISPPAC Information Systems Authorization Working Group (NISA) update (Attachment 6)
Karl Hellman, DSS, provided the next update on the NISA Working Group. The first item discussed was the process manual that describes the assessments and authorization process of classified systems that is scheduled to be released April 8 with an effective date of May 6. It includes the revisions that have been made in NIST instruction and the transition to eMASS (Enterprise Mission Assurance Support Service) as a system of record. The transition to eMASS began on May 6, and he advised that there are numerous job aids on the Risk Management Framework (RMF) resource center link. Mr. Hellman reminded the audience that from the time of the meeting until May 6, ODAA Business Management System (OBMS) is still the system of record for assessment and authorization.

Mr. Hellman added that they are working classified enterprise wide area networks at a national level initiative to try to bring central monitoring and management, along with continuous monitoring, vulnerability management, insider threat management to the classified arena. They are trying to leverage best practices within the classified arena and anticipate that this will have a huge impact on resources for both Industry and DSS.

Mr. Hellman added that there are a few companies that have their initial classified wide area networks authorized and probably another eight to ten that are putting the information together. DCSA is leveraging people from the capital region into the northern region, and are continuing to study impacts as well as to how they can continue to manage the assessment and authorization process. Mr. Pannoni inquired why the capital region has a significantly higher number of SPO denials and Mr. Hellman answered it is because the capital region has the largest percentage of very small cleared contractors. Mr. Pannoni also inquired of the pilot program, and Mr. Hellman stated this eMASS application is owned, managed, and supported by Defense Information Systems Agency, (DISA), who requested to delay the pilot for a short time.

Clearance Working Group Update

Mr. Pannoni began his discussion of the Clearance Working Group Meeting noting that much of this WG's business was provided in the previous DoD, ODNI, and the NISS updates. Mr. Pannoni expressed his concern about the lack of communication within the group. He discussed the voice of industry newsletter, noting that sometimes, the eight NISPPAC industry members do not receive the communication. Consequently, he requested that the industry spokesperson be included on any wide-spread communications. Mr. Pannoni also expressed his desire to improve e-adjudication numbers. Perhaps the business process is too difficult, but he also suggested that there is not enough of a risk-management approach. He expressed the desire to collect numbers and timelines to determine how long it takes to process NIDS.

Marc Brooks, DOE, questioned the proposal to collect metrics on NIDS. Furthermore, he raised a concern that if there is a specific issue(s) with a particular cognizant security agency/cognizant security office that is where the discussions should begin, and that we should not collect data to validate a problem without the analytical work to see if an issue actually exists. Mr. Brooks would like Industry to provide that information to ISOO to see if it is actually an issue that has been validated versus an assertion. Mr. Spinnanger, DoD, mentioned that Section 842 will be implemented in advance of October 1, 2020, and that it is a good mechanism to receive metrics. Mr. Brooks expressed his concern that there needs to be a single government repository for items, such as clearances, facility clearances, and NIDS, so they can better access the data. Mr. Pannoni replied that they don't have the data to support this.

ODNI Update (Attachment 7)
Olga Delgado, ODNI, delivered a slide presentation. Her first slide contained data from agencies, while her second slide addressed methodology, and it represented industrial or personal security timeliness metrics as it relates to quarters. She provided a snapshot for Secret clearances for FY 19, Quarter 1 as well as providing statistics for Top Secret Clearances as well as periodical investigations.

Defense Office of Hearings and Appeals (DOHA) Update
Perry Russell-Hunter, DOHA, provided the final presentation. He explained that DOHA does not have a backlog, and their workload is at a steady state. There were 472 cases pending hearing and 340 cases pending administrative judgement, which are within the normal limits. Mr. Russell-Hunter was also excited about the effects of continuous evaluation, which would help them find "the needles in the haystack."

Mr. Russell-Hunter also addressed the e-adjudication issue, noting that it has not worked as well for industry, as opposed to the military departments. He suggested that this is because the applicants are older. Consequently, they are more likely to have derogatory items in their file. He expressed his hope that in the coming year, DoD CAF would develop more robust e-adjudication business rules to allow for an easier transition.

VII. Closing Remarks and Adjournment
The Chair mentioned that the next NISPPAC meetings would be held in the McGowan Theater on July 18 and November 20. He reminded the participants that announcements are made in the Federal Register about a month before each meeting.

SUMMARY OF ACTION ITEMS

- Valerie Heil (DoD) will provide another update of SEAD 3 at the next NISPPAC meeting.
- ODNI to host a meeting on March 28 to discuss Industry inclusion in Trusted Work Force 2.0.
- Industry requested to have a meeting to discuss DSS in transition.
- Industry to provide ISOO of instances of delayed NID's processing by CSA/CSO.
- DSS is in process of internal and formal coordination of an ISL that will replace the current ISL 2016-02.
- CUI is going to host a Stakeholders meeting on April 17 as well as an Industry day on June 21.
- CUI was going to inform when the NIST SP 800-171-Rev 2 will be available for public comment in the summer. More information on this topic will be posted to CUI blog.
- Heather Green offered to meet with Kim Baugher, to get her requirements and prepare a roadmap for the future.
- Heather Green was going to take an action item for her EBSO to hold a stakeholder's group meeting.

Attachments:
1. Briefing: NBIB
2. Briefing: NISS
3. Briefing: Industry
4. Briefing: Controlled Unclassified Information
5. Briefing: Defense Vetting Directorate/CAF
6. Briefing: NISA Working Group
7. Briefing: ODNI Security Performance Metrics

Attachment 1

NISPPAC Attendance March 13, 2019

Last Name	First Name	Agency or Group	Sub-Agency or Company
Aghdam	Laura	DOD	DSS
Arriaga	Dennis		SRI International
Baugher	Kimberly	Department of State	
Blackburn	Cindy		
Borrero	Rosie	Industry	ENSCO, Inc.
Bradley	Mark	NARA	ISOO
Brady	Denis	NRC	
Brooks	Marc	DOE	
Buckley	Gwendolyn	DOD	Navy
Burgwald	Shawn	Industry	General Atomics
Casey	Devin	NARA	ISOO
Chvotkin	Alan		PSCouncil
Cicirelli	Steve		BAE
Clay	Glenn	DOD	NAVY
D'Agati	Caroline	Clearancejobs	
Davidson	William		Bill Davidson Associates, LLC
Day	Sandy	OPM	NBIB
Delgado	Olga	ODNI	
Deloney	Ryan	DOD	DSS
Dinkel	Jane		LMCO
Dondlinger	Sharon	DOD	AIR FORCE
Doudleday	Justin		Inside Defense
Eskelsen	Jon		NBIB
Fish	Ned	DoD	DoD/CAF
Fisher	Darci		Cyber Security Innovations
Forrest	Christopher	DOD	DSS
Giguere	Jessica		McKinsey & Co
Green	Heather	DOD	DSS
Harney	Robert	Industry	NGC
Heil	Valerie	DoD	OUSDI

Hellmann	Karl	DOD	DSS
Hogan	Patrick	DOD	DSS
Hollandsworth	Matt	ASIS	American Systems
Kaohi	Catherine		NCMS
Keith	Dennis	Industry	Harris
Kerben	Valerie	ODNI	
Kindle	Tracy	DOE	
Klink	Carolina	NARA	ISOO
Kyzer	Lindy		ClearanceJobs
Ladner	George	CIA	
Lawhorn	Rick		L3T
Lilje	Bob	ASIS	Peerless Technologies
Lowy	David	DOD	AIR FORCE
Mackey	Brian	CSSWG	BAE
Massey	John	DOD	DSS
Matchett	Noel		NDM Technologies
Matthews	William		
McGarvey	Daniel		Alion Science and Technology
McGlone	Amanda	DOD	OUSD(I)
Mierzejk	Brian	DOD	NSA
Miller	Karen	NSA	
Minard	Keith	DOD	DSS
Moss	Leonard		DynCorp International
Norton	Paul	Equifax	
O'Kane	Elizabeth	Army	
Ogrysko	Nicole	Press	Federa News Network
Pannoni	Greg	NARA	ISOO
Pashoian	Norm		White & Case international law firm
Pekrul	Mark	NBIB	
Phalen	Charlie	NBIB	
Pherson	Kathy	INSA	Pherson Associates LLC
Raynor	Dianne		Boeing
Reidy	Lisa		General Dynamics

Riddle	Mark	NARA	ISOO
Roundtree	Amy	NRC	
Russell-Hunter	Perry	DOD	OGC/DISA/DOHA
Scott	Mike	DHS	
Scott	Shillee	NSA	
Smith	Linwood	DOD	
Spinnanger	Jeffrey	DOD	
Steinke	Susan		Perspecta
Steinour	Jason		
Stokes	Patricia	DOD	DSS
Stone	Cheryl	Industry	RAND
Sutphin	Michelle		BAE
Taylor-Dunn	Zudayyah	NASA	
Tegadi	Caroline		ClearanceJobs
Thomas	Ana		
Thomas	Clyde	DOD	DSS
Tiger	Kimberly	NSA	
Timmons	Katharine	Admin Support	VIASAT
Tringali	Robert	NARA	ISOO
Weaver	Richard		John Hopkins University
Wilkes	Quinton	Industry	L-3 Technologies Inc
Woodard	Alegra	NARA	ISOO

Attachment 2

Timeliness Performance Metrics for Submission, Investigation & Adjudication Time

DoD-Industry

OCTOBER 2018

QUARTERLY TIMELINESS PERFORMANCE METRICS FOR SUBMISSION, INVESTIGATION & ADJUDICATION* TIME
AVERAGE DAYS OF FASTEST 90% OF REPORTED CLEARANCE DECISIONS MADE
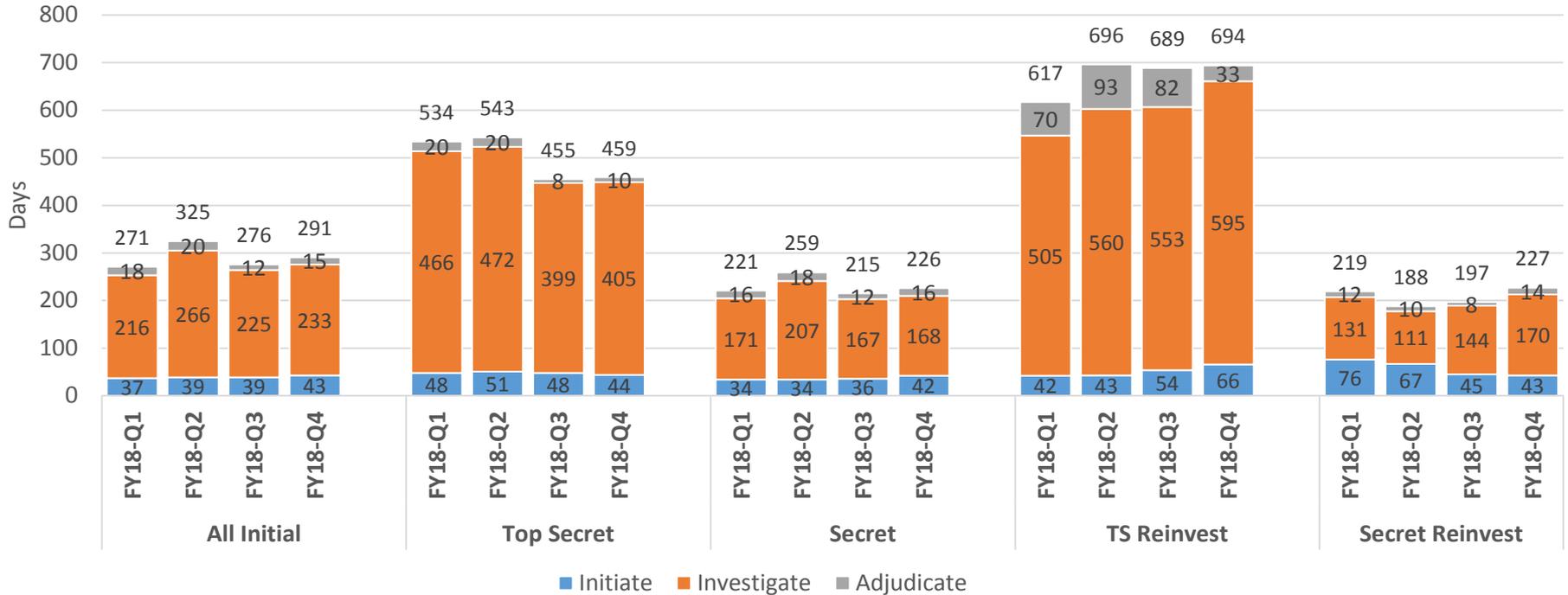
	All Initial	Top Secret	Secret/ Confidential	Top Secret Reinvestigations	Secret Reinvestigations
Adjudication actions taken – 1st Q FY18	16,588	3,052	13,536	3,954	7,548
Adjudication actions taken – 2nd Q FY18	17,685	4,511	13,174	3,264	10,689
Adjudication actions taken – 3rd Q FY18	21,170	5,610	15,560	4,155	8,543
Adjudication actions taken – 4th Q FY18	16,094	4,732	11,362	3,745	7,676

*The adjudication timeliness includes collateral adjudication by DoD CAF and SCI adjudication by other DoD adjudication facilities

INDUSTRY'S AVERAGE TIMELINESS TRENDS FOR 90% INITIAL TOP SECRET SECURITY CLEARANCE DECISIONS
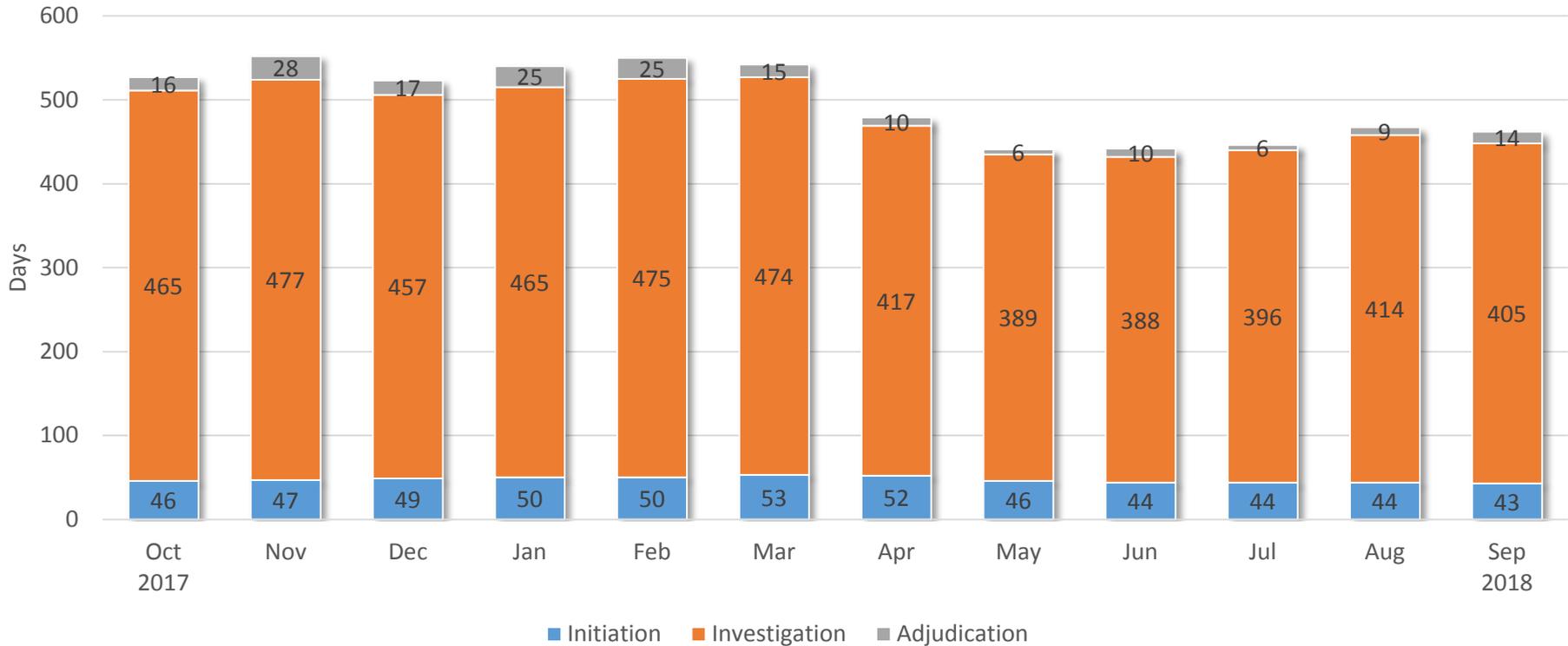
GOAL: Initiation – 14 days   Investigation – 80 days   Adjudication – 20 days

	Oct 2017	Nov 2017	Dec 2017	Jan 2018	Feb 2018	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018	Sep 2018
Total Adjudications Reported	940	937	1,181	942	1,339	2,234	2,054	1,741	1,817	1,510	1,496	1,726
End-to-End Timeliness (Fastest 90%)	527 days	552 days	523 days	539 days	549 days	541 days	478 days	442 days	441 days	444 days	467 days	462 days

INDUSTRY'S AVERAGE TIMELINESS TRENDS FOR 90% SECRET/CONFIDENTIAL SECURITY CLEARANCE DECISIONS

GOAL: Initiation – 14 days   Investigation – 40 days   Adjudication – 20 days

	Oct 2017	Nov 2017	Dec 2017	Jan 2018	Feb 2018	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018	Sep 2018
Total Adjudications Reported	5,337	4,244	3,963	4,563	4,360	4,258	5,931	5,291	4,343	4,185	3,996	3,186
End-to-End Timeliness (Fastest 90%)	223 days	223 days	212 days	246 days	254 days	275 days	211 days	214 days	222 days	217 days	230 days	229 days

INDUSTRY'S AVERAGE TIMELINESS TRENDS FOR 90% TOP SECRET REINVESTIGATION SECURITY CLEARANCE DECISIONS
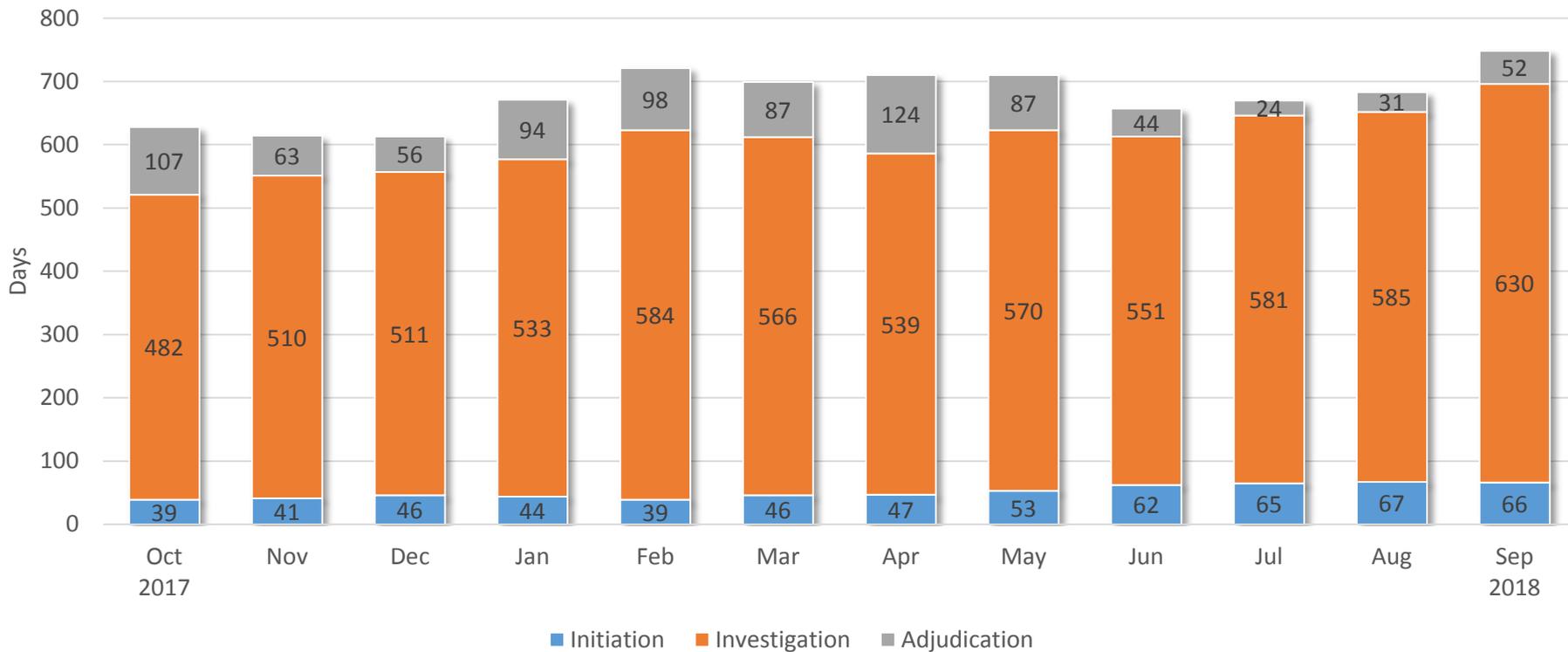
GOAL: Initiation – 14 days   **Investigation – 150 days**   **Adjudication – 30 days**

	Oct 2017	Nov 2017	Dec 2017	Jan 2018	Feb 2018	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018	Sep 2018
Total Adjudications Reported	1,181	1,589	1,192	1,094	950	1,221	1,204	1,439	1,514	1,277	1,537	936
End-to-End Timeliness (Fastest 90%)	627 days	615 days	613 days	671 days	721 days	699 days	711 days	710 days	657 days	669 days	683 days	748 days

INDUSTRY'S AVERAGE TIMELINESS TRENDS FOR 90% SECRET REINVESTIGATION SECURITY CLEARANCE DECISIONS (T3R)

	Oct 2017	Nov 2017	Dec 2017	Jan 2018	Feb 2018	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018	Sep 2018
Total Adjudications Reported	3,838	2,234	1,477	3,010	4,205	3,477	2,028	3,280	3,235	4,009	2,784	883
End-to-End Timeliness (Fastest 90%)	207 days	220 days	258 days	239 days	171 days	168 days	239 days	204 days	166 days	183 days	280 days	272 days

Attachment 3

NISS (National Industrial Security System) Update

- **NISS Successfully Deployed on 8 October for Industry and Government users**
  - NISS is now the DSS System of Record for industrial security oversight activities
  - ISFD and e-FCL are no longer available

- **Deployment Notes** (as of 29 Oct)
  - 4,700+ users 3500 industry, 600 government, 600 DSS
  - Sample system activity
    - 7,000+ clearance verifications submitted
    - 200+ facility clearance sponsorships submitted
    - 300+ change conditions reported
  - User feedback
    - 600+ comments received
    - Training aides developed, knowledge center updated
    - 27 bugs resolved

- **Training**
  - USALearning/STEPP training: Course IS127.16
  - In-system shorts and job-aids

Sample Home Dashboard

Contact: DSS.NISS@mail.mil
http://www.dss.mil/is/niss.html

NISS (National Industrial Security System) Update

- **Key Industry & Government Capabilities Delivered:**
  - Submit & track facility clearance requests
  - Submit clearance verifications
  - Automated notifications

- **Additional Industry Capabilities Delivered:**
  - Submit facility clearance documentation
  - Submit Change Conditions
  - Submit Annual Self-Inspection Certifications
  - View Facility Profiles and Assessment history

- **Upcoming capabilities in FY19:**
  - Personnel Security Investigation Projection Survey
  - Industry updates for profile & vulnerability mitigation
  - DiT related functions (i.e. Security Baseline)
  - Enhanced in-system reporting (i.e. SCR, Security Violations)

- **NISS Operational Requirements Committee**
  - Seeking Government and Industry participation

Sample Sponsorship Form

Sample Facility Profile

Attachment 4

Industry NISPPAC Update

March 2019

Agenda

- **Current NISPPAC/MOU Membership**

- **Policy Changes and Impacts**

- **New Business**

- **Systems**

- **Old Business**

National Industrial Security Program Policy Advisory Committee
Industry Members

Members	Company	Term Expires
Quinton Wilkes	L3 Technologies	2019
Dennis Keith	Harris Corp	2019
Robert Harney	Northrop Grumman	2020
TBD		2020
Dennis Arriaga	SRI International	2021
Dan McGarvey	Alion Science and Technology	2021
Rosie Borrero	ENSCO	2022
Cheryl Stone	RAND Corp	2022

National Industrial Security Program Policy Advisory Committee
Industry Memorandum of Understanding (MOU) Members

Industry Association	Chairperson
AIA	Kai Hanson*
ASIS	Matt Hollandsworth
CSSWG	Brian Mackey
FFRDC/UARC	Shawn Daley
INSA	Kathy Pherson
ISWG	Marc Ryan
NCMS	Aprille Abbott
NDIA	Rick Lawhorn
PSC	Matt Hollandsworth

Policy Changes and Impacts

Industry Questions / Concerns

- New proposed Facility Pre-decisional Security Rating Score (SRS)
- Accounting for Top Secret material when in electronic form
- Continuous Evaluation (CE) and lack of understanding concerning terminated employees
- Agencies not recognizing reciprocity of individuals in CE that are out of scope
- "Deliver Uncompromised" initiative
- Future OUSDI guidance on use of marijuana, ownership of stocks involved with marijuana and use of other products derived from marijuana (marijuana/CBD oil purchased for your pet) – is this reportable?
- NSA released new Evaluated Products List and removed equipment that had been previously approved for DVD destruction. Industry was left in limbo with no guidance from sponsoring agencies.

Industry Proposed Solutions / Requests

- Industry and Government have encountered vast amounts of security policy and procedural changes in the past two years and do not anticipate this slowing. Implementation is difficult when Industry expertise is not leveraged early in the planning process. Collaborating with Industry will reduce some of the challenges when executing new national security policy.
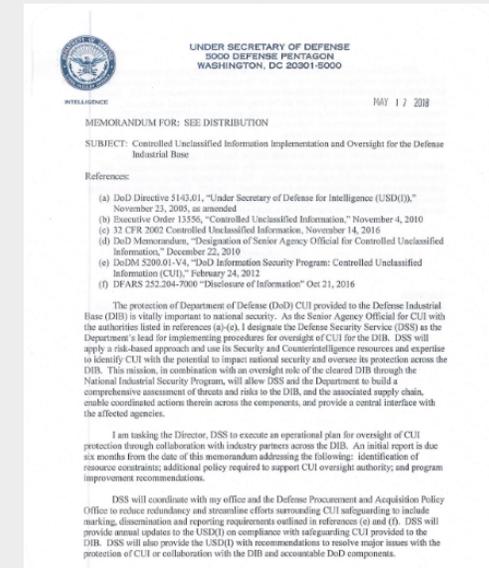
New Business: DSS and CUI

Industry Questions / Concerns

- How will CUI governance be distinguished from NISP governance?

- How might this impact DSS' ability to remain responsive on matters under NISP governance?

- Industry is currently being asked during DSS assessments to describe DFARS compliance for CDI on unclassified networks.

- With increased Comprehensive Security Assessments under DiT, will Industry be increasingly evaluated on protection of CUI/CTI?

Industry Proposed Solutions / Requests

- Industry stands ready and willing to interface and work with DSS on suggestions for implementation on both governance and compliance

- Industry requests guidance on DFARS compliance during current DSS assessments

New Business: DSS in Transition (DiT)

Industry Questions / Concerns

- Variances in implementation from one DSS field office to the next to include inconsistency of certain DSS activities within DiT (Meaningful Engagement) as well as the potential industry adoption of elevated Industrial Security Requirements Tailored Security Plan (TSP's)

- Smaller companies without key technologies will not be seen or reviewed and the vulnerabilities this might introduce into the supply chain

- Coordination with the GCA's and the concern about the impacts of introducing vulnerability information to the GCA outside the scope of a contract

Activity	Asset ID	Business Processes	12x13	TSP	Rating
Comprehensive Security Review	Yes	Yes	Yes	Yes	No
Targeted Security Reviews	Yes	Yes	Yes	No	Yes
Enhanced SVAs	Introduce	Introduce	Introduce	No	Yes
Meaningful Engagements	No	No	No	No	No

Industry Proposed Solutions / Requests

-

-

- Industry requests the opportunity for collaboration when coordinating with the GCA's on vulnerability information

New Business: Insider Threat and NID

Industry Questions / Concerns

- February 2019 Voice of Industry indicates there is a draft Industrial Security Letter (ISL) coming soon for Industry comment on evaluating Insider Threat Program Effectiveness
  - Will the CDSE site include the new Insider Threat evaluation process?
  - NISPPAC awaiting draft ISL

- NID timelines are growing and NSA revoked all blanket NIDs without notice or coordination with Industry

Industry Proposed Solutions / Requests

- NISPPAC requests more involvement in the Insider Threat Program evaluation criteria and processes
- Industry would like to convene the NID working group to review timelines and processes

New Business: DOD Memo: Transfer of Elements to DSS

Industry Questions / Concerns

- Trusted Work Force 2.0
  - Currently there is no NISPPAC representation in the Trusted Work Force 2.0 meetings

Industry Proposed Solutions / Requests

- Industry requests that a NISPPAC member attend the Trusted Workforce 2.0 meetings

- NISPPAC awaiting confirmation of briefing from OUSDI on what Trusted Work Force 2.0 is and how it will impact Industry
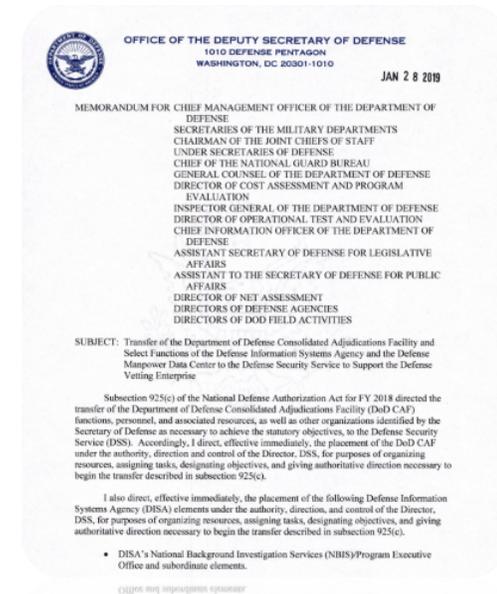
Systems – Industry Questions / Concerns

National Industrial Security System (NISS):
>Still in transition
>
>Latency issues
>
>Increase in facility clearance timelines
>
>Awaiting guidance on when Industry must have access

Defense Information System for Security (DISS):
>Concern regarding roll-out and lack of available user training
>
>Increasing call volumes/wait times of DMDC help desk

- How many users with current accounts?

NISP Contracts Classification System (NCCS):

- Concern regarding timely provisioning of the system
>Available training for both Industry and Government
>
>Still awaiting information regarding a help desk for industry to call with questions

eAPP:

- Awaiting go live date and transition plan

eAgency:

- Awaiting beta test, go live date and transition plan

eMASS:

- Lack of involvement with NISA working group on test phases, functionality, roll-out, etc.

Old Business: Small Business in Crisis

Industry Questions / Concerns

- What will happen when DiT, CUI, & NIST 800-171 takes hold?

- How will this affect our supply chain?

- Based on white paper submitted to DSS by NCMS, DSS is engaging with DMDC to determine if system access to JPAS, SWFT and DISS can be accomplished without an eligibility.

Industry Proposed Solutions / Requests

- Industry needs policies for consultants/security services companies

Old Business: SEADs

Industry Questions / Concerns

- Industry is still awaiting implementation information regarding travel reporting under SEAD 3. Reporting foreign travel for all suitability, collateral, SAP and SCI individuals may adversely impact both government and Industry, especially if the reporting mechanisms vary per customer.

- Draft ISL SEAD 3 verbiage has been reviewed by Industry and suggestions have been submitted

Industry Proposed Solutions / Requests

- NISPPAC requests to see draft ISL for SEAD 3 before final release to industry

- Industry is aware SEAD 8 draft is under coordination and is awaiting response on the ability to provide input
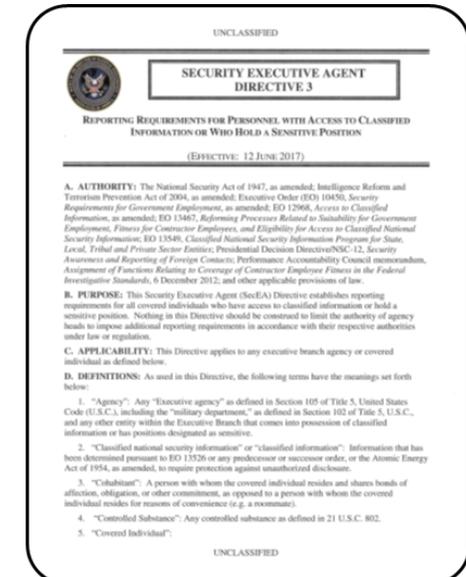
Old Business: Legislation Watch
Creation of Committees

Industry Questions / Concerns

- NDAA 2017 Section 1647: Formation of an "Advisory Committee on Industrial Security and Industrial Base Policy". Charter filed April 30, 2017
  - Awaiting clarification on committee members and funding

- NDAA 2018 Section 805: Formation of an "Defense Policy Advisory Committee on Technology"
  - Committee comprised of Industry and Government to share technology threat information
  - Will meet at least annually from 2018 to 2022
  - Awaiting clarification on committee members and information sharing

Industry Proposed Solutions / Requests

- NISPPAC recommends ISOO be one of the members of both committees since this agency represents Industry

Attachment 5

CUI Program Update

- **Agency Implementation**
  - Projections
- **CUI Registry Updates**
  - Categories, Notices, New Training
- **Federal Acquisition Regulation**
- **Update to Stakeholders**
  - November 14 (1-3 EDT)
- **CUI Industry day**
  - December 10 (9-3 EDT)
  - RSVP to CUI@NARA.GOV

CONTROLLED
UNCLASSIFIED
INFORMATION

Attachment 6

DEFENSE SECURITY SERVICE

Partnering with Industry to Protect National Security

AGENDA

- Overview

- VROC

- CAF

Defense Vetting Directorate (DVD)

Personnel Vetting Transformation

Defense Vetting Directorate

Established in April 2018 as a directorate within DSS to re-align existing DoD vetting functions to achieve a more responsive, risk-based enterprise that enables a trusted workforce (TW), while establishing the foundation for a new personnel vetting framework (TW 2.0).
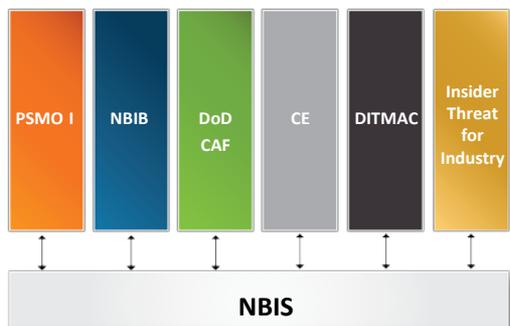
DVD integrates the following:

- Background Investigations
- Insider Threat
- Enhanced Screening Protocols

- Continuous Vetting
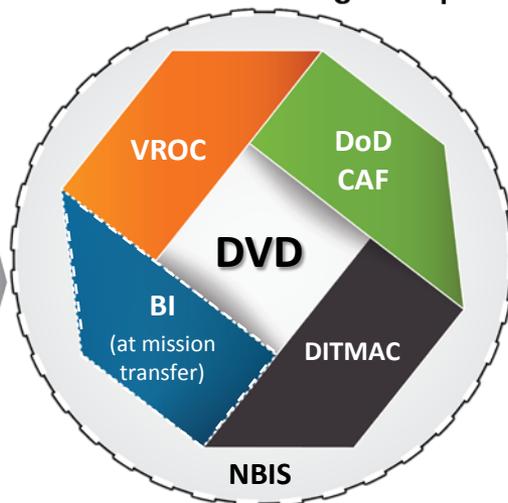- Investigative Submissions
- Adjudications

YESTERDAY

Silos of Excellence

| PSMO I | NBIB | DoD CAF | CE | DITMAC | Insider Threat for Industry |

NBIS

TODAY/TOMORROW

Transformed Vetting Enterprise

VROC

DoD CAF

DVD

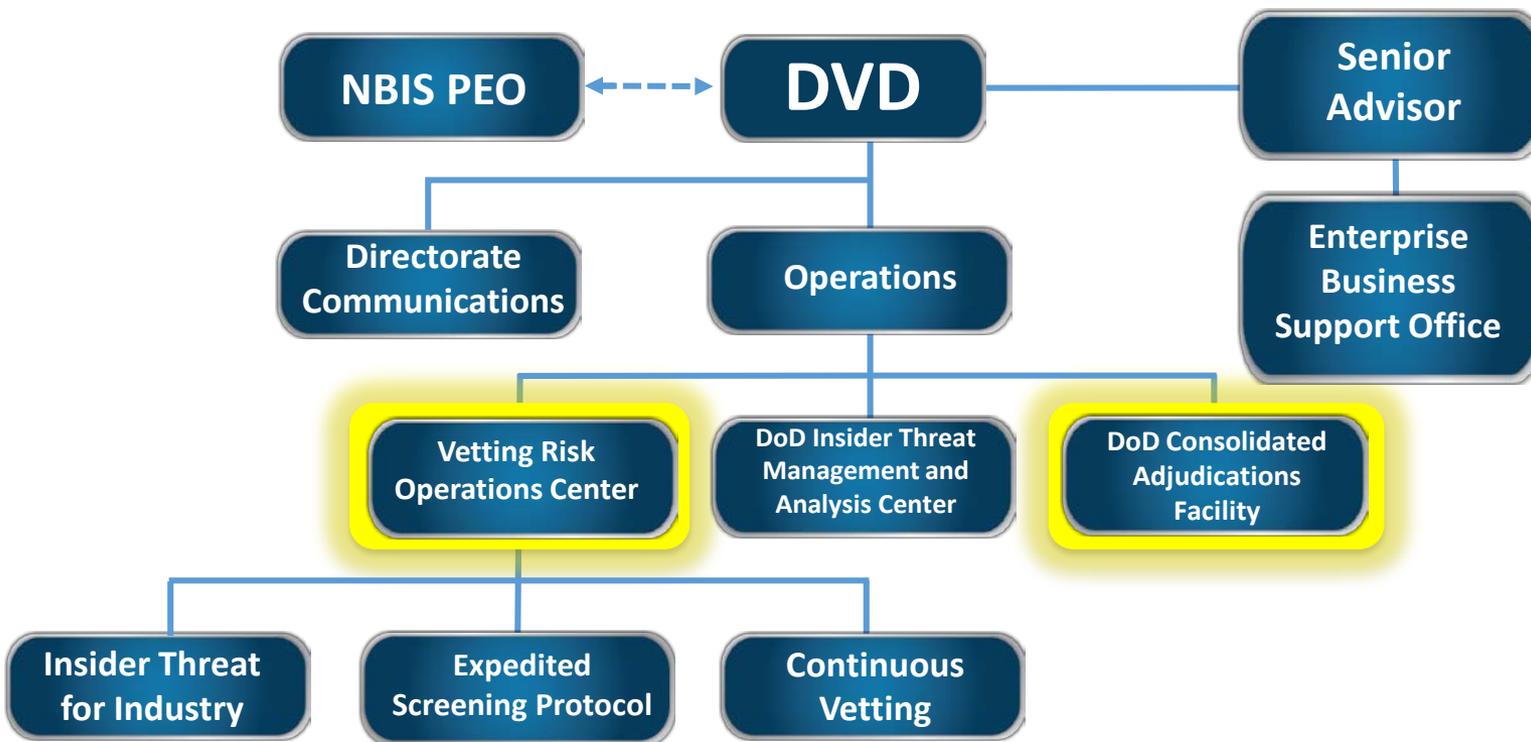BI (at mission transfer)

DITMAC

NBIS

1. New Concept: Trusted Workforce 2.0
2. New Structure: Integrated
3. New System: NBIS
4. New Business Processes: Continuous Vetting
5. New IT Capabilities, e.g., forms, position designation, AI and Smart workflow
6. Multi disciplinary Vetting Workforce
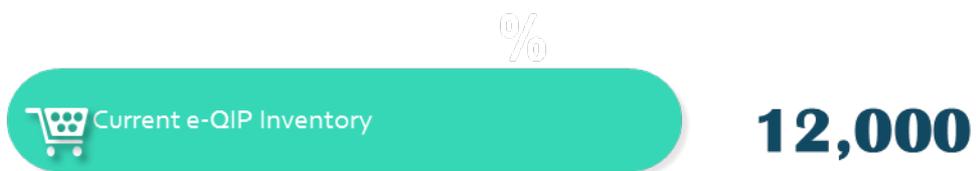
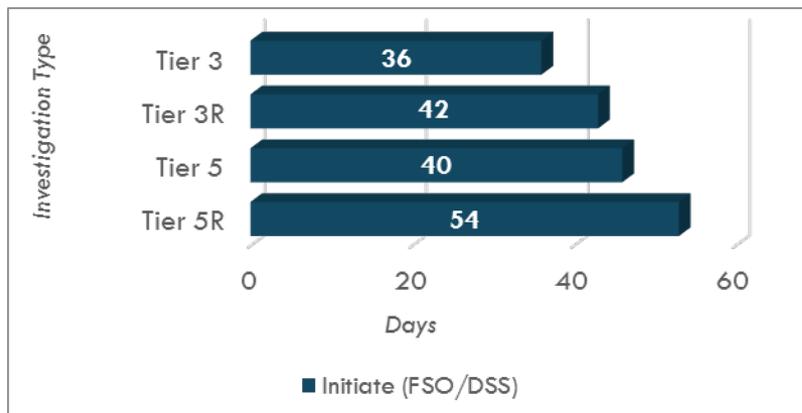**Trusted Workforce**

DVD Structure - Current


```
NBIS PEO  <--->  DVD  ──────  Senior Advisor
```

- **DVD**
  - **Directorate Communications**
  - **Operations**
    - **Vetting Risk Operations Center**
      - Insider Threat for Industry
      - Expedited Screening Protocol
      - Continuous Vetting
    - **DoD Insider Threat Management and Analysis Center**
    - **DoD Consolidated Adjudications Facility**
- **Senior Advisor**
  - **Enterprise Business Support Office**

– – – Represents a coordinating entity

Industry e-QIP & Interim Determination Metrics

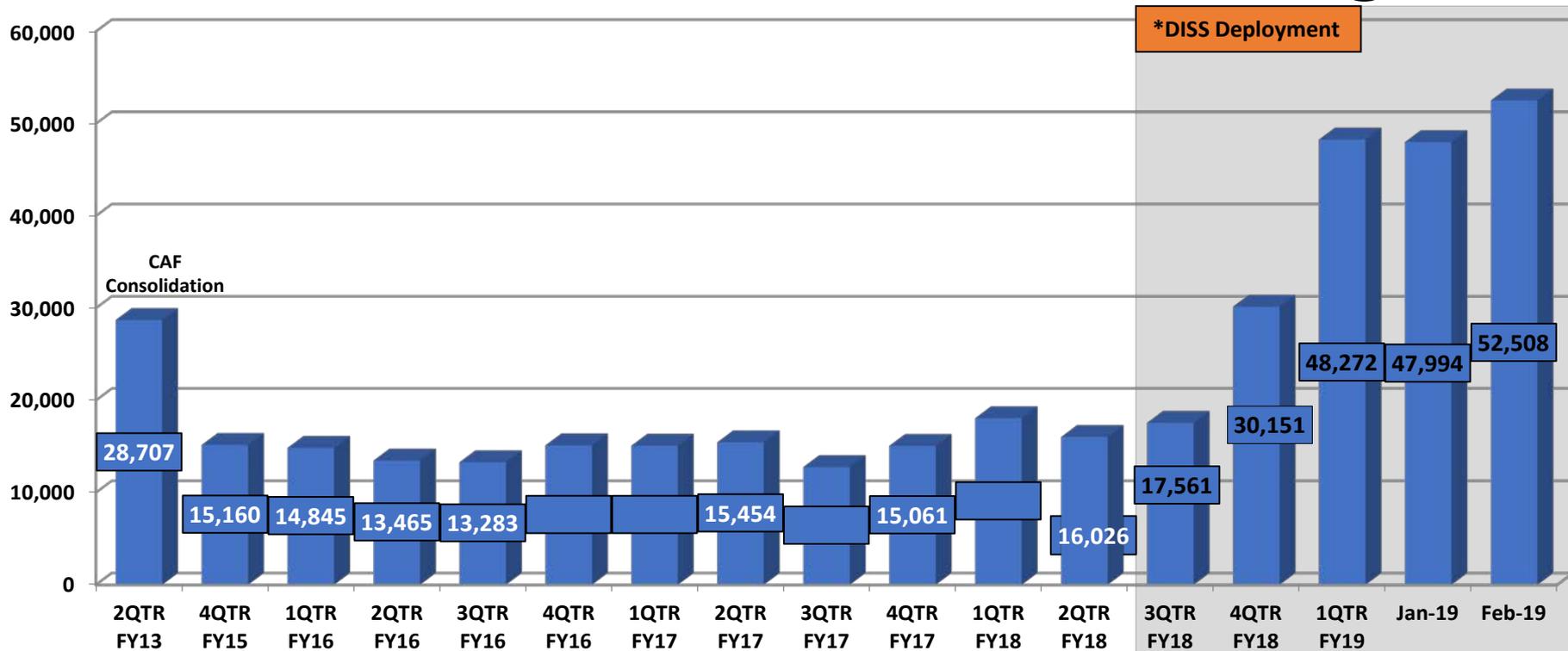|	
FY 19 e-QIP Submissions	**54,500**
Current e-QIP Inventory	**12,000**
FY19 PRs deferred to CE	**16,500**
FY 19 Interims Processed	**40,531**
Interim Timeliness	**Average 15 days**

Reminders:

★ Conduct thorough review for accuracy and completeness

★ Submit e-fingerprints prior to e-QIP submission

★ Use click to sign for all forms associated with e-QIP

Industry Initiate/VROC Submission Clearance Timeliness

Investigation Type / Days

Investigation Type	Days
Tier 3	36
Tier 3R	42
Tier 5	40
Tier 5R	54

■ Initiate (FSO/DSS)

DoD CAF Industrial Cases Work In Progress


DoD CAF working:
- Multiple efficiency indicatives both implemented and planned to increase output:
  - LSS
  - Targeted and Prioritizing Initial investigations and Derogatory Cases
  - eAdjudication
  - Surge
- CAF Historic output of ~14k is now near ~18k (Feb 19)
- WIP = 52.5K

INDUSTRY
Intelligence Reform and Terrorism Prevention Act Performance
(Based on OPM Reporting from SEP 17 – FEB 19)

FEB 19: PR = 113 days
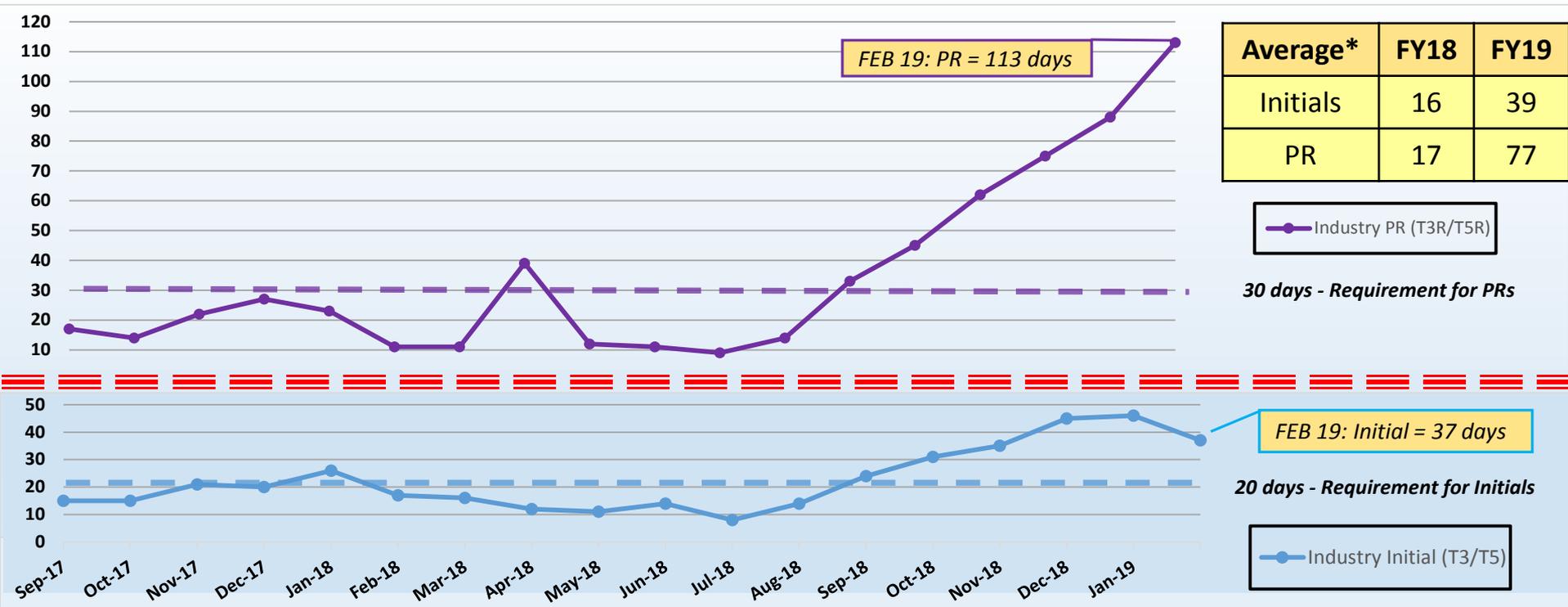
Average*	FY18	FY19
Initials	16	39
PR	17	77

Industry PR (T3R/T5R)

30 days - Requirement for PRs

FEB 19: Initial = 37 days

20 days - Requirement for Initials

Industry Initial (T3/T5)

- Due to prioritization, expect initial case adjudication timeliness to return to normal compliance by end of FY19
- Expect PR case adjudication timeliness to remain out of compliance for the near future

* Separated non-DoD CAF cases and data applicable to other elements of the DoD (e.g. DIA, NSA, & NGA)

Defense Security Service

Questions

Attachment 7

NISP Authorization Office Update

DSS Assessment and Authorization Process Manual (DAAPM)

Version 2.0 scheduled to be released on April 08, 2019 with an effective date of May 06, 2019.

Includes: updates to revised NIST SP's; eMASS instructions; proposal systems

- **Transition to eMASS**

  – Transition to eMASS scheduled for May 06, 2019

  – OBMS will remain as the system of record until May 06, 2019 and be available to process submitted plans after transition date

  Job aids available on the DSS web site under the "NISP RMF Resource Center" link

- **Enterprise Wide Area Network (eWAN)**

  Leveraging centrally managed, distributed node networks to increase cybersecurity, enable continuous monitoring and reduce resources

  National level oversight and authorization with assistance of local resources on an ad-hoc basis

Region Operations

Northern Assessment & Authorization Actions (OBMS)

Past 12 months:
ATO processed: **1390/116 per month** Submitted: **1760/147 per month**

Returned from Review: **239** SSP Denied: **5**
Cancelled (Industry) **126**

Current:
SSP in que/pending review: **244**   Pending Approval**: 134**

Expiring ATOs   <90   days = **248**

Western Assessment & Authorization Actions (OBMS)

Past 12 months:
ATO processed: **1119/93 per month** Submitted: **1373/114 per month**

Returned from Review: **129** SSP Denied: **26**
Cancelled (Industry) **109**

Current:
SSP in que/pending review: **121**   Pending Approval: **19**

Expiring ATOs   <90   days = **369**

Southern Assessment & Authorization Actions (OBMS)

Past 12 Months:
ATO processed: **931/78 per month** Submitted: **1201/100 per month**

Returned from Review: **111** SSP Denied: **66**
Cancelled (Industry) **93**

Current:
SSP in que/pending review: **175**   Pending Approval**: 1**

Expiring ATOs   <90   days = **143**

Capital Assessment & Authorization Actions (OBMS)

Past 12 Months:
ATO processed: **638/53 per month** Submitted: **881/73 per month**

Returned from Review: **69** SSP Denied: **93**
Cancelled (Industry): **81**

Current:
SSP in que/pending review: **101**   Pending Approval: **3**

Expiring ATOs <90 days: **129**

Attachment 8

Performance Accountability Council (PAC) Security Clearance Methodology

- Data on the following slides reflects security clearance timeliness performance on contractor cases. DoD Industry data is provided by OPM and IC contractor data is provided by the following IC agencies: CIA, DIA, FBI, NGA, NRO, NSA and Department of State.
- Timeliness data is being provided to report the length of time contractor cases are taking - not contractor performance.
- As shown in the diagram, 'Pre/Post' casework is not considered in the PAC Timeliness Methodology.
- Unless otherwise specified, Initial Secret data is a combination of legacy investigative types and Tier 3 investigations.

Initial Secret

| Initiate (14 Days) | Investigate (40 Days) | Adjudicate (20 Days) |

Initial Top Secret

| Initiate (14 Days) | Investigate (80 Days) | Adjudicate (20 Days) |

Periodic Reinvestigations

| Initiate (15 Days) | Investigate (150 Days) | Adjudicate (30 Days) |

Pre-submission Coordination

Pre-submission Coordination

Post-decision Coordination

Post-decision Coordination
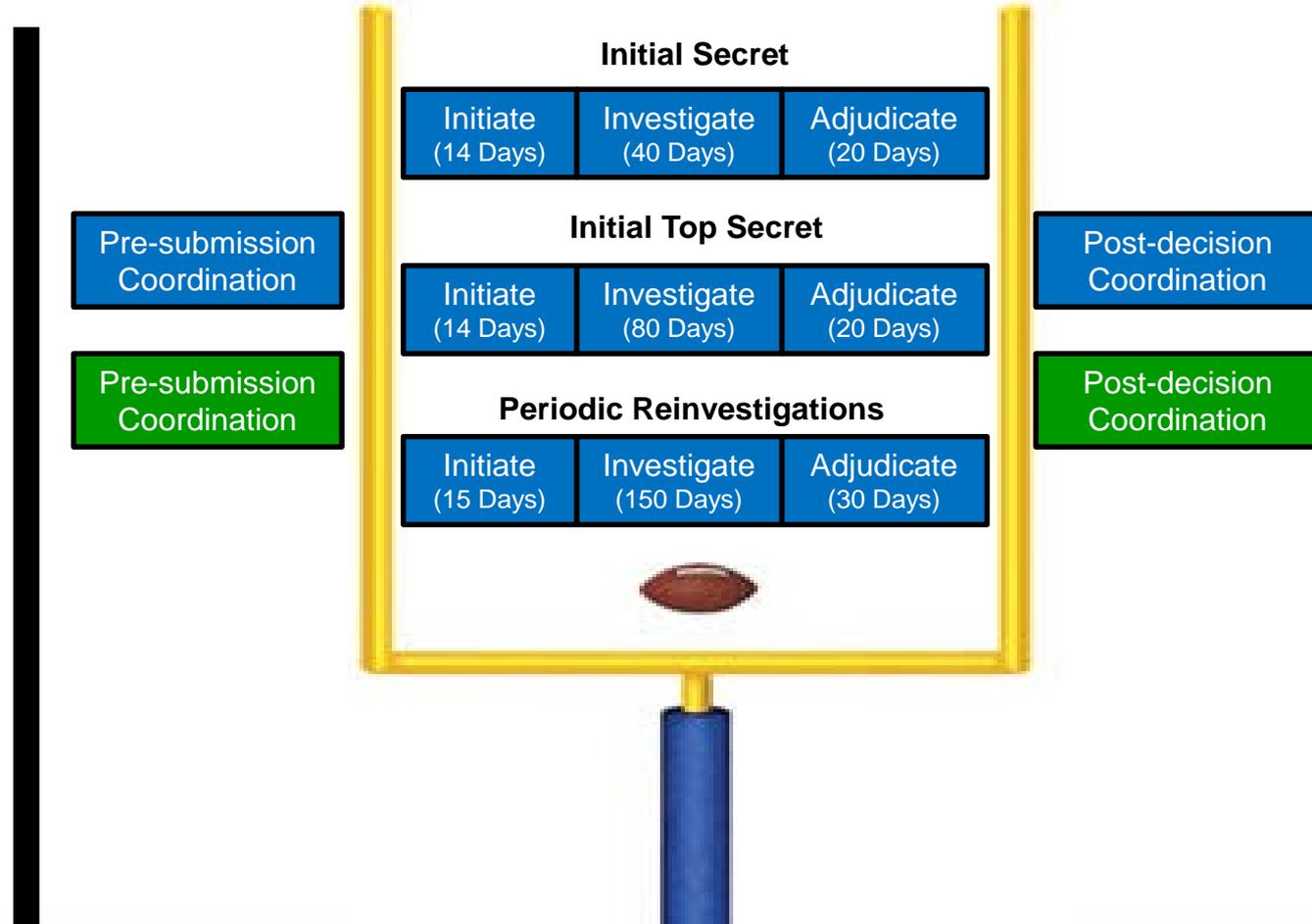
Timeliness Methodology Evolution

IRTPA (2004)

Initial Secret and Top Secret

Investigate (40 Days) → (20 Days)

PAC (2008)

Initial Secret and Top Secret

Initiate (14 Days) → Investigate (40 Days) → Adjudicate (20 Days)

Periodic Reinvestigations

Initiate (15 Days) → Investigate (150 Days) → Adjudicate (30 Days)

PAC/SecEA (2012)

Initial Secret

Initiate (14 Days) → Investigate (40 Days) → Adjudicate (20 Days)

Initial Top Secret

Initiate (14 Days) → Investigate (80 Days) → Adjudicate (20 Days)

Periodic Reinvestigations

Initiate (15 Days) → Investigate (150 Days) → Adjudicate (30 Days)

Pre-submission Coordination

Post-decision Employment Coordination

Timeliness Performance Metrics for IC/DSS
<u>Industry Personnel Submission, Investigation & Adjudication* Time</u>

Average Days of Fastest 90% of Reported Clearance Decisions Made
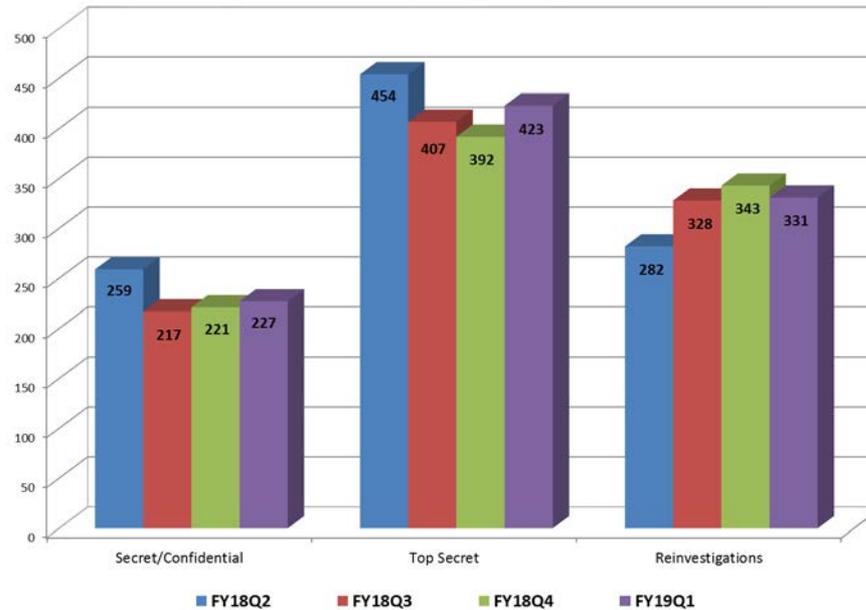
	Secret/ Confidential	Top Secret	Periodic Reinvestigations
Adjudication actions taken – 2nd Q FY18	13,900	6,388	17,077
Adjudication actions taken – 3rd Q FY18	16,373	7,611	15,447
Adjudication actions taken – 4th Q FY18	12,276	6,711	14,273
Adjudication actions taken – 1st Q FY19	14,565	5,070	14,113

*The adjudication timeliness includes collateral adjudication and SCI, if conducted concurrently.

As of 02/15/2019
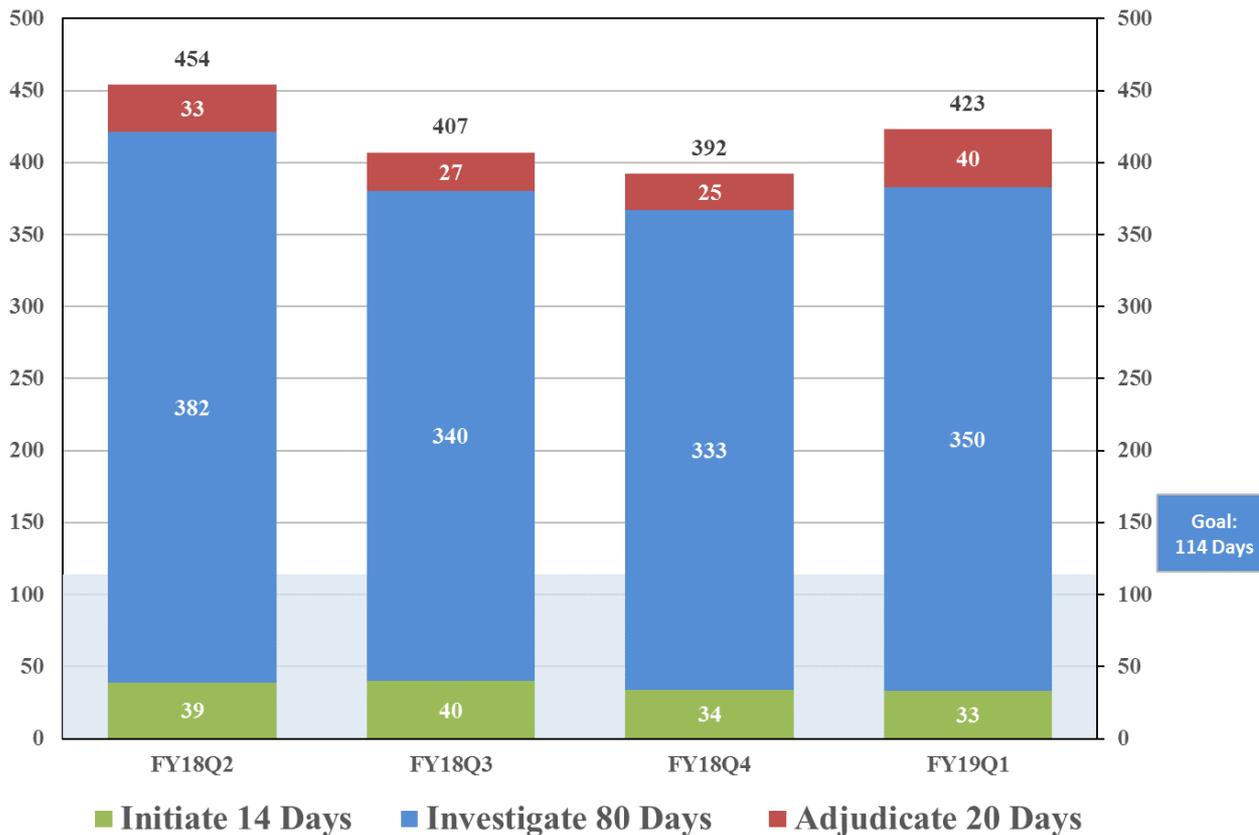
IC and DoD Industry – Secret Clearances

Average Days of Fastest 90% of Reported Clearance Decisions Made
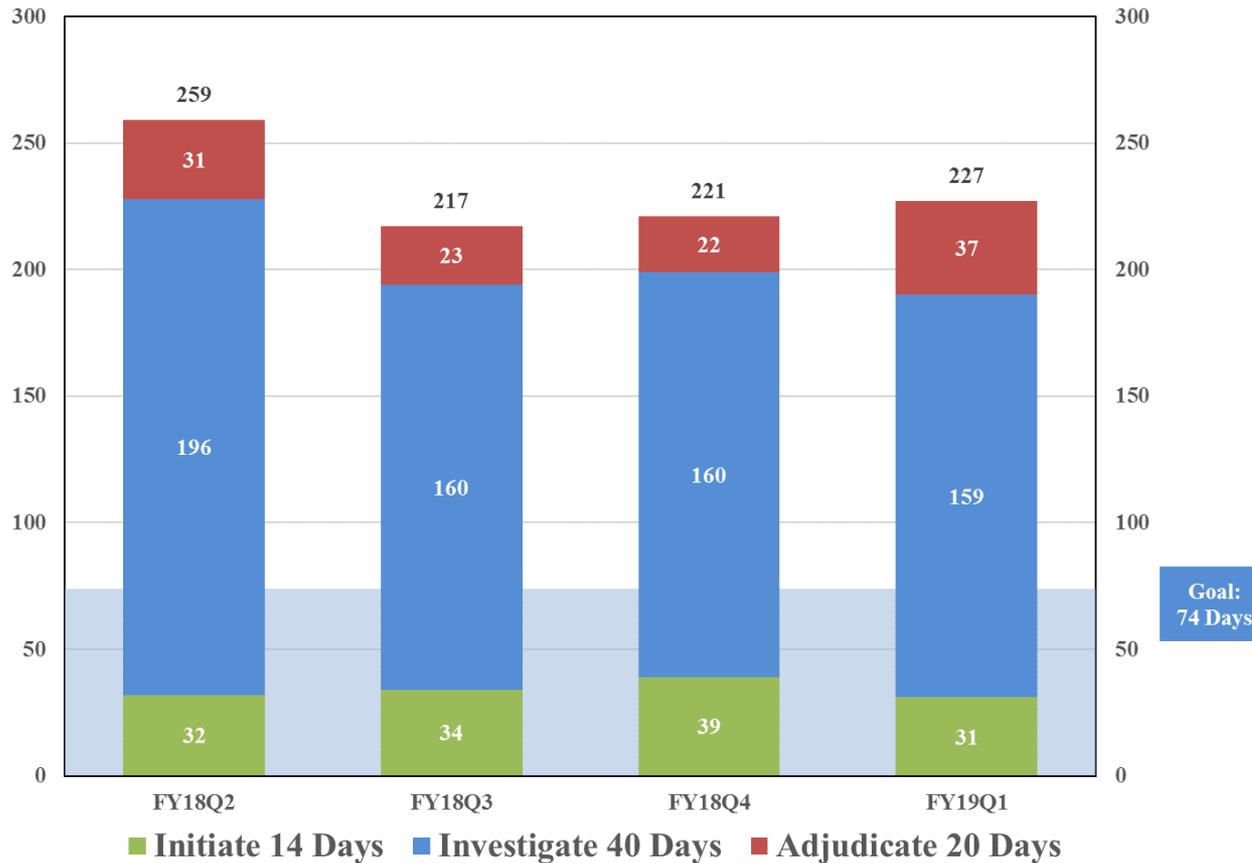
As of 02/15/2019

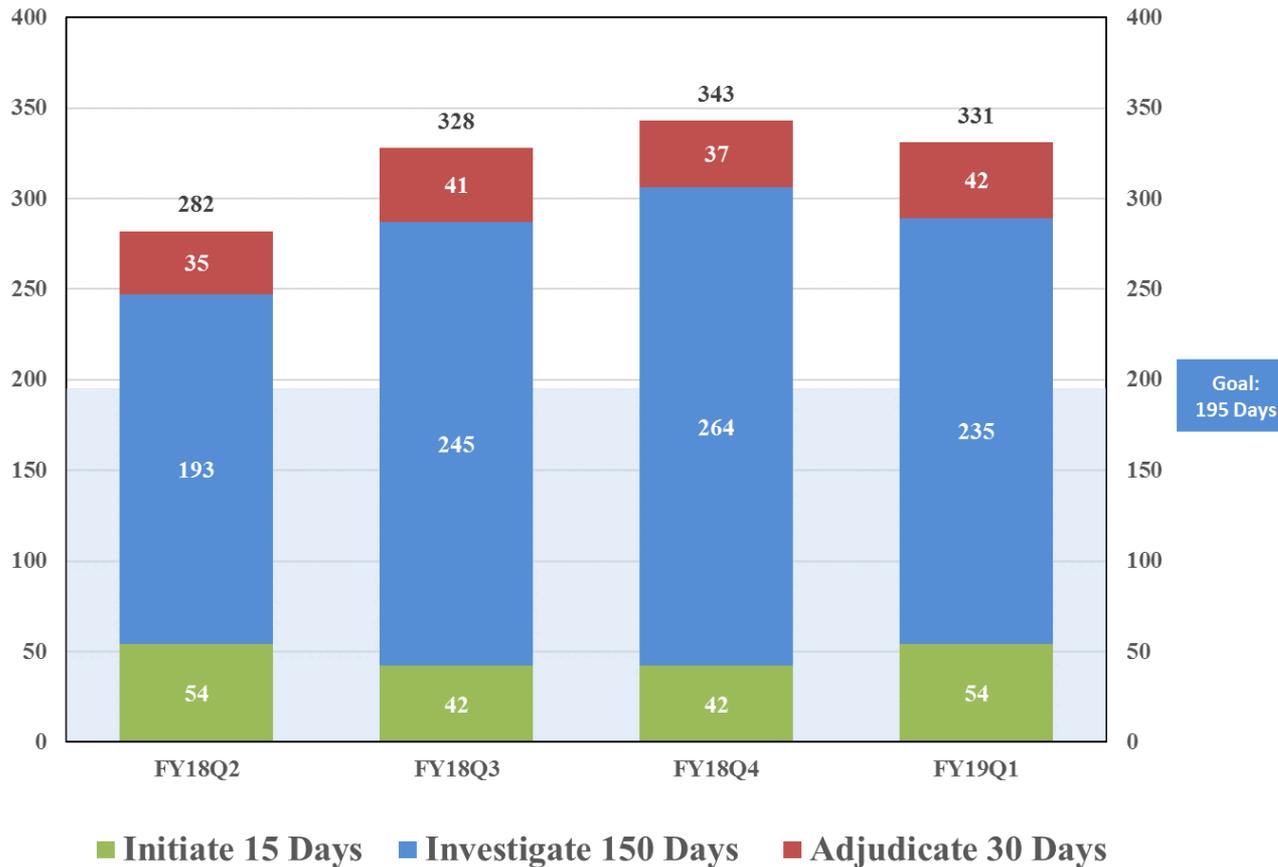# IC and DoD Industry - Top Secret Clearances
SSBI and Tier 5

As of 02/15/2019

Questions?

Email: SecEA @dni.gov