

May 25, 2018

The Honorable Richard Burr
Chairman
Senate Select Committee on Intelligence
211 Hart Senate Office Building
Washington, DC 20510

The Honorable Mark Warner
Vice-Chairman
Senate Select Committee on Intelligence
211 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Burr and Vice Chairman Warner:

On behalf of the industry community, we thank you again for your leadership in addressing the critical national security issue of security clearance reform. Below is ManTech's response to your Question for the Record on reciprocity, received May 5, 2018.

I would be happy to discuss any additional questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to be 'K. Phillips', written in a cursive style.

Kevin Phillips
President & Chief Executive Officer
ManTech International

Q: Reciprocity: The Committee is concerned that the Government policies intended to result in prompt reciprocity may not, in fact, operate promptly in practice. Understanding that there could be proprietary and privacy restrictions on certain data categories, can you please provide data for ManTech, and any companies with whom you coordinated your testimony, regarding how long it takes for personnel to transport clearances issued at the same level between agencies? Can you identify what may contribute to delays, e.g., specific additional investigative requirements at certain agencies?

A: Data: Industry clearance timeline data for the last six months are shown in the table below. The data includes approximately 2,000 instances of clearance cross-overs – from ManTech and five of the other companies who approved ManTech’s SSCI testimony on March 7, 2018. The data was presented to the Industry-PAC/PMO “Tiger Team” on reciprocity. The PAC/PMO team confirmed that this data accurately reflects the general industry experience with crossovers. The data includes both reinstatements within the same agency (i.e. when an employee moves from one contract to another), as well as crossovers between agencies. This tends to actually skew the crossover averages lower. All industry partners that provided data have an excellent pre-screening program, which ensures clean cases are submitted, although Industry does not have access to derogatory information held by the Government. The timelines below start from when the requested paperwork is initiated to when the cleared contractor is briefed into the position.

Gaining Agency	Crossover Industry Average (days)	Crossover Industry Average for Longest 10% of cases (days)
DIA	20	90
NRO	15	67
NSA	30	174
NGA	16	50
CIA	12	32
ODNI	18	44
DHS	87	223
DoD (SCI)	44	300

Conclusion from Data: Industry data confirms the Committee’s concern that government policies intended to ensure prompt reciprocity are not, in fact, resulting in prompt reciprocity in practice. As the table indicates, Industry’s experience is that prompt reciprocity between Government agencies is the exception rather than the rule.

Factors Contributing to Delay: The key contributing factor to delays is that application processes, adjudication standards, and investigative requirements for positions of trust (National Security Access, Suitability & Fitness and Credentialing) vary widely between Government agencies. Moreover, Industry has limited visibility into these standards.

Government agencies do not automatically accept reciprocity from another agency until they review the eligibility database, receive the transfer of the investigative case file, and re-adjudicate against agency specific standards. A current example of this is the extreme delays in transferring individuals cleared for TS/SCI with at least CI polygraph from NSA to U.S. Cyber Command. While we lack extensive data on transfers to the command, one contractor reports that out of 31 crossover cases in the past 6 months, the average approval time for U.S. Cyber Command is 179 days.

Other factors contributing to delays in prompt, reciprocal transfers include:

- Delays in the transfer of security files between Government agencies
- Re-vetting of personnel that hold equivalent or higher eligibility (DHS Suitability & Fitness Determinations)
- Delays in Contractor Officer Representative (COR) coordination and approval for access
- Lack of industry visibility into exceptions, deviations, waivers or derogatory information in Government eligibility systems
- Manual legacy business practices
- Zero defect adjudicative objectives
- Un-adjudicated information in the case file
- Pending incident reports
- Out of Scope investigation or polygraph
- Agency's additional paperwork and processing requirements
- Program-specific, risk-based vetting requirements
- Time to schedule Government briefings after approval
- Adverse or derogatory information in the case file (legitimate factor)

Recommendations to Promote True Reciprocity: Industry strongly recommends one simple, universally-accepted and enforced set of standards for national security access, suitability & fitness and credentialing across all of Government to increase efficiency and promote reciprocity.

The Security and Suitability Executive Agents should ensure that Government agencies implement their policies and procedures uniformly and consistently to ensure appropriate uniformity, centralization, effectiveness and timeliness. These Executive Agents should own the standards overseeing execution – they should not just promulgate the policies. They should ensure reciprocal recognition among agencies and establish mechanisms for crossovers for vetted individuals to be done routinely, timely and automatically. As time matters to the mission, they should minimize any deviations or additions to these uniform standards.

Finally, the Administration and Congress should establish ambitious timeline goals for reciprocity and should routinely track and collect data on cross-over clearances against these goals. This capability should be incorporated into the planned National Background Investigation System (NBIS).