



PERSEREC

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Baseline Suitability Analysis

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Released by – Eric L. Lang

BACKGROUND

Individuals in civil service are expected to act with integrity, be worthy of the public trust, and promote public interests. Federal agencies, including the Department of Defense (DoD), perform suitability adjudication to help ensure that the individuals they hire meet these expectations.

DoD delegated responsibility for suitability adjudication to its components and each component implemented its own suitability program with minimal central DoD oversight. The study reported here gathered information about DoD component suitability programs to determine whether it was possible to summarize suitability processes across DoD components and identify a DoD-wide suitability process. This study also sought to identify important considerations (including unique DoD component requirements), for consolidating suitability adjudication at the DoD Central Adjudication Facility (CAF).

HIGHLIGHTS

This study successfully generated an outline of the current suitability process across DoD by identifying similarities across participating DoD components. The outline grouped tasks into one of five major process steps: (1) Define, (2) Validate, (3) Recruit, (4) Select, and (5) Vet. The majority of the key suitability tasks occurred during the Vet step, which includes tasks such as obtaining and reviewing the Optional Form (OF) 306, *Declaration for Federal Employment*, checking for previous investigation information, completing the background investigation application, and adjudicating the completed background investigation.

This study also identified important considerations for understanding differences across DoD components and for consolidating suitability adjudication at the DoD CAF. These considerations included the nature of the jobs being filled (e.g., nonappropriated fund [NAF] jobs, childcare workers) and the tempo and surge requirements of the hiring process (e.g., fast turnaround requirements, surge hiring needs).

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ABSTRACT: The hiring process for federal civilian employment includes steps to adjudicate applicant background information against standards of character and conduct to identify suitable personnel. The Department of Defense (DoD) largely delegated suitability adjudication to its components and the components implemented unique suitability programs with minimal central oversight. This study gathered information about the DoD component suitability programs and generated a DoD-wide suitability process flow that summarized processes across DoD components, identified important considerations (including agency-unique requirements) for consolidating suitability adjudication at the DoD Central Adjudication Facility (CAF), and found additional research needs.				
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PREFACE

Individuals seeking employment with the United States federal government undergo an investigation to determine whether they will perform their duties with integrity and promote the common good of the public and the agency they serve. To ensure prospective employees meet these requirements, federal agencies, including the Department of Defense (DoD), must adjudicate individuals for employment suitability. DoD performs similar, security-related adjudication to determine individuals' trustworthiness to handle classified information, and the Defense Personnel and Security Research Center (PERSEREC) has a long history of contributing to the improvement of personnel security processes and procedures. PERSEREC first explored issues related to suitability in 2009 and, with this study, further expands on that work by applying its personnel security expertise to assist DoD with its suitability processes and procedures.

Eric L. Lang
Director, PERSEREC

EXECUTIVE SUMMARY

The hiring process for federal civilian employment includes steps to evaluate applicants against standards of character and conduct. Referred to as suitability adjudication, this process is important for ensuring that individuals entering federal civil service will perform their duties in a manner that serves the interests of the public and of the hiring agency. Suitability is distinguishable from a person's ability to fulfill the qualification requirements of a job, as measured by experience, education, knowledge, and skills. The Office of Personnel Management (OPM) is the Suitability Executive Agent for the federal government and delegated suitability adjudication authority to other federal agencies, such as the Department of Defense (DoD). DoD largely delegated suitability responsibility to its components and each component implemented its own suitability program with minimal central oversight from DoD.

The purpose of the current study was to begin gathering information about the DoD component suitability programs. Goals included (a) determining whether it was possible to summarize suitability programs across DoD components to identify a DoD-wide suitability process, (b) identifying important considerations, including component-unique requirements, for consolidating suitability adjudication at the DoD Central Adjudication Facility (CAF), and (c) identifying additional research needs.

The project started with a blank slate in the sense that there was little available documentation, policy, or procedure guidance about suitability processes to direct the collection of quantitative data. Instead, the project took a qualitative approach to data collection and used interviews, small group meetings, and observation to gather information from participating organizations. Members of a DoD Suitability Working Group identified participants from the component they represented. The sampling was one of convenience but included at least one location from more than 12 different DoD components and agencies (Army, Navy, Air Force, Marine Corps, Army and Air Force Exchange Service [AAFES], Defense Finance and Accounting Service [DFAS], Defense Human Resources Activity [DHRA], Defense Logistics Agency [DLA], and Washington Headquarters Service [WHS]. Additional participants included the DoD Education Activity [DoDEA], which participated by video teleconference, the Defense Commissary Agency [DeCA] and the Defense Contract Audit Agency [DCAA], which participated by phone).

Analysts spoke with and observed individuals who performed suitability-related tasks at each location. Using this qualitative methodology, they collected in-depth information focused on the specific tasks and processes at each location rather than numerical information for statistical analysis. The primary data consisted of notes taken by the analysis team. The team organized the information by key suitability task in the order performed, including key steps, actors, systems, and tools. The data gathered varied across location and changed as the analysts gained a better understanding of the process. Suitability tasks are an inherent part of the

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hiring process, so the analysis included tasks that were (a) primarily suitability tasks, (b) primarily hiring tasks, and (c) tasks that contributed to both suitability and other hiring processes.

The data collected from each location provided a broad overview of suitability processes at that site and included a moderate level of detail for each task. The analysts generated an outline of the current suitability process across DoD by identifying similarities across participating components. The analysts also identified special requirements that met component-specific needs or had important implications for future process development.

The suitability process outline grouped tasks into one of five major process steps: (1) Define, (2) Validate, (3) Recruit, (4) Select, and (5) Vet. Analysis of the Define step focused on position sensitivity/risk designation. Analysis of the Validate step focused on position designation validation. The Recruit and Select steps received less attention as they involved tasks more directly related to the hiring process than the suitability process. The majority of the key suitability tasks occur during the Vet step, including verifying qualifications, obtaining and reviewing the Optional Form (OF) 306, *Declaration for Federal Employment*, checking for previous investigation information, completing the background investigation application (most commonly the electronic Questionnaire for Investigations Processing [e-QIP], or the SF-85 *Questionnaire for Non-Sensitive Positions* version), and adjudicating the completed background investigation.

Important considerations included the nature of the jobs being filled (e.g., nonappropriated fund [NAF] jobs, childcare workers) and the tempo and surge requirements of the hiring process (e.g., fast turnaround requirements, surge hiring needs). These factors were important for understanding differences across DoD components and plans for consolidating suitability adjudication at the DoD CAF should take them into account. Results of the study were briefed to the DoD Suitability Working Group in December 2012.

RECOMMENDATIONS: OVERALL SUITABILITY PROCESS

- Gather additional information about the suitability process from a broader and more representative sample of DoD locations.
- Gather additional information to better understand the extent to which job-specific suitability requirements exist for DoD positions and how to account for them in suitability adjudication.
- Involve representatives from all employment categories (e.g., NAF, competitive service) in system development and consolidation efforts. The employment groups have unique requirements that require accurate representation.
- Prepare a suitability manual containing DoD and other policy and guidance for suitability process steps and tasks.

- Provide guidance clarifying the use of the OF-306, including decisions about when to collect the information, the decisions that can be made based on the information, and requirements and procedures for terminating an offer of employment based on the information.
- Gather information to determine whether there is a need to convey information from the field to the DoD CAF about OF-306 adjudication and local or other checks performed by field locations.
- Educate suitability adjudicators and others requiring access to the Central Verification System (CVS) and the Joint Personnel Adjudication System (JPAS) as to the requirements for obtaining that access.
- Support efforts to gain access to, and training on, CVS to allow personnel to check for records of debarment.
- Investigate options for providing better e-QIP guidance to support personnel who oversee e-QIP completion.
- Investigate options for providing better Position Designation Tool (PDT) guidance and training.
- Investigate options for a reciprocity exception for military, and possibly DoD civilians, that have a favorably adjudicated National Agency Check with Local Agency Checks and Credit Check (NACLC) and are now seeking a position that requires a National Agency Check with Written Inquiries (NACI).
- Develop a tool or questionnaire to gather information about the suitability process from a broader and more representative sample of DoD locations.
- Develop a PDT that better meets DoD component and agency needs, captures results, and potentially feeds the results into a DoD system such as Defense Civilian Personnel Data System (DCPDS).
- Investigate additional possibilities for centralization. For example, the Army Personnel Security Investigation Center of Excellence (PSI-COE) is a successful model of the benefits of centralizing e-QIP submissions. Another possibility is centralized databases of the assessments required for USAStaffing postings. Many organizations have similar jobs, and a central database of assessments could make the job posting process more efficient.

RECOMMENDATIONS: REPORTS OF INVESTIGATION (ROI) ADJUDICATION

- Develop standards and procedures to specify the favorable suitability determinations the DoD CAF will make and the issue cases that the field must adjudicate.
- Ensure that plans for consolidating suitability adjudication include strategies for handling:
 - Hiring surges and other times of high demand for suitability adjudication.

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- Child and youth service worker suitability requirements (i.e., multiple fingerprint checks to address line-of-sight supervision hurdle).
- Ensure that adjudicators in the field have access and authority in the DoD system of record for suitability determinations to allow field adjudicators to document final determinations as needed.
- Investigate options for resolving the problem caused by JPAS overwriting final suitability determinations made in the field with provisional suitability determinations made at a CAF (e.g., No Determination Made). Include options for updating previously overwritten decisions with the correct final determinations in both JPAS and DCPDS.

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INTRODUCTION

As is true for most private companies, the selection process for civilian employment with the United States federal government includes steps to evaluate applicants against job requirements to identify qualified personnel. The federal civilian employee selection process, however, also includes steps to evaluate applicants against standards of character and conduct to identify suitable personnel. Suitability is related to, but distinct from, a person's ability to fulfill the qualification requirements of a job (e.g., experience, education, or skill requirements) and refers instead to a person's ability to fulfill the requirement that his or her employment protects the integrity and promotes the efficiency of the hiring agency. Suitability adjudication is important for establishing that individuals entering federal civil service meet standards of conduct, are worthy of public trust and promote the efficiency of the service (e.g., put public and agency interests over personal interests). For example, an individual with a significant criminal history and no evidence of rehabilitation would not meet suitability requirements for federal employment.

This report describes an initial analysis by a team from the Defense Personnel and Security Research Center (PERSEREC) of processes used to adjudicate employment suitability as a subset of DoD components. Analysis goals included gathering more information about the steps and tasks that make up the suitability process and supporting consolidation of the adjudication of suitability background investigations. PERSEREC began exploring issues related to suitability in 2009 when asked to develop guidance for DoD suitability adjudications. This preliminary work provided a foundation for this analysis, as did PERSEREC's extensive background in personnel security research, experience with adjudication facility consolidation, and role in joint suitability and security reform efforts.

EMPLOYMENT SUITABILITY

As specified in Executive Order (E.O.) 13467 (2008), the Office of Personnel Management (OPM) is the delegated Suitability Executive Agent and is responsible for developing and implementing policies and procedures for investigations and adjudications for suitability determinations. OPM retains authority to conduct suitability investigations, but delegates to Heads of Agencies the authority, with some exceptions, to conduct suitability adjudication for competitive service, senior executive service and some excepted service positions (Title 5, Code of Federal Regulations [CFR], Part 731, "Suitability," as amended).¹ While not covered under 5 CFR 731, DoD applies similar suitability-like (i.e., fitness) requirements to nonappropriated fund (NAF) positions (e.g., positions in DoD morale, welfare, and

¹ Including those (a) in the excepted service that can be noncompetitively converted to competitive service and (b) career appointments in the Senior Executive Service.

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recreation organizations that receive funding through profits earned by the organization).

An applicant can be deemed suitable for federal civilian employment when a review (i.e., adjudication) of background information indicates that he or she is likely to (a) display and maintain high standards of character and conduct (e.g., adhere to general principles of public service such as placing loyalty to the Constitution, the laws, and ethical principles above private gain) and (b) carry out the duties of a federal job with appropriate integrity, efficiency, and effectiveness. Suitability adjudication is distinct not only from assessments of the individual's qualifications for the job, it is also distinct from assessments of eligibility for access to classified information or assignment to sensitive duties.

Determining whether an individual is suitable to carry out the duties and responsibilities of a position has two facets: a basic suitability determination for general entry or retention in any federal position, and a job-specific suitability determination. A basic suitability determination involves assessment of issues, in and of themselves, without reference to the specific position the individual will hold. Reviewers must assess the issues to determine whether they are sufficient in nature and gravity to result in a determination that the individual is unsuitable for federal employment.

A reasonable expectation that the individual is not suitable for employment is established when background information shows an adverse nexus or connection between the conduct in question and (a) an individual's ability to carry out the duties and responsibilities of a position in an efficient way, or (b) the employing agency's ability to complete its mission. The conduct must reflect one or more of the specific factors in Title 5, CFR, Part 731 (e.g., misconduct or negligence in employment, criminal or dishonest conduct, knowing and willful engagement in acts or activities designed to overthrow the U.S. Government by force).

Job-specific Suitability Requirements

If a person's conduct does not warrant a negative determination during the basic suitability determination, the adjudicator evaluates any items of potential concern in the context of job-specific requirements, including the duties, responsibilities, or level of public trust associated with the job in question. As an example of a potential issue that might have job-specific suitability implications, traffic violations are not a general suitability issue, but may require additional review if the individual is applying for a job that requires a driver's license. Suitability adjudication must also recognize that adverse elements in an individual's past conduct may not be specifically relevant to the position. Incidents of previous bad conduct, such as driving while intoxicated, possessing or using marijuana, or experiencing indebtedness, do not automatically disqualify an applicant from federal employment.

SUITABILITY IN DoD

DoD delegated operational responsibility for suitability adjudication to individual DoD components and agencies. As a result, each DoD component developed its own approach to suitability adjudication and incorporated it into the hiring process in varying ways. The resulting suitability processes vary across components and consist of different numbers and types of process steps. For example, some organizations conduct preliminary background checks before making tentative offers of employment or assign adjudication responsibility to different groups of personnel.

DoD Suitability Policy

DoD issued its first centralized policy on suitability adjudication in August 2012, with DoD Instruction (DoDI) 1400.25 v731, *DoD Civilian Personnel Management System: Suitability and Fitness Adjudication For Civilian Employees* (2012). DoD suitability (i.e., fitness) policy for NAF positions appears in DoDI 1400.25 v731, as well as DoD 1400.25-M, Subchapter 1403, *Nonappropriated Fund Employment*, (1996; change 5, 3/29/2000).

DoDI 1400.25 v731 provides high-level guidance for suitability and fitness adjudication procedures. The instruction includes steps for designating position sensitivity and risk, determining the appropriate level of investigation, adjudicating background investigations, and pre-screening for suitability. DoDI 1400.25 v731 also encourages DoD components to establish procedures allowing individuals to provide clarifying or mitigating information prior to a final suitability or fitness determination. Table 1 summarizes the suitability and fitness procedures outlined in DoDI 1400.25 v731.

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Table 1
Summary Suitability and Fitness Procedures*

-
- Designate position sensitivity or risk for covered positions with OPM position designation tool (PDT).
 - Pre-screen applicants for early identification and resolution of suitability and fitness issues on the basis of:
 - employment applications;
 - other employment related documents;
 - Optional Form (OF) 306, “*Declaration for Federal Employment.*”
 - Make interim determinations, in the absence of issues, when practicable, on the basis of:
 - favorable fingerprint checks;
 - OF 306;
 - security forms and;
 - investigation information available from OPM Central Verification System (CVS), or other federal agencies.
 - Request the appropriate background investigation as determined by OPM PDT.
 - An offer of employment based on an interim determination is conditional and subject to the completion of a favorable, final suitability, or fitness determination.
 - Adjudicate the completed background investigation in accordance with 5 CFR 731.
-

*(DoD Instruction 1400.25 v731)

DoD Suitability Working Group

The first DoD effort to gather more information about suitability policy and processes throughout the organization began in 2010 when the Defense Civilian Personnel Advisory Service (DCPAS) established a suitability program manager for DoD and established a Suitability Working Group consisting of a group of subject matter experts with knowledge of suitability policy and processes in various DoD components. This group served as a source of expertise for the present analysis.

DoD Suitability Working Group Process Map

DoDI 1402.05 v731 was not available when this analysis began, so a process map produced by the DoD Suitability Working Group served as a starting point for the analysis and for discussions with DoD component representatives about local suitability processes. The process map prepared by the DoD Suitability Working Group appears as Figure 1 and is presented in its original format.

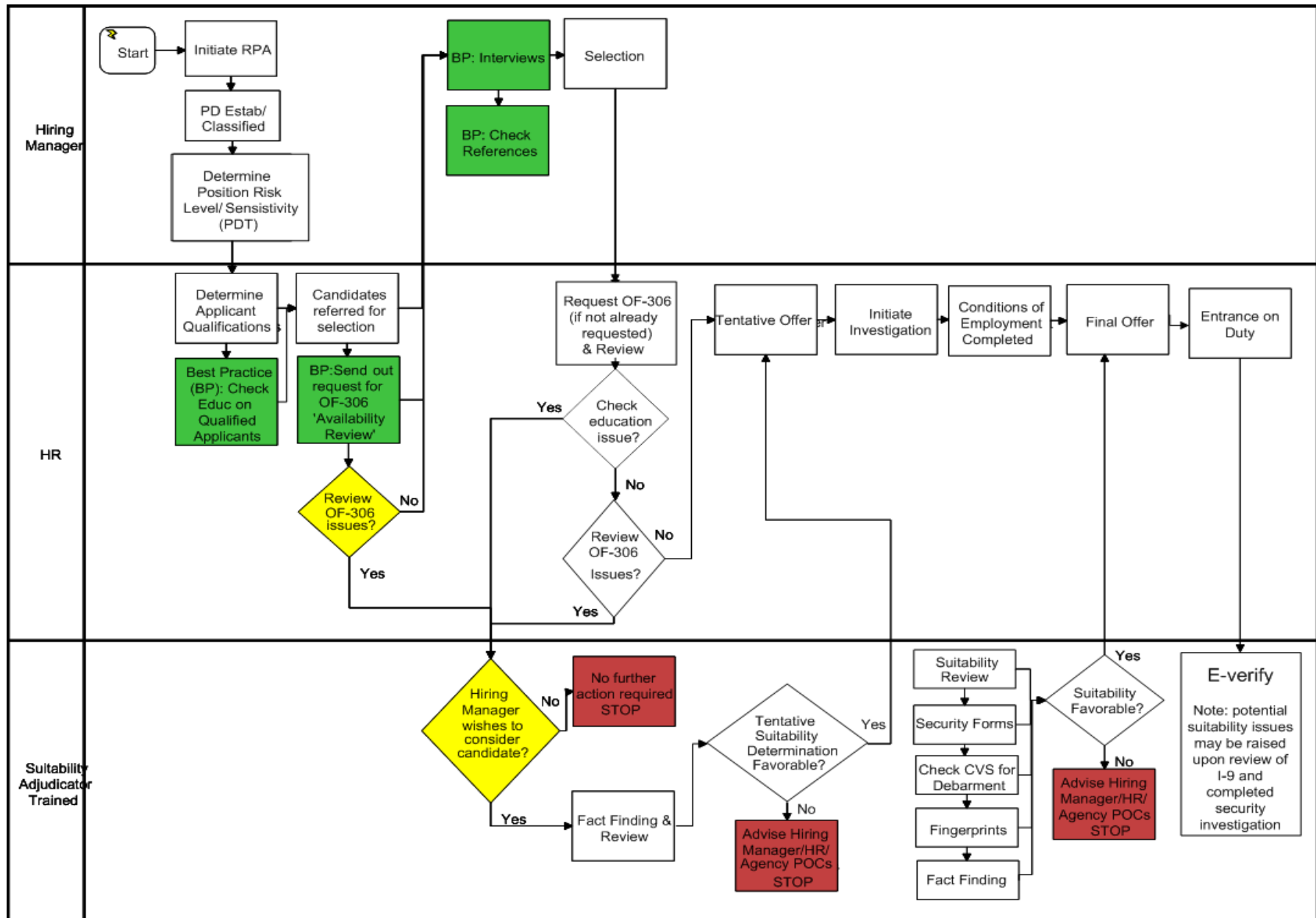


Figure 1 DoD Suitability Working Group Process Map

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The map presents an overall outline of the suitability process and divides it into roles played by three categories of personnel: the hiring official, human resources staff, and a trained suitability adjudicator (see the rows of Figure 1). The process it depicts primarily reflects the current DoD suitability process with some additional suggestions for best practices. In the working group's terms, "trained suitability adjudicator" refers to someone who met OPM suitability training requirements. In some organizations these personnel were security personnel, while at others they were human resources personnel.

The DoD Suitability Working Group process map shows the suitability process as integrated into the overall hiring process. It begins when the hiring official initiates a request for personnel action (RPA). A hiring RPA requires a position description that includes a position sensitivity or risk designation. The hiring official sends this information to human resources to use to identify eligible applicants and review applicant qualifications. The process map identifies some best practices including steps in which human resource staff verify education and request and adjudicate the OF-306, *Declaration for Federal Employment*, before sending tentatively qualified applicants to the hiring official to evaluate (e.g., interview, check references). (The OF-306 is a short form that collects information that informs decisions about an individual's acceptability for federal civilian and contract employment.)

After the hiring official selects a candidate, human resources and the suitability adjudicator have another opportunity to collect and adjudicate the OF-306 (provided it was collected previously). If the suitability adjudicator can reach a tentative favorable suitability determination, human resources makes a tentative offer of employment and initiates the background investigation. As shown in the figure, the next step for the suitability adjudicator is the suitability review based on the results of the background investigation. If the suitability adjudicator makes a favorable suitability determination and the candidate meets all other conditions of employment, human resource staff makes the final job offer and the suitability process ends. As reflected in Figure 1, DoD components reported some differences in the order in which they performed some of the tasks. For example, some components reported obtaining and reviewing the OF-306 before managers selected a candidate and others reported that they did not obtain the OF-306 until after managers made a selection.

The DoD Suitability Working Group process map was a useful starting point for a baseline analysis of the suitability process. However, the process flow was unclear between some of the steps (e.g., the relationship between the suitability review and the background investigation) and suitability consolidation efforts would benefit from a more in-depth look at actual processes implemented at DoD components. The process map in Figure 1 was additionally useful in that it had a number of points of congruence with the procedures outlined in the subsequently issued DoDI 1400.25 v731. For example, the process step labeled "Determine Position Risk Level/Sensitivity (PDT)" aligns with the requirement to use the OPM PDT to

determine position sensitivity and risk and to identify the appropriate investigation for the position.

DOD CAF

Consistent with the delegation of suitability adjudication to individual DoD components and agencies, components and agencies assigned responsibility for adjudication decisions to internal staff, typically in multiple field locations. From information available at the start of the project, it appeared that component and agency suitability adjudicators were based at potentially hundreds of locations.

A recent effort by DoD to consolidate its adjudication facilities also has bearing on any analysis of suitability processes. This consolidation will not only bring together the existing personnel security adjudication facilities, it will establish capabilities for centralized adjudication of background investigations for suitability and Homeland Security Presidential Directive 12 (HSPD-12) adjudication (Deputy Secretary of Defense, 2010). Following the completion of this consolidation effort, adjudication of all suitability background investigations will begin at the DoD Central Adjudication Facility (CAF). The DoD CAF reviews all suitability cases and will make favorable determinations where possible. If DoD CAF adjudicators cannot render a favorable determination, the case will be returned to the originating field location for final determination. This represents a significant change from current processes and will be important to factor into plans for establishing the future or “To-Be” suitability process.

SUITABILITY AND PERSONNEL SECURITY REFORM

Efforts to better align suitability and personnel processes began in 2008 in response to a request from the President for a reform proposal to achieve the goal of making hiring and clearing decisions more quickly, effectively, and efficiently. As noted in the President’s memo, both suitability and personnel security processes rely on very similar background data but are not well coordinated and do not facilitate rapid movement between agencies and positions within agencies.

The President’s request led to the establishment of the Suitability and Security Clearance Reform Effort (“Joint Reform Effort”) and coordination between Executive Agencies, including OPM, DoD, and the Office of the Director of National Intelligence (ODNI) to bring suitability and personnel security processes into better alignment. Within DoD, one of the sources of differences between the two processes was the result of differences in the implementation of suitability adjudication in the DoD components and agencies. The analysis proposed for this study provided an opportunity to better identify the differences and support reform efforts.

INTRODUCTION

PROPOSED ANALYSIS

The present analysis was proposed as an initial survey of the end-to-end suitability process (from RPA through final adjudication), as implemented in a subset of DoD organizations. The idea for the analysis arose from awareness that suitability responsibilities devolved to DoD components by default and with little centralized guidance. DoD did not issue Instruction 1400.25 v731 until August of 2012, and detailed information about DoD component suitability processes was not readily available. The work of the DoD Suitability Working Group, also a recent development, provided some insight into DoD component processes, but a more focused study was needed to better define baseline suitability processes.

The current analysis proposed to build on the expertise of the Suitability Working Group and their initial process map to gather additional, specific information about suitability procedures. Goals included (a) gathering more information about the steps and tasks that make up DoD component suitability processes, (b) determining whether it was possible to summarize across programs to identify a DoD-wide suitability process, (c) supporting development of centralized policy and procedures and suitability consolidation, and (d) identifying additional research needs. The process steps associated with adjudicating completed suitability background investigations were a particular focus of the analysis. This focus was, in part, due to interest from DCPAS in information relevant to the requirements for incorporating suitability adjudication into the case management system for the DoD CAF. Although the project lacked the resources to conduct formal requirements gathering, research staff collected relevant information to the extent feasible.

METHODOLOGY

The project took a qualitative approach to data collection because it was best suited to the situation and project goals. The methodology consisted of site visits that included interviews, small group meetings, and observation of task performance, allowing analysts to collect detailed information that focused on describing and documenting the specific tasks and processes at each location.

SITE VISITS

DoD has hundreds of locations around the world that perform suitability tasks and it was not feasible to visit all of them. Instead, the goal was to collect initial baseline information from a variety of locations. Some organizations only had one or a very few sites performing suitability adjudication. For those locations, site visits were planned for the headquarters location. For DoD components with multiple locations (e.g., Army, Navy), the sample was one of convenience, selected primarily on the basis of location, in order to minimize travel costs.

Planning

The analysis team worked with local points of contact from the sites nominated by working group members to gain an overview of the suitability process as performed at that site, identify participants, and plan each site visit. Planning began with an email communication that introduced the project and included two attachments (see APPENDIX A). The first attachment explained the project in detail, outlined the proposed site visit, and provided instructions for completing a worksheet to identify individuals best qualified to participate in meetings and interviews. The second attachment was a worksheet that listed each suitability task. Next to each task was space to enter the job titles and number of the people performing the task, the organizational group they worked for (e.g., human resources), and the number of locations where these individuals worked. The analysis team worked with the site contacts and used the information from the worksheet to identify the groups and job titles of individuals involved in the suitability process and to prepare draft agendas for site visit activities (see APPENDIX B). The site contacts used the draft agendas to schedule meetings and interviews with personnel at each location.

Participating Sites

The following DoD components participated in this phase of the project: Army, Navy, Air Force, Marine Corps, Army and Air Force Exchange Service (AAFES), Defense Finance and Accounting Service (DFAS), Defense Human Resources Activity (DHRA), Defense Logistics Agency (DLA), and Washington Headquarters Service (WHS). Additional participants included the DoD Education Activity (DoDEA), which participated by video teleconference, the Defense Commissary Agency (DeCA) and the Defense Contract Audit Agency (DCAA) which participated by phone.

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In most cases, human resources groups at each component performed the majority of the suitability tasks. Army, Navy, Air Force, and Marine Corps had separate human resources groups for appropriated fund (ApF) and NAF civilians, so the analysis included representatives of both groups. Personnel security professionals at all participating organizations played some role in the suitability process. In most cases, the Personnel Security group was independent of human resources and participated in separate meetings. In addition, Army and Air Force each assigned significant roles to unique groups (i.e., Army Personnel Security Investigation Center of Excellence [PSI-COE] and Air Force Central Adjudication Facility [AFCAF]). Table 2 shows the participating groups from each DoD component.

Table 2
Participating Sites

DoD Component	Human Resources	Personnel Security	Other
Army	• Civilian Human Resources (ApF; Ft. Riley, KS) • NAF Civilian Human Resources (Ft. Riley, KS)	• Installation Security and Intelligence (Ft. Riley, KS)	• Personnel Security Investigations Center of Excellence (Aberdeen Proving Ground, MD)
Navy	• Human Resources Services Center, Southwest Region (San Diego, CA) • Human Resources Office, Space and Naval Warfare Systems Command (ApF; Point Loma, CA) • NAF Human Resources (San Diego, CA)		
Air Force	• Civilian Human Resources (ApF; Randolph Air Force Base [AFB], TX) • NAF Human Resources (Andrews AFB, MD) • Air Force Personnel Center – Classification (Randolph AFB, TX)	• Information Protection (Randolph AFB, TX)	• AFCAF Personnel Support Branch (Ft. Meade, MD)
Marine Corps	• Civilian Human Resources (ApF; Camp Lejeune, NC) • Marine Corps Community Services Human Resources (Camp Lejeune, NC)	• Installation Security (Camp Lejeune, NC)	
AAFES	• Human Resources (Dallas, TX)	• Force Protection (Dallas, TX)	
DeCA	• Human Resources (Ft. Lee, VA)	•	
DCAA	• Human Resources (Ft. Belvoir, VA)	•	
DFAS	• Human Resources - HR Shared Services (Indianapolis, IN)	• Personnel Security - HR Shared Services (Indianapolis, IN)	
DHRA	• Human Resources (Alexandria, VA)	• Security [Personnel and Facilities] (Alexandria, VA)	
DLA	• Human Resources Services (Columbus, OH)	• Personnel Security (Columbus, OH)	
DoDEA	• Human Resources Regional Service Center (Alexandria, VA)		

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DoD Component	Human Resources	Personnel Security	Other
WHS	Human Resources Directorate - Personnel Services (Alexandria, VA)	Human Resources Directorate - Personnel Security Operations (Alexandria, VA)	

Structure

The specifics of the site visits varied by location because the components' suitability processes differed. At most locations, the visit began with an introductory meeting that included an overview of the project and a description of the purpose and structure of the site visit. The remainder of the visit was typically organized around small group meetings with individuals representing the groups identified in the planning worksheet.

Discussions and Interview Protocol

The analysis team prepared an interview protocol (see APPENDIX C) that provided overall guidance for gathering information during each site visit. Topics of discussion included specifics of the process, tasks, task interrelationships, training, policies and procedures, end product, metrics, problems and challenges, etc., in order to capture the suitability process at each location. Session length depended on the number of personnel and the number of common suitability tasks performed by the participants. The number of sessions varied based on the number of tasks and the number of groups involved. For example, if the component's process included all of the steps, the discussion sessions took a full day or longer.

DATA AND ANALYSIS

The primary data consisted of notes taken by the analysis team during interviews and observation. The two members of the analysis team transcribed their notes individually and organized them by suitability task and in the order in which personnel performed the tasks. Although guided by the interview protocol, the data collected, like the process, varied across location. The analysts initially categorized the notes into task lists to correspond to the tasks identified by the Suitability Working Group in the initial process map (the tasks appear in Table 3, and in the initial process map in Figure 1).

Table 3
Initial Suitability Task List

Task
Initiate RPA
Position Description Established/Classified
Determine Position Risk Level/Sensitivity
Determine applicant qualifications
Best practices: Check debarment, check education
Best practice: Request OF-306
Review OF-306 for issues
Refer candidates
Evaluate and compare candidates (interview, check references)
Select candidate
Tentative offer
Initiate investigation
Security forms
Fingerprints
Suitability review
Final offer
Entrance on duty

As the analysts completed additional site visits, they prepared task lists for each location, modifying the lists to reflect unique processes at each location. For example, some locations performed the tasks in a different order or included additional tasks. An example of the revised task list appears in Table 4.

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Table 4
Sample Revised Suitability Task List

Task
Initiate RPA
Position Sensitivity/Risk: Determine level and investigation required
Classify position (build position)
Review position sensitivity/risk designation
Recruit/post position: Post requirements so that people can apply
Recruit/post position: Gather qualifications information from applicants
Prepare Hiring Certificate/List of eligible applicants based on qualifications, including suitability
Select Candidate
Review applicant suitability and other qualifications information
Extend preliminary or tentative job offer
Pre-employment paperwork, including OF-306 ¹
Check for previous investigation/debarment
Review OF-306
Gather more information, if issues on OF-306
Adjudicate OF-306 (option to rescind offer)
Initiate e-QIP ² /SF-85 ³
Assist with e-QIP/SF-85 questions
Review e-QIP/SF-85
Final offer
Submit e-QIP/SF-85/Initiate Investigation to OPM
Fingerprints
Entrance on Duty
Receive completed investigation
Adjudicate completed investigation
Record adjudicative result

¹Optional Form 306, *Declaration for Federal Employment*.

²Electronic Questionnaire for Investigations Processing.

³Standard Form (SF) 85, *Questionnaire for Non-Sensitive Positions*.

The data collected from each location provided a broad overview of suitability processes at that site and included a moderate level of detail for each task. After the analysts transcribed the notes for all locations, they compared the task lists across locations to identify similarities and differences. The findings from this analysis appear in the next section.

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The qualitative methodology used for this study produced rich and informative data. The analysis below begins with an outline of the suitability process across DoD that the analysts generated from the data by identifying similarities across participating DoD components. Summaries of findings for specific suitability process steps follow. The section ends with a discussion of some important considerations that can result in process differences and/or component-unique requirements.

SUITABILITY PROCESS OUTLINE

As described in the methodology section, the analysts worked from task lists that detailed specific suitability tasks as performed at each organization, including similarities and reflecting process differences across organizations. The analysts made extensive comparisons of the task lists, aligning tasks, identifying similarities, and clarifying differences. The result was an overall suitability process outline that focused on the similarities between organizations while describing the process as comprehensively as possible.

The task list that served as the suitability process outline and provided structure for reporting the findings appears in Table 5. The outline represents an overview of the current, or “As-Is,” suitability process, and, as shown in Table 5, consists of five major steps: Define, Validate, Recruit, Select, and Vet. Each process step consists of one or more tasks. Because suitability tasks are an inherent part of the hiring process, the analysis included tasks that were (a) primarily suitability tasks, (b) primarily hiring tasks, and (c) tasks that contributed to both suitability and other hiring processes. In addition, although the analysis focused on the suitability process, a number of the tasks that made up the Vet step, when performed using different tools or personnel (e.g., *SF-86 Questionnaire for National Security Positions*, instead of *SF-85 Questionnaire for Non-Sensitive Positions*), also contribute directly to personnel security adjudication.

Several categories of personnel performed the tasks that made up the suitability process. Hiring officials typically performed the tasks in the Define and Select process steps, human resources personnel with classification responsibilities typically performed the tasks in the Validate process step, and human resources personnel with staffing or recruitment responsibilities typically performed the tasks in the Recruit process step. Personnel from a variety of organizational offices performed the tasks in the Vet process step, including human resources and security personnel. Personnel with appropriate suitability adjudication training handled those tasks directly involved in suitability determinations.

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Table 5
“As Is” Suitability Process Outline

Tasks
Define
Describe position
Determine position sensitivity or risk level
Validate
Validate position description (e.g., classify position)
Review position sensitivity/risk designation
Recruit
Prepare job posting (e.g., analyze job)
Collect applicant responses (including qualifications information)
Identify eligible applicants (based on qualifications)
Select
Select candidate
Vet
Verify eligibility and qualifications
Extend preliminary or tentative job offer
Request and review OF-306
Adjudicate OF-306
Check for previous investigation and debarment
Initiate e-QIP/SF-85
Review e-QIP/SF-85
Collect fingerprints
Submit e-QIP/SF-85/initiate investigation to OPM
Extend final offer
Receive completed investigation
Adjudicate completed investigation
Record adjudicative result

The sections below present findings from analyses of the suitability process steps and tasks and, where relevant, highlight key findings. Analysis of the Define step focused on position sensitivity and risk designation. Analysis of the Validate step focused on position designation validation. The Recruit and Select steps received less attention as they involved tasks more directly related to the hiring process than the suitability process. The majority of the key suitability tasks occurred during the Vet step, including tasks that were of key importance for developing requirements for adding suitability adjudication to the case management system for the DoD CAF. The project did not include formal requirements gathering, but did pay particular attention to the tasks associated with adjudicating the completed background investigation and the analysis reflected this.

SUITABILITY PROCESS STEP: DEFINE

The Define process step consisted of two major tasks: (1) Describe Position and (2) Determine Position Sensitivity/Risk. A position description states major duties, responsibilities, and supervisory relationships of a position and must include

sufficient information to support determination of position attributes such as occupational series, grade, and position sensitivity or risk.

Determine Position Sensitivity/Risk

Position sensitivity/risk has a direct relationship to the suitability adjudication process, as it determines both the type of background investigation and the type of adjudication required. To determine position sensitivity or risk level, someone familiar with a position must assess the position's potential adverse impact on the efficiency and integrity of the hiring agency and potential for a material adverse effect on national security. The designated position sensitivity/risk then indicates the level of investigation and type of adjudication required. OPM, in its role as the Suitability Executive Agent, developed a PDT to assist agencies making these designations. The PDT is available online at an OPM website and helps users walk through the definitions for different levels of position sensitivity and risk. The definitions are fairly high-level, seldom linked to specific job duties, and require the application of broad concepts of sensitivity and risk.

DoD recently began adopting the PDT (Under Secretary of Defense, Personnel and Readiness, *Implementation of the Position Designation Automated Tool*, May 10, 2011), but implementation is still ongoing. Positions at many of the participating organizations were described as fairly stable and non-sensitive, with position descriptions that seldom changed. These positions already required the lowest level of investigation and adjudication, so most participants reported little need for further assessment of position sensitivity or risk. Of the organizations participating in the study, only one had fully implemented the PDT, although most of the other organizations had either tried using it and encountered difficulties or were still working out implementation challenges. Two organizations used tools developed specifically for their organizations instead of the PDT.

Key Findings: Participants reported a number of issues that affected use of the PDT. Many reported a lack of sufficient training and guidance and several reported that the tool seemed too subjective and that the decisions about how to designate positions seemed open to interpretation. Several reported that it was cumbersome to obtain the results because the PDT does not allow for ready downloading of the designation documentation or provide other options for capturing the results.

Participants from several organizations, particularly NAF organizations that deal with frequent hiring of large numbers of low-level, non-sensitive positions such as store clerks and hotel housekeeping staff, reported that the tool did not seem relevant or was not applicable to NAF positions in general. The one organization where staff reported successful implementation of the PDT found it useful because they dealt with hiring for positions with a broad range of sensitivity and risk levels and of varying complexity, and hiring officials often modified position descriptions. By requiring hiring officials to justify higher sensitivity or risk designations by

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documenting the need with the PDT, the organization was better able to manage position classification and background investigation costs.

SUITABILITY PROCESS STEP: VALIDATE

Analysis of the Validate process step focused on work performed by classification staff to review position sensitivity and risk designations made by hiring officials. In most organizations classification staff followed procedures for comparing sensitivity and risk designations against position descriptions to verify that designations matched duties. However, only two organizations had procedures for addressing situations where sensitivity or risk designations did not appear consistent with position descriptions; most organizations viewed hiring officials, not classification staff, as possessing the knowledge necessary to make sensitivity and risk decisions. The stable and non-sensitive nature of many of the positions, as described in the Define step, may explain why few organizations had procedures for questioning hiring officials' designations.

SUITABILITY PROCESS STEP: RECRUIT

The tasks that made up the Recruit process step were primarily hiring tasks with few direct suitability implications. These tasks included: Prepare Job Posting, Collect Applicant Responses, and Identify Eligible Applicants. The first two tasks typically involved some type of online hiring and recruitment tool, most commonly USAStaffing, at least for ApF positions. NAF human resources tended to use either proprietary systems or a simple position listing and job application on the local installation website, due to the relatively high cost of USAStaffing and a large, ongoing hiring need.

For organizations that used an online recruiting tool, the task of preparing job postings involved entering information from the position description and other documentation into the recruitment tool to create postings of varying levels of detail. Some of the more detailed postings were those prepared using the USAStaffing tool, which allowed organizations to create assessments to capture information from applicants about their qualifications. Simpler postings consisted of short job descriptions with links to a standard job application. Most organizations collected applicant responses through the online tool, although a few, particularly NAF organizations, also allowed applicants to submit hard copy applications directly to human resources.

Identifying eligible applicants from the responses to the job posting typically required human review of the information collected, although assessments created in USAStaffing performed some automated comparison and ranking of applicants. Organizations varied in the extensiveness of processes used to rate and rank applicants, where the variation correlated with complexity of the position and number of applicants, not as a function of suitability requirements.

Key Findings: Suitability requirements were not a significant component of recruiting tasks, not even as part of the job posting, and recruitment seldom involved significant pre-screening of applicants based on suitability requirements.

SUITABILITY PROCESS STEP: SELECT

Hiring officials typically handled the Select process step and Select was primarily a hiring-related task that consisted of identifying the desired candidate or candidates from the list of eligible applicants. Recruitment staff provided the list of eligible applicants to the hiring official, who was then responsible for selecting the desired candidate in accordance with policy requirements and hiring needs.

Job-specific Suitability Requirements

Suitability adjudication must take into account the nexus between a job and an applicant's conduct. According to study participants, hiring officials had much of the responsibility for assessing this aspect of a candidate's qualifications during the Select step. Most organizations appeared to consider the hiring official, with detailed knowledge of the position and requirements, as best suited to evaluating job-specific suitability and did not adjudicate job-specific suitability outside of the hiring official's assessment.

In addition, according to participants, few of the positions at any of the participating organizations had job-specific suitability requirements that candidates had to meet. Of those that did, most of the positions were childcare providers. Another factor that may have contributed to lack of job-specific suitability assessment procedures was that the vast majority of DoD positions that have suitability, but not national security, requirements fall into the low-risk, non-sensitive category. It is possible that, at least within DoD, positions with job-specific suitability requirements (e.g., contract management, logistics) are classified as national security sensitive and undergo adjudication under personnel security procedures.

SUITABILITY PROCESS STEP: VET

Most of the tasks directly related to suitability adjudication fell into the Vet process step, where "Vet" refers to appraising or verifying that an individual meets screening requirements. As mentioned previously, many of the tasks that made up the Vet process step had implications for personnel security adjudication as well as suitability adjudication. The tasks that made up this step included:

- Verify Eligibility and Qualifications
- Extend Preliminary or Tentative Job Offer
- Request OF-306
- Review OF-306
- Adjudicate OF-306

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- Check for Previous Investigation and Debarment
- Initiate e-QIP/SF-85
- Review e-QIP/SF-85
- Collect Fingerprints
- Submit e-QIP/SF-85/Initiate Investigation to OPM
- Extend Final Offer
- Receive Completed Investigation
- Adjudicate Completed Investigation
- Record Adjudicative Result

The specifics of how the tasks in the Vet process step were performed varied extensively across organizations. Some organizations included additional tasks in this step (e.g., additional background checks), while others did not perform all of the tasks (e.g., did not separately adjudicate the OF-306 before receiving the completed background investigation). As with the other process steps, the findings presented here focus on similarities across organizations.

Verify Eligibility and Qualifications

Verifying eligibility and qualifications was relevant to the suitability process to the extent that organizations took steps at this stage to ensure that candidates met suitability requirements. Participants from most of the organizations, however, reported that they performed only minimal suitability-specific qualifications checks at this point, either because they relied on the hiring official to check for job-specific suitability during the selection process or because it was part of the task of identifying eligible applicants during recruitment. Most organizations did include checks of other applicant qualifications such as education and eligibility for various priority placement programs as part of this task.

Extend Preliminary or Tentative Job Offer

Most organizations made either a “tentative” job offer, or a job offer that was contingent upon meeting conditions of employment, including suitability requirements. Despite these conditions on the job offer, participants described some concerns and uncertainty about the relationship between job offers, background checks, and suitability decisions. They reported two primary issues: (a) uncertainty about the types of background information it was acceptable to collect prior to an official job offer and (b) whether it was possible to rescind a job offer due to suitability issues without going through extensive due process or review procedures.

Participating organizations varied greatly in terms of the type and amount of background information they collected and reviewed before extending or rescinding an employment offer. For example, some organizations conducted preliminary

background checks through a provider other than OPM before making even a tentative offer of employment. At the opposite extreme, other organizations required that a preliminary job offer be made before the applicant was asked to complete even the OF-306.

Participating organizations showed a similar range of variation in the way they handled suitability issues identified before a candidate came on-board at the organization. Some organizations terminated the hiring process at any point that derogatory suitability information was identified, including after a tentative offer, and the process did not always include options for contesting the decisions. At the other end of the range, some organizations required extensive review procedures regardless of the point in the process the decision was made to eliminate a candidate.

Key Findings: Offers of employment, whether tentative or final, have legal significance and the relationship between legal requirements and suitability investigation and adjudication was not always clearly understood.

Request OF-306

The OF-306 asks for basic, personally identifiable information (PII) such as name, birthdate, and social security number. It also collects information about selective service registration, military and criminal history, delinquent federal debt, and whether the applicant has relatives employed by the organization where he or she is applying. In most of the participating organizations, the OF-306 accompanied the formal reiteration of the initial job offer, although a few organizations had applicants complete the OF-306 as part of the initial application for the position. Once completed, the OF-306 became part of the pre-employment materials and a copy accompanied the background investigation application to the investigation service provider (ISP).

Participants varied in their views about when it would be most effective to obtain the completed OF-306. Some participants thought that the selection process would be more effective if applicants completed the OF-306 prior to the tentative offer of employment, or even prior to identifying eligible applicants. Others believed that they had no legal standing to ask applicants to complete the OF-306 until after extending the tentative offer of employment.

Although the OF-306 is available as a form that can be completed electronically, candidates are required to sign the form and certify their responses. However, the electronic version of the OF-306 does not allow for electronic signature. Instead, candidates must print out the form to sign the hard copy. Many organizations allowed candidates to return the form electronically as a scanned email attachment, but others required that candidates return a hard copy of the form in-person or via fax.

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Key Findings: According to the *OPM Suitability Processing Handbook* (2008), the questions on the OF-306 are suitability questions and agencies may decide at what point in the hiring process they want candidates to complete the OF-306. Participants from several organizations indicated that they would like to receive the completed OF-306 closer to the beginning of the hiring process in order to begin screening applicants at an earlier point.

By reducing the electronic form of the OF-306 to hard copy, opportunities for capturing the information electronically are lost. Lack of this information in electronic form is of particular concern to plans to implement electronic screening of completed background investigations. The OF-306 is a key source of information relevant to several suitability criteria; lack of this information may derail plans for electronic screening unless other sources can be found.

Review OF-306

At all participating organizations, human resources staff reviewed the OF-306 after receipt, with particular attention to responses to questions with suitability implications (e.g., positive responses indicating criminal history, firing by previous employer, delinquent federal debt). However, the goal of the review was typically just to verify that candidates provided the additional requested information expanding on the positive response.

The next steps with the OF-306 varied extensively across organizations. Most organizations stopped the review after verifying completeness. For those organizations, staff might contact candidates to fill in missing information, but would not do additional fact-finding to inform an adjudication decision. Other organizations performed additional follow-up checks such as contacting previous employers when the candidate reported being fired. Some organizations had procedures for contacting candidates to discuss issues (e.g., to determine whether the issues could be mitigated).

Key Findings: Although organizations varied in the extent to which they collected follow-up information about potential suitability issues identified on the OF-306, participants from most organizations also indicated that they received few completed forms with potentially disqualifying information.

Adjudicate OF-306

This task refers to evaluating the information from the OF-306 against suitability adjudication criteria to determine whether any reported issues indicate that a candidate may be unsuitable for federal employment. Few of the participating organizations included this task as a formal part of the process, however. Most of the organizations received only very small numbers of OF-306 forms that included significant issues and had minimal need for extensive adjudication procedures for the OF-306. The most common type of issue was that of discrepancies between the information reported on the OF-306 and information reported elsewhere. Other

factors that contributed to minimal adjudication of the OF-306 included uncertainty about whether a tentative offer of employment could be rescinded based on responses to the OF-306 alone, and uncertainty about requirements for collecting issue information (e.g., whether a completed background investigation was necessary before an offer could be rescinded).

For cases with issues, some organizations assigned final decision-making to the hiring official, allowing the hiring official to decide whether the issue had a nexus with the job or if the risk could be mitigated. Other organizations chose to leave primary responsibility with the human resources or personnel security staff (i.e., the trained suitability adjudicator handling the case). Finally, several organizations centralized OF-306 adjudication at headquarters or regional human resource facilities while others left the decisions with local human resources offices.

Key Findings: Most organizations encountered few cases with significant issues and the participating organizations varied in the extensiveness of their adjudication procedures. Organizations differed in how they assigned final authority for adjudicating the OF-306, some appearing to prefer to make a decision by the chain of command or individual closest to the position (e.g., the supervisor), while others left the final decision to individuals specifically trained to adjudicate suitability issues.

Check for Previous Investigation and Debarment

The next phase of the vetting process centers on checks of databases. One of the checks is to determine there is a record of a current, adjudicated background investigation for the candidate. A second check is to determine whether there is any record of debarment of the candidate. A record of a current, favorably adjudicated background investigation may allow the candidate to skip the remaining steps of the suitability process, under reciprocity guidelines. Reciprocity, when applicable, requires federal agencies to accept the results of previously adjudicated investigations of equal or greater sensitivity or risk. Debarment occurs when OPM or a federal agency finds a person unsuitable for employment and determines that the individual should be denied appointment to, or examination for, covered positions.

There are two primary databases that contain information relevant to these two checks: (1) OPM's CVS and (2) DoD's Joint Personnel Adjudication System (JPAS). JPAS is the central repository for all DoD personnel security adjudicative results. CVS is the central repository for adjudicative outcomes for all investigations performed by OPM and includes records of government-wide debarments by OPM. Two separate federal agencies manage these databases and each focuses on different types of adjudicative data. JPAS provides a data feed to CVS, but JPAS is not the official repository for DoD suitability adjudications, although some DoD organizations use it for that purpose.

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Both JPAS and CVS require that users meet minimum background investigation and adjudication requirements before they can access data, and this created challenges for a number of the organizations participating in the study. The lowest level of JPAS access, the level that allows users to check adjudication status but does not provide access to the specifics of the adjudication, requires Secret eligibility (i.e., a favorably adjudicated Access National Agency Check with Written Inquiries [ANACI] or National Agency Check with Local Agency Checks and Credit Check [NACLC]). CVS has a similar minimum requirement (i.e., a favorably adjudicated ANACI, NACLC, or equivalent). Personnel serving as security managers typically have a Single Scope Background Investigation (SSBI) and higher levels of access. However, most human resources positions are only required to meet the lower level requirement of a favorably National Agency Check with Written Inquiries (NACI)/non-sensitive investigation. For individuals who will adjudicate suitability, OPM requires, at a minimum, a favorably adjudicated Background Investigation (BI). A BI is a more expensive investigation than the investigation required for Top Secret eligibility (the SSBI) and several individuals interviewed reported difficulty obtaining support for a BI due to cost.

Table 6 shows the access to CVS and JPAS reported by personnel at participating organizations. None of the human resources groups reported current access to CVS, although a few had either attempted to gain access or were in the process of trying to meet access requirements. At least one human resources group reported that they had been informed that CVS access required a minimum of a BI and that funding was not available for that investigation.

Fewer than half of the human resources groups had access to JPAS to check for previous investigations and most of those personnel only had the lowest level of JPAS access. If they needed details about issues covered by adjudication, they worked with security to get the information or contacted OPM to request the previous investigation. The rest of the human resources groups had to submit requests to an associated security group to check whether a candidate had a previous investigation and adjudication on file.

Key Findings: Although all organizations indicated that they attempted to check CVS for previous investigations, almost all reported some type of problem in accessing the necessary information. The most common problem was lack of access to CVS, particularly for those in human resources positions. The difficulty was due, at least in part, to uncertainty about access requirements and problems obtaining approval for required background investigations. However, some security personnel reported that they could get at least some information about investigations recorded in CVS through JPAS. Lack of access to CVS also made it impossible to check for debarment.

Table 6
Check for Previous Investigation and Access to e-QIP

	Access to CVS	Access to JPAS	Access to e-QIP
Army			
ApF Civilian HR (Ft. Riley)	No	Yes (recent)	PSIP ¹
NAF Civilian HR (Ft. Riley)	No	No	PSIP
Installation Security (Ft. Riley)	No	Yes	PSIP
PSI-COE	Yes	Yes	Yes
Navy			
Human Resources Service Center (Navy Region Southwest)	No	No	No
HRSC² Security Manager (Internal)	No	Yes	Yes
ApF Civilian Human Resources Office (HRO) (Pt. Loma)	No	No	No
Security Office (Pt. Loma)	Yes	Yes	Yes
NAF Civilian HR (Navy Region Southwest)	No	Yes	No
Air Force			
ApF Civilian HR (Randolph AFB)	No	Limited user role	Yes
NAF Human Resources (Randolph AFB)	No	Limited user role	Yes
Air Force Personnel Center - Classification	n/a	n/a	n/a
Information Protection (Randolph AFB)	No	Yes	Yes
AFCAF	Yes	Yes	n/a
Marine Corps			
ApF Civilian HR (Camp Lejeune)	No	No	Yes
NAF Civilian HR (Camp Lejeune)	No	Yes	Yes
Installation Security (Camp Lejeune)	No	Yes	Yes
AAFES			
Human Resources	No	No	No
Force Protection	Yes	Yes	Yes
DFAS			
Human Resources - HR Shared Services	No	No	No
Personnel Security - HR Shared Services	Yes	Yes	Yes
DLA			
Human Resources	No	No	Yes
Personnel Security	Yes	Yes	Yes
DoDEA			
Human Resources Services	No	Yes	Yes

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	Access to CVS	Access to JPAS	Access to e-QIP
Center			
WHS			
Personnel Services	No	No	No
Personnel Security Operations	Yes	Yes	Yes
DHRA			
Human Resources	No	No	No
Security (Personnel and Facilities)	No	Yes	No

¹ Personnel Security Investigation Portal (PSIP)

² Human Resource Service Center

Reciprocity

Reciprocity refers to the reciprocal acceptance of a previous, favorable adjudication decision that was based on an equivalent investigation and equivalent adjudicative criteria, as described in E.O. 13467 (2008) and 13488 (2009). Reciprocity comes into play when an individual applies for a new position or job that has similar or lesser investigation and adjudication requirements than the prior position (e.g., military personnel with a Secret clearance seeking a civilian position that requires a Secret clearance).

Reciprocal acceptance of a previous determination allows organizations to move candidates through the hiring process without the need to expend resources (monetary or time) on an additional background investigation. The suitability process addresses reciprocity requirements by incorporating CVS and JPAS checks to identify any previous adjudication decisions.

Key Findings: A number of individuals indicated that the standards for deciding when to reciprocally accept a previous favorable determination were confusing and that they received contradictory guidance. A particular frustration was that they could not reciprocally accept a current, favorably adjudicated NACLC, sufficient for Secret eligibility, for an individual seeking a non-sensitive, low-risk position. Instead, they were required to initiate a new, lower-level NACI, with the associated costs and time required to complete.

e-QIP/SF-85

This task consisted of several sub-tasks including: (a) initiate, (b) review, and (c) submit form and initiate investigation to OPM through completion of the SF-85 either via OPM e-QIP or hard copy. This report focuses on the SF-85 because it is the version of the application form used for non-sensitive positions. Ensuring that the candidate underwent fingerprint collection was a related task. Human resources staff handled the suitability tasks associated with e-QIP or hard copy forms at the majority of participating organizations (see Table 6). However, one organization created a central processing center (PSIP) to handle all e-QIP tasks.

All but one of the participating organizations used e-QIP to submit applications for background investigations. Participants from several organizations indicated that e-QIP messaging about cases was not always as timely or as informative as they would like, resulting in rework and duplication of effort, particularly when they did not receive enough notice that a candidate was slow to complete the form and e-QIP terminated the application.

The participant from the organization that did not use e-QIP reported that too few applicants had the skills or access to computers to use e-QIP and that many were non-native English speakers who found the application form confusing. This organization's solution was to have candidates complete a paper version of the form, bring it into the office, and walk through it with human resources staff to ensure the candidates filled the information in correctly.

Key Findings: Participants from most organizations indicated that they would like to receive more training not only in how to use the e-QIP system, but also about how to answer candidate questions about the form and how to identify input that was likely to cause OPM to reject the form back to the candidate for correction.

Receive Completed Investigation

This section of findings focuses on factors with implications for receipt of suitability background investigations including: organizations, mode of delivery, format, receiving office identifier, decision-making, and recording results. The investigation type of interest was the NACI, as it is the primary suitability investigation. NACIs, like all background investigations, contain sensitive, PII that must be handled in a manner that protects individual privacy.

Organizations

Of the 27 organizations contributing to the study, 12 reported receiving completed NACIs for suitability adjudication purposes. This subset of participating organizations appears in Table 7 and the findings reported below focus on information from these organizations.

The organizations not included in the table either did not receive completed investigations as part of their workload or did not adjudicate suitability investigations (e.g., they adjudicated HSPD-12 investigations). The table also does not include AFCAF because, although Air Force centralized all investigation processing at AFCAF, AFCAF adjudicates all NACIs against personnel security adjudication criteria, not suitability criteria. If AFCAF adjudicators cannot make a favorable determination, AFCAF sends the case to the field for final determination. Air Force findings come from the two Air Force organizations listed; findings related to AFCAF are reported separately.

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Table 7
Organizations that Adjudicated Suitability Investigations

• Army ApF Human Resources (ApF-HR) • Army NAF Human Resources (NAF-HR) • Air Force ApF-HR • Air Force NAF-HR • Marine Corps ApF-HR • Marine Corps NAF-HR	• Navy NAF-HR • DLA • AAFES • WHS • DeCA • DoDEA
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Mode of Delivery and Format

The OPM Federal Investigative Service (OPM-FIS) is the primary investigative service provider for DoD, and OPM-FIS performed the background investigations for all participating organizations. Nine of the 12 organizations received hard copy reports of investigation (ROIs) in the mail from OPM-FIS. The packages arrived via certified mail in protective wrapping to shield the contents. Organizations that submitted small volumes of cases reported receiving ROIs a few at a time in envelopes. Organizations that submitted larger volumes of cases received larger packets containing multiple ROIs. ROI packages arrived at varying intervals, as investigations were completed. OPM-FIS did not provide notification of completion separate from the case arriving at the submitter's office.

Another of the organizations also received cases in the mail; however, it received cases in electronic format on an encrypted disk from a CAF. The security office at the same base also received encrypted, electronic cases in the mail, although not suitability cases. Personnel from the organization receiving cases in this manner reported a number of challenges, including difficulties obtaining passwords to decrypt the files, difficulty finding work stations that could handle the encrypted disks, and extensive delays between the time the case was completed by OPM, processed by the adjudication facility, and mailed to their location.

The two Air Force organizations received cases in electronic format via the Air Force Central Adjudication Security Personnel Repository (CASPR). Field locations check CASPR regularly for notifications of cases that require local adjudication (as mentioned previously, AFCAF only makes favorable determinations, the field handles the remainder of cases). CASPR allowed secure transfer of information, so participants from the Air Force organizations did not report the kinds of problems with delays in receiving the cases or accessing the case information.

Hard copy investigation files from OPM included colored top sheets indicating the seriousness of any issues identified (level 1=green top sheet, level 2=yellow, level 3=red), a summation page called the case closing transmittal (CCT) that listed the background checks completed, with issue status, plus subject identifying information, as well as any investigator notes and completed inquiries. In addition, the case files included two paper forms for documentation purposes. The first was a Certificate of Investigation with information about case type and application type

and the second was Form 79A, *Report of Agency Adjudicative Action on OPM Personnel Investigations*, for returning to OPM with the adjudication result.

Key Findings: (a) most participating organizations received completed cases in the mail, (b) most of the locations received hard copy ROIs, (c) all Air Force investigations are routed through its internal adjudication tracking system, CASPR, and, at the time of the analysis, could be routed to field locations electronically via CASPR, (d) one organization centralized some of its investigations processing and provided electronic files to at least some field locations by sending encrypted disks, and (e) mailing encrypted disks with cases caused problems with case receipt and processing.

Receiving Officer Identifier

Due to the sensitive nature of background investigation information, it is critical that completed ROIs are returned to the correct location for adjudication. In a number of cases, the group performing the adjudication (e.g., the human resources office) received the completed investigation from another office that was part of their component, and was not very familiar with the details of the return process. However, participants from most of the organizations reported that the Security Office Identifier (SOI) served as the primary key for determining where OPM-FIS returned the completed investigations.

The SOI is one type of identifying number the OPM Federal Investigations Processing Center (OPM-FIPC) assigns when OPM-FIS provides investigative services to an agency. The Submitting Office Number (SON) is the second type of identifying number OPM-FIPC uses. OPM-FIPC uses SOIs to identify security offices that may receive completed investigative reports and assigns SONs to offices that initiate or request investigations.

A primary distinction between SOIs and SONs is that individuals associated with SOIs must have a favorable adjudication based on at least an OPM BI and at least one individual associated with each SOI must have a favorably adjudicated SSBI. SONs do not have a similar requirement, although, in many cases, individuals associated with DoD SONs do meet the background investigation requirements. Both SOI and SON are recorded in the appropriate Agency Use Block (AUB) of the SF-85, although the SOI may also be used in the SON block if the SOI and SON are the same office.

There are hundreds of DoD SOIs and SONs. Some of the components participating in the analysis were relatively small, with adjudication functions headquartered in a single location (e.g., DoDEA, WHS) and only one or a very few SOIs and SONs. Other groups, such as the Army or Air Force reported multiple SOIs and SONs as well as multiple adjudication sites within a single base (e.g., Army ApF and Army NAF).

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SOI use created challenges for some organizations because it directs the return of the investigations to the security office, even though the human resources office held adjudicative responsibility for suitability cases for these organizations. For SOIs that received cases in the mail for multiple submitting offices, sorting cases for the correct destination was an additional challenge.

Key Findings: (a) SOI served as the primary key for determining where OPM-FIS returned the completed investigations, (b) many of the adjudication locations (e.g., human resource offices) were not the same as the SOI location, and (c) virtually all of the adjudication locations had a SON.

Adjudicate Completed Investigation

For those organizations receiving hard copy investigation files, decision-makers typically organized the files by issue seriousness (i.e., Level 1, clean; Level 2, minor; Level 3, major). Most reported receiving very few cases with major issues and that often cases with minor issues had been mitigated by information the subject provided at an earlier point in the suitability process (e.g., when completing the OF-306). As required by OPM, all individuals performing suitability adjudication reported receiving some form of OPM suitability training, although not all had completed the 2-week OPM training course.

Key Findings: (a) hard copy case files included OPM assessments of issue seriousness, (b) all suitability adjudicators had some form of OPM suitability training, (c) all suitability adjudicators used the OPM suitability adjudication criteria, (d) most locations compared any derogatory information to previously gathered information (e.g., the OF-306) to determine if the information had already been mitigated or to check for falsification, (e) if necessary, cases with derogatory information were considered in light of requirements of the subject's job to determine whether there was a nexus with the position that would prevent mitigation of the issue, (f) cases with derogatory information, particularly at military locations, were discussed with the commander and/or the individual's supervisor for a final determination, (g) some locations had never had a case that reached the point of having to deny or terminate employment and some had never had cases with serious derogatory information.

Record Adjudicative Result

Participants reported at least two record-keeping needs. The first was the need to save a copy of the Certificate of Investigation in subjects' official personnel folders. The second was to document the adjudicative result on Form 79A and return the completed form to OPM. Organizations responsible for vetting individuals for childcare positions reported a third record keeping need; the need to maintain documentation for audit purposes.

Participants from several organizations described problems with recording suitability adjudication results in JPAS and the Defense Civilian Personnel Data

System (DCPDS). JPAS is not the system of record for suitability results, but the OPM Personnel Investigations Processing System (PIPS) creates a record in JPAS when it initiates the investigation for all investigations associated with an adjudication facility. The record assigns the adjudication facility overriding ownership of those cases, even if a field location makes the final determination. At least two of the participating organizations faced this problem. The adjudication facility would enter an adjudication decision of “No Determination Made” in JPAS, and then send the case to the field organization for a final determination. The field organization would make a final determination, but could not permanently enter the determination in JPAS because ownership of the case remained with the adjudication facility. As a result, JPAS would not reflect the final determination made by the field organization. At least one organization reported that the resulting incorrect JPAS record would overwrite the correct, final determination entered in DCPDS.

A few participants reported an additional problem with “No Determination Made” cases that may be of interest to efforts to consolidate suitability adjudications at the DoD CAF. The problem was mentioned by participants who did not have a significant suitability adjudication workload and felt that CAF adjudicators were in a better position to make a determination. Adjudication is the primary task of CAF adjudicators; they deal with cases daily, and undergo extensive training. Field adjudicators have more difficulty accessing training and have much less adjudication experience.

Key Findings: (a) for the majority of cases, the only documentation of the adjudication result was the hard copy Form 79A, (b) Form 79A, a bubble sheet, was completed by hand and mailed, in hard copy format, to OPM, (c) most organizations did not keep local records of suitability determinations, and (d) if personnel in the field must make the final suitability determination, DoD databases should allow them to record those determinations in DoD systems.

BASELINE SUITABILITY PROCESS—“AS IS” PROCESS

Despite initial concerns that DoD components and agencies differed a great deal in their suitability processes, the process steps and tasks described in the Findings section provided a good representation of the process across organizations. The analysis conceptualized the suitability process as made up of five process steps that can be further analyzed into a number of tasks. Figure 2 provides a visual depiction of these process steps and tasks and associated outcomes.

The left side of Figure 2 shows the five process steps: Define, Validate, Recruit, Select, Vet. Tasks that make up each process step appear in their respective process boxes. The right side of the diagram lists the outcome of each step (e.g., a hiring request is the outcome of the Define process step, a list of eligible applicants is the outcome of the Recruit process step). A legend at the bottom indicates the group responsible for each process step (e.g., hiring officials perform the process

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steps outlined with dotted lines, human resources or security staff perform the process step outlined with mixed dashed lines).

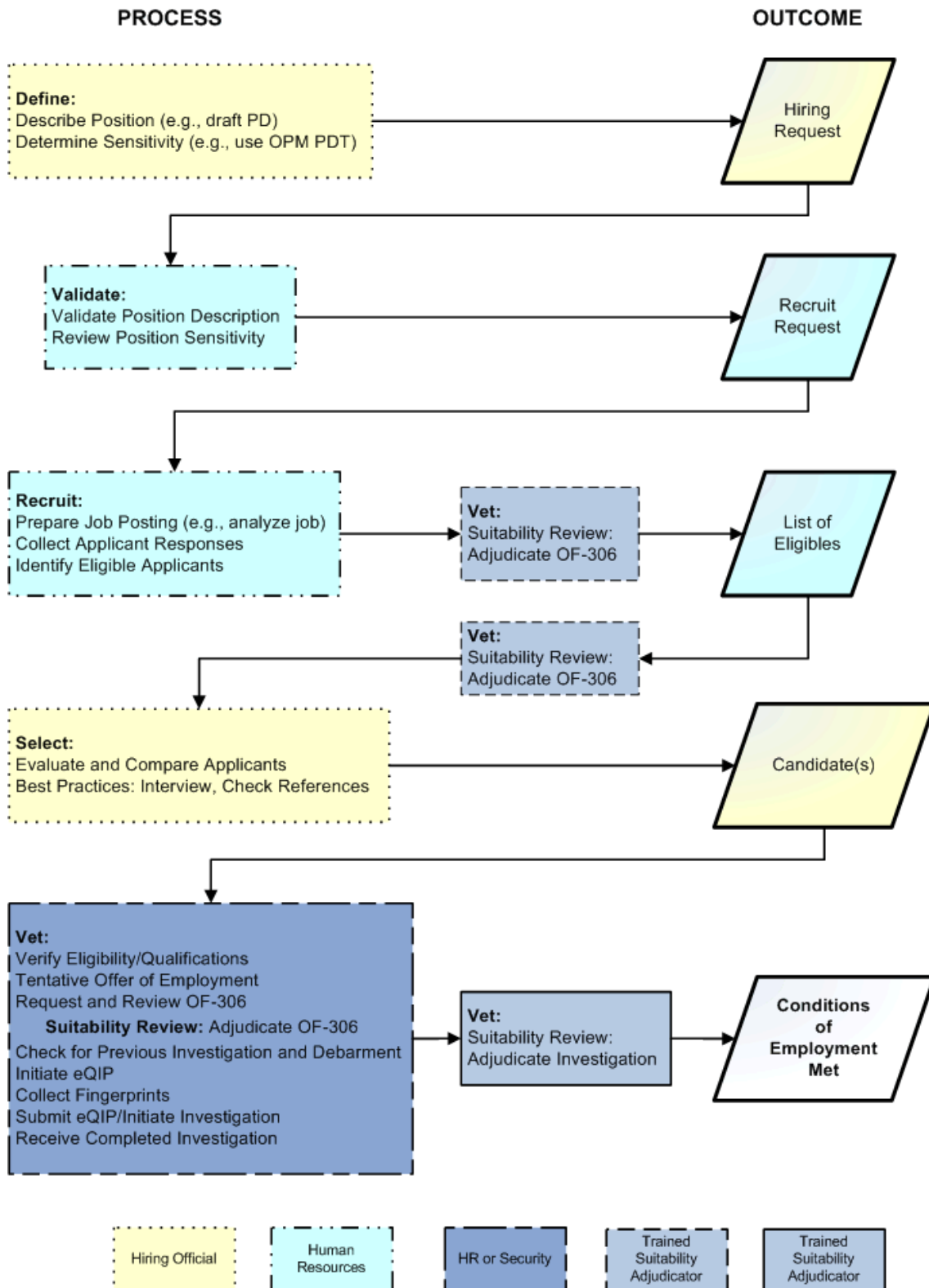


Figure 2 “As-Is” Suitability Process Summary Map

The three boxes in the middle of Figure 2, plus the task labeled “Suitability Review” in the Vet box, list the tasks that involve evaluating candidates against suitability adjudication criteria. The first two boxes have dashed lines because those involving the OF-306 varied the most across organizations, but were most likely to occur either immediately before or after preparation of the list of eligible candidates. In addition, all of the tasks labeled “Suitability Review” have special requirements for the personnel that perform them, including the requirement that the personnel have a favorable determination based on the results of at least a BI and training in suitability adjudication.

IMPORTANT CONSIDERATIONS

Participants reported several recurring issues that represented key factors that affected the way organizations implemented the suitability process. Two of the most important of these were position characteristics and hiring tempo. Table 8 lists the factors, their dimensions, and the scale or range along which organizations differed. The factors, their dimensions, and implications are discussed below.

Table 8
Factors Affecting Suitability Processes

Factor	Dimension	Scale
Position Characteristics	Sensitivity/risk	Non-sensitive ↔ Critical Sensitive
	Complexity	Low (simple) ↔ High (intricate)
	Modifiability	Low (stable) ↔ High (changeable)
	Number per Position	Low ↔ High
Hiring Tempo	Steady	Low ↔ High
	Surge	

Position Characteristics

The first factor, position characteristics, refers to the characteristics of the positions that the human resources office typically handled, and has four dimensions. The first dimension refers to position sensitivity/risk, and positions ranged from non-sensitive to critical sensitive, where any sensitivity designation higher than non-sensitive indicated that the position had national security requirements. High and medium risk public trust positions were not common in the participating organizations and received little mention during discussions. One possible explanation for the rareness of positions at higher levels of public trust is that, in DoD, such positions are also likely to be national security sensitive and, as a result, undergo personnel security adjudication.

The second dimension of position characteristics refers to the complexity of the tasks that make up the position, where positions of low complexity involved tasks that were fairly simple or routine and did not require extensive training and experience, while the reverse was true of positions of high complexity. The third

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dimension, modifiability, refers to the likelihood that hiring officials would change the position description from posting to posting. Some positions have stable job duties and position descriptions that seldom change (e.g., store clerk). Other positions have descriptions that are likely to be modified to meet specific needs (e.g., certain types of analyst positions). The final dimension, number per position, refers to the number of individuals hired per position, ranging from low (e.g., one person hired per posting) to high (e.g., ten people hired per posting).

Position characteristics had particular implications for position sensitivity/risk designation. With higher levels of sensitivity/risk and complexity and lower numbers of applicants per position, it was more likely that the organization would regularly review position sensitivity or risk level. If an office handled all, or mostly non-sensitive, less complex, and more stable positions, particularly when hiring large numbers per posting, it was less likely the organization would use the OPM PDT.

Position characteristics also had implications for the pace at which the process had to move and the volume of cases handled. Less complex and less modifiable positions tended to have heavier hiring needs, necessitating a process that moved quickly and could efficiently identify and vet candidates for employment. Hiring for positions that are more complex tended to be more time-consuming and tended to allow more time to complete the steps for evaluating suitability. For positions higher on the sensitivity or risk scale, adjudication emphasized personnel security concerns, so it was important that careful suitability adjudication occur at earlier points in the process.

Hiring Tempo

Differences in hiring volume showed some relation to position characteristics, as mentioned, but for most organizations, the hiring tempo tended to be steady and ongoing. Other organizations dealt with periodic upswings, or surges, in hiring volume that affected their suitability process. For example, one organization processed a very large percentage of its cases in a short time period to ensure that it fully staffs its schools at the beginning of every school year. The need to hire and vet hundreds of teachers, educational aides, and administrative staff for domestic and overseas positions required the dedication of significant resources to that specific need during a relatively inflexible time period and their process had to accommodate that need.

NAF and Other Employment Categories

Most suitability policy, guidance, procedures, and training focuses on competitive service positions, as specified in 5 CFR 731. DoD NAF positions do not fall into the competitive service category, but NAF organizations still must vet the fitness of potential employees. NAF positions, as a group, tend to differ significantly from most competitive service positions and have some unique hiring needs that consolidation of suitability processes should take into account. NAF hiring tended

to be fast-paced, with larger numbers of positions to fill at any given time. The positions tend to be lower level, with more turnover, making it important to complete the suitability vetting process quickly and economically.

Child and Youth Services Positions

Child and youth services positions are another employment category with special suitability-like requirements. In addition to standard background investigation requirements, individuals working with children and youth must undergo a specific type of background investigation, the Childcare NACI (CNACI). The CNACI meets the federal requirement that applicants for child and youth services positions be subject to a criminal history check for every state of residence within a 5-year scope. The reason for these additional state criminal history checks is that state criminal databases typically include more detailed criminal history data than the standard FBI fingerprint-based criminal history check. Such additional detail could be particularly important when vetting individuals who will be responsible for children and youth.

The reason that these positions are of particular concern to the suitability adjudication process is that states return the criminal history results on varying schedules and OPM-FIS returns an investigation with a completion status of closed, pending additional results, if all results are not returned within a certain time frame. It becomes the responsibility of the adjudicating office to determine whether all state criminal history results were returned before making a final adjudication decision. Participants at organizations where investigations filtered through an adjudication facility reported that the adjudication facilities did not always understand this requirement and sometimes made determinations before receiving all of the required information.

From the perspective of the field, there is an additional important component of the CNACI investigation. States vary in the format of the fingerprint submissions they accept and, as a result, it may be necessary to submit multiple sets of fingerprints for an individual applicant to meet differing state requirements.

Another challenge for vetting child and youth service workers is the requirement that such workers be within sight and under the supervision of a staff person with a favorable background check until state and other criminal history checks are completed (DoDI 1402.5, *Criminal History Background Checks on Individuals in Child Care Services*, 1993). The criminal history checks are important for protecting children and youth, and until they are completed, the individual is limited in carrying out his or her job duties. In addition, organizations must maintain records of the checks for audit purposes and update fingerprint checks as required.

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UNIQUE PROCESS APPROACHES

The analysis also identified some larger-scale unique approaches to various aspects of the suitability process. Two of these approaches consisted of centralization of key steps of the process; the third consisted of an additional pre-screening step.

Pre-screening

Suitability screening, while an important part of the hiring process, can be time-consuming and expensive, both of which are exacerbated by large-volume, high-turnover hiring needs. Some organizations dealt with this challenge by performing additional, low-cost, fast-turnaround background checks at an early stage in the process to weed out unsuitable candidates. By performing checks such as an initial criminal history check early in the process, organizations could focus their hiring efforts and dollars on candidates most likely to be hired.

PSI-COE

The application for a background investigation (e.g., SF-85) that candidates must complete before the organization can request the investigation is complex and time-consuming. Although the application is part of an online system (e-QIP), candidates frequently have questions, make errors, or encounter other obstacles that make it difficult to complete the form in a timely fashion. In most organizations, human resources staff must assist and oversee this process as one of their many job duties. Minimal training is available for e-QIP, and it requires frequent monitoring by staff to ensure that applications are moving through the system.

The Army identified the bottlenecks associated with decentralized e-QIP processing and assistance and created the PSI-COE to address these problems. Human resources staff must initiate candidates into the PSIP system, but once PSI-COE has candidates' information, it provides oversight and assistance. Centralization has had numerous benefits for the Army in terms of reducing time required to process cases, reducing errors, and cost avoidance.

AFCAF

DoD organizations established CAFs to standardize adjudication of personnel security investigations, and except for the Air Force, the CAFs adjudicate only personnel security cases. Air Force, however, centralized adjudication of all its investigations to AFCAF. As a result, AFCAF has addressed a number of the challenges the DoD CAF will face. As will be true of the DoD CAF, AFCAF receives all Air Force investigations electronically. AFCAF only makes favorable determinations for NACIs and sends all other NACIs to the field for final determination. Unlike the DoD CAF, however, AFCAF uses the criteria for personnel security adjudication to guide determinations for NACI cases. DoD CAF adjudicators will use the suitability adjudication criteria.

DISCUSSION

As described in the Findings section, the study found that it was possible to summarize across DoD components and identify a DoD-wide suitability process. The process steps and tasks of this DoD-wide process summary provided a good representation of the end-to-end suitability process across organizations. In addition, discussions with study participants identified important considerations and differences that should be factored into any future work that affects the suitability process.

“AS IS” ROI ADJUDICATION PROCESS

The portion of the suitability process concerned with adjudicating suitability ROIs received additional attention in the analysis in the interest of supporting DoD plans to incorporate suitability adjudication into the case management system for the DoD CAF. The Findings section provides a number of details about the tasks and requirements and Figure 3 depicts the common process flow. The rows of the figure indicate the position, personnel, or system responsible for handling each task and the arrows indicate the direction of flow.

The ROI adjudication process begins with personnel in human resources or security manager offices initiating a request in e-QIP to allow candidates to complete the application for investigation. From e-QIP, the OPM PIPS system processes the request and sends it to investigative personnel to complete. Once completed, the investigation is tracked through PIPS for return to the requesting agency. The suitability adjudicator at the requesting agency/field location adjudicates the ROI to determine whether candidate suitability for federal employment. Adjudicative results are recorded in CVS using Form 79-A.

The process flow shown in Figure 3 relies largely on computerized systems at the start, but at the point of the return of the investigation, the process becomes manual and based on hard copy (not electronic) files. The vast majority of organizations received the completed investigations as hard copy files delivered through a ground-based delivery service.

DISCUSSION

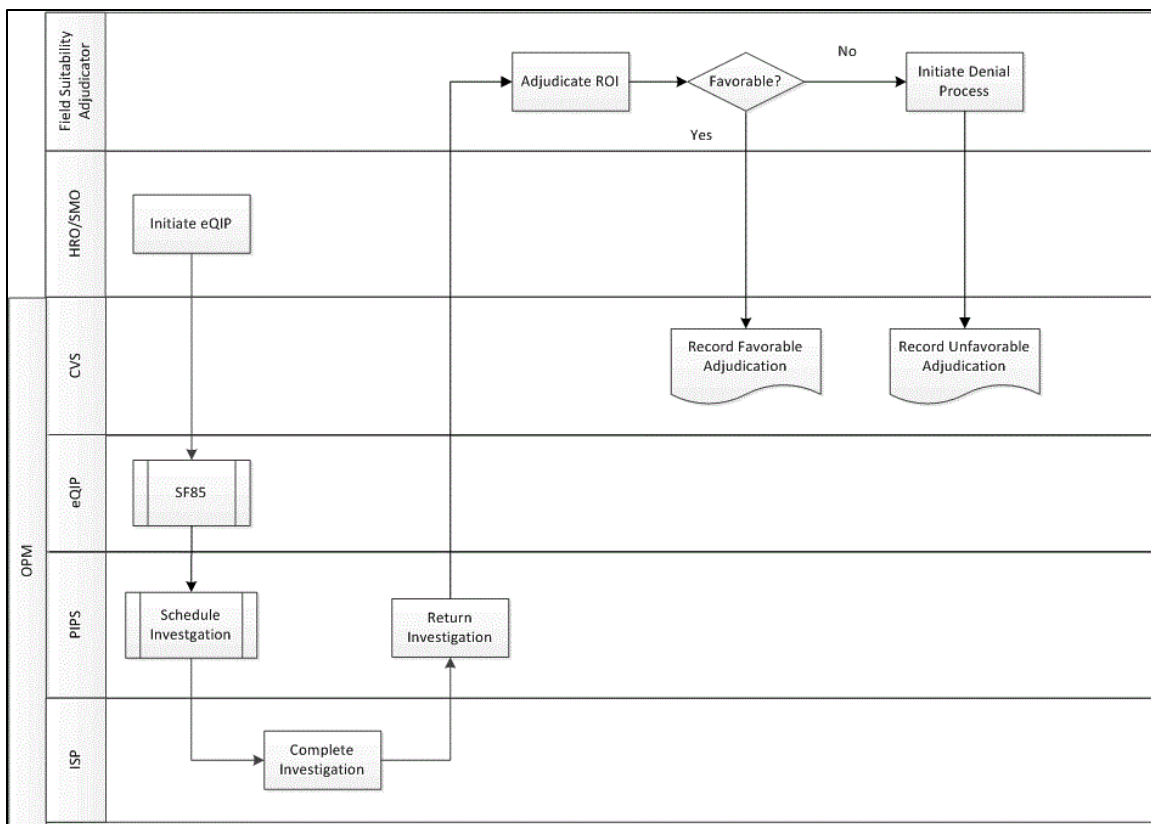


Figure 3 “As-Is” ROI Adjudication Process

SAMPLE “TO-BE” ROI ADJUDICATION PROCESS FLOW

Another goal of this study was to support plans to consolidate the adjudication of suitability background investigations at the DoD CAF. With the consolidation, all completed background investigations would first be returned to the DoD CAF, and not to the field locations that currently adjudicate them. Plans specify that the DoD CAF would only handle favorable suitability adjudications and would send the remaining cases to the field location that submitted the investigation request for final adjudication. Figure 4 shows an initial draft of a future, or “To-Be,” process flow for moving investigations between the DoD CAF and the field. The rows of Figure 4 represent the person, organization, or system that would handle a process step, the process steps appear as boxes within the rows, and decision points as diamonds. Arrows depict process flow.

In the diagram, the “To-Be” process begins with initiation of e-QIP (or hard copy SF-85) although the “To-Be” process does not make any changes to the e-QIP tasks. After the organization releases the completed application, OPM-FIS schedules the investigation. OPM-FIS completes the investigation and sends it electronically through its PIPS systems to the DoD Central Adjudication Tracking System (CATS). CATS processes the Extensible Mark-up Language (XML) tagged ROI through electronic adjudication (eAdjudication).

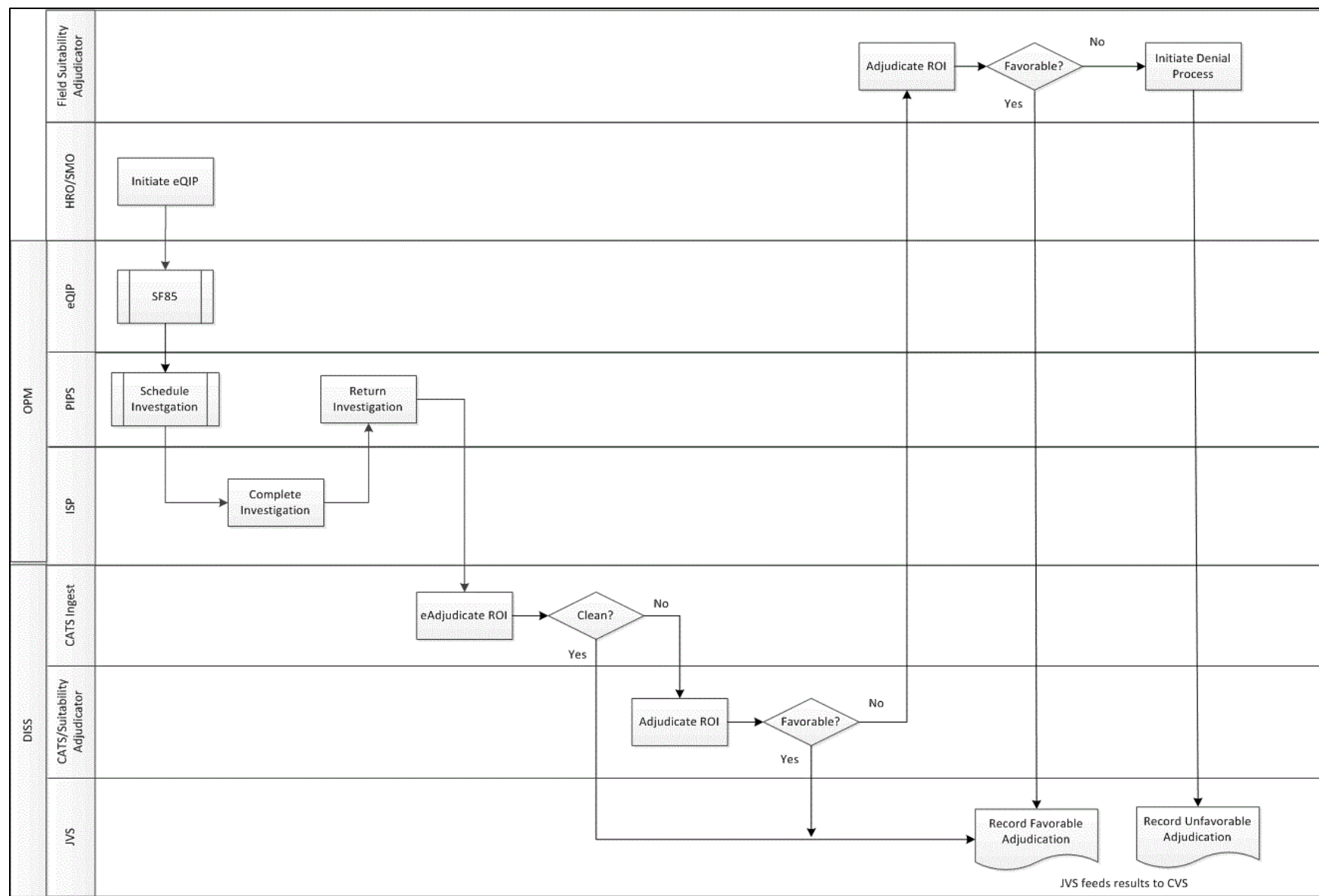


Figure 4 Sample "To-Be" ROI Adjudication Process

DISCUSSION

In this future, or “To-Be” process, eAdjudication will apply business rules to determine whether cases are free from derogatory information (i.e., clean cases). If the case is clean, CATS will record a favorable suitability determination into the Joint Verification System (JVS) and the suitability adjudication process ends. It is anticipated that the eAdjudication aspect of the “To-Be” process will remove the human adjudication burden of a substantial number of cases. If the case is not completely free from derogatory information, the “To-Be” process will send it to a human suitability adjudicator at the DoD CAF to review and determine whether to make a favorable determination. Experience with eAdjudication of other case types shows that many cases that fail eAdjudication actually contain little derogatory information. For example, if a candidate reports any criminal information, even traffic tickets, the case fails eAdjudication. The most efficient strategy would be for the DoD CAF to adjudicate as many cases as it can readily adjudicate favorably and only send those where DoD CAF adjudicators cannot render a favorable determination to the field (i.e., the process shown in Figure 4).

Field Versus DoD CAF Suitability Determinations

One of the questions still to be resolved about the “To-Be” process is how to define the level of derogatory information that requires adjudication in the field. The need for suitability adjudication to consider the relationship between derogatory information and job-specific suitability requirements further complicates this question. For example, individuals seeking positions that involve firearms must meet special suitability requirements, as must individuals seeking childcare positions. However, it is difficult to specify exactly which jobs have special suitability requirements. On the other hand, discussions with participants indicate that only a small proportion of jobs have special suitability requirements.

Additionally, some participants suggested that there would be benefits to the DoD CAF making most suitability determinations, particularly if the case included mitigating information. Adjudicators at the DoD would have: (a) the training, (b) adjudication as a primary responsibility and gain corresponding experience, and (c) be better positioned to make most determinations. Some participants related experiences receiving “No Determination Made” cases from their component CAF and wondering how they were supposed to make a decision when the CAF could not.

RECOMMENDATIONS: OVERALL SUITABILITY PROCESS

The Findings section highlights key conclusions that provide important insights into the suitability process. The two Recommendations sections build on those findings to generate suggestions for addressing problems and additional research.

- Gather additional information about the suitability process from a broader and more representative sample of DoD locations.

- Gather additional information to better understand the extent to which job-specific suitability requirements exist for DoD positions and how to account for them in suitability adjudication.
- Involve representatives from all employment categories (e.g., NAF, competitive service) in system development and consolidation efforts. The employment groups have unique requirements that require accurate representation.
- Prepare a suitability manual containing DoD and other policy and guidance for suitability process steps and tasks.
- Provide guidance clarifying the use of the OF-306, including decisions about when to collect the information, the decisions that can be made based on the information, and requirements and procedures for terminating an offer of employment based on the information.
- Gather information to determine whether there is a need to convey information from the field to the DoD CAF about OF-306 adjudication and local or other checks performed by field locations.
- Educate suitability adjudicators and others requiring access to CVS and JPAS as to the requirements for obtaining that access.
- Support efforts to gain access to and training on CVS to allow personnel to check for records of debarment.
- Investigate options for providing better e-QIP guidance to support personnel who oversee e-QIP completion.
- Investigate options for providing better PDT guidance and training.
- Investigate options for a reciprocity exception for military, and possibly DoD civilians, that have a favorably adjudicated NACLC and are now seeking a position that requires a NACI.
- Develop a tool or questionnaire to gather information about the suitability process from a broader and more representative sample of DoD locations.
- Develop a PDT that better meets DoD component and agency needs, captures results, and potentially feeds the results into a DoD system such as DCPDS.
- Investigate additional possibilities for centralization. For example, the Army PSI-COE is a successful model of the benefits of centralizing e-QIP submissions. Another possibility is centralized databases of the assessments required for USAStaffing postings. Many organizations have similar jobs, and a central database of assessments could make the job posting process more efficient.

RECOMMENDATIONS: ROI ADJUDICATION

- Develop standards and procedures to specify the favorable suitability determinations the DoD CAF will make and the issue cases that the field must adjudicate.

DISCUSSION

- Ensure that plans for consolidating suitability adjudication include strategies for handling:
 - Hiring surges and other times of high demand for suitability adjudication.
 - Child and youth service worker suitability requirements (i.e., multiple fingerprint checks to address line-of-sight supervision hurdle).
- Ensure that adjudicators in the field have access and authority in the DoD system of record for suitability determinations to allow field adjudicators to document final determinations as needed.
- Investigate options for resolving the problem caused by JPAS overwriting final suitability determinations made in the field with provisional suitability determinations made at a CAF (e.g., No Determination Made). Include options for updating previously overwritten decisions with the correct final determinations in both JPAS and DCPDS.

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**APPENDIX A:
SUITABILITY TASK AND ACTOR**

APPENDIX A

Suitability Process Analysis Data Collection

This document outlines the help we are requesting in order to plan the data collection for the suitability process analysis project; if the project is new to you, a brief summary appears at the end of this document. Your help is critical, not only as input for the analysis, but also for planning. In particular, we need assistance to identify participants, schedule data collection sessions and minimize disruption to your workload. The rest of this document describes the information we need to get started.

Data Collection Target

We will be analyzing the suitability process from end-to-end, focusing on those tasks listed in Table 1 that are part of your agency/component's process. We don't expect that all of them are, so don't be concerned if you don't recognize some of them.

Table 1. Suitability Process Tasks

-
- (a) Determine Position Risk Level/Sensitivity (Position Designation Tool, PDT)
 - (a1) Review Position Sensitivity Results
 - (b) Review Applicant Suitability Qualifications from resume, job application, etc. (e.g., check candidates against suitability-related qualifications such as clean driving record)
 - (b1) Check OPM's Central Verification System (CVS) for Debarment
 - (c) Review OF-306 for Issues
 - (d) Suitability Review and Adjudication
 - (d1) Validate need for investigation
 - (d2) Initiate eQIP/Background Investigation Application
 - (d3) Review completed eQIP/Background Investigation Application
 - (d4) Submit eQIP/Background Investigation Application to Initiate Background Investigation
 - (d5 & e1) Receive and review results of fingerprint check
 - (e) Make interim decision about CAC qualifications
 - (d6) Receive completed investigation/investigation summary
 - (d7) Adjudicate
 - (d7a) Report positive outcome
 - (d7a) Report negative outcome
-

Data Collection Participants

To plan the data collection, we need to know the number and types of individuals who perform each suitability task. We prepared a worksheet in Excel that lists the tasks and asks for

APPENDIX A

information about subject matter experts who perform them. Each row of the worksheet lists one of the tasks or subtasks from Table 1. For each task we would like the following:

- **Column 1** (Job Titles of People Who Do the Task) asks for the job titles of the individuals who perform the task (referred to in the worksheet as the "Doer," the one who does the task). Many agencies/components have people in multiple job titles that perform a task.
- **Column 2** (Group the "Doer" works for) asks for the name of the organizational group(s) of the "Doers" listed in column 1. By organizational group, we are referring to something like Human Resources, AFPC, HRO, CPAC, Security, etc. Most of the people involved in the suitability process are likely from a Human Resources organizational group, but some agencies/components also involve people from Security or other divisions/ departments/ organizational groups.
- **Column 3** (How Many "Doers") asks for the number of "Doers" who perform the task. Please enter a separate total for each job title listed in Column 2. In some cases, there may be a large, unknown number of people who perform the task (e.g., all the managers in your agency/component complete the Position Designation Tool (PDT) to determine position sensitivity). If that's the case, it's fine to enter "all managers," or something to that effect, instead of a number.
- **Column 4** (Number of Locations) asks for the number of sites represented in your numbers. If you are only reporting for the location where you work, the answer would be one. If you are reporting for 22 locations throughout the United States, the answer would be 22. In this case, "site" refers to geographically dispersed locations (e.g., cities or bases, not number of offices at a given base).

We don't want the worksheet to be a time-consuming project to complete, so the information doesn't have to be exact, just a good estimate. If the task is not performed at all in your agency/component, please enter N/A. If an organizational group other yours performs the task, please enter the information for that group.

Table 2 is an example of a completed worksheet where the blue text shows examples of the information we need.

Table 2. Tasks and Actors

Suitability Process Task	Job Titles of People Who Do the Task	Group the "Doer" works for	How Many "Doers"	Number of Locations
(a) Determine Position Risk Level/ Sensitivity (PDT)	Hiring Managers throughout agency	6 divisions	60	3
(a1) Review Position Sensitivity	Results not reviewed (N/A)			
(b) Determine Applicant Qualifications	Employee Relations Specialists and Human Resources Analysts	HR	4 and 3	1
(b1) Check CVS for Debarment	same group that determines applicant qualifications	HR	4 and 3	1
(c) Review OF-306 for Issues	Employee Relations Specialists, Human Resources Analysts, and Security Specialists	HR and Security	4, 3, 2	3
(d) Suitability Review & Adjudication				

Suitability Process Task	Job Titles of People Who Do the Task	Group the "Doer" works for	How Many "Doers"	Number of Locations
(d1) Validate need for investigation	Human Resources Analyst and Security Specialist	HR and Security	1 and 1	3
(d2) Initiate eQIP/Application	Employee Relations Specialists, Human Resources Analysts, and Security Specialists	HR and Security	4, 3, 2	3
(d3) Review completed eQIP/ Application	Employee Relations Specialists, Human Resources Analysts, and Security Specialists	HR and Security	4, 3, 2	3
(d4) Initiate investigation	Human Resources Analyst and Security Specialist	HR and Security	1 and 1	3
(d5 & e1) Receive and review results of fingerprint check	Employee Relations Specialists, Human Resources Analysts, and Security Specialists	HR and Security	4, 3, 2	1
(e) Make interim decision about CAC qualifications	Employee Relations Specialists, Human Resources Analysts, and Security Specialists	HR and Security	4, 3, 2	1
(d6) Receive completed investigation/investigation summary	Human Resources Analyst and Employee Relations Specialist	HR	1 and 1	1
(d7) Adjudicate	Human Resources Analyst and Employee Relations Specialist	HR	1 and 1	1
(d8a) Report positive outcome	Human Resources Analyst and Employee Relations Specialist	HR	1 and 1	1
(d8b) Report negative outcome	Human Resources Chief	HR	1	1

Data Collection Sessions

Once we get a general picture of tasks and personnel, we can work with you to identify a good sample of participants that represent the various groups involved and plan the data collection sessions. As a general overview, the data collection sessions will involve individuals or small groups sampled on the basis of the information from the worksheet and will focus on those tasks that the participants perform.

During the sessions, research staff would like see the tasks performed, and then discuss the tasks, the steps required, the tools used, and any other key aspects of each task. Session length will depend on the number of personnel. The number of sessions will depend on the number of tasks and the number of different groups involved. For example, if the process in your agency includes all of the steps, we would like to spend at least a day in sessions with various groups and individuals. Some items of discussion will include:

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Defense Personnel Security Research Center (PERSEREC)
Leissa.Nelson@osd.pentagon.mil

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- What is the initiating event for the task (e.g., request from a hiring manager, an automated message)?
- How is the task accomplished?
- What tools are used?
- Is there flexibility about when this task must be accomplished?
- Are there any deadlines or time limits?
- Are there any prerequisites/ things that must be completed first?
- Are there any dependencies?
- What is the physical or electronic product? What does it look like?
- Is the product electronic? If yes, what system? What are the record keeping requirements? If no, could it be?
- Who uses the outcome of this task?
- Who communicates end/result? and to whom?
- Is any of the communication electronic? If yes, what system? If no, could it be?

Next Steps

Please do what you can to complete the worksheet in the next two weeks. If there are sections that you are not familiar with, or you have other questions, please contact Leissa Nelson (831-583-2839 or Leissa.Nelson@osd.pentagon.mil – I am very happy to answer questions). When you have completed the worksheet, please email it to the address provided along with some suggested times for a conference call. Please provide your contact information if it differs from that of the person who originally received the request.

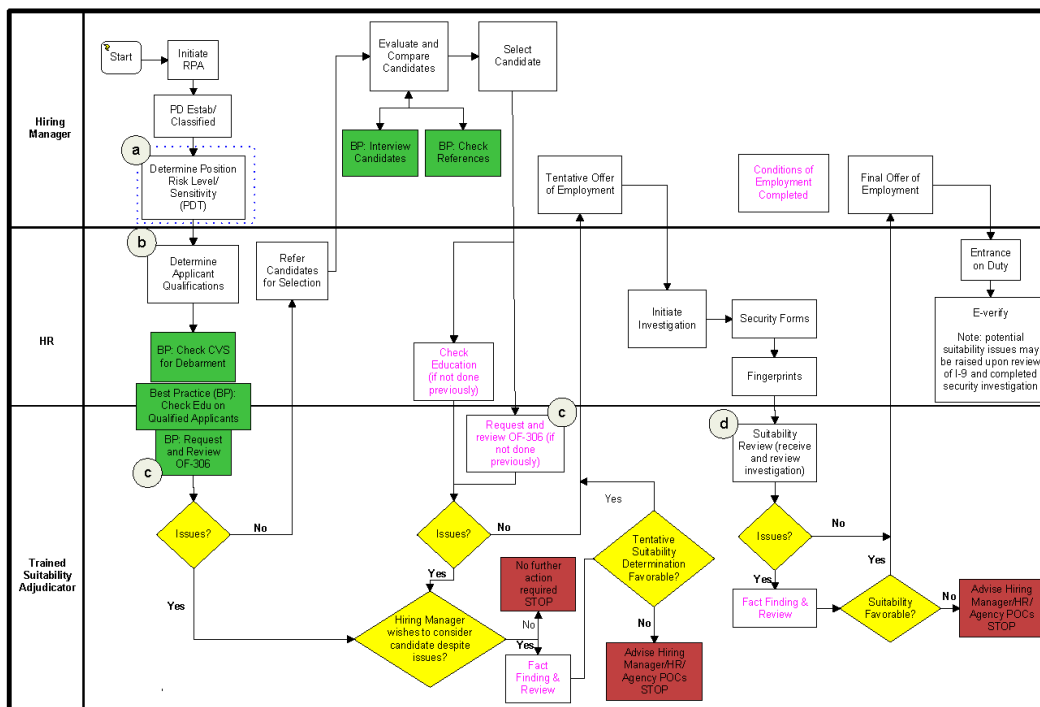
Thank you!

Attachment: Project Description

Suitability Process

The initial foundation of the analysis is a process map (Figure 1) drafted by members of the DoD Suitability Working. The process map presents a general outline of the suitability process, with the acknowledgment that the steps and participants may vary across agency/component. As shown in Figure 1, the suitability process is divided into roles played by three categories of personnel: the hiring manager, human resources, and a trained suitability adjudicator (see the rows of the figure) and may or may not map onto the way your agency/component assigns the roles. For example, someone in Human Resources may complete the Position Designation Tool. Or, the person with the suitability adjudication training may be someone in the Security division. The specific tasks may also differ in your agency/component. For example, the process map shows the review of the OF-306 as occurring in two possible points in the process (see the two items labeled "c").

Figure 1. Draft DoD Suitability Process Map



Purpose of the Analysis

The primary purpose of the suitability process analysis is three-fold. First, the analysis seeks to gather in-depth information about key steps as they are implemented by each

agency/component. Agencies/components and human resources departments are organized in many different ways, and those differences are likely to affect the process used for suitability review and adjudication.

The second purpose of the analysis is to identify agency/component-unique requirements. Agencies/components differ in mission, types of jobs, and other factors, and these differences are likely to create unique needs and requirements that can affect the suitability process. Some examples might be differences in who needs to receive information or time requirements for completing certain steps.

Thirdly, the analysis will gather information for use in planning for the Department of Defense (DoD) Consolidated Adjudication Facility (CAF). The DoD CAF aims to centralize and simplify suitability review and adjudication and support resource efficiencies. However, to be successful, both in terms of the future CAF and in terms of the needs and resources of the agencies/components, it is critical to get input from subject matter experts who are currently involved with the process.

PERSEREC

PERSEREC (the Defense Personnel Security Research Center) will be leading this effort. PERSEREC is a DoD organization that falls under DHRA. It was started back in the late 1980s to address problems with the security clearance process and provide support to USD(I). More recently, PERSEREC began providing more support to USD(P&R), to include this suitability process analysis.

There is a great deal of overlap between components of the security clearance process and the suitability evaluation process, and employing PERSEREC to conduct this analysis takes advantage of that experience and knowledge base. Previous PERSEREC projects have included work on both security and suitability adjudication guidelines, electronic adjudication tools, quality assessment tools, adjudicator certification requirements, and many others.

A Suitability Task and Actor Worksheet.xls

Suitability Process Task	Job Titles of People Who Do the Task	Group the "Doer" works for	How Many "Doers"	Number of locations
(a) Determine Position Risk Level/Sensitivity (PDT)				
(a1) Review Position Sensitivity Results				
(b) Review Applicant Suitability Qualifications from resume, job application, etc				
(b1) Check OPM Central Verification System for debarment information				
(c) Review OF-306 for Issues				
(d) Suitability Review and Adjudication				
(d1) Validate need for investigation				
(d2) Initiate eQIP/Background Investigation Application				
(d3) Review completed eQIP/Background Investigation Application				
(d4) Submit eQIP/Application to Initiate Background Investigation				
(d5 & e1) Receive and review results of fingerprint check				
(e) Make interim decision about CAC qualifications				
(d6) Receive completed investigation/investigation summary				
(d7) Adjudicate				
(d8a) Report positive outcome				
(d8b) Report negative outcome				

**APPENDIX B:
SITE VISIT SAMPLE AGENDA**

APPENDIX B

Proposed Agenda for PERSEREC Suitability Site Visit

We would like to begin the visit with a large group meeting that includes everyone we will be meeting with throughout our visit. During this meeting we will provide an introduction to the project, outline the goals of our visit, and discuss the overall flow of suitability tasks and processes in your organization.

For the remainder of the time, we would like meet with people who perform the tasks that appeared in the Suitability Task & Actor Worksheet (see Table 1 for a summary). We would mostly like to meet with small groups of people, but we may ask to meet individually with people for demonstrations of the tasks they perform and the systems and/or tools they use.

Table 1. Suitability Task & Actor Worksheet

Suitability Process Task	Group	Number
(a) Determine Position Risk Level/Sensitivity (PDT)	Dept. heads	All managers
(a1) Review Position Sensitivity Results	HR	2 HR Specialists
(b) Review Applicant Suitability Qualifications (resume, application, etc.)	HR	3 HR Specialists
(b1) Check OPM Central Verification System for debarment		
(c) Review OF-306 for Issues	HR	3 HR Specialists
(d) Suitability Review and Adjudication		
(d1) Validate need for investigation	Security	1 Security
(d2) Initiate eQIP/Background Investigation Application	HR/Security	1 HR Assistant/ 1 Security
(d3) Review completed eQIP/Background Investigation Application	HR/Security	1 HR Assistant/ 1 Security
(d4) Submit eQIP/Application to Initiate Background Investigation	HR/Security	1 HR Assistant/ 1 Security
(d5 & e1) Receive and review results of fingerprint check	Security	1 Security
(e) Make interim decision about CAC qualifications	Manpower/Security	1 and 1
(d6) Receive completed investigation/investigation summary	HR	1 HR Specialist
(d7) Adjudicate	HR	1 HR Specialist
(d8a) Report positive outcome	HR	1 HR Specialist
(d8b) Report negative outcome	HR	1 HR Specialist

During the meetings, we would like to discuss the tasks, task steps, tools used, and any other key aspects of each task (see Table 2 for some sample questions). Our overall goal is to get a sense of the suitability process at your facility, and to understand how and why tasks are completed. We are also interested in communication among those involved in the process, systems and forms used, and training received.

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Table 2: Sample Questions

- What is the initiating event for the task?
- How is the task accomplished?
- What tools are used?
- Are there any deadlines or time limits?
- Are there any prerequisites/ things that must be completed first?
- What is the outcome of the task? Who uses it?

Table 3 shows an outline of our proposed agenda. We have organized the sessions by task, but we are flexible on the order of meeting with staff after the large group introduction session. On average, small group meetings take 30-60 minutes. Session length will depend on the number of personnel involved and the complexity of the task.

Table 3: Agenda Outline

Task	Meeting Participants	Purpose	Meeting Type & Duration
Introduction	HR & Personnel Security Staff	Introductions; overview of processes and discussion of communication of tasks/processes	Large Group: 60 minutes
(a) Determine Position Risk Level/Sensitivity (a1) Review Position Sensitivity Results [2]	HR Specialists: Personnel who determine & review position sensitivity results.	Discuss the information required for sensitivity determinations.	Small group: 30 minutes
(b) Review Applicant Suitability Qualifications from resume, job application, etc. (e.g., check candidates against suitability-related qualifications such as clean driving record) [3]	HR Specialists: Personnel experienced with reviewing suitability qualifications.	Discuss responsibilities, processes, tasks, and systems used for reviewing applicant qualifications.	Small group: 30 minutes
(c) Review OF-306 for Issues [3]	HR Specialists: Personnel experienced with reviewing OF-306	Discuss responsibilities, processes, tasks, and systems used for reviewing OF-306	Small group: 30 minutes
(d) Suitability Review and Adjudication			
(d1) validate need for investigation [1]	Security: Personnel who performs this task	Discuss processes, tasks, and systems	Individual meeting or combine with meetings for d2-d5

PERSEREC Suitability Site Visit

Task	Meeting Participants	Purpose	Meeting Type & Duration
(d2) Initiate eQIP/ Application [2 all] (d3) Review completed eQIP/Application (d4) Submit eQIP/ Application to Initiate Background Investigation	HR & Security: personnel experienced with eQIP initiation, review, and submittal	Discuss responsibilities, processes, tasks, and systems used for suitability review and adjudication Walk through process with staff	Small group: 30 minutes Individual meetings: 30 minutes
(d5 & e1) Receive and review results of fingerprint check [1]	Security: experienced personnel	Discuss responsibilities, processes, tasks, and systems	Individual meeting: 30 minutes
(e) Make interim decision about CAC qualifications [1]	Manpower/Security: experienced personnel	Discuss responsibilities, processes, tasks, and systems	Individual meeting: 30 minutes
(d6) Receive completed investigation/investigation summary [1 all] (d7 & d8a) Adjudicate & Report (Positive outcome) (d7 & d8b) Adjudicate & Report (Negative outcome)	HR Specialist: experienced personnel	Walk through process with staff	Individual meeting: 60 minutes

**APPENDIX C:
INTERVIEW PROTOCOL**

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Interview Protocol

Overview

1. What are your major responsibilities? What are your major tasks? Are there other tasks/responsibilities you sometimes have to take on?
2. How do you prioritize your tasks (i.e. by date, workload, mission, etc)?
3. What is a typical day like for you?
4. Organization of People and Tasks
5. Organization (structure of group(s) providing service): How is your group organized? Does the organization reflect task flow or something else? Are the ways the group could be restructured to improve tasks/processes?
6. Organization (structure of tasks/steps): How are the tasks/steps organized? Does the organization reflect task flow or something else? Are the ways the tasks/steps could be restructured to improve tasks/processes?

Process

1. Walk us through your tasks, from beginning to end
2. How is the task accomplished?
3. What specific steps do you take to begin the task?
4. What is the initiating event for the task (e.g., request from a hiring manager, an automated message)?
5. Are there any pre-requisites or dependencies for this task: things that must be completed before you can begin your work, or things that are dependent on you completing your task? If so, what are they and how do they impact your task?
6. How do the different tasks that you are working on relate to each other or connect to the larger step? * How does your task fit into the larger suitability process? What comes before? After?
7. What is the product flow within this department for the major tasks?
8. What is the information flow within this department for the major tasks?
9. What tasks overlap with someone else's responsibilities? How do you communicate with that other person, and who decides what to do if there is a difference in how to proceed?
10. Who do you communicate most with throughout the day, and how?
11. What tools do you use to complete your tasks? If appropriate, ask to see the tools
12. Do you do anything differently/alter the process in any way (from how you were trained, from policy guidelines)? If so, how and why?
13. *I'm trying to get at "why do you do this the way you do it with this question
14. What resources do you need to complete your tasks? Are there other resources that you don't have that might make it easier/faster for you to complete your tasks?

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15. How many systems to you have to log into? How many different places to you have to file/send documents/end product?
16. Are there any points in which you are dependent on someone else's work/task to complete your task? If so, how does this affect your ability/timeliness in completing your task?
17. Are there others who depend on you/completion of your task in order to begin their tasks? If so, how does that affect your ability/timeliness in completing your task?

Training

1. Training (that would improve process e.g., for things that you had to figure out on your own): What training did you receive in order to perform these tasks? Did it adequately prepare you? Were there things you had to figure out on your own? Have you had the OPM suitability training?
2. *Do you have refresher trainings? Or trainings with new information? If so, what is the initiating event for training?
3. What kind of training did you receive?

Personnel

1. Personnel (who currently & possible changes): Who currently performs the task? Is this the most efficient choice of personnel? Are multiple personnel required when one it would be more efficient for one person to handle multiple steps? Are there steps that require multiple people in order to ensure fairness?
2. *Do you interface with your counterparts in other agencies? If so, when and under what circumstances?

Doctrine

1. Doctrine (policy & procedures):*What policy specifically provides guidelines or authority for the task?

End Product

1. What is the end product of the task? What does it look like?
2. Is the product electronic? If yes, what system? What are the record keeping requirements? If no, could it be?
3. Who uses the end product/outcome of this task?
4. Who communicates end/result? and to whom?
5. Is any of the communication electronic? If yes, what system? If no, could it be?
6. How long do you retain information needed to complete the task (i.e. investigation information, OF-306)?
7. What is the main product from your tasks? What does it look like? Where does it go, and how is it sent/transferred? What happens next?

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Metrics

1. What is the time frame in which you must complete this task? Is it flexible or do you have strict timelines? Why/why not?
2. How do you assess the end product? How do you know when it is complete and you are satisfied with the results? Are there any formal metrics? Is anything about the end product tracked (e.g., number completed in a week)?
3. What are the most important aspects of the process to improve? Completion time, quality, cost, etc.
4. If we made changes to the process, what sort of things could we look at to determine whether the changes were improvements?
5. What is your measure/metric for completing your task?

Engineer

1. Are there any parts of the tasks that are redundant?
2. Is there overlap with tasks another person performs? Are there redundancies?
3. Which parts of the task are the most time-consuming? The least time-consuming?
4. Any suggestions for things that could make the process more streamlined and/or efficient?
5. Are there ways in which certain requirements (paperwork, use of a specific system) hinder your ability to complete a task efficiently?

Facilities

1. Facilities (infrastructure): What is the underlying framework of the process? Have there been efforts to reform the framework or make changes to the overall structure (e.g., has it been tied to DoD Hiring Reform or reform efforts in your agency)?

Leadership

1. Leadership (who & how): Who has overall ownership of the task/process? In your agency? In DoD? How do they convey their leadership? Are they taking an active role or are you left more on your own?

Materiel

1. Materiel (systems used): What systems? How many? Log-in requirements? Paper-based that could be electronic?
2. *When was the last time a new system was introduced? Did you receive specific training for the system?