



Security

Newsletter

October 2018

Continuous Evaluation (CE) Program Overview

By: DSS

As we await the official executive order transferring the clearance process from OPM to DoD, it's clear that some big changes are on the horizon.

Here are a few recent or upcoming changes that will be impacting security officers and clearance holders.

1. Continuous evaluation is here.

There are already 1.2 Million clearance holders enrolled in continuous evaluation (CE), with the plan of all clearance holders eventually being in the system. As the name suggests, the system is continually vetting cleared employees using data streams from credit bureaus and criminal records. The idea is that the system will incorporate more and more data streams as time goes on, including social media. Already in FY 2018, the system has reported over 41,000 alerts and caught significant, unreported security concerns on the part of employees. Now that cleared professionals will be under the microscope regularly, reporting any arrests, financial struggles, or other concerns to your FSO will be even more essential (refer to your 13 Adjudicative guidelines!).

2. The End of Periodic Reinvestigations.

As CE takes a greater and greater role, the goal is to eventually eliminate the need for periodic reinvestigations of all cleared personnel. An investigation would only be triggered when the continuous evaluation system finds a red flag that bears a full investigation. The elimination of PRs would vastly free-up investigator hours for first-time clearance holders. In order to maintain security, however, annual employer or subject interviews are being considered as system safeguards.

3. Agency name changes.

According to the DSS (Defense Security Service) website:

The Defense Vetting Directorate (DVD) is a newly established directorate of the Defense Security Service (DSS). The DVD will integrate the National Background Investigations Bureau (NBIB) and the DoD Consolidated Adjudication Facility (DoD CAF) into the DSS as directed by legislative and presidential directives. The DVD will establish a holistic end-to-end personnel-vetting enterprise by re-aligning existing DSS vetting functions in conjunction with the transfer of NBIB and the DoD CAF.

Likewise, the DSS Personnel Security Management Office for Industry (PSMO-I) has a new acronym: VROC - "Vetting Risk Operations Center" — this is the hub in charge of the Continuous Evaluation (CE) program.

The Continuous Evaluation Process

How does it work for those who are in the system? It all begins with the automated checks. Once an alarm is sounded on a clearance holder within the system, it's immediately checked to ensure the information is credible, has flagged the right person, whether or not the issue has already been previously recorded, and if the information is relevant to the adjudication process.

If an analyst reviews the alert and finds the incident is valid, new, and relevant, a report will be generated and sent to the candidate's security manager. All alerts are prioritized based on severity of the incident and the reports are reviewed and approved by a supervisor before forwarding to a security manager. If any additional investigative work is required, adjudicators will be the ones to determine the candidate's continued eligibility for a security clearance. Clearance holders still have access to due process safeguards during periodic reinvestigations.

The reality is that if you have an incident, you will either need to report it now or wait for it to come up during your reinvestigation process. The goal of continuous evaluation is to flag incidents sooner and resolve them with either a revoked clearance or updated information in the system.

DSS notes the program has been highly successful, particularly at flagging issues individuals had not self-reported between PRs. The hope is that once CE is fully implemented, the need for PRs will disappear altogether (a near reality at present time, when PRs have been suspended and CE and self-reporting are the primary mechanisms for finding adverse information for the already cleared).

How does it work?

Mirador, which is a separate IT system from what ODNI is developing to implement CE, is the name of DoD's own continuous evaluation IT system. The system conducts automated record checks of commercial and government data sources on enrolled DoD members. The goal of the automated checks is to provide near real-time identification of adverse information to be added to considerations used during the evaluation of a clearance holder's ongoing eligibility for access to classified information. Despite Mirador already being in use, the system is still under development. Mirador is expected to be fully operational by the end of fiscal year 2018. See Diagram next page.



Enrollment

A clearance eligible person is enrolled into the Department of Defense's (DOD) continuous evaluation information technology (IT) system, called Mirador.

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Automated record checks

DOD's IT system, Mirador, runs checks of commercial and government data sources for information, such as criminal activity or suspicious financial activity. Checks are run daily, monthly, quarterly, or annually depending on the data source.



Adverse information generates an alert

Alert is validated, the analyst generates a report



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Alert validation

Analysts at DOD's validation cell review the alert to verify: (1) the alert is for the correct individual, (2) adverse information was not previously known, (3) the issue is adjudicatively relevant to the individual's continued eligibility for access to classified information. If the alert does not meet these three criteria, there is no adverse information to adjudicate and regular record checks continue.



Consolidated Adjudications Facility



Component IT Hub

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Security Management Official (SMO) review

The individual's SMO receives and reviews the report, and briefs relevant parties. SMOs gather additional information and prepare a final security report. The report is also forwarded to the Consolidated Adjudications Facility and Component IT Hub for Situational Awareness.

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Possible investigation and adjudication

Adjudicators at the Consolidated Adjudications Facility receive and evaluate the alert and final report. Adjudicators may request additional investigative work.



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Determination

Adjudicators make a determination to either continue the individual's eligibility for access to classified information or take an adverse action, such as clearance revocation.

Source: GAO analysis of Department of Defense information. | GAO-18-117

Other noteworthy Changes:

Adjudicative Guidelines

It's very likely that the longstanding 13 adjudicative guidelines (which we JUST reviewed extensively in recent newsletters) may become a thing of the past. However, it is important to note that the spirit of the guidelines will likely stay very similar, but the wording and number may shift as the DoD is thinking critically about literally every aspect of the security clearance process.

"Rocket Vetting" and e-adjudication

There are not a lot of details on this, but rocket vetting would consist of taking only 30 days for low-risk secret clearance investigations and adjudications. Along with this comes the possibility of e-adjudication and lowering the risk thresholds for low-risk clearances and personnel. This is a way to try to cut down the backlog and direct resources towards higher-risk candidates and clearances.

A risk-management approach and business-level technology

The DoD is trying to take a different approach to how it measures and manages risk. The Office of Director of National Intelligence (ODNI) said just last week that they are trying to work on standardizing guidelines for risk across the board so all agencies are on the same page. Likewise, employing up-to-date technology, both in vetting and in the background investigations process, could catch potential concerns and reduce error and wait times. This is reflected in the development and ongoing improvement of the new DISS System (JPAS replacement) and the desire for simple things like a single customer service phone number, or the option to chat online with customer service – just as you'd be able to with any large business.



CONTACT US:

Holly Higgins/FSO:
holly.higgins@wbsi.com