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Office of Inspector General  
United States Department of State

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AUD-MERO-21-41

Office of Audits

September 2021

# **Management Assistance Report: Process To Report Department of State Security Clearance Data to the Office of the Director of National Intelligence Needs Improvement**

MANAGEMENT ASSISTANCE REPORT

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## CONTENTS

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|                                                                                                  |    |
|--------------------------------------------------------------------------------------------------|----|
| BACKGROUND.....                                                                                  | 3  |
| The Security Clearance Process.....                                                              | 3  |
| Prior OIG Reporting on This Topic.....                                                           | 4  |
| Purpose of This Management Assistance Report .....                                               | 5  |
| RESULTS.....                                                                                     | 5  |
| Finding A: The Department’s Security Clearance Reporting Did Not Meet ODNI Requirements<br>..... | 5  |
| RECOMMENDATIONS .....                                                                            | 11 |
| APPENDIX A: BUREAU OF DIPLOMATIC SECURITY RESPONSE.....                                          | 12 |
| ABBREVIATIONS .....                                                                              | 16 |
| OIG AUDIT TEAM MEMBERS.....                                                                      | 17 |

## Summary of Review

During an Audit of the Integrity and Use of Security Clearance Data Reported to the Office of the Director of National Intelligence (ODNI), which is ongoing and being conducted jointly with the Inspector General of the Intelligence Community, the Office of Inspector General (OIG) identified deficiencies in the Department of State's (Department) reporting of security clearance data to ODNI.<sup>1</sup> The reporting of security clearance data is required by the Intelligence Authorization Act for FY 2010, codified at 50 U.S. Code § 3104, and the National Defense Authorization Act for FY 2018, codified at 10 U.S. Code § 1564 note.<sup>2</sup> To comply with the legislation, ODNI requires each Intelligence Community element to submit quarterly and annual assessments of Timeliness Data and National Security Metrics.<sup>3</sup>

The Timeliness Data reporting requirement is meant to identify the processing time of personnel security clearances at each phase of the process (*initiation, investigation, and adjudication*), by clearance level, for both initial investigations and periodic reinvestigations during the prior fiscal year for Government and contractor employees. The National Security Metrics reporting requirements include, among other things, identifying the timeliness for each phase of the security clearance process; number of completed or pending cases that took longer than 1 year; number of individuals enrolled in continuous evaluation; adjudicative reporting requirements for denied, revoked, and appealed cases; and reciprocity reporting requirements. Once ODNI collects the information from each agency, it prepares an annual report to Congress, in accordance with the Intelligence Authorization Act for FY 2010, codified at 50 U.S. Code § 3104, and the National Defense Authorization Act for FY 2018, codified at 10 U.S. Code § 1564 note. The Bureau of Diplomatic Security (DS) is responsible for the Department's security clearance investigations.

OIG found that the Department's methodology for collecting and reporting FY 2019 quarterly and annual Timeliness Data and National Security Metrics did not meet ODNI requirements. Specifically, to report Timeliness Data, OIG found that DS collected a random sample of security clearance cases for the quarter and reported the average for each quarterly submission to ODNI for the *initiation* phase, which is not reflective of the true timeframe for completing the *initiation* phase for all security clearances because it involves an average timeframe of the sample of cases selected. With respect to the National Security Metrics, OIG found that in FY 2019, DS did not submit the required quarterly reporting to ODNI because

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<sup>1</sup> The objectives of the ongoing audit are to determine whether: (1) Intelligence Community elements accurately capture, document, and report required security clearance processing timeliness information; (2) Intelligence Community elements calculate processing timeliness in a consistent manner; (3) the Security Executive Agent accurately compiles and reports data provided by Intelligence Community elements, as required; and (4) the Security Executive Agent uses Timeliness Data to address the security clearance backlog and inform security clearance-related policy decisions. This audit is currently delayed as a result of the COVID-19 pandemic.

<sup>2</sup> See 10 U.S. Code § 1564 note, Background and Security Investigations for Department of Defense Personnel, (k)(1).

<sup>3</sup> ODNI developed its reporting requirements based on the data reported to Congress as detailed in 50 U.S. Code § 3104 and 10 U.S. Code § 1564 note, Background and Security Investigations for Department of Defense Personnel.

the process to provide all of the information on a quarterly basis was considered too cumbersome due to the manual nature of collecting and organizing the data. OIG also found that of the two reporting requirements (Timeliness Data and National Security Metrics), DS had outdated standard operating procedures to guide the collection and reporting process for Timeliness Data and had not developed standard operating procedures for collecting and reporting National Security Metrics. Moreover, DS told OIG that there was only one official responsible for collecting and reporting security clearance data to ODNI.

The FY 2019 reporting deficiencies occurred, in part, because the case management system DS used to maintain all of the Department's security clearance data in FY 2019 did not have the capability to produce the exact data required for ODNI reporting. For example, the case management system used in FY 2019 could not connect to and extract the *initiation* phase timeframe data that were maintained on a separate IT system. As a result, DS selected a random sample of security clearance cases for the quarter and reported the average for each quarterly submission to ODNI. However, this methodology is not reflective of the true timeframe for completing the *initiation* phase for all security clearances because it involves a random sample. Consequently, OIG was unable to recreate the data that DS reported to ODNI for FY 2019 to verify that the information submitted was accurate. It is important to note that the limitations of the case management system used in FY 2019 were recently addressed. Specifically, in January 2021, DS implemented a new case management system that can directly connect to and access the *initiation* phase data to complete the Timeliness Data reporting requirements. However, OIG found that additional system modifications to the new case management system are needed to fully meet ODNI reporting requirements for the National Security Metrics.

Until DS makes the necessary modifications to the case management system to respond to all reporting requirements, establishes requisite internal controls to guide the reporting process to ODNI, and adequately resources the process with staff and supervisory support to fulfill the reporting requirements, the Department will not have assurance that the data reported to ODNI, and subsequently to Congress, are accurate and reliable. OIG therefore made three recommendations to address the deficiencies identified in this report. On the basis of DS's response to a draft of this report, OIG considers all three recommendations resolved, pending further action. A synopsis of DS's comments on the recommendations offered and OIG's reply follow each recommendation in the Results section of this report. DS's response to a draft of this report is reprinted in its entirety in Appendix A.

## BACKGROUND

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### **The Security Clearance Process**

The Intelligence Reform and Terrorism Prevention Act of 2004 mandated improvements in the U.S. Government's security clearance processes and established specific timeliness goals.<sup>4</sup> Additionally, Executive Order 13467<sup>5</sup> established the Performance Accountability Council<sup>6</sup> and designated the Director of National Intelligence as the Security Executive Agent.<sup>7</sup> Together, the Intelligence Reform and Terrorism Prevention Act of 2004 and the Performance Accountability Council established the three phases of the security clearance process: *initiation*, *investigation*, and *adjudication*, which captures the end-to-end security clearance process.<sup>8</sup> The following are the definitions for each phase.

- *Initiation*: The time, in days, from the date of submission by the applicant to the receipt date of all information required to begin an investigation.
- *Investigation*: The time, in days, from the receipt date of the completed personnel investigative package to the date the final investigative file is forwarded to the adjudicative unit or received by the adjudicative facility, if sent electronically.
- *Adjudication*: The time in days from the date the final investigative file is forwarded to the adjudicative unit (or received electronically) to the date of the adjudicative decision.

### **ODNI Reporting Requirements**

The reporting of security clearance data is required by the Intelligence Authorization Act for FY 2010, codified at 50 U.S. Code § 3104, and the National Defense Authorization Act for FY 2018, codified at 10 U.S. Code § 1564 note.<sup>9</sup> To comply with the legislation, ODNI requires each Intelligence Community element to submit quarterly and annual assessments of

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<sup>4</sup> Intelligence Reform and Terrorism Prevention Act of 2004, Pub. L. No. 108-458, § 3001, codified at 50 U.S. Code § 3341.

<sup>5</sup> Executive Order 13467, Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information, June 30, 2008.

<sup>6</sup> The Performance Accountability Council has to, among other responsibilities, ensure alignment of security; hold agencies accountable for implementation of security; and establish annual goals and progress metrics and prepare annual reports on results.

<sup>7</sup> According to Executive Order 13467, § 2.3(c), the Security Executive Agent, among other responsibilities, "shall be responsible for developing uniform and consistent policies and procedures to ensure the effective, efficient, and timely completion of investigations and adjudications relating to determinations of eligibility for access to classified information or eligibility to hold a sensitive position." In addition, the Security Executive Agent "may issue guidelines and instructions to the heads of agencies to ensure appropriate uniformity, centralization, efficiency, effectiveness, and timeliness in processes relating to determinations by agencies of eligibility for access to classified information or eligibility to hold a sensitive position."

<sup>8</sup> Specifically, the Intelligence Reform and Terrorism Prevention Act of 2004 established specific performance goals for the timeliness of security clearance investigations and adjudications. The Performance Accountability Council established standardized performance measures for collection and reporting of security clearance metrics.

<sup>9</sup> See 10 U.S. Code § 1564 note, Background and Security Investigations for Department of Defense Personnel, (k)(1).

Timeliness Data and National Security Metrics.<sup>10</sup> The Timeliness Data reporting requirement is meant to identify the timeliness of personnel security clearances at each phase of the process (*initiation, investigation, and adjudication*), by clearance level, for both initial investigations and periodic reinvestigations during the prior fiscal year for Government and contractor employees. The National Security Metrics reporting requirements include, among other things, identifying the timeliness for each phase of the security clearance process; completed or pending cases that took longer than 1 year; number of individuals enrolled in continuous evaluation; adjudicative reporting requirements for denied, revoked, and appealed cases; and reciprocity reporting requirements. After ODNI collects all of the data from each element, it prepares an annual report to Congress, consistent with the Intelligence Authorization Act for FY 2010, codified at 50 U.S. Code § 3104, and the National Defense Authorization Act for FY 2018, codified at 10 U.S. Code § 1564 note.

Within the Department, DS is responsible for overseeing and conducting investigations to determine an individual's eligibility for a security clearance,<sup>11</sup> and consequently, is responsible for collecting and reporting Timeliness Data and National Security Metrics to ODNI for inclusion in their annual report to Congress.<sup>12</sup>

### **Prior OIG Reporting on This Topic**

In 2017, OIG reported that the Timeliness Data that the Department submitted to ODNI from 2012 to 2016 was incorrect.<sup>13</sup> For example, DS did not report the actual total number of days it took to move background investigations through the *initiation* phase and instead used a blanket estimate for each case it reported. DS stated at the time that its case management system did not share a data connection with the Electronic Questionnaires for Investigations Processing (e-QIP) system,<sup>14</sup> so it could not capture and store the data needed to report the *initiation* phase. As a result, OIG recommended that DS inform ODNI of the steps it will take to correct the errors. In September 2017, DS provided a response outlining actions it intended to take to address the deficiencies identified by OIG. For example, DS stated that it was in process of developing a new case management system which would "allow for automation of the initiation timeliness measurement." DS estimated that the new case management system would be operational by March 2018, at the latest.

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<sup>10</sup> ODNI developed its reporting requirements based on the data reported to Congress as detailed in 50 U.S. Code § 3104 and 10 U.S. Code § 1564 note, Background and Security Investigations for Department of Defense Personnel.

<sup>11</sup> 12 Foreign Affairs Manual 232.1, "Security Clearance Investigations."

<sup>12</sup> The Office of Personnel Security and Suitability within DS manages the Department's personnel security clearance program. 1 Foreign Affairs Manual 262.7-2, "Office of Personnel Security and Suitability (DS/SI/PSS)."

<sup>13</sup> OIG, *Evaluation of the Department of State's Security Clearance Process* (ESP-17-02, July 2017).

<sup>14</sup> e-QIP is a web-based automated system that was designed to facilitate the processing of standard investigative forms used when conducting background investigations. To finish the *initiation* phase, the applicant completes the Standard Form 86 using e-QIP.

## **Purpose of This Management Assistance Report**

In October 2019, the Inspector General of the Intelligence Community began an Audit of the Integrity and Use of Security Clearance Data Reported to the Office of the Director of National Intelligence. The objectives of this audit are to determine whether: (1) Intelligence Community elements accurately capture, document, and report required security clearance processing timeliness information; (2) Intelligence Community elements calculate processing timeliness in a consistent manner; (3) the Security Executive Agent accurately compiles and reports data provided by Intelligence Community elements, as required; and (4) the Security Executive Agent uses Timeliness Data to address the security clearance backlog and inform security clearance-related policy decisions. To answer the objectives, the Inspector General of the Intelligence Community is auditing eight Intelligence Community elements, including the Department.<sup>15</sup> OIG is conducting this audit jointly with the Inspector General of the Intelligence Community and assessed the Department's submitted security clearance data for FY 2019.

During this joint audit, which has been delayed due to the COVID-19 pandemic, OIG identified deficiencies in the Department's methodology to collect and report security clearance data to ODNI. Therefore, OIG is issuing this Management Assistance Report to encourage prompt action to address the identified deficiencies. OIG is reporting the deficiencies discussed in this Management Assistance Report in accordance with generally accepted government auditing standards. In performing the work related to these deficiencies, OIG interviewed DS officials, reviewed applicable criteria, and tested the data to determine whether the Department's method for calculating processing time was consistent with ODNI guidance. OIG faced challenges in completing this work due to the COVID-19 pandemic. These challenges included limitations on in-person meetings and difficulty accessing information, and related difficulties within the Department, which affected its ability to respond to OIG requests for information in a timely manner. Despite these challenges, OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions presented in this report.

## **RESULTS**

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### **Finding A: The Department's Security Clearance Reporting Did Not Meet ODNI Requirements**

OIG found that the Department's methodology for collecting and reporting FY 2019 quarterly and annual Timeliness Data and National Security Metrics did not meet ODNI requirements. Specifically, to report Timeliness Data, OIG found that DS selected a random sample of security clearance cases for the quarter and reported the average processing time for each quarterly submission to ODNI for the *initiation* phase, which is not a true reflection of the timeframe for completing the *initiation* phase for all security clearances because it involves an average timeframe of the sample of cases selected. With respect to the National Security Metrics, OIG

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<sup>15</sup> The other Intelligence Community elements included the Central Intelligence Agency, National Security Agency, Defense Intelligence Agency, National Geospatial-intelligence Agency, National Reconnaissance Office, and the Federal Bureau of Investigation.

found that in FY 2019, DS did not submit the required quarterly reporting to ODNI because the process to provide all of the information on a quarterly basis was considered too cumbersome due to the manual nature of collecting and organizing the data. OIG also found that for the two reporting requirements (Timeliness Data and National Security Metrics), DS had outdated standard operating procedures to guide the collection and reporting process for Timeliness Data and had not developed standard operating procedures for collecting and reporting National Security Metrics. Moreover, DS told OIG that there was only one official responsible for collecting and reporting security clearance data to ODNI.

The FY 2019 reporting deficiencies occurred, in part, because the case management system used by DS to maintain all of the Department's security clearance data in FY 2019 did not have the capability to produce the exact data required for ODNI reporting. For example, the case management system used in FY 2019 was unable to connect to and extract the *initiation* phase timeframe data that was maintained on a separate IT system known as e-QIP. As a result, DS selected a random sample of security clearance cases for the quarter and reported the average for each quarterly submission to ODNI. However, this methodology is not reflective of the true timeframe for completing the *initiation* phase for all security clearances because it involves a random sample. Consequently, OIG was unable to recreate the data that DS reported to ODNI for FY 2019 to verify that the information submitted was accurate.

It is important to note that this situation has recently been addressed. Specifically, in January 2021, DS implemented a new case management system that can directly access the *initiation* phase data to complete the Timeliness Data reporting requirements. However, OIG found that additional system modifications are needed to fully meet ODNI reporting requirements for the National Security Metrics. Until DS makes the necessary modifications to the recently deployed case management system to respond to all reporting requirements, establishes requisite internal controls to guide the reporting process, and adequately resources the process with staff and supervisory support to fulfill the reporting requirements, the Department will not have assurance that the security clearance data reported to ODNI, and subsequently provided to Congress, are accurate and reliable.

***Timeliness Data***

With respect to the Timeliness Data, OIG found that in FY 2019, DS had collected a random sample of security clearance cases for the quarter and reported the average processing time for each quarterly submission to ODNI for the *initiation* phase. However, this methodology is not reflective of the true timeframe for completing the *initiation* phase for all security clearances because it involves an average timeframe of the sample of cases selected. Moreover, because ODNI uses the Department's reported data to assess the Department's end-to-end security clearance timeliness, the accuracy of that assessment is also impacted by using a sample rather than complete data for all security clearances at the *initiation* phase.

***National Security Metrics***

With respect to the National Security Metrics, OIG found that in FY 2019, DS did not submit the required quarterly reporting to ODNI. According to a DS official, this reporting requirement was

not fulfilled because the process to provide all of the information on a quarterly basis was too cumbersome due to the manual nature of collecting and organizing the data. Specifically, the DS official explained that a manual review of all open cases must be conducted before inputting each case number into the case management system to obtain relevant information for reporting. This includes completed or pending cases that took longer than 1 year; number of individuals enrolled in continuous evaluation; adjudicative reporting requirements for denied, revoked, and appealed cases; and reciprocity reporting requirements. OIG found that DS submitted the annual report for National Security Metrics in FY 2019, but OIG could not attest to the accuracy of the data submitted. Specifically, OIG was unable to recreate the data that DS reported to ODNI in FY 2019 to verify that the information submitted was accurate due to the ad hoc process for collecting and reporting the data.

### ***Case Management System Limitations Hindered Accurate Reporting in FY 2019***

The reporting deficiencies in FY 2019 occurred, in part, because the case management system DS used to maintain all of the Department's security clearance data in FY 2019 did not have the capability to produce the exact data required for ODNI reporting. Specifically, the limitations of the case management system prevented DS from connecting to and extracting data from a separate IT system that maintained data regarding the initiation phase. For example, data needed to accurately report the *initiation* phase for all security clearances are maintained on e-QIP. However, the case management system is not connected to e-QIP and therefore cannot extract needed data from e-QIP to populate the case management system with data specific to the *initiation* phase. As a result, DS employed the random sample methodology previously discussed to avoid manually entering the *initiation* phase data in the case management system every quarter.

In addition, the limitations of the case management system require DS to manually review and remove data exported from the case management system to ensure security clearance data not relevant to ODNI reporting are removed.<sup>16</sup> For example, for FY 2019 first quarter data, DS manually removed more than 12,000 security clearance cases from the data ultimately reported to ODNI because it was not relevant to the Timeliness Data required by ODNI. As a result of these system limitations, when OIG attempted to recreate the Timeliness Data for all four quarters of FY 2019, OIG was unable to replicate DS calculations that were reported to ODNI. DS also confirmed with OIG that all of the data submitted to ODNI required extensive manual manipulation to calculate and report the data, which increases the risk of human error and makes the calculations difficult to reproduce.

### ***Outdated and Absent Standard Operating Procedures for ODNI Reporting***

OIG also found that DS had outdated standard operating procedures to guide the collection and reporting of Timeliness Data and had not developed standard operating procedures to guide the collection and reporting of the National Security Metrics. With respect to the Timeliness

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<sup>16</sup> The Department also serves as a main provider of overseas background investigations work for other Government agencies. DS removes from the data, among other things, cases that are irrelevant to ODNI reporting and removing duplicate cases.

Data, OIG attempted to recreate the FY 2019 Quarter 1 data reported to ODNI using the standard operating procedures but was unable to recreate the data to match what DS had submitted. A DS official explained that due to the manual data collection and calculation process, the results would likely never match up. Additionally, OIG found that within DS, there is only one official who is familiar with the process to collect and report Timeliness Data and National Security Metrics to ODNI. The responsible DS official told OIG that they learned the process from a previous employee and relied on institutional knowledge to complete the collection and reporting requirements. When asked who verifies the responsible DS official's work, they stated that only spot-checking is done, and there is no formal verification process.

### ***Internal Controls Over Security Clearance Data Submitted to ODNI Are Needed***

Outdated and absent standard operating procedures, in addition to limited staff who have knowledge of the reporting process to collect and prepare ODNI reporting requirements, demonstrate a breakdown of internal controls in the security clearance reporting process. The Government Accountability Office's *Standards for Internal Controls in the Federal Government* states that control activities are "[t]he actions management establishes through policies and procedures to achieve objectives and respond to risks."<sup>17</sup> It also states that management should communicate control activities using an appropriate method, such as a written document so that the organization has the appropriate tools to communicate quality information on a timely basis.<sup>18</sup> Written documentation also "provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel,"<sup>19</sup> such is the case when only one DS official is responsible for collecting and reporting security clearance data to ODNI. Finally, it states that another common category of control activity is "[r]eviews by management at the functional or activity level,"<sup>20</sup> indicating that DS management should review the data submitted to ODNI to ensure that the data submitted are accurate.

### ***Integrated Security and Suitability System Implementation***

In July 2021, DS told OIG that it had implemented a new case management system, the Integrated Security and Suitability System (IS3), in January 2021. Unlike the previous case management system, the IS3 is connected to e-QIP and allows DS to track the *initiation* phase more accurately for its Timeliness Data reporting.<sup>21</sup> With respect to the National Security Metrics, DS told OIG that it is still in the process of better understanding IS3 to create specific system modifications that would fulfill the quarterly ODNI reporting requirements. The DS official also stated that with the implementation of IS3, DS is no longer using the outdated

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<sup>17</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government* 8 (GAO-14-704G, September 2014).

<sup>18</sup> GAO-14-704G, September 2014, at 61.

<sup>19</sup> GAO-14-704G, September 2014, at 29.

<sup>20</sup> GAO-14-704G, September 2014, at 46.

<sup>21</sup> According to DS, IS3 "utilizes modern technology to enhance the security clearance process by ingesting e-QIP data to minimize redundant data entry and leveraging automation."

standard operating procedures. However, the responsible DS official told OIG that new standard operating procedures have not been developed and implemented to guide the identification and reporting of data for either the Timeliness Data or the National Security Metrics. Furthermore, the responsible DS official remained the sole person accountable for collecting and reporting the ODNI requirements with no additional level of review prior to submitting the data to ODNI.

Until DS makes the necessary modifications to the new case management system to respond to all reporting requirements, establishes requisite internal controls over the reporting process to ODNI, and adequately resources the process with staff and supervisory support to fulfill the reporting requirements, the Department will not have assurance that the data reported to ODNI, and subsequently to Congress, are reliable and meets the intent of legislation. Therefore, OIG is making three recommendations to address the deficiencies identified in this report.

**Recommendation 1:** OIG recommends that the Bureau of Diplomatic Security implement modifications to the recently deployed Integrated Security and Suitability System that responds to all Office of the Director of National Intelligence quarterly and annual reporting requirements involving Timeliness Data and National Security Metrics.

**Management Response:** DS concurred with the recommendation, stating that with the implementation of IS3, DS “can now provide accurate Timeliness and National Security Metrics data for all cases initiated in the new system.” DS also stated that “[p]roviding metrics for the legacy cases is a challenge as the migrated data remains in an unstructured format” and “[a]s this transition period phases out and DS continues using the new system, all investigations will contain all relevant data, to include initiation data for the required data calls.” Because DS now has the IT functionality in place to meet the intent of the recommendation, DS requested that this recommendation be closed.

**OIG Reply:** On the basis of DS’s response and actions, OIG considers this recommendation resolved, pending further action. During fieldwork for this audit, DS told OIG that it had not fulfilled the quarterly reporting requirements for the National Security Metrics and additional modifications to IS3 were needed. Therefore, this recommendation will be closed when OIG receives documentation demonstrating that DS has implemented modifications to respond to all ODNI quarterly and annual reporting requirements involving Timeliness Data and National Security Metrics.

**Recommendation 2:** OIG recommends that the Bureau of Diplomatic Security develop and implement standard operating procedures that result in consistent and accurate reporting of Timeliness Data and National Security Metrics. The standard operating procedures at a minimum should include the methodology for identifying and exporting the data from the case management system and a process to verify that only relevant cases are included for quarterly and annual reporting to the Office of the Director of National Intelligence.

**Management Response:** DS concurred with the recommendation, stating that “[s]tandard operating procedures are now being updated to reflect the interim process for pulling data

from both the legacy system and IS3, as well as the future term where all data is pulled from IS3 only.” The standard operating procedures “will be updated as DS works through the optimal routines to collect all data required for both ODNI data calls.”

**OIG Reply:** On the basis of DS’s response and planned actions, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives documentation demonstrating that DS has developed and implemented standard operating procedures that result in consistent and accurate reporting of Timeliness Data and National Security Metrics. The standard operating procedures, at a minimum, should include the methodology for identifying and exporting the data from the case management system and a process to verify that only relevant cases are included for quarterly and annual reporting to the Office of the Director of National Intelligence.

**Recommendation 3:** OIG recommends that the Bureau of Diplomatic Security (a) assign responsibilities to additional personnel for the collection and reporting of Timeliness Data and National Security Metrics and (b) require a secondary level of review prior to submitting the data reported to the Office of the Director of National Intelligence.

**Management Response:** DS concurred with the recommendation, stating that it “has not requested any funding or positions to support the collection and reporting of Timeliness Data and National Security Metrics; however, [DS] fully intends to pursue requesting the positions as recommended by the OIG.” To staff additional personnel with metrics responsibilities, “DS would either require additional funding for new employees to staff this program or would need to pull staff from current programs, which would negatively impact the Department’s ability to produce timely investigations” and “will work to make the case for additional positions in future budget requests.”

**OIG Reply:** On the basis of DS’s response and planned actions, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that DS (a) assigned responsibilities to additional personnel for the collection and reporting of Timeliness Data and National Security Metrics and (b) required a secondary level of review prior to submitting the data reported to the Office of the Director of National Intelligence.

## RECOMMENDATIONS

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**Recommendation 1:** OIG recommends that the Bureau of Diplomatic Security implement modifications to the recently deployed Integrated Security and Suitability System that responds to all Office of the Director of National Intelligence quarterly and annual reporting requirements involving Timeliness Data and National Security Metrics.

**Recommendation 2:** OIG recommends that the Bureau of Diplomatic Security develop and implement standard operating procedures that result in consistent and accurate reporting of Timeliness Data and National Security Metrics. The standard operating procedures at a minimum should include the methodology for identifying and exporting the data from the case management system and a process to verify that only relevant cases are included for quarterly and annual reporting to the Office of the Director of National Intelligence.

**Recommendation 3:** OIG recommends that the Bureau of Diplomatic Security (a) assign responsibilities to additional personnel for the collection and reporting of Timeliness Data and National Security Metrics and (b) require a secondary level of review prior to submitting the data reported to the Office of the Director of National Intelligence.

APPENDIX A: BUREAU OF DIPLOMATIC SECURITY RESPONSE

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United States Department of State

Washington, D.C. 20520

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September 7, 2021

**INFORMATION MEMO TO ACTING INSPECTOR GENERAL  
SHAW – OIG**

FROM: DS – Gentry Smith

SUBJECT: Bureau of Diplomatic Security Response to the Office of  
Inspector General (OIG) Management Assistance Report  
(MAR) on “Process to Report Department of State Security  
Clearance Data to Office of the Director of National  
Intelligence Needs Improvement August 2021”

Below is the Bureau of Diplomatic Security’s response to  
recommendations 1-3 of the subject draft report.

**Recommendation # 1:** OIG recommends that the Bureau of Diplomatic  
Security implement modifications to the recently deployed Integrated  
Security and Suitability System that responds to all Office of the  
Director of National Intelligence quarterly and annual reporting  
requirements involving Timeliness Data and National Security Metrics.

**DS Response (08/19/2021): DS-SI concurs with OIG’s**  
**recommendation #1.** With the implementation of the Integrated  
Security and Suitability System (IS3), the Bureau of Diplomatic Security  
(DS) can now provide accurate Timeliness and National Security  
Metrics data for all cases initiated in the new system. However, during  
system launch, DS migrated all pending cases to the new system, and  
investigations are still being conducted and adjudicated. Providing  
metrics for the legacy cases is a challenge as the migrated data remains  
in an unstructured format. As this transition period phases out and DS  
continues using the new system, all investigations will contain all

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relevant data, to include initiation data for the required data calls. Since DS now has the IT functionality in place to meet the intent of the recommendation for all cases moving forward, DS respectfully requests that this recommendation be closed.

**Recommendation # 2:** OIG recommends that the Bureau of Diplomatic Security develop and implement standard operating procedures that result in consistent and accurate reporting of Timeliness Data and National Security Metrics. The standard operating procedures at a minimum should include the methodology for identifying and exporting the data from the case management system and a process to verify that only relevant cases are included for quarterly and annual reporting to the Office of the Director of National Intelligence.

**DS Response (08/19/2021): DS-SI concurs with OIG's recommendation #2.** During the audit referenced in the MAR, DS was in the process of developing its new case management system. This new system, the Integrated Security and Suitability System (IS3) launched on January 4, 2021. Standard operating procedures are now being updated to reflect the interim process for pulling data from both the legacy system and IS3, as well as the future term where all data is pulled from IS3 only. These will be updated as DS works through the optimal routines to collect all data required for both ODNI data calls.

**Recommendation # 3:** OIG recommends that the Bureau of Diplomatic Security (a) assign responsibilities to additional personnel for the collection and reporting of Timeliness Data and National Security Metrics and (b) require a secondary level of review prior to submitting the data reported to the Office of the Director of National Intelligence.

**DS Response (08/19/2021): DS-SI concurs with pursuing OIG's recommendation #3.** DS/SI/PSS has not requested any funding or positions to support the collection and reporting of Timeliness Data and

UNCLASSIFIED

- 3 -

National Security Metrics; however, DS/SI/PSS fully intends to pursue requesting the positions as recommended by the OIG.

Due to the changing landscape of personnel security with the transition to the Trusted Workforce 2.0 initiatives and policies, DS has had to allocate staff to multiple new required programs. These include, but are not limited to, Continuous Evaluation and updating and expanding the policy for security reporting requirements. These new programs, along with Department-wide hiring initiatives, require DS/SI/PSS to allocate all available personnel to ensure a trusted and vetted workforce can exist within the Department.

To staff additional personnel with metrics responsibilities, DS would either require additional funding for new employees to staff this program or would need to pull staff from current programs, which would negatively impact the Department's ability to produce timely investigations. DS will work to make the case for additional positions in future budget requests.

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Approved: DS – Gentry O. Smith

[  ]

Analyst: DS/MGT/PPD – Peggy Brown

Cleared: DS/DSS – CMatus (ok)  
DS/EX – EX staff (ok)  
DS/EX/MGT – JSchools (ok)  
DS/MGT/PPD – LLong, Acting (ok)  
DS/MGT/PPD- Policy – LLong (ok)  
DS/SI - DBlersch (ok)  
M: BPeracchio (ok)  
M/SS: MLongstreth (ok)  
GTM: MLedesma-Leese (ok)  
BP: MRafaniello (ok)

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## ABBREVIATIONS

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|       |                                                         |
|-------|---------------------------------------------------------|
| DS    | Bureau of Diplomatic Security                           |
| e-QIP | Electronic Questionnaires for Investigations Processing |
| IS3   | Integrated Security and Suitability System              |
| ODNI  | Office of the Director of National intelligence         |
| OIG   | Office of Inspector General                             |

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