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GUIDE

SECURITY CLEARANCES & FACILITY CLEARANCES

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A GUIDE TO SECURITY CLEARANCES & FACILITY CLEARANCES

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ADVICE OR THE CREATION OF AN ATTORNEY/CLIENT RELATIONSHIP

SECURITY CLEARANCE HANDBOOK

I. Introduction

There are three main categories of clearances. **CONFIDENTIAL**: applied to information or material the unauthorized disclosure of which can reasonably be expected to cause damage to the national security. **SECRET**: applied to information or material the unauthorized disclosure of which can reasonably be expected to cause serious damage to the national security. **TOP SECRET**: applied to information or material the unauthorized disclosure of which can reasonably be expected to cause exceptionally grave damage to the national security. In addition to the above, there are other classifications applied to a TOP SECRET clearance that covers more sensitive classified information. These are known as Sensitive Compartmented Information (SCI), or Special Access Programs (SAP).

A. Who Requires a Security Clearance?

Anyone who requires access to classified information to perform their duties requires a security clearance, and depending on the level of access needed would determine the class clearance needed. In the military, a clearance is determined by an individual's MOS/AFSC Rating (job) and duty assignment. Many military slots require access to information regardless of the assignment. In other jobs, the job may not require a clearance, but a person's duty assignment might require a clearance. And to have access to classified information, one needs not only a security clearance, but the appropriate "Need to Know." You must have a sponsor, either military, federal agency, or contractor. You are not able to obtain a clearance just to have a clearance. Only United States citizens can be granted a security clearance.

B. What Determines Granting or Denying a Clearance?

The military and DOD civilian employees' determinations or recommendations are made by a Central Adjudication Facility (CAF). Each military service has one and the Washington Headquarters Service contains the civilian counterpart. Industrial clearances, or Contractor clearances, are handled by the Defense Industrial Security Clearance Office (DISCO), which is co-located with the Defense Office of Hearings and Appeals (DOHA). The adjudicators look at the following factors in making their evaluation:

- The nature, extent and seriousness of the conduct;
- The circumstances surrounding the conduct, to include knowledgeable participation;
- The frequency and recency of the conduct;
- The individual's age and maturity at the time of the conduct;
- The voluntariness of participation;
- The presence or absence of rehabilitation and other pertinent behavioral changes;
- The motivation for the conduct;
- The potential for pressure, coercion, exploitation, or duress; and
- The likelihood for continuation or recurrence of the conduct.

C. How Long Does It Take to Obtain a Clearance?

There are no time limits imposed on the issuers of a security clearance. In recent years, due to the increased demand for government employees and contractors, it can take a few months for a CONFIDENTIAL or SECRET clearance, up to as much as a year for a TOP SECRET clearance. Generally, for TOP SECRET clearances, an interim clearance may take four to six months to be issued, allowing the individual to commence work, but it often takes up to a year or more for the final clearance to be granted. Your investigation will take longer if you have lived or worked in several locations within the United States or overseas, traveled extensively outside of the United States, have relatives who live outside of the United States, or information that is developed during the investigation process that requires further fact-finding.

If you want to check on the status of your investigation, contact the unit or contractor security officer, who keeps in contact with the investigative agencies.

D. Continuing Evaluation

Once you have a clearance, you will be continually monitored for compliance. You have a duty to report adverse information to your Facility Security Officer (FSO) at any time. For example, you obtain a ticket for DUI, or you have a mortgage foreclosed by a financial institution. You must report these events. The FSO will report them to DSS, so a determination can be made whether or not to suspend or revoke your clearance. Some of the factors used in determining what type of action to take include: who is aware of the incident, the seriousness of the incident, whether previous incidents were a matter of concern in the past, and whether the incident relates to areas considered to be of concern for persons holding clearances. Events that are not immediately investigated may also be noted and explored later when a person undergoes a periodic re-investigation.

The categories of concerns enumerated in the Adjudicative Guidelines are as follows:

- a) Allegiance to the U.S.
- b) Foreign Influence
- c) Foreign Preference
- d) Sexual Behavior
- e) Personal Conduct
- f) Financial Considerations
- g) Alcohol Consumption
- h) Drug Involvement
- i) Psychological Conditions: Emotional, Mental and Personality Disorders
- j) Criminal Conduct
- k) Handling Protected Information
- l) Outside Activities
- m) Use of Information Technology Systems

If you are denied a clearance, or if you have a current clearance that is suspended or revoked, you have the right to appeal that decision. Under most circumstances, you will be provided a Statement of Reasons (SOR) why you are ineligible for continued access to classified information and the appeal procedures. If the information stated in the SOR is inaccurate or misleading, you will have the opportunity to correct or clarify the record. If an option, ALWAYS request a personal appearance hearing. The odds of obtaining or maintaining a clearance are much greater with a hearing.

The Defense Office of Hearings and Appeals maintains a website that provides security clearance decisions for industrial or contractor cases. <http://www.dod.mil/dodgc/doha>

E. Periodic re-investigations

Periodic re-investigations are required every five years for a TOP SECRET clearance, ten years for a SECRET clearance, or fifteen years for a CONFIDENTIAL clearance. However, civilian and military personnel may be randomly investigated at any time. If you leave the service, or you leave your government civilian job or contractor job, your clearance can be reactivated within two years as long as the last background investigation falls within the above timeframes. Otherwise, you must start over by filing a SF 86.

F. Polygraph examinations

The use of polygraphs for any Department of Defense program is governed by DOD Directive 5210.48 and DOD Regulation 5320.48R. Certain employers require polygraph exams. DSS, National Security Agency (NSA), Central Intelligence Agency (CIA), and National Reconnaissance Office are some. It is also mandatory for some SCI and SAP access designations to require these tests.

On occasion, they are used in personal security investigations to resolve serious adverse information about a person only with his or her consent. No adverse action may be taken solely on the basis of a polygraph exam that indicates deception except upon written finding by the Secretary of Defense or certain enumerated designees.

Investigation of felonies, unauthorized disclosure of classified information, acts of terrorism, or when requested by the individual for exculpation with respect to allegations arising from the investigation are additional uses.

G. Cost of a security clearance

If you are military personnel or a government civilian employee, the government pays the cost of clearances. Contractors must pay for their employees. That's why you often see contractor job fairs that advertise for persons who already hold a valid clearance. It saves time and can save a substantial amount of money. A security clearance can cost a contractor several thousand dollars up to \$15-20,000 for a TOP SECRET clearance, depending upon individual factors.

H. Access to records

If you want a copy of your investigation file, you need to send a request that contains:

- Your full current name
- Any other names you may have used in the past
- Date of Birth
- Social Security Number
- An originally notarized signature
- A brief description of the records you are seeking
- Any other information that you believe may be useful in our search for records pertaining to you
- Whether you want someone else to receive the records on your behalf (include name and address of the other party)

The address to send your request to is:

Defense Security Service
Privacy Act Branch
938 Elkridge Landing Road
Linthicum, MD 21090-2917

Please note, that due to privacy concerns, facsimile and electronic mail requests for investigative files are **not** accepted. Only originally signed and properly notarized requests will be accepted via postal mail.

PERSONNEL SECURITY CLEARANCES

II. Government Contactor Employees (Applicant)

Security Clearance Process

The Defense Office of Hearings and Appeals is the Agency within DOD that issues decisions on employees' eligibility to access classified information. Security clearances may be obtained only by persons employed in positions requiring access to classified information, and is not available for someone to just have "a clearance." For government contractors within the Executive Branch, DOHa makes a final decision on security clearance decisions affecting government contractors. For military and civilian employees, DOHA makes a recommended decision, and the final decision is made by the military or civilian agency's Personnel Security Appeal Board (PSAB). No one seeking a security clearance has a right to judicial review of any security clearance matter. *Dept. of the Navy v. Egan*, 444 US 518 (1988).

A. Background Investigation

To initiate an application for a security clearance, a person fills out either a written SF86 Security Clearance Questionnaire, or an electronic version, the Electronic Questionnaire for

Investigations Processing (EQIP). The form asks about education, places of residence, past employment, countries visited, names of parents, grandparents and siblings. It also asks for more personal data, such as mental health history, organizations you have belonged to, your financial affairs, debts, alcohol and drug use, history of arrests and convictions.

Background investigations are conducted by the Office of Personnel Management (OPM). These investigators check state and federal criminal databases, may include interviewing the applicant, interviewing persons he lists on the SF86, credit history, and other data available in government databases.

It cannot be emphasized enough that it is absolutely essential that full information is listed on these forms. If you omit something and it later comes to the attention of the government investigators, it may be grounds for revoking your clearance.

B. Commencing Work – Provisional Clearance

If after all of the routine background checks are run, and no negative information is found, an applicant may be given an interim security clearance by the Defense Industrial Security Clearance Office (DISCO). This, in most cases, allows an employee to commence work for his employer.

C. JPAS (Joint Personnel Adjudication System)

The Joint Personnel Adjudication System (JPAS) is the DOD system containing the personnel security information for use by Central Adjudication Facilities (CAFs), security managers, special security officers, and the defense industrial security community. All industrial security-cleared contractors use this system for all types of personnel actions involving security clearances, including the initial request to commence a clearance investigation. When a clearance is issued, DISCO makes an electronic entry into JPAS.

D. The Role of the Defense Office of Hearings and Appeals (DOHA)

Once an applicant's investigative file is sent to DOHA, it is reviewed by the adjudicators and Department Counsel for completeness and an assessment of whether or not a clearance should be granted.

E. If Applicant Is Refused a Clearance

1. Statement of Reasons (SOR) issued by DOHA

If DOHA determines that a clearance should be denied, it then issues a Statement of Reasons (SOR) as to why it is not clearly consistent with the national interest to grant or continue the person's clearance. An applicant then has twenty days to respond with a detailed written answer, under oath, that admits or denies

the allegations listed in the SOR. If the applicant ignores the SOR or does not send a timely response, DOHA can deny the clearance.

2. Request a hearing – what is involved

At the time an applicant responds to the SOR, a hearing may be requested. ALWAYS request a hearing. There is better than a 90% denial rate for non-hearing or FORM cases that are decided on just the written record.

3. Hearing before an Administrative Judge – when, where, exhibits, witnesses - pre-trial discovery

If a hearing is requested, the DOHA Administrative Judge will set a date for a hearing, at which time an applicant may offer testimony, exhibits and witnesses. Many cases are heard around the country, and DOHA attempts to set the Industrial cases within 150 miles of an applicant's home. More and more video teleconferencing cases are done, where an applicant and his attorney can be in a far location and the Judge and Department Counsel can be at the DOHA main office in Arlington, Virginia, or in its satellite offices in Los Angeles, Seattle, Chicago, and Boston. Discovery before a hearing may consist of written interrogatories and requests for production of documents. The Department Counsel must provide a list of witnesses to the applicant. The Administrative Judge controls the discovery issues. At a hearing, the government has the burden of going forward with the evidence and the Department Counsel presents the government's case. Both parties may offer exhibits into evidence, and although DOHA has no subpoena power, witnesses for each side may be called to testify. At the conclusion, the applicant or his attorney and Department Counsel may make closing statements.

F. DOHA Issues a Written Decision

After the hearing, the Administrative Judge issues a written decision which is a final decision. A list of appeal instructions is included with the original Administrative Judge's decision.

G. Who May Appeal

Either party may appeal the Judge's decision. The losing party must appeal Judge's decision to the DOHA Appeal Board within 15 days of the date that appears on the Judge's decision. The appealing party must file an appeal brief within 45 days of the date on the Judge's decision. Evidence that was not before the Judge is not part of the record, and no new evidence

may be received or considered by the Appeal Board. After receipt of the appeal brief, the non-appealing party has 20 days to file an optional reply brief.

H. Appeal Board Decision

The Appeal Board then reviews the file and makes a decision sustaining, reversing, or remanding the case to the Administrative Judge for further deliberations.

I. Reapplication

If an applicant is denied a clearance, he or she may reapply for a clearance one year from the date of an unfavorable decision, either the Statement of Reasons, or if a hearing is held, from the date that the Judge's decision becomes final.

J. Reimbursement

For government contractor applicants, if a security clearance has been suspended, denied or revoked, then subsequently is granted, the person may petition for loss of earnings resulting from that suspension, denial or revocation. The petition must be filed within one year after the date that the claim arises. The reimbursement decision is made by the DOD General Counsel.

(III) Federal Employees Including Military Personnel (Appellant)

Security Clearance Process

A. Role of the Central Adjudication Facility (CAF)

For military personnel and civilian government employees, clearances are granted by the Central Adjudication Facilities (CAF), the military services, and the Washington Headquarters Service (WHS), Central Adjudication Facility for DOD and certain other federal employees.

B. Background Investigation and Form SF 86

The background check again is initiated with a Form SF 86, or its electronic equivalent, and the investigation takes the same format as discussed for industrial clearances, above.

C. Adverse Findings – Appellant Denied a Clearance – SOR Issued

If adverse findings are determined, the appellant, the term for an applicant for a security clearance from a federal agency or the military, is issued a Statement of Reasons, or as sometimes called a Letter of Intent (LOI) to revoke or deny a clearance.

D. Responding to the SOR

Upon receipt of the SOR/LOI, the appellant has ten days to notify the CAF of an Intent to Respond, and 30 days to file the response itself. Extensions may be granted.

1. Request for documents
2. Response to SOR

The appellant responds to the SOR.

E. Final CAF Decision / Letter of Denial

A clearance may either be issued or a further denial is made, and the appellant receives a Letter of Denial (LOD), which states the final reasons for denial of the clearance.

F. Appeals of Letters of Denial

In these cases, an employee may appeal without a Personal Appearance Hearing or may appeal with a Personal Appearance Hearing. Once again, ALWAYS request a hearing. If a Personal Appearance is requested, the CAF then sends the file to DOHA for assignment to an Administrative Judge to conduct a Personal Appearance Hearing.

G. Personal Appearance Process

1. Right to counsel

Again, there is no right to counsel, but an appellant may hire counsel of his choosing, or may have a representative, for example, from his unit, to assist him with his hearing. Once the case is assigned, the Administrative Judge will send a Personal Appearance Guide, which sets forth the personal appearance process.

2. Hearing – where, when

A hearing is usually held at the appellant's place of employment, but for the convenience of the AJ, may be held at the Arlington, Virginia, or DOHA satellite offices. Personal Appearance Hearings are closed to spectators.

3. Who may represent an appellant?

An appellant may hire counsel, or may have a representative (non-attorney) to assist with his case. Military appellants often have a first sergeant or other unit NCO act as their representative.

4. Witnesses

An appellant may call witnesses and if the government chooses to participate in the hearing, the Department Counsel may also call witnesses.

5. Recommended decision by DOHA Administrative Judge

Once the hearing is completed, the Administrative Judge will issue a recommended decision, which is sent to the respective CAF.

6. Final Decision by CAF

The Judge issues the recommended decision, and the file is then returned to the CAF for a final determination.

a. Conditional Clearances

The Administrative Judge may make a recommendation of conditions or a probationary clearance be issued to allow the appellant time to demonstrate his or her adherence to the mitigating conditions.

b. Remedies

The DOD civilian employee who has been wrongfully suspended or terminated is entitled to reinstatement and may be restored to duty.

IV. FACILITY CLEARANCES

A. Definition of “Facility Clearances”

The National Industrial Security Program (NISP) defines “facility” as an operating entity which may consist of a plant, laboratory, office, college, university, commercial structure with associated warehouse, storage areas, utilities and components, which are related by function or location. It is not a government installation.

B. A Facility Clearance (FCL)

What is a Facility Security Clearance? It is an administrative determination that a facility is eligible for access to classified information at the same or lower classification category as the clearance being granted, either CONFIDENTIAL, SECRET OR TOP SECRET level. The FCL includes the execution of a Department of Defense Security Agreement (DD Form 441). Pursuant to these agreements, the government agrees to issue the FCL and inform the contractor as to the security classification to which the contractor will have access. The contractor agrees to abide by the security requirements set forth in the National Industrial Security Program Operating Manual (NISPOM).

C. Who Can Obtain a FCL?

A contractor, or prospective contractor can not apply for its own facility clearance. Either the government procuring activity, or a cleared contractor in the case of a subcontractor, may request the clearance when a definite, classified procurement need has been established.

D. FCL Eligibility

The facility must qualify as a bidder to the government procurement activity, or to a prime contractor or subcontractor performing on a government contract. If the bid or a potential subcontract involves access to classified information, the procuring activity or cleared prime contractor submits a request to clear the prospective bidder. The Defense Industrial Security Clearance Office (DISCO) evaluates the request and makes the determination that the facility has a reputation for integrity and lawful conduct in its business dealings. The prospective contractor and its key managers must not be in a “barred” status from participation in government contracts. It is generally unnecessary to obtain a FCL before winning a contract that requires one. Rather the company first is awarded the contract, and then obtains the facility clearance when the agency or cleared company sponsors the contractor.

E. How to Get an FCL

If DISCO determines the request is valid, it is then assigned to a DSS Industrial Security Representative (ISRep). The ISRep obtains information concerning the facility, provides the facility with instructions on completing the necessary forms, and provides basic information about the NISP. The ISRep also provides guidance in establishing an Industrial Security Program.

An interim FCL may be granted before the full investigation is completed. Just because an organization is denied an interim Facility Security Clearance does not mean that it will be denied a final clearance. A determination on a final clearance can be from several weeks to several months after an organization is sponsored for the FCL. An interim FCL enables the cleared employees of the contractor to access national security information, classified at the level of the interim clearance. There are certain restrictions based on the classification.

The contractor and the government designate specific company employees who must receive Personnel Security Clearances (PCL) as part of the FCL process.

FCL eligibility requirements:

1. The company's physical location must be in the U.S. or its territories.
2. The company must be organized under the laws of the United States or its territories.
3. A federal government agency or cleared contractor may sponsor the non-cleared company for the FCL.

These first three are absolute requirements.

4. The company may not be owned, controlled or influenced by a foreign person or interests.
5. Certain employees of the company who must be U.S. citizens obtain their own Personnel Security Clearances as part of the Facility Security Clearance process.

These are negotiable.

F. Costs

The government does not charge for a FCL. However, depending on the level of clearance, the physical safeguards required may add substantial costs. The higher the classification, the more stringent the physical security measures are in the requirements for the Facility Security Program. An employee is designated the Facility Security Officer (FSO), who runs the security program in accordance with federal regulations. This is a cost to the contractor.

G. Security Controls

The NISPOM proscribes the minimum security requirements and the ISRep provides guidance to the contractor in implementing these requirements in their facility. This assures adequate safeguarding of the classified information involved. In some cases, government agencies have requirements for additional safeguards. For example, if your contract requires you to institute a Special Access Program, additional controls are necessary, which can include special clearances and investigative requirements.

H. What Is the Length of the FCL?

The FCL remains in effect as long as the Security Agreement, DD Form 441, is effective. This agreement may be terminated by either party on 30 days notice. Generally, most FCLs remain in effect as long as there is a need for that contractor to have access to classified information.

I. Government Inspections

Periodic security investigations of all cleared contractors are conducted by the assigned ISRep to ensure that the safeguards put in place by the contractors are adequate for the protection of the classified information. The ISRep determines the frequency of such formal reviews, but a review normally is conducted at least annually.

J. Checklist for New Facility Security Clearances

- DSS uses Commercial and Government Entity (CAGE) codes to track facility information. If your company does not have a CAGE code, one may be obtained by submitting DD Form 2051 to the Commander, Defense Logistics Services Center, ATTN: DLSC-SVB, Federal Center, 74 North Washington, Battle Creek, MI 49017-3084. DD Form 2051 may be found at the following website:
<http://www.dtic.mil/whs/directives/infomgt/forms/efoms/dd2051.pdf>.
- The sponsoring government Agency may also request the CAGE code by submitting a request on Agency letterhead to the above address. Alternatively, you may register with the Central Contractor Registration (CCR) database to get a CAGE code at <http://www.ccr.gov/>.
- The Government Contracting Activity (GCA) or another cleared company submits a sponsorship letter to DSS. Once received and accepted, the Facility Clearance Branch sends the company a packet that contains detailed information for a company that is beginning the facility clearance process. The local Industrial Security Field Office is contacted and an ISRep is assigned. The ISRep will help obtain a CAGE code if one has not already been received.
- Prepare for DSS' visit. Download the National Industrial Security Program Operating Manual (NISPOM) and become familiar with its requirements.
- Documentation to have available.
 1. Articles of Incorporation, stock records, minutes of board meetings, corporate by-laws;
 2. Federal Tax ID Number;
 3. Any 10K reports filed with the Securities and Exchange Commission;
 4. Key management personnel list – the senior management official, the prospective Facility Security Officer (FSO), all executive committee

members, and all board members, including the chairman, should be listed;

5. A brief summary of your company's primary businesses or services provided;
 6. Email, fax and complete address information for the last ten years (include the last four number extension on your zip code(s));
 7. Proof of citizenship for the prospective FSO.
[NISPOM, paragraph 2, provides guidance.]
- Key management must obtain his/her own Personnel Security Clearances (PCL). The ISRep will help you identify those and start the process.
 - Fingerprint cards - FD 258. These are sent to OPM to be used in the background investigation.
 - Complete any DSS Facility Processing forms. DD Form 441 is the Security Agreement and must be signed whether a corporation, partnership or proprietorship. SF 328 is a certificate pertaining to foreign interest and is used to report your organization's foreign involvement. In place of the paper form, there is now a DSS Electronic Facility Clearance (e-FCL) online application. Further, there is now an Electronic Communications Plan (ECP) which provides tools to mitigate the Foreign Control or Influence (FOCI). The ECP template will assist contractors with developing appropriate security countermeasures to effectively monitor electronic communications and ensure that unclassified systems are protected from foreign control or influence. The ISRep can assist with these forms. For more information, see the checklist for new Facility Security Clearances at http://www.dss.mil/isp/fac_clear/fac_clear_check.html.

This is a brief description of the security clearance process for industrial contractor employees, military personnel, federal employees, and contractor facilities. Should you need more information, please contact the law firm of TULLY RINCKEY PLLC at (202) 787-1900.

www.fedattorney.com

APPENDIX

Frequently Used Security Related Acronyms, Abbreviations and Basic Security Forms

Security Related Acronyms, Abbreviations

AFCAF	Air Force Central Adjudication Facility
BI	Background Investigation
C	Confidential
C-PR	Confidential Periodic Reinvestigation
CAGE	Commercial and Government Entity
CAF	Central Adjudication Facility
CCF	Central Clearance Facility (Army) (See also PCCF)
DA	Department of the Army
DC	Disqualifying Conditions
DIA	Defense Intelligence Agency
DISCO	Defense Industrial Security Clearance Office
DoD	Department of Defense
DoDD	Department of Defense Directive
DOHA	Defense Office of Hearings and Appeals (formerly Directorate, Industrial Security Clearance Review (DISCR))
DON	Department of Navy
DON CAF	Department of Navy Central Adjudication Facility
DSS	Defense Security Service
EPSQ	Electronic Personnel Security Questionnaire
FCL	Facility Security Clearance

FOCI	Foreign Ownership, Control, or Influence
FOIA	Freedom of Information Act
FSO	Facility Security Officer
GCA	Government Contracting Activity
ISRep	Industrial Security Representative
LAA	Limited Access Authorization
LFC	Local Files Check
LOD	Letter of Denial
LOI	Letter of Intent
LON	Letter of Notification
MC	Mitigating Conditions
MOS	Military Occupational Specialty
NAC	National Agency Check
NACI	National Agency Check plus Written Inquiries
NACLC	National Agency Check/Local Agency Check/Credit Check
NCAF	Department of Navy Central Adjudication Facility
NISP	National Industrial Security Program
NISPOM	National Industrial Security Program Operating Manual
NTK	Need To Know
OPM	Office of Personnel Management
PA	Privacy Act
PCCF	Personnel Central Security Clearance Facility (Army)
PCL	Personnel Security Clearance

PR	Periodic Reinvestigation
PSAB	Personnel Security Appeals Board
PSI	Personnel Security Investigation
PSQ	Personnel Security Questionnaire
QNSP	Questionnaire for National Security Positions
(S)	Secret
SCI	Sensitive Compartmented Information
SCIF	Sensitive Compartmented Information Facility
SOR	Statement of Reasons
SSBI	Single Scope Background Investigation
SSO	Special Security Officer
(TS)	Top Secret
(U)	Unclassified

Basic Security Forms

DD Form 254	Contract Security Specification
DD Form 441	Security Agreement
DD Form 2051	Request for Assignment of a Commercial and Government Entity Code
FD Form 258	Applicant Fingerprint Card
SF 86	Questionnaire for National Security Positions
SF 328	Certificate Pertaining to Foreign Interests
SF 701	Activity Security Checklist