National Industrial Security Program Policy Advisory Committee (NISPPAC)

Meeting Minutes

November 1, 2017

The NISPPAC held its 57th meeting on Wednesday, November 1, 2017, 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 of this meeting were certified on Wednesday, December 13, 2017.

I. Welcome:

The Chair opened the meeting by welcoming everyone and explaining that due to the large number of topics, additional time was added to the agenda.

After introductions, the Chair recognized the newest government and industry NISPPAC members:

- Valerie Kerben, ODNI, SecEA
- Daniel McGarvey, Industry
- Dennis Arriaga, Industry

He also expressed appreciation to two outgoing industry members, Bill Davidson and Phil Robinson, for their dedication and service to the NISPPAC.

List of meeting attendees is provided (**Attachment 1**).

The Chair turned to Greg Pannoni, NISPPAC Designated Federal Official (DFO), to address administrative items and old business.

II. Administrative Items

Mr. Pannoni reminded attendees that per the last NISPPAC meeting, all presentations and handouts were provided 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 within approximately 30 days.

III. Old Business

Action Items from Previous Meetings

Mr. Pannoni addressed and provided updates to the NISPPAC action items from the May 10, 2017 meeting;

• ISOO to contact NISPPAC government members to verify and update the appointed National Industrial Security Program (NISP) Senior Agency Official (SAO) for each agency.

STATUS: <u>CLOSED</u>. ISOO has received the requested information from all NISPPAC government members.

• ISOO to contact NISPPAC government member agencies to confirm endorsement of each current government member.

STATUS: <u>CLOSED</u>. ISOO has confirmed endorsement for all government members.

 ISOO to ensure NISPPAC government members are in compliance with NISPPAC membership requirements: 4-year term, financial disclosure statement, meeting attendance and voting.

STATUS: <u>OPEN</u>. Annual financial disclosure statements for all NISPPAC government members have <u>not</u> been received, as required, per a recent request by ISOO. Members are reminded to submit their financial disclosure statements as soon as possible to ISOO or the NARA office of general counsel.

- ISOO to obtain updates from members on contact information. **STATUS:** CLOSED. All contact information has been updated.
- Industry to provide a copy of the completed Memorandum Of Understanding (MOU) for Federally Funded Research and Development Centers (FFRDC)/University Affiliated Research Center (UARC) and Intelligence and National Security Alliance (INSA). STATUS: CLOSED. The MOU has been updated, signed and received by ISOO.
- PSMO-I to provide details on responses to the tracking methods for Research, Recertify, Upgrade (RRU) actions related to reciprocity requests.
 STATUS: OPEN. PSMO-I to provide information on RRU tracking methods during this meeting.
- DSS to provide an update on the National Industrial Security System (NISS).
 STATUS: OPEN. DSS to provide a NISS update during this meeting.

IV. Reports and Updates

Update on the National Background Investigations Bureau (NBIB)

Charlie Phalen, Director, NBIB, provided an update (**Attachment 2**) on the clearance backlog, current statistics, and strategies for improvement. He stated the current backlog has decreased from approximately 700,000 to 690,000 cases. He explained that of the 690,000 cases, approximately 330,000 of them are initial Tier (T)3 and T5 investigations. The remaining number of cases are periodic investigations. In 2017, 1.9 million cases moved through the system with approximately 50,000 received and 55,000 opened on a weekly basis.

Mr. Phalen explained that with the following improvements, the backlog would continue to decrease: an increase in personnel from 5,900 to 7,000; collaboration with DoE and the military services to create a cadre of investigators to work batches of cases on a regional basis; and active partnership with industry to obtain input on efficient case processing.

Michelle Sutphin, Industry Spokesperson, asked what percentage of the 50,000 incoming weekly cases represented industry. Mr. Phalen stated of the 330,000 currently in inventory, 70,000 of them are industry cases and that the numbers fluctuate over the year. Ms. Sutphin suggested that part of the reason for the fluctuation may be caused by metering. Ms. Green, PSMO-I, agreed. Ms. Sutphin summarized that the ratio of cases is approximately one out of four and Mr. Phalen agreed.

Dennis Keith, Industry, asked Mr. Phalen for his target number of investigators. Mr. Phalen stated NBIB currently has 7,000 personnel to work investigations, but that 8,000 is the targeted number. Mr. Phalen further explained that once hired, there is a training period of approximately 6-12 months for entry level investigators.

Industry Presentation

Ms. Sutphin, provided an industry update (**Attachment 3**). She recognized two new industry members, Dennis Arriaga and Dan McGarvey, and expressed her gratitude to the two outgoing members, Bill Davidson and Phil Robinson. She also introduced the new NCMS representative, Aprille Abbott.

Ms. Sutphin provided a timeline illustrating the large number of NISP policy-related changes over the last year. She expressed industry's concern in its growing inability to meet contract needs due to the growing clearance backlog. Industry is eager and ready to be involved in new initiatives.

Ms. Sutphin listed the following legislation initiatives and provided industry concerns/questions:

- NDAA 2017 Section 1647, Formation of an "Advisory Committee on Industrial Security and Industrial Base Policy": Although this committee is not yet funded, industry remains interested in its function and members.
- NDAA 2018 Section 805, Formation of "Defense Policy Advisory Committee on Technology": Industry is interested in the members chosen to represent this group.
- NDAA 2018, Section 938, DoD Investigations Transition from NBIB to DSS: Industry is
 focused on the methods by which this transition will occur and its resulting effects on the
 contractor population.
- S. 1761, Intelligence Authorization Act of 2018: Industry requests more clarity on the intent of this legislation.
- HR 3210, Secret Act of 2017: Industry is interested in the origin and intent of this legislation.

Ms. Sutphin discussed the Fee for Service study, stated industry provided input via interviews of 29 contractors, and is waiting for feedback from the government. Rather than applying alternative measures for funding investigations, industry believes the actual issue is overall inadequate funding for accomplishment of the mission.

Ms. Sutphin provided industry concerns on the following topics:

• DSS In Transition: Industry continues to partner with DSS on this effort but is concerned with a lack of government and industry resources to adequately train and implement the program.

- DHS Proposed Rule HSAR Case 2015-001: Due to the DHS proposal for a new category of Controlled Unclassified Information (CUI) not in the registry, industry is concerned with differing requirements, duplication of effort and increased cost. NISPPAC industry and MOU groups have submitted a response to this proposed rule and are waiting for feedback from the government.
- Security Executive Agent Directive (SEAD) 3 Implementation: Industry is concerned
 that the implementation guidance provided by CSAs will be redundant and/or different
 for individuals who work for more than one CSA. Additionally, due to the increased
 reporting requirements for foreign travel, there will be a resulting influx of reports for
 contractor submissions and CSA review and approval without an increase in resources.

Ms. Sutphin provided updates on the following NISPPAC Working Groups (WG):

- National Industrial Security Operating Manual (NISPOM) Re-write: The WG had its last meeting on October 19, 2017, and DoD will now begin its internal editing process. This effort was a successful government/industry partnership.
- DSS In Transition: Industry remains engaged and supports the effort with adequate training and resources to government and industry. There are currently 66 industry participants.
- NIDs: This working group is in a dormant status and will reconvene once the 32 CFR 2004 is released.
- Insider Threat: This working group is in a dormant state until DSS implements Phase 2 of the Insider Threat program. DSS is in the planning stages of Phase 2.
- NISP Information Systems Authorization: WG focus is on incorporation of the Risk Management Framework (RMF) into future process manuals and on metrics associated with Approvals to Operate (ATO). Additionally, over this period, the WG reviewed and provided comments on the new DSS Assessment and Authorization Process Manual (DAAPM).
- Clearance WG: Due to its global focus into areas beyond clearance processing metrics, the group changed its name to the Clearance WG. Ms. Sutphin provided the following updates on clearance related applications:
 - O Defense Information System for Security (DISS): A government/industry WG is being formed; system is scheduled for industry deployment in Q3 of 2018; appointment of an industry advocate for the DISS change request governance review board is planned, and training is in development, but industry is concerned with its lack of details.
 - o eAPP: Industry has requested details on the transition from eQIP and would like to participate in beta testing.
 - NISP Contract Classification System (NCCS): Industry is concerned with the fact that there is only one DSS NCCS POC and if there is a timeline for incorporating the Knowledge Center as a call-in help desk.
 - National Industrial Security System (NISS): Industry has participated in beta testing and is awaiting the date in which NISS will be the official system of record. Industry is eager for training.

Department of Defense (DoD) Update

Ben Richardson, DoD, expressed his appreciation to the government and industry for their participation and support of the multiple ongoing initiatives in the government. The NISPOM working group was a successful industry/government partnership and the overall NISPOM rewrite is now in the USD(I) internal editing/coordination process. NISPOM, Change 3, with its incorporation of SEAD 3, is also in internal coordination. Prior to its release, DoD will distribute a memo with implementation guidance.

Mr. Richardson expressed his gratitude to industry for providing feedback on the Fee for Service study. He stated the effort remains in the review process and that no decisions have been made. He will provide an update as soon as there is progress.

Tony Ingenito, Industry, asked if DoD has considered determining clearance projections via the government and its upcoming programs. Mr. Richardson confirmed that government clearance projections are being reviewed as options.

Office of the Director of National Intelligence (ODNI) Update

Valerie Kerben, ODNI, provided updates on SEADs 3, 4, 6 and 7. Ms. Kerben reiterated that SEAD 3 reporting requirements went into effect on June 12, 2017. ODNI is currently working with agencies, all of which are at varying levels of progress, on implementation. Reporting requirements apply to all individuals in the "collateral" and "SCI" community.

SEAD 4, effective June 8, 2017, increases reciprocity by implementing one set of national adjudicative standards for all classified and sensitive positions. SEAD 6, Continuous Evaluation (CE), is in its last stage of coordination at OMB and once approved, will be distributed. SEAD 7, Reciprocity, is in its last stage of informal internal coordination at ODNI and once complete, will be sent to government agencies for review and comment. There is not yet an established timeframe for final release.

Ms. Sutphin asked if SEAD 7 addresses personnel security or physical security. Ms. Kerben stated it addresses personnel security for reciprocal eligibility determinations.

Assuming a cleared individual has reported all foreign travel per SEAD 3, Mr. Pannoni asked if when submitting information in eQIP for a periodic reinvestigation (PR), the applicant can simply check "yes" to the foreign travel question. Ms. Kerben stated ODNI is currently working on establishment of electronic reporting methods.

Mary Edington, Industry, asked if SEADs 3 and 4 apply to those with public trust positions and Ms. Kerben confirmed they do.

Defense Security Service (DSS) Update

Fred Gortler, DSS, began the DSS update by acknowledging the current challenges in the security environment and expressed appreciation to industry for its cooperation and involvement in the various ongoing initiatives. DSS is actively pursuing intelligence lead, asset focused, and threat driven tailored security programs at contractor facilities. He stated the DSS In Transition

team is in the process of creating a government team to assist with the effort and encouraged government attendees to contact Andrea Brett, DSS Change Management Office, if interested in participating.

The continuous evaluation (CE) mission was transferred to DSS in January 2017 and DSS is working with NBIB and DMDC to ensure CE-related records checks are automated. There are currently 1.1 million subjects enrolled in CE, 300,000 of which are industry. To date, 21,000 CE alerts have been received, 6,500 of which have been validated.

For the record, Mr. Gortler expressed his gratitude to DSS employee, George Goodwin, who is retiring in December after 49 years of government service, 28 of which are with DSS.

DSS Implementation of NISP Contract Classification System (NCCS)

Lisa Gearhart, DSS, provided an update (**Attachment 4**) on the NCCS. Ms. Gearhart stated the system is in Phase 5 of its deployment and that there are now 30 government agencies and 98 contractors registered as database users. The system reporting capability is active and currently contains 6 facility clearance sponsorships, 425 prime contracts, 20 solicitations and 7 subcontracts. In order to handle the anticipated volume of inquiries, DSS is considering use of the Knowledge Center as a help desk.

The FAR clause, mandating use of the NCCS, has been approved to move forward into the initial comment period. In the interim, DoD will be distributing a memo mandating use of the system across DoD.

National Industrial Security System (NISS)

Lauren Firich, DSS, provided a presentation (**Attachment 5**) on the NISS, a database that will replace the Industrial Security Facilities Database (ISFD) and eFCL. Generally, users will use this system to submit and view facility clearance (FCL) sponsorships and request FCL verifications. Industry will have the following additional capabilities: ability to message Industrial Security Representatives (IS Reps), submit FCL changed conditions, input self-inspection certifications, and view facility information. The system will contain automated FCL packages and will have direct interface with the NCCS and the Defense Information System for Security (DISS), the replacement database for JPAS.

Ms. Firich stated there was a soft launch of the system on September 25, 2017 for the government and DSS, and that several glitches were identified. Once the glitches were remedied, another soft launch on October 31, 2017 was performed to include industry. Full deployment at the end of the calendar year is planned and DSS will continue to provide updates as the system progresses. Training is contained in the system and additional training outside the system will be released next month.

Mr. Pannoni asked if the system contains a space for users to share best practices. Ms. Firich stated she would take this question back to DSS for information on the potential for this capability. [ACTION ITEM]

Defense Information System for Security (DISS)

Nick Levasseur, DMDC, provided an update, via telecon, on the DISS, the replacement system for JPAS. The system's first deployment will occur in March 2018 for DoD government civilians and in the May 2018 timeframe for industry. The system will incorporate SEAD 3 and 4 requirements and will have interface to the NISS. DMDC is currently working with PSMO-I to include CE in the system. Once DISS has been fully deployed, there will be a 90-day period before JPAS is shut down and DISS becomes the official system of record. During the 90-day period, JPAS will continue to be the system of record and both systems will be operating.

DMDC is working with USD(I) and CDSE on creating training for DISS. A user guide in the system and training shorts are currently available.

Mr. Levasseur liked Mr. Pannoni's suggestion for a best practices space inside the NISS and will inquire for this same capability for DISS. [ACTION ITEM]

Kim Baugher, State Department, asked if the other Executive branch, non-DoD agencies would be included for access to the system. Mr. Levasseur stated DMDC is in talks with the Performance Accountability Council (PAC) on how to incorporate the remaining Executive branch agencies into the DISS. [ACTION ITEM]

Controlled Unclassified Information (CUI) Update

Mark Riddle, ISOO, provided an update (**Attachment 6**) on the CUI program and stated full implementation of the CUI program by the government will take about 3-4 years. Most agencies are in the process of implementation but there are a few which are very close to accomplishing full programs. ISOO's current focus on the establishment of the CUI programs is on leadership, policy and training. CUI Notice 2017-01 provides implementation and program guidance. Additionally, ISOO has been working on a FAR clause which will require government agencies to provide CUI guidance to industry. It is anticipated that the clause will be issued sometime in FY 18-19.

Mr. Riddle stated ISOO is focused on providing a variety of CUI training products and that we has released training videos on You Tube and are also working on short training modules. A CUI blog on the ISOO website serves as the primary means of communication on program progress and provides FAQs, general information, and discussion rooms.

A CUI program update briefing is scheduled for December 16, 2017, from 1-3 pm. The briefing will include information on implementation, program strategies, FAQs, and information on training products.

NISP Implementing Directive

Mr. Pannoni stated the 32 CFR 2004 has cleared OMB for a limited interagency comment period. The suspense for comments is November 13, 2017, after which OMB will review and mitigate all comments. ISOO will continue to provide updates as the document moves through the approval process.

V. Working Group Updates

NISP Information Systems Authorization (NISA) Working Group

DSS

Karl Hellmann, DSS, began his update (**Attachment 7**) by stating that by January 1, 2018, all DSS accredited systems will be required to use the National Institute of Standards and Technology (NIST) Risk Management Framework (RMF) system controls. All existing systems will continue to operate with their current Approvals to Operate (ATO) until expired. Industry/government review of the DAAPM 1.2 was a successful effort and comments were provided via the NISA. The draft will be released on November 15, 2018 and become effective on January 1, 2018.

SIPRnet now requires the use of PKI and tokens for access, and systems must be updated to Windows 10. CDSE will be releasing three training courses in mid-November. In mid-2018, DSS will transition from Office of the Designated Approving Authority (ODAA) Business Management System (OBMS) to eMass for system ATOs. Training will be provided in January 2018.

Mr. Hellmann provided the following metrics: DSS receives 200 ATO requests monthly and processes approximately 7,000-8,000 systems per year. Currently, DSS is providing ATOs in an average of 30 days.

Clearance Working Group Report

Mr. Pannoni announced the name change of the Personnel Clearance Working Group to the Clearance Working Group due to its expanded focus into clearance policy and systems affecting industry. In addition to metrics, and as listed above, updates on the SEADs, NCCS, NISS and DISS were provided during the meeting.

In addition, Mr. Pannoni explained that due to shared interests, members of the Insider Threat Working Group were invited to attend the Clearance Working Group meeting. The Insider Threat Working Group will reconvene once DSS initiates the second phase of the program.

Updates and Processing Statistics

ODNI

Valerie Kerben, ODNI, provided a presentation (**Attachment 8**) on security clearance and timeliness methodology as well as Intelligence Community (IC) clearance processing times. The office continues to focus on meeting its timeline goals.

PSMO-I

Heather Green, PSMO-I, gave a brief update (**Attachment 9**) and explained that FY 17 has been a challenging year for her office due to budget shortfalls and associated constraints. However, she reported PSMO-I is now processing initial clearance submissions at a steady state and that the goal of issuing interim clearances in 30 days has

been met. PSMO-I is fully budgeted for FY 18 which will allow prioritization of initial clearance requests, a decrease in processing times for Tier 3 Reinvestigations (T3R) and recovery on Tier 5 Reinvestigation (T5R) requests.

Ms. Green reported the office processes 150 RRUs daily, with a 2-5 day turnaround period, and that there are currently 512 RRUs in the cue. Reciprocity requests are sent via the Research category. When processing reciprocity requests, PSMO-I sends an automated message to the requestor that the request has been received and is being worked.

DoD CAF

Steve Demarco, DoD CAF, provided metrics slides (**Attachment 10**), stated the office is approaching a steady state of case processing and that there are approximately 400 cases per month awaiting legal sufficiency reviews. Current adjudicative time for periodic reinvestigations is 17 days and for initial investigations, 15 days.

The CAF expects to begin using the DISS in the 3rd quarter of FY 18 and is attempting to close as many cases as possible to avoid transferring them to the new system. The 90-day period in which both JPAS and DISS will be operating will cause a temporary increase in processing times.

DOHA

Perry Russell-Hunter, DOHA, stated that due to continuous collaboration with the DoD CAF, his office is fully on track with processing times of 30 days. Current number of cases awaiting legal sufficiency review is 176. The implementation of SEAD 4 has worked well for DOHA and the DoD CAF and has helped to improve reciprocity issues.

Ms. Sutphin, Industry, asked if contractors should continue taking foreign passports from clearance applicants until guidance is provided. Keith Minard, DSS, stated there will be an Industrial Security Letter (ISL) issued which will provide guidance. Mr. Hunter added that the requirement to enter and exit the U.S. with U.S. passports by those with foreign passports remains unchanged.

VI. General Open Forum/Discussion

The Chair opened the meeting for anyone to present new business or to speak to the committee.

Natasha Wright, DoE, explained that as of October 19, 2017, DoE and DoD, including the National Nuclear Security Administration (NNSA), have executed a Memorandum of Understanding (MOU) to increase reciprocity and information sharing, and to decrease redundancy in facility clearance and personnel clearance processing over those NISP facilities with which they have cognizance. Ms. Wright stated the MOU also applies to all non-DoD NISP signatories.

Leonard Moss, Industry, asked if this effort would address the different names of investigations (e.g., TS for DoD and Q for DoE) and if this would be a true effort in reciprocity. Ms. Wright

explained that the conversion of a particular level of clearance would be based on the type of background investigation, but stated the MOU includes a chart to assist departments in making determinations. Mr. Moss asked if the MOU is available. Ms. Wright stated she would inquire on the MOU's distribution status. [ACTION ITEM].

VII. Closing Remarks and Adjournment

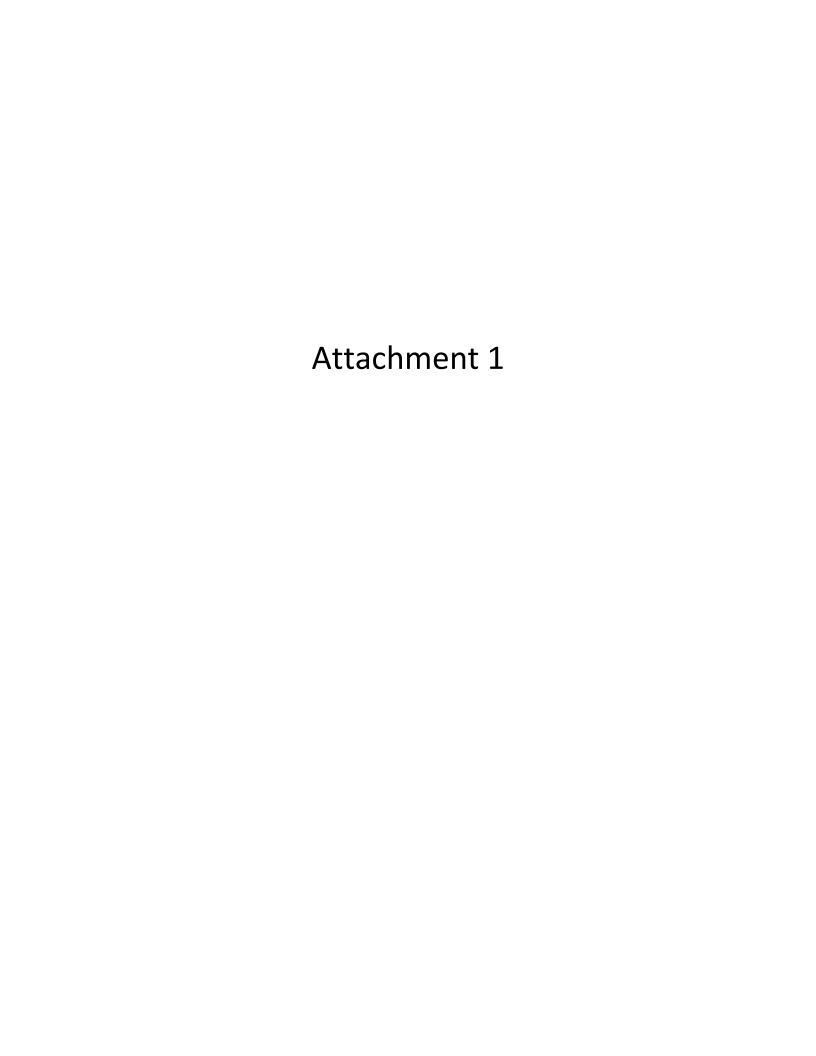
The Chair thanked attendees for coming, and thanked all the presenters. He announced the dates for the 2018 NISPPAC meetings: March 14th, July 19th, and November 15th, all to be held in the Archivist's Reception Room. The chair adjourned the meeting.

SUMMARY OF ACTION ITEMS

- ISOO to ensure NISPPAC government members have submitted annual financial statements.
- DSS to inquire on the capability of NISS to have a "best practices" section for users.
- DMDC to inquire on the capability of DISS to have a "best practices" section for users.
- DMDC to determine how to incorporate the remaining Executive branch agencies into the DISS.
- DoE to determine releasability of the DoE/DoD MOU.

Attachments:

- 1. Attendee List
- 2. Briefing: National Background Investigations Bureau
- 3. Briefing: NISPPAC Industry
- 4. Briefing: NISP Contract Classification System
- 5. Briefing: National Industrial Security System
- 6. Briefing: Controlled Unclassified Information
- 7. Briefing: NISPPAC Information Systems Authorization Working Group
- 8. Briefing: Office of the Director of National Intelligence
- 9. Briefing: DSS Personnel Security Management Office for Industry
- 10. DOD CAF Personnel Security Performance Metrics
- 11. DOE Personnel Security Performance Metrics
- 12. NRC Personnel Security Performance Metrics



NISPACC Meeting November 1, 2017 Government Members

NAME	ORGANIZATION CONTACT INFO	
CSAs		
Carrie Wibben (not present)	DoD	Benjamin.c.richardson8.civ@mail.mil
Alt: Ben Richardson		
Steven Lynch (not present)	DHS	James.ervin@dhs.gov
Alt: Jim Ervin		
Marc Brooks (not present)	DOE	Natasha.wright@hq.doe.gov
Alt: TBD (Natasha Wright)		
Denis Brady	NRC	Denis.brady@nrc.gov
Alt: William Ewald (not		
present)		
Valerie Kerben	ODNI	valeribk@dni.gov
Alt: Gary Novotny (not		
present)		
CSOs		
Michael Mahoney (not	CIA	georgcl@ucia.gov
present)		
Alt: George Ladner		
Fred Gortler	DSS	Fred.w.gortler.civ@mail.mil
Alt: Keith Minard		Keith.minard.civ@mail.mil
GOVT MEMBERS		
David Lowy	AF	David.m.lowy.civ@mail.mil
Alt: Sharon Dondlinger		Sharon.m.dondlinger.civ@mail.mil
Patricia Stokes (not present)	Army	James.l.anderson52@mail.mil
Alt: Jim Anderson		
TBD	Commerce	kbraxton@doc.gov
Alt: Kisha Braxton		-
Anna Harrison	Justice	Anna.m.harrison@usdoj.gov
Alt: Kathleen Berry (not		Kathleen.m.berry@usdoj.gov
present)		
Zuddayah Taylor-Dunn	NASA	Zuddayah.l.taylor@nasa.gov
Alt: Steve Peyton (not		
present)		
Mark Livingston (not	Navy	Glenn.clay@navy.mil
present)		
Alt: Glenn Clay		
Amy Davis (not present)	NSA	Sabrow1@nsa.gov
Alt: Shirley Brown		
Kimberly Baugher	State	baugherkz@state.gov
Alt: Michael Hawk (not		
present)		

Industry Members and MOU Representatives Attendees

Industry

NAME	ORGANIZATION	EMAIL
Michelle Sutphin	BAE Systems	Michelle.sutphin@baesystems.com
Industry Spokesperson		
Dennis Arriaga	SRI International	Dennis.arriaga@sri.com
Robert Harney	Northrup Grumman	Robert.harney@ngc.com
Dennis Keith	Harris	dkeith@harris.com
Daniel McGarvey	Alion Science and	Daniel.a.mcgarveysr@gmail.com
	Technology	
Kirk Poulsen	Leidos	Kirk.a.poulsen@leidos.com
Martin Strones	Strones Enterprises, Inc.	Not present
Quinton Wilkes	L-3	Quinton.wilkes@1-3com.com

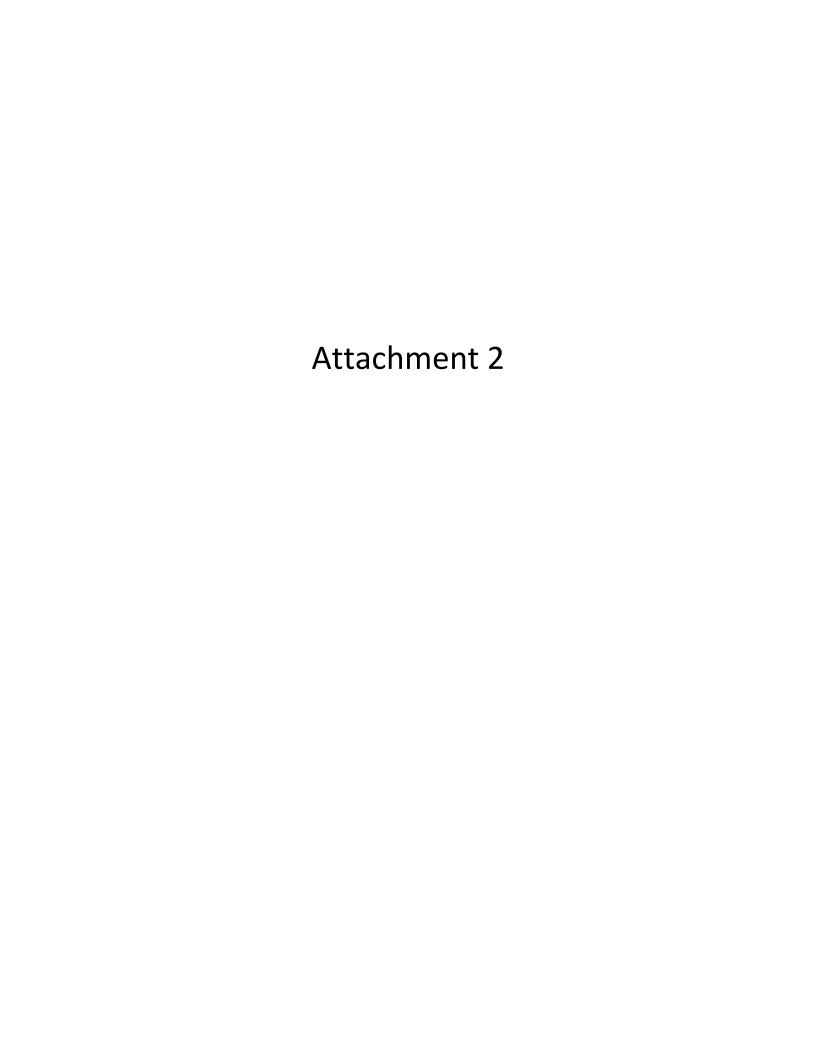
MOU REPRESENTATIVES

ORGANIZATION	NAME	CONTACT INFO
AIA	Steven Kipp	Not present
ASIS	Robert Lilje	Bob.lilje@peerless.com
FFRDC/UARC	Shawn Daley	sdaley@ll.mit.edu
INSA	Kathy Pherson	kpherson@pherson.org
ISWG	Marc Ryan	Marc.ryan@salientgrct.com
CSSWG	Brian Mackey	Not Present
NCMS	Aprille Abbott	aabott@mitre.org
NDIA	Mitch Lawrence	Mitchl3@cox.net
PSC	Matt Hollandsworth	Matthew.hollandsworth@americansystems.com

Non-NISPPAC Government and Industry Member

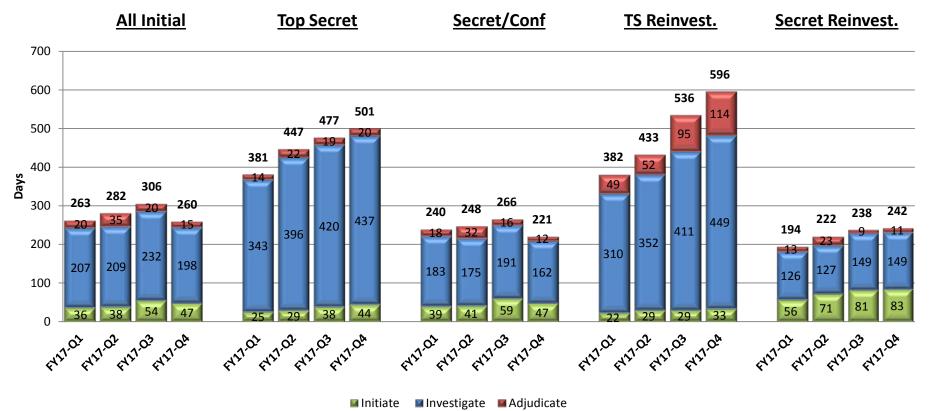
Attendees

NAME	ORGANIZATION	EMAIL
GOVERNMENT		
John Abeles	DoE	John.abeles@hq.doe.gov
Ashley Barlow	DSS	Ashley.j.barlow.ctr@mail.mil
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Perry Russell-Hunter	DOHA	russellp@osdgc.osd.mil
Alayne Huntimer	NSA	aahunti@nsa.gov
Nick Levasseur	DMDC	Nicholas.j.levasseur.civ@mail.mil
Robert Lomurro	ODNI	
Donna Mcleod	NBIB	Donna.mcleod@nbib.gov
Keith Minard		
Mark Pekrul	NBIB	Mark.pekrul@nbib.gov
Charles Phalen	NBIB	Charles.phalen@nbib.gov
John Rastler	GAO	rastlerj@gao.gov
Vaughn Simon	NASA	Vaughnsimon101@gmail.com
Natasha Wright	DoE	Natasha.wright@hq.doe.gov
Jocelyn Yin	GAO	yinj@gao.gov
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Erin Bruce (telecon)		
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Scott Hazen	Lockheed Martin Corporation	Scott.hazen@lmco.com
Jen Kirby	Deloitte	jkirby@deloitte.com
Cory Klein	DoD Security	fklein@dodsecurity.com
Noel Matchett	ISI	
Leonard Moss	Dyncorp	Leonard.Moss@dyn-intl.com
Michelle O'Donnell (telecon)		
Norm Pashoian	White & Case	normanpashoian@whitecase.com
Chris Puffer	Elbit Systems of America	Chris.puffer@elbitsystems.us.com
Lisa Reidy (call in)		Lisa.reidy@gdit.com
Sue Steinke	Keypoint Govt. Solutions	Susan.steinke@keypoint.us.com



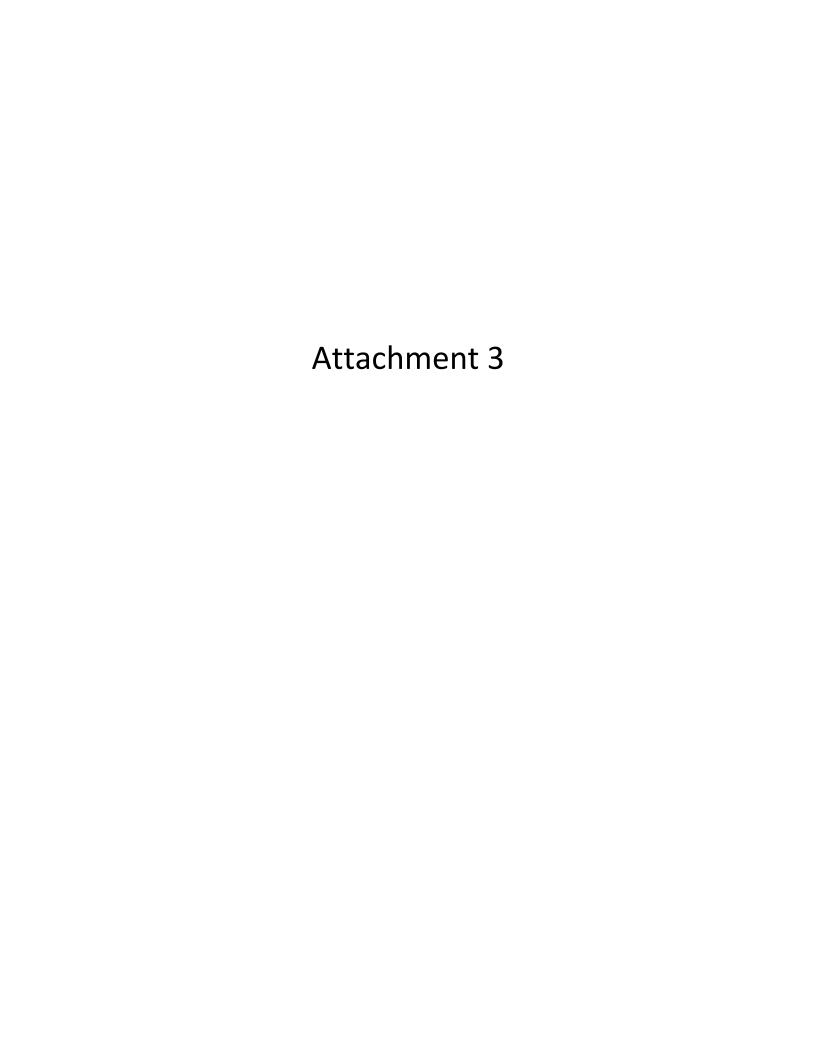
Quarterly Timeliness Performance Metrics for Submission, Investigation & Adjudication* Time

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 FY17	12,549	2,268	10,281	5,802	4,762
Adjudication actions taken – 2 nd Q FY17	13,209	2,564	10,645	6,054	6,216
Adjudication actions taken – 3 rd Q FY17	12,537	2,579	9,958	4,141	4,682
Adjudication actions taken – 4nth Q FY17	16,118	2,551	13,567	3,318	5,409

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



Industry NISPPAC Update

Agenda

November 2017

- Current NISPPAC/MOU Membership
- Impacts of Policy Changes
- Working Groups

NISPPAC Industry Members

Members	Company	Term Expires
Michelle Sutphin	BAE Systems	2018
Martin Strones	Strones Enterprises	2018
Dennis Keith	Harris Corp	2019
Quinton Wilkes	L3 Communications	2019
Robert Harney	Northrop Grumman	2020
Kirk Poulsen	Leidos	2020
Dennis Arriaga	SRI International	2021
Dan McGarvey	Alion Science and Technology	2021

1 3

National Industrial Security Program Industry MOU Members

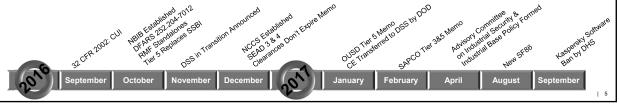
Industry Association	Chairperson
AIA	Steve Kipp
ASIS	Bob Lilje
CSSWG	Brian Mackey
FFRDC/UARC	Shawn Daley
INSA	Larry Hanauer
ISWG	Marc Ryan
NCMS	Aprille Abbott*
NDIA	Mitch Lawrence
PSC	Matt Hollandsworth

*New since last meeting

| 4

Impacts of Policy Changes - Overview

- Industry has encountered vast amounts of change in the past year and does not anticipate this slowing. Industry and USG both need increased fidelity on the costs of NISP implementation before additional reforms and new regulations are considered.
- The growing backlog of personnel security investigations and long lead time for meaningful reform to take hold will place national security at risk as both the USG and industry struggle to deliver responsive solutions from a tightening cleared labor market.
- Industry will be responsive to new initiatives, preferably if included in preparatory phases and where intended outcomes are clearly communicated.



New Business: Legislation Watch

Creation of Committees

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

6

New Business: Legislation Watch

Clearance Reform

- NDAA 2018, Section 938: DOD Investigations transition from NBIB to DSS
 - Will require DSS to conduct all DOD investigations not later than October 1, 2020
- S. 1761: Intelligence Authorization Act of 2018
 - Section 602: Governance Council for Suitability, Credentialing and Security
 - DNI to submit reports on improving the background investigation process, reviewing the schedule for processing security clearances, evaluation of splitting the background investigation function, an assessment of the SF86, etc.
- HR 3210: SECRET Act of 2017
 - Requires the NBIB to report on the backlog of security clearance investigations and must report on the duplicative costs of implementing a plan for the DSS to conduct security investigations.

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New Business: Fee for Service Survey

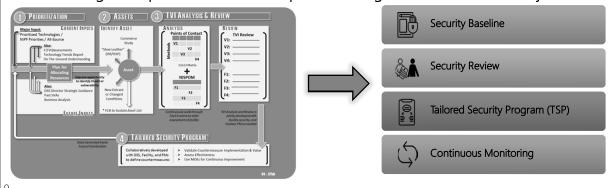
- Led by the Office of Cost Assessment and Program Evaluation (CAPE), DoD completed a study of options related to funding of personnel security investigations exploring:
 - Fee for Service
 - Working Capital Fund
 - Industrial Funding Fee
- 29 small, medium and large cleared companies were selected and interviewed.
- NISPPAC submitted a white paper with our position: the current model, if properly funded, will work. It is not the method of funding causing the problem, but the lack of funding.



| 8

New Business: DSS in Transition

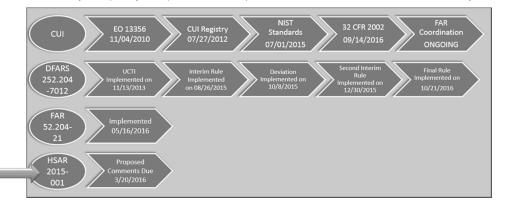
- NISPPAC is participating on both the Core Group and Focus Group in order to partner with DSS on formulating a new methodology and we are already seeing an evolution.
- We are committed to the mission but concerned about lack of resources or training for implementation on the part of both government and industry.



Old Business: DHS Proposed Rule HSAR Case 2015-001

Trem rate being proposed by bird min add to it new eategones of cortal at are not in the trink to it negotiag.

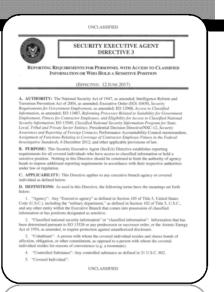
- Safeguarding does not require the use of NIST 800-171 standards.
- This new regulation may require differing protections for these categories of CUI which will require different network configurations and separate servers; having a large cost impact on contractors supporting DHS.
- NISPPAC and the MOUs submitted formal response; CODSIA response also submitted
- Seen as unnecessary complexity and potential for duplication of efforts and added cost to industry.



10

Old Business: SEAD 3

- SEAD 3 was signed in December of 2016, to be effective June 12, 2017.
- Pre-approval for foreign travel will be required for collateral clearance holders once it is incorporated into the new NISPOM. This will impose a new and large burden on both industry, DSS and other CSAs to handle the influx of reports that this will now generate. Will also need to de-conflict the process: who will be responsible for approving? Industry or Govt?
- NISPOM CC3 coordination is underway. SEAD 3 will be an addendum with the ability for CSAs to issue their own implementation guidance.
- Concern from industry over redundant reporting and differing reporting on the same employee to multiple CSAs.



NISPPAC Working Groups

NISPOM Re-Write

- Efforts continue. Last and final meeting held October 19, 2017. Government coordination will now take over
- DSS In Transition (Formerly RBAM)
 - Currently, industry is on board with transitioning to different methodology provided proper training and resources are allocated to both government and industry.
 - NISPPAC supplied 66 industry names to participate on one working group (Industry IPT Members) and one focus group (Industry Focus Group) surrounding the New DSS Methodology. Four meetings of the Core Group and 1 meeting of the Focus Group have been held thus far.
- NID Ad-Hoc Meeting
 - No further meetings until finalization of 32 CFR 2004.

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NISPPAC

Working Groups (continued)

- Insider Threat Working Group
 - Will focus on how DSS (and the rest of the USG) will start to evaluate and rate industry on the "effectiveness of insider threat programs" in 2018.
 - Currently no automated process when adverse is entered into Scattered Castles to alert DSS
- NISP Information Systems Authorization (NISA) Working Group (Formerly C&A WG)
 - Working group focus is on incorporating the Risk Management Framework (RMF) into future process manual updates.
 - Industry participated in DSS hosted WG to review the DAAPM.
 - Closely looking at statistics to see timeliness and locations of ATOs submitted. Northern Region currently has longest timelines.

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NISPPAC

Working Groups (continued)

- Personnel Clearance Working Group name was changed to Clearance Working Group.
- Applications
 - JPAS
 - · Current system of record
 - Defense Information Systems for Security (DISS)
 - · Working to formulate a DISS Government/Industry working group in place
 - Projected go live for Industry Q3 of 2018
 - Still awaiting an Industry Advocate for the Governance Review Board for DISS change requests
 - Training overview has been developed; concern regarding lack of detailed training to be made available to industry and government
 - eQIP
 - eQIP will be replaced with eAPP. Industry is requesting more information on this transition as well as participation in a beta test. Unsure of potential impacts between eAPP and DISS.

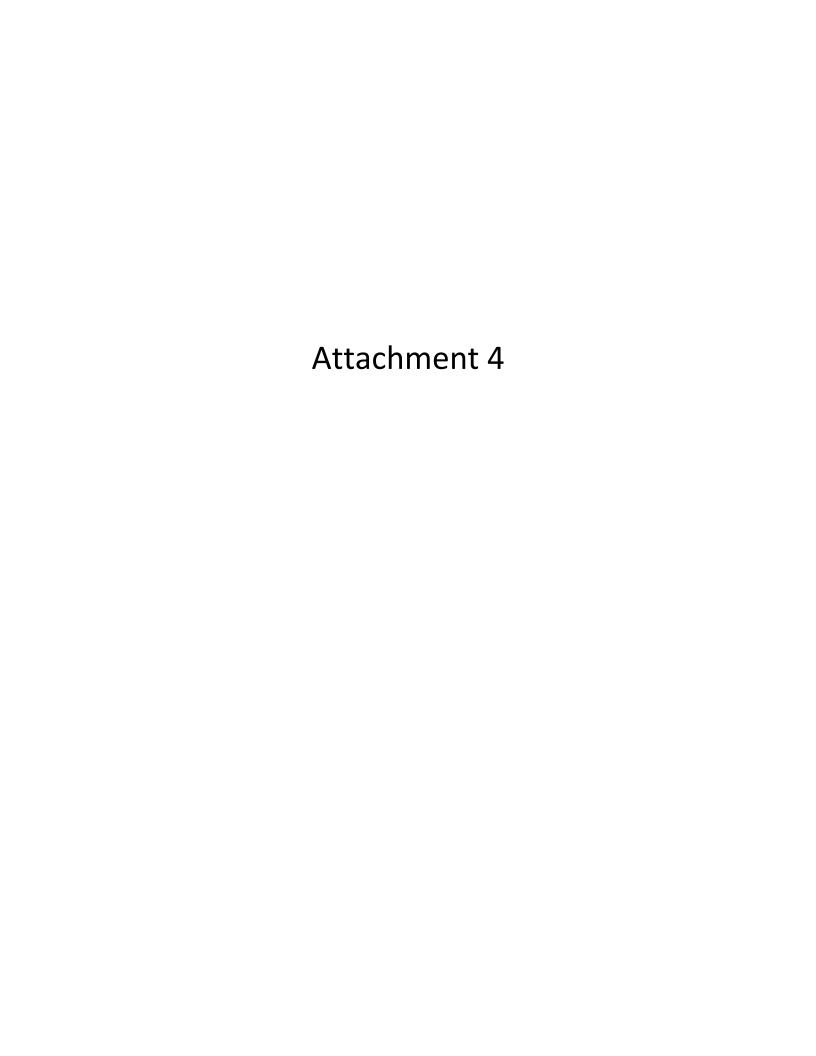
| 14

NISPPAC

Working Groups (continued)

- Applications (continued)
 - NISP Contractor Classification System (NCCS)
 - Currently one POC at DSS to set up accounts. Backup needed.
 - Timeline for incorporation into the Knowledge Center?
 - Development of National Industrial Security System (NISS)
 - Have participated in multiple beta testing sessions
 - Awaiting the date when NISS will be the official system of record
 - Unsure when training will be released

| 15







NCCS (NISP Contract Classification System) Update

- NCCS is an enterprise system for generation of DD Form 254s and workflows
 - Single web-based system to receive, change, and keep up-to-date contractor security requirements
 - Analytic capability across government programs and companies to identify relationships and trends
 - Linkages to existing automated systems
- Phased Implementation:
 - Phase 1 June 2016 Initial Operational Capability (Approved Operating Baseline)
 - 2 Agencies, 2 Industry using system
 - Phase 2 December 2016 Full Operational Capability (Mandatory Requirements Delivered)
 - 5 Agencies, 7 Industry using system
 - Phase 3 (January April 2017)
 - 10 Agencies, 24 Industry implemented
 - Phase 4 (May August 2017)
 - 21 Agencies, 70 Industry implemented
 - Phase 5 (September December 2017)
 - 30 Agencies, 97 Industry implemented

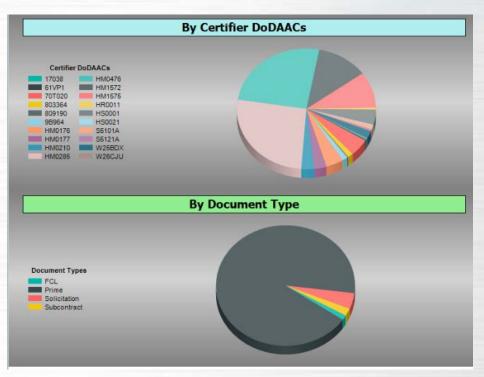
Contact DSS.NCCS@mail.mil

• FAR clause is still on hold; staffing USD(I) memo with AT&L implementing memo to mandate NCCS





NCCS (NISP Contract Classification System) Update



MRS – Reporting Tool Capability

- Agency use of NCCS since June 2016 to Present
- Types and number of documents in NCCS

	Document	FCL	5
ı	Туре	Prime	368
		Solicitation	17
		Subcontract	8



Questions?













NISS (National Industrial Security System) Update

- NISS is the DSS' future information system that will **replace and expand** upon Industrial Security Facilities Database (**ISFD**) and Electronic Facilities Clearance System (**e-FCL**) capabilities
- Key Capabilities Delivered in Increment 1
 - Government
 - Submit / view sponsorship requests
 - Track facility clearance issuance in real-time
 - Submit / view facility clearance verification requests
 - Industry
 - Message your ISR (General, Security Violation, SCR, FOCI Annual)
 - Submit change conditions
 - Submit annual self-inspection certification
 - View facility information
 - Submit / view sponsorship requests
- Personnel Clearance Timeliness Specific Benefits
 - Up-front data integrity, reduced FCL & KMP rework
 - Automated FCL Package and Change Condition package processes
 - Automated notice from field to FCB for initiation of KMP PCL
 - Streamlined PCL tracking with relation to FCL issuance
 - Extracts to JPAS for CAGE/facility data
 - Planned direct interface with DISS





NISS (National Industrial Security System) Update

- Implementation Status:
 - 28 Sep 2017 Soft Launch (Govt) / Q4FY18 Soft Launch (Industry): Register for accounts, Hands-on system familiarization and training, ISFD/e-FCL still acting as systems of record
 - Users can access, test, and provide feedback
 - "This is my first time in NISS. Looking up an industry CAGE appears to be a very smooth, intuitive process." -Department of the Navy
 - "Love this new system! Very user friendly compared to ISFD Application site."
 -Department of the Air Force
 - 30 Oct 2017 Soft Launch 2.0: Remedies top issues identified by the community
 - Q1FY18 Full Deployment: Purge information captured during Soft Launch, Migrate information & sunset ISFD/e-FCL
 - Pending resolution of outstanding system issues
 - Cutover date will be announced one month in advance
 - 2018 & Beyond System Enhancements, including a direct DISS and NCCS interface
- Training is available now through the system
 - Additional STEPP training will be deployed this quarter
- Communications engagement ongoing through 2017

Contact - DSS.NISS@mail.mil





CUI Update

- Implementation Projection (3-4 years)
- Implementation Activities (Focus on: Leadership, Policy, and Training)
- CUI Notice 2017-01 (Recommendations for implementation)
- Federal Acquisition Regulation for CUI (FY18)
- Training videos (YouTube)
- CUI Blog (https://isoo.blogs.archives.gov/)













NISP Authorization Office Update

Risk Management Framework (RMF)

- Beginning January 1, 2018 all Industry Information Systems (IS) will be authorized using RMF based on NIST security controls.
- DSS Assessment and Authorization Process Manual (DAAPM) Version 1.2 will be released by November 15, 2017. This version will become effective January 1, 2018. Existing Process Manuals will remain in force until December 31, 2017
- RMF guidance and artifacts are available at <u>www.dss.mil/rmf</u>

SIPRNet

- Beginning October 1, 2017 all Industry personnel accessing SIPRNet are required to have PKI tokens for account authentication. User names and passwords are no longer allowed.
- Industry IS connected to the SIPRNet are required to update to Windows 10 Secure Host Baseline (SHB) by end of 2017. Industry should be working with their sponsors on this requirement.



NISP Authorization Office Update

CDSE Training for RMF

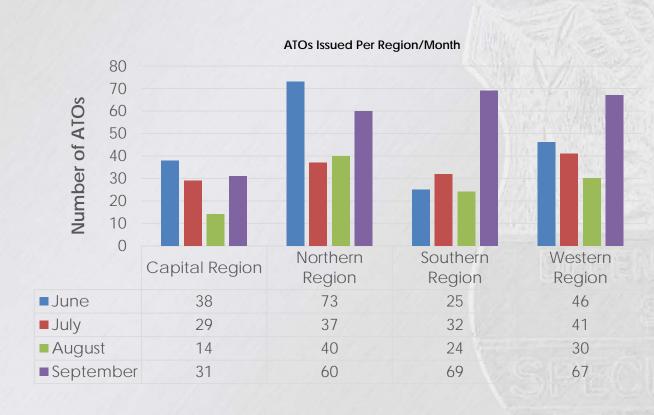
- CS150.16 Introduction to NISP Assessment and Authorization (A&A) (15 NOV)
- CS250.16 Applying A&A in the NISP (15 NOV)
- CS140.16 Protected Distribution Systems (PDS) Course (15 NOV)
- Technical Implementation of A&A (Beta testing for mid-NOV, release scheduled for end of NOV)

Transition to Enterprise Mission Assurance Support Service (eMASS)

- eMASS is a DoD application developed by DISA to support the NIST RMF authorization process.
- DSS Field Operations will be transitioning Industry classified IS submissions to eMASS in mid-2018. eMASS will replace OBMS as the DSS Assessment and Authorization system.
- Training and account management information on eMASS to be available for Industry by January 2018.



Number of Authorizations (ATO) Issued



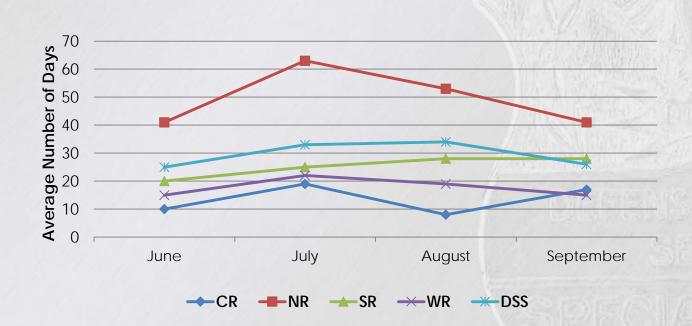
Source: NAO - 2017OCT13





Average Number of Days to ATO

Average Number of Days Per Region/Month



Source: NAO - 2017OCT13







NCSC AND STATES OF MUTAL.

(U)Timeliness Metrics and Quality of Background Investigations

National Counterintelligence and Security Center

LEADING INTELLIGENCE INTEGRATION

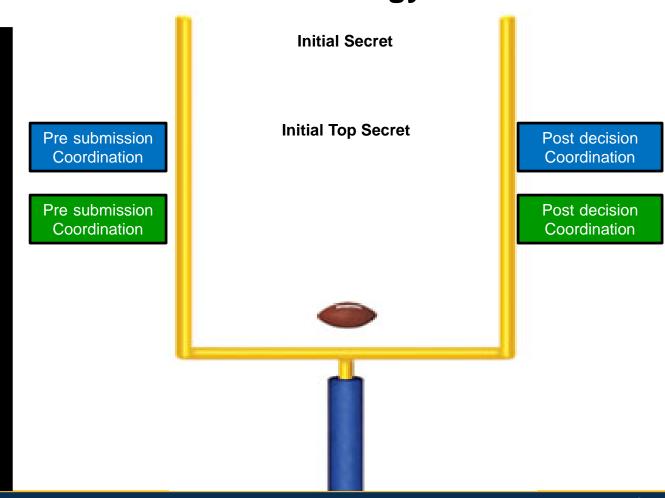
Gary Novotny
1 November 2017



LEADING INTELLIGENCE INTEGRATION

(U) Security Clearance Timeliness Methodology

- (U) 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 IC Agencies.
- (U)Timeliness data is being provided to report the length of time contractor cases are taking - not contractor performance.
- (U) As shown in the diagram, 'Pre/Post' casework is not considered in the timeliness methodology.
- (U) Unless otherwise specified, Initial Secret data is a combination of legacy investigative types and Tier 3 investigations.

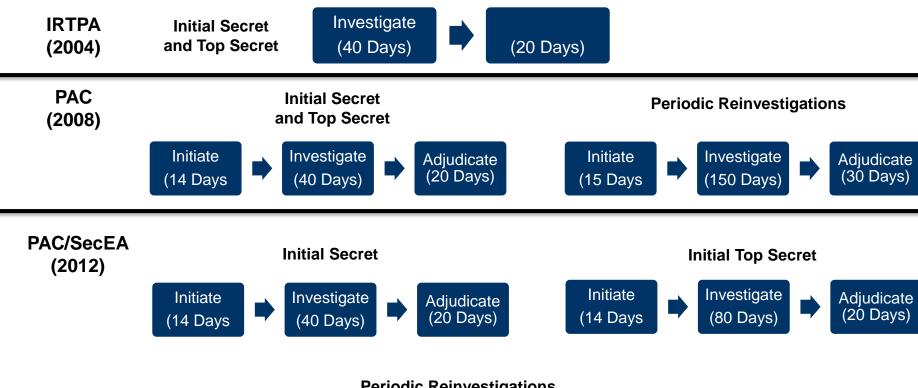




NCSC AND STATES OF AMERICA

LEADING INTELLIGENCE INTEGRATION

(U) Timeliness Methodology Evolution



Periodic Reinvestigations

Pre submission Coordination

Initiate (15 Days) Investigate (30 Days)

Post decision Employment Coordination

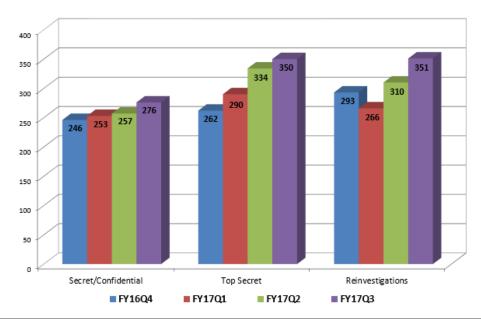


EADING INTELLIGENCE INTEGRATION



(U) Timeliness Performance Metrics for IC/DSS Industry Personnel Submission, Investigation & Adjudication* Time

Average Days of Fastest 90% of Reported Clearance Decisions Made



	Secret/ Confidential	Top Secret	Periodic Reinvestigations
Adjudication actions taken –FY16 4th Qtr	8,697	4,145	12,995
Adjudication actions taken –FY17 1st Qtr	10,854	4,181	13,730
Adjudication actions taken –FY17 2nd Qtr	11,194	4,648	15,652
Adjudication actions taken –FY17 3rd Qtr	10,851	4,616	11,998

^{*}The adjudication timeliness includes collateral adjudication and SCI, if conducted concurrently



THE CENTRAL STATES OF AUTHORS.

LEADING INTELLIGENCE INTEGRATION

Questions

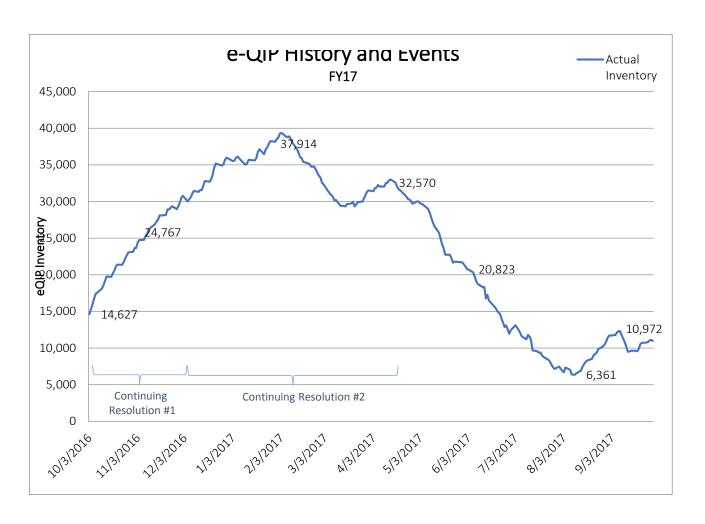
Security Executive Agent Metrics Team

Email: SecEAmetrics@dni.gov





Industry Investigation Request History & Events FY17





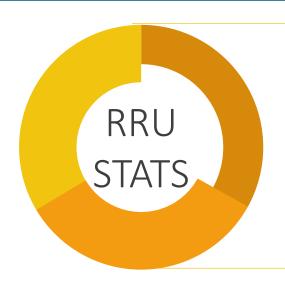


Industry Investigation Requests – FY18

- Continue prioritization of Initials
- Maintain ~30 day Interim
- Reduce T3R Inventory
- Begin incremental recovery on Top Secret Periodic Reinvestigation to meet DoD periodicity
- Keep Industry appraised of DSS efforts



High Level RRU Process Overview



DAILY AVERAGES

PSMO-I has received a daily average of 70 Research, 35 Upgrade, and 38 Recertify RRU requests

PEAK INVENTORY

There were a total of 510 Research RRU on Jan 19, 2017, with a high of 2,022 on March 2, 2017.

CURRENT INVENTORY

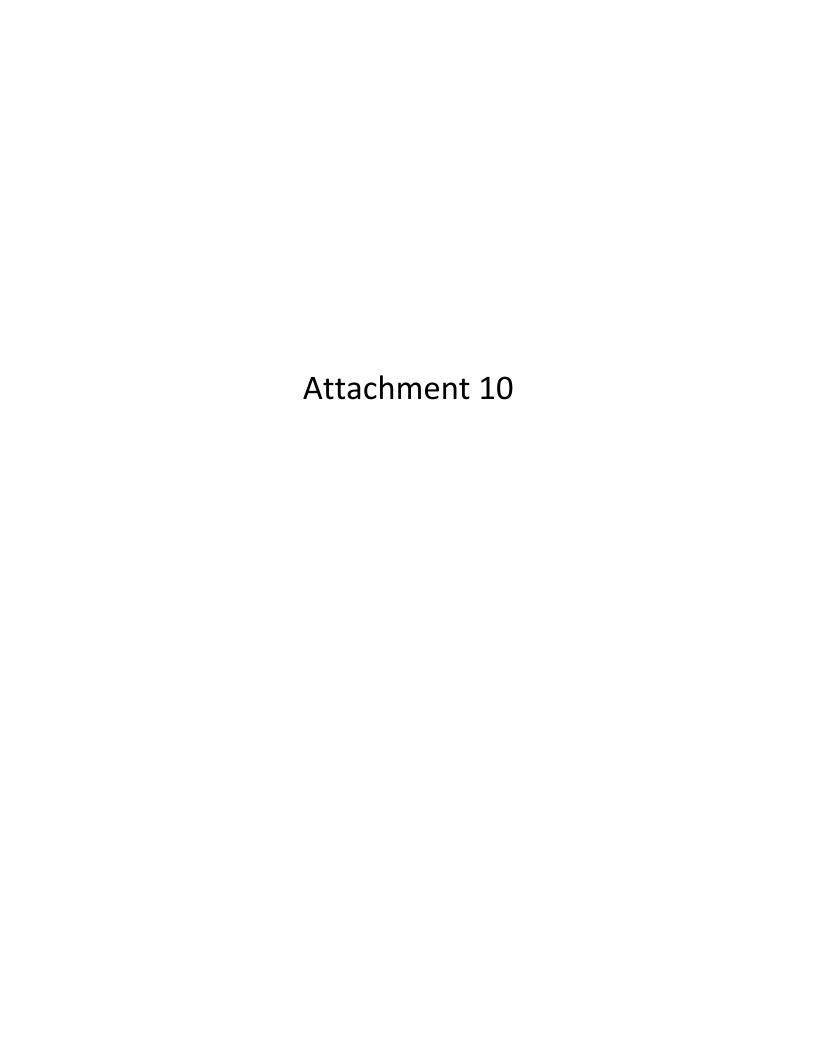
Research RRU's: 153

OUR PROCESS

PSMO-I reviews RRU to determine requested action.

- ➤ If the RRU can be processed/answered by PSMO-I, then appropriate action is taken by PSMO-I.
- If the RRU requires CAF action, it is sent to the DoD CAF via a CATS RRU.

Reciprocity requests are sent via Research RRU. The RRU is answered with a preformatted message indicating that the request has been forwarded for verification.





<u>Department of Defense</u> <u>Consolidated Adjudications Facility</u>





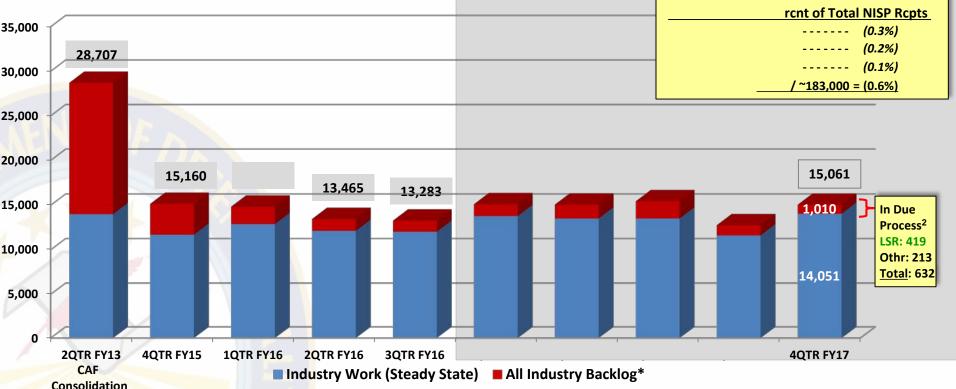
NOV 2017

NISPPAC WORKING GROUP



INDUSTRIAL CASES PENDING ADJUDICATION





- Backlog was reduced 29% since the May 17 NISPPAC WG Meeting
- LSR Due Process cases remain steady at ~420 avg. since May 17
- With planned DISS deployment, the DoD CAF expects an increase in NISP backlog for a short period of time.

Month	NISP Backlog	FY 16 NISP Receipt*	Backlog % of Total NISP
October 13	13,515		7.49%
September 17	1,010		0.6%
	-12,505	~ 183,000	

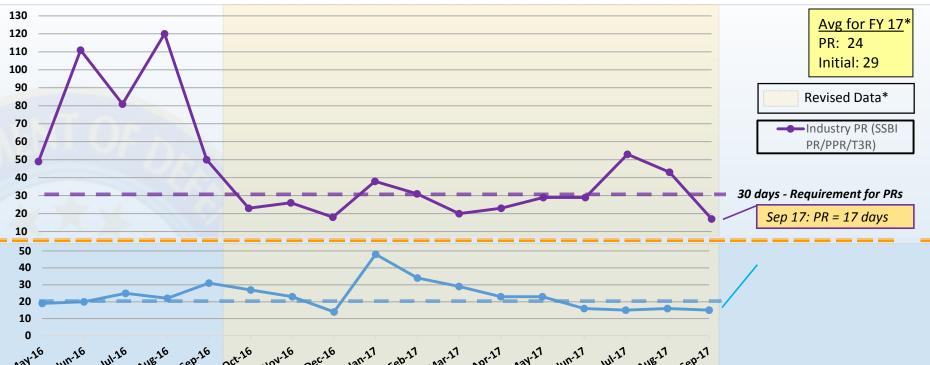
NOTE: Re-baselined starting Q4 FY16; Now includes <u>all</u> NISP cases to include 4th Estate TS/SCI ¹Age based on date case received at the DoD CAF; data as of 26 Sep 17 ² Data as of 10 Oct 17

^{*} Includes Personal Security Investigations, Incident Reports, Reconsiderations, etc. (does not include SACs)



INDUSTRY Intelligence Reform and Terrorism Prevention Act Performance (Based on OPM Reporting from May 16 – Sep 17)





- Delays in ingest due to IT challenges caused timelines to increase (Jan 17)
- Balance in adjudicating aged and new cases should help steady timelines (Jul 17)
- Expect timelines to remain steady for the first half of FY18; likely to increase after
 DISS deployment with steady state thereafter

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



KEY TAKEAWAYS



- CAF, in conjunction with USDI, continues to focus on being properly postured for any/all future workload surges
- Industry portfolio currently approaching relative steady state
- DISS Deployment will have impacts
- Look forward to normalizing procedures in post-DISS deployment era



<u>Department of Defense</u> <u>Consolidated Adjudications Facility</u>







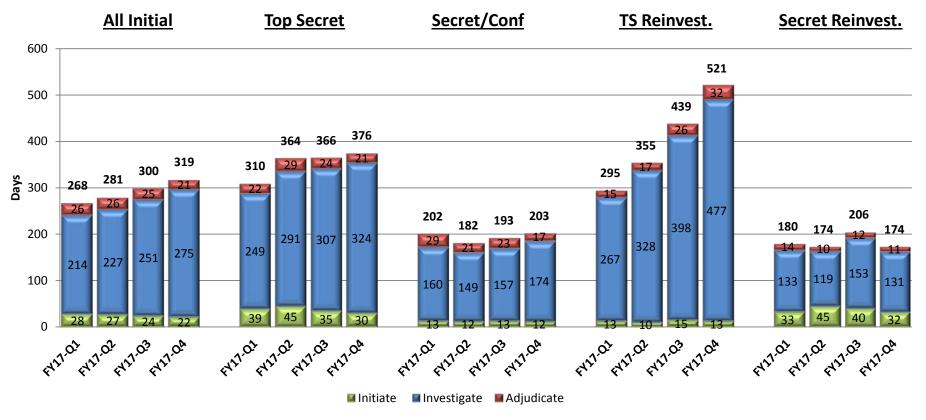
Timeliness Performance Metrics for Submission, Investigation & Adjudication Time

DOE

October 2017

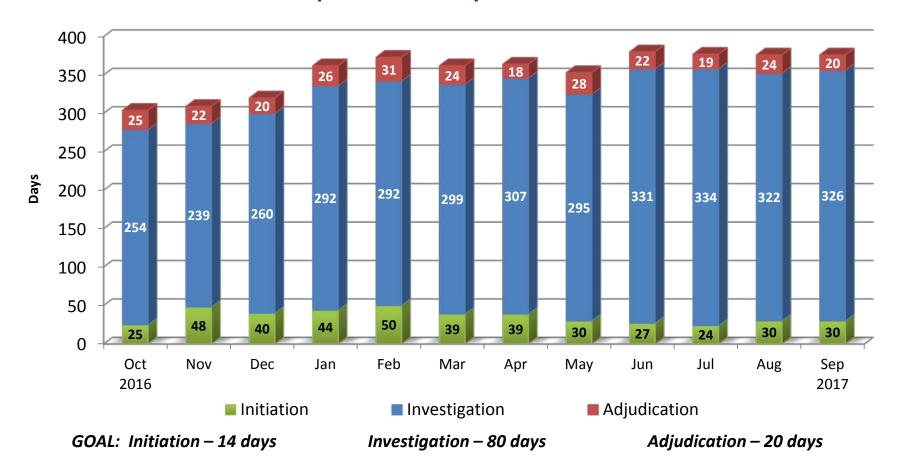
Quarterly Timeliness Performance Metrics for Submission, Investigation & Adjudication Time

Average Days of Fastest 90% of Reported Clearance Decisions Made



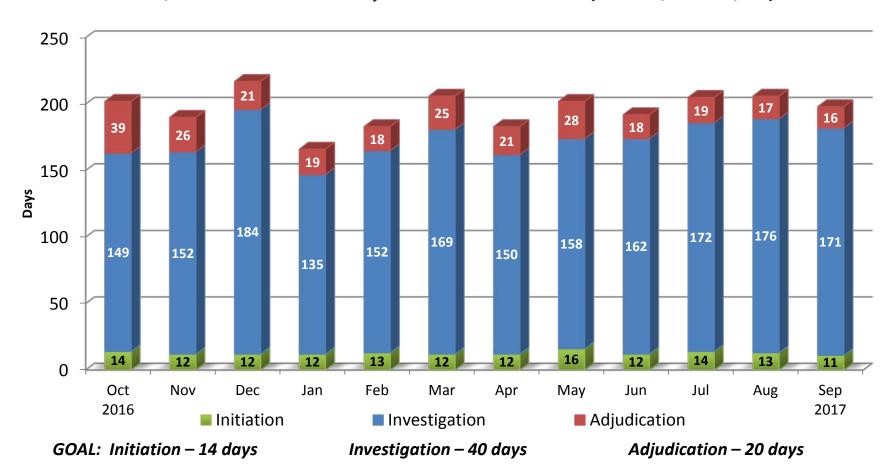
	All Initial	Top Secret	Secret/ Confidential	Top Secret Reinvestigations	Secret Reinvestigations
Adjudication actions taken – 1st Q FY17	1,326	830	496	1,835	453
Adjudication actions taken – 2 nd Q FY17	1,638	923	715	1,775	1,131
Adjudication actions taken – 3 rd Q FY17	1,685	1,056	629	949	578
Adjudication actions taken – 4 th Q FY17	1,835	1,282	553	757	645

DOE's Average Timeliness Trends for 90% Initial Top Secret Security Clearance Decisions



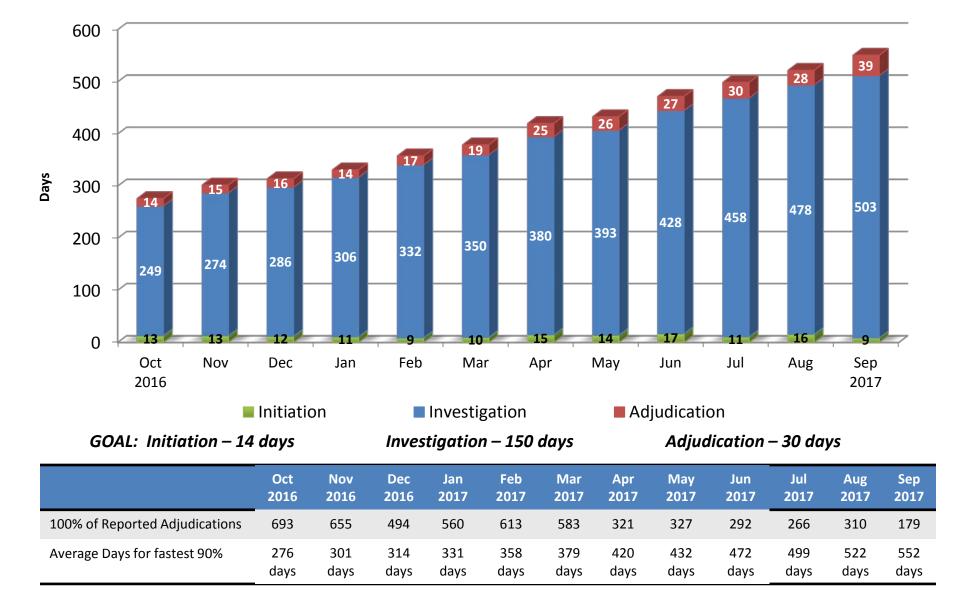
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	2016	2016	2016	2017	2017	2017	2017	2017	2017	2017	2017	2017
100% of Reported Adjudications	274	281	290	275	277	356	315	346	386	370	488	424
Average Days for fastest 90%	304	309	321	363	373	362	364	354	381	377	376	375
	days											

DOE's Average Timeliness Trends for 90% Secret/Confidential Security Clearance Decisions (NACLC/ANACI/T3)

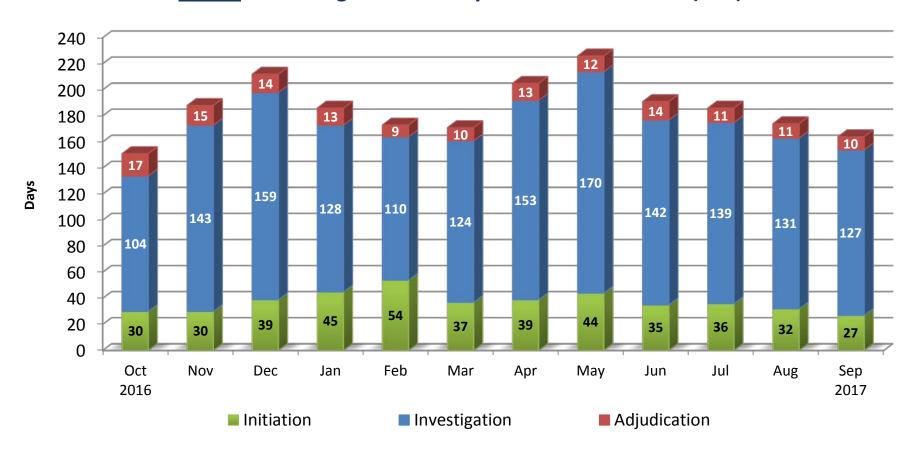


Oct Nov Dec Jan Feb Mar May Jul Aug Sep Apr Jun 2016 2016 2016 2017 2017 2017 2017 2017 2017 2017 2017 2017 100% of Reported Adjudications 160 244 216 174 158 224 166 175 168 185 232 216 Average Days for fastest 90% 202 190 217 166 182 206 183 203 192 205 205 199 days days

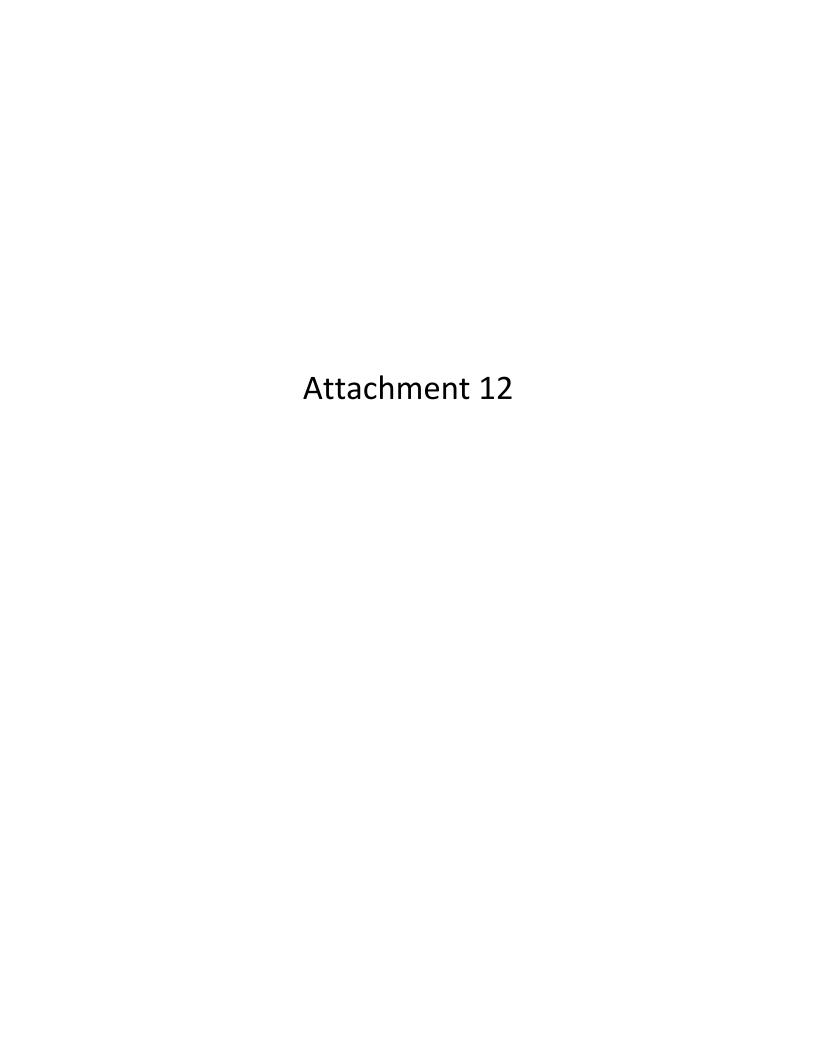
DOE's Average Timeliness Trends for 90% <u>Top Secret</u> Reinvestigation Security Clearance Decisions



DOE's Average Timeliness Trends for 90% <u>Secret</u> Reinvestigation Security Clearance Decisions (T3R)



	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	2016	2016	2016	2017	2017	2017	2017	2017	2017	2017	2017	2017
100% of Reported Adjudications	168	149	138	239	314	545	200	150	191	209	193	234
Average Days for fastest 90%	150	188	212	186	172	171	204	226	190	185	175	163
	days											





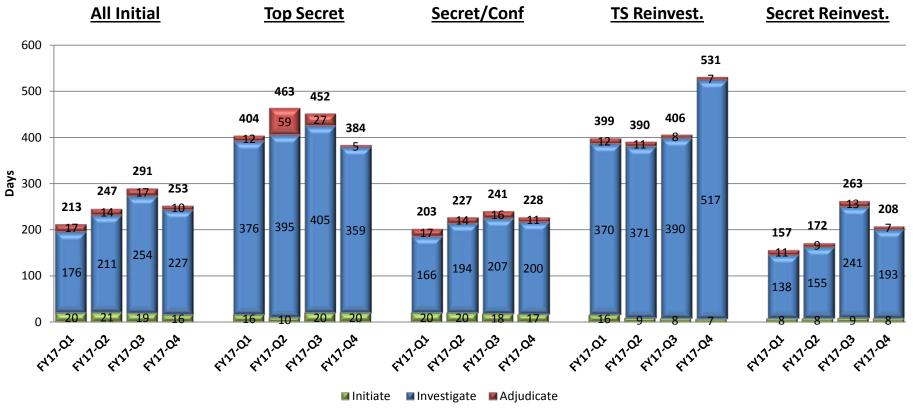
Timeliness Performance Metrics for Submission, Investigation & Adjudication Time

NRC

October 2017

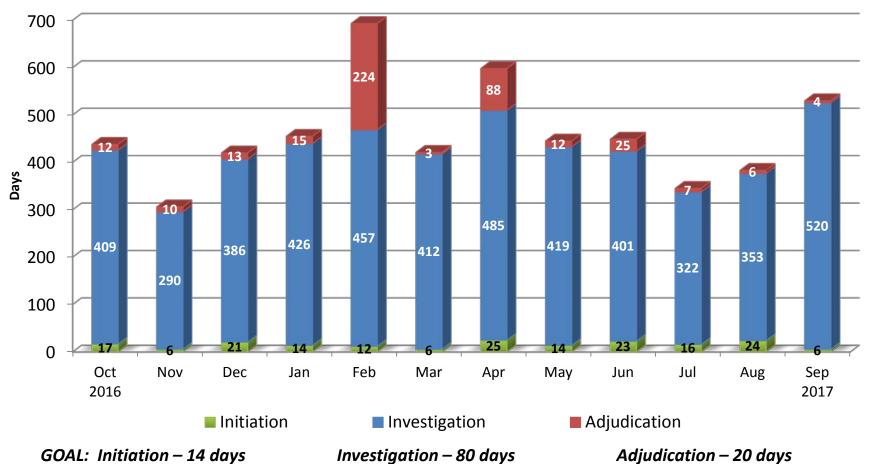
Quarterly Timeliness Performance Metrics for Submission, Investigation & Adjudication Time

Average Days of Fastest 90% of Reported Clearance Decisions Made



	All Initial	Top Secret	Secret/ Confidential	Top Secret Reinvestigations	Secret Reinvestigations
Adjudication actions taken – 1 st Q FY17	68	5	63	40	54
Adjudication actions taken – 2 nd Q FY17	89	10	79	29	93
Adjudication actions taken – 3 rd Q FY17	66	16	50	41	51
Adjudication actions taken – 4 th Q FY17	74	13	61	29	47

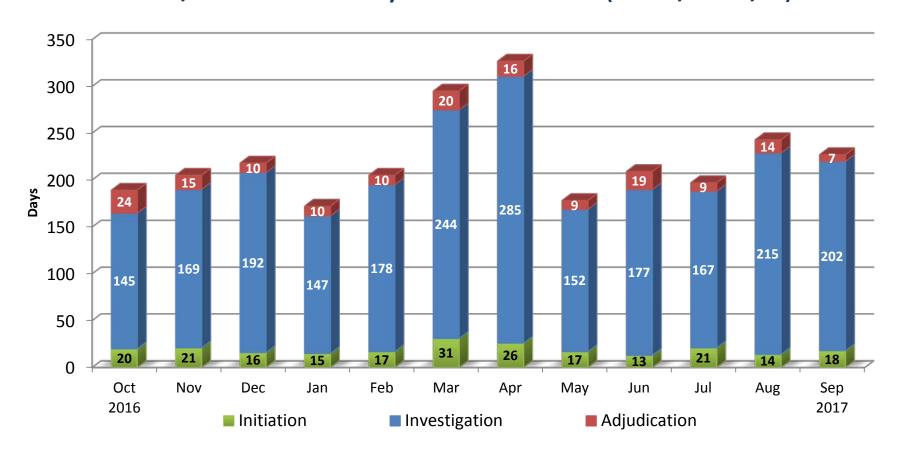
NRC's Average Timeliness Trends for 90% **Initial Top Secret Security Clearance Decisions**



Investigation – 80 days

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	2016	2016	2016	2017	2017	2017	2017	2017	2017	2017	2017	2017
100% of Reported Adjudications	2	1	2	5	2	3	2	8	6	3	8	2
Average Days for fastest 90%	437	306	420	454	693	421	598	445	449	345	382	529
	days											

NRC's Average Timeliness Trends for 90% Secret/Confidential Security Clearance Decisions (NACLC/ANACI/T3)



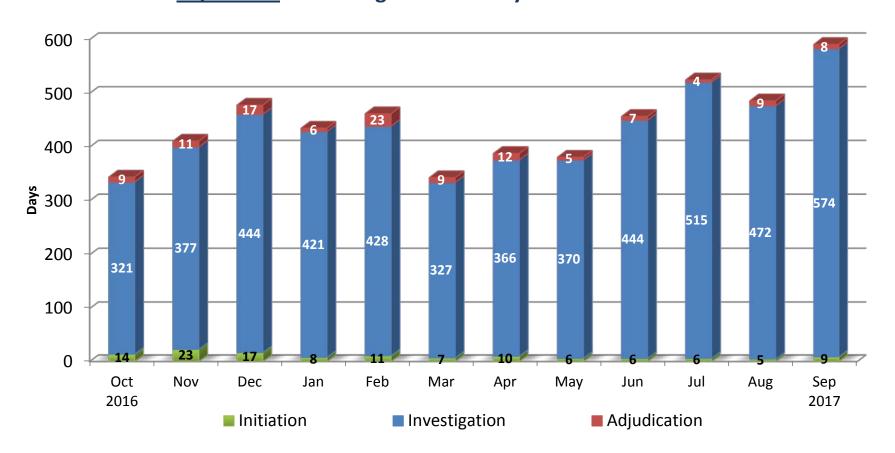
GOAL: Initiation – 14 days

Investigation – 40 days

Adjudication – 20 days

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	2016	2016	2016	2017	2017	2017	2017	2017	2017	2017	2017	2017
100% of Reported Adjudications	22	27	14	22	23	35	17	12	21	19	26	16
Average Days for fastest 90%	189	206	218	171	206	295	327	179	209	197	243	226
	days											

NRC's Average Timeliness Trends for 90% <u>Top Secret</u> Reinvestigation Security Clearance Decisions



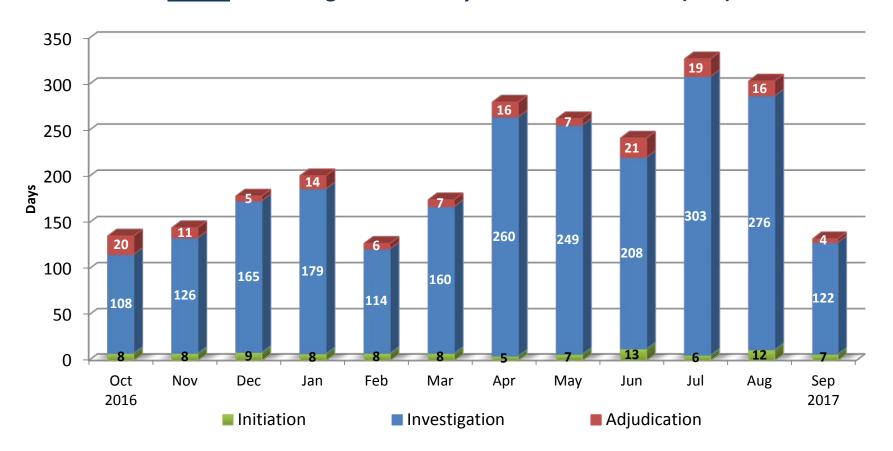
GOAL: Initiation – 14 days

Investigation – 150 days

Adjudication – 30 days

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	2016	2016	2016	2017	2017	2017	2017	2017	2017	2017	2017	2017
100% of Reported Adjudications	19	6	15	12	5	12	17	12	12	10	10	9
Average Days for fastest 90%	343	411	479	435	462	343	388	381	457	526	486	590
	days											

NRC's Average Timeliness Trends for 90% <u>Secret</u> Reinvestigation Security Clearance Decisions (T3R)



	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	2016	2016	2016	2017	2017	2017	2017	2017	2017	2017	2017	2017
100% of Reported Adjudications	15	13	26	30	23	40	17	16	18	7	15	25
Average Days for fastest 90%	136	146	180	201	128	176	281	262	242	328	303	133
	days											