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## Sources of Information and Issues Leading to Clearance Revocations

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14. ABSTRACT <p>This study examines the range of adjudicative issues and sources of information about those issues leading to clearance revocations in FY98. Data from 864 cases were coded from adjudicative files at five DoD adjudicative facilities that included enlisted personnel, officers, civilian DoD employees, and contractor personnel. The report looks first at the issues and sources of information about trigger events or initial reports of a vulnerability that begins the process leading to a final clearance revocation. Drug use is by far the most frequently cited initial problem, particularly for enlisted personnel. The report also shows that the periodic reinvestigation continues to be a highly productive source of issue information for employee populations who hold clearances long enough to become eligible for a reinvestigation. Also examined here are the "reasons" cited by adjudicators for a revocation. High on the list of issues are drug use, alcohol abuse, criminal activity, and financial problems. This analysis also includes information about the time required from the date of an initial report of a serious issue to reach a final revocation and, when appealed, to reach a final decision by an appeals board.</p>					
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## Preface

This study of human vulnerabilities and sources of information leading to clearance revocation is the most recent product in PERSEREC's tradition of research on the DoD clearance process for improving the effectiveness of the personnel security system. In this report we revisit research questions addressed in a 1989 PERSEREC study to examine the reasons for denials and revocations in the U.S. Army and U.S. Air Force. This will give us a sense of the magnitude of change that has taken place over the past decade with respect to the causes of revocation.

The present study—looking at the broader U.S. Department of Defense (DoD) workforce—is in a sense concerned more with continuing evaluation than with revocation itself. As such, it explores in greater depth the multiplicity of issue/source combinations that alert the personnel security system to personal behavior that requires intervention of some kind in the interest of national security. It also provides empirical findings on previously open questions such as the importance of the periodic reinvestigation in the continuing evaluation of trusted employees and on the relative value of other sources of information that feed into the adjudicative system.

Furthermore, this analysis sheds light on the greatest vulnerability problems of the modern Defense workforce, namely criminal conduct, drug use, financial problems, and alcohol abuse which account for most of the administrative actions to terminate clearances. Research in this area continues to enhance our understanding of the personnel security system as it confronts human conditions that place trusted employees at risk.

James A. Riedel  
Director

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Finally we wish to acknowledge the contribution of Kent Crawford of the Defense Personnel Security Research Center who originally conceived of the need for this study, was instrumental in the developing its research design, and provided guidance and encouragement throughout the process.



## **Executive Summary**

This study, which examines issues and the productivity of sources of information leading to clearance revocations, was conducted to provide empirical data to supplement broader research efforts aimed at improving the effectiveness of the U.S. personnel security system. In this study researchers asked about the type and source of information that has proven relevant for making difficult decisions about continued access to classified information. Narrowing the focus in the present study to information and sources that have led to final revocations imposes a filter or test of relevance on the data collected. For example, for 864 cases in this one-year study (FY98), the gravity of issue-information led to a determination that in each case continued access to classified information by an employee or service member would constitute an unacceptable risk for the United States Government.

Over a period of several months researchers, using automated data-entry software, captured relevant facts directly from documents contained in case dossiers at five principal adjudicative facilities (CAFs) or their record repositories. These cases fell into four employment categories: enlisted personnel, military officers, civilian DoD employees, and contractor employees, all of whom were subject to a clearance revocation during the study year. All cases of revocation were included in the study with the exception of enlisted personnel for which a 20% systematic sample was drawn from the more than 1,500 cases. Data fields captured issue and source information related to initial reports or trigger events that begin the process leading to a final revocation and related to issues cited in Statements of Reasons (SORs) for the revocations. Additional data entry fields captured information about subsequent appeals.

### **Initial Events Leading to a Revocation**

Information that initiates the revocation process originates from a wide range of sources or types of reports (18 types were coded for the four occupational categories). For military personnel and government civilians, police reports of criminal conduct, drug testing, and periodic reinvestigations (PRs) are the most productive sources of initial information leading to revocation. In contrast, the most fruitful sources for contractors are the PR, national agency checks (NACs), and special investigative inquiries (SIIs).

The percentage of revocations in which the PR was the initial source of issue information varied considerably among occupational groups, with enlisted revocations at 5.8%, officers at 13.1%, civilian employees, 28.1%, and contractors, 20.7%. This confirms the effectiveness of the PR as one of the most productive sources of information, especially for civilians.

Among the issues that predominate in initial reports that ultimately lead to revocations, drug use clearly leads the list for all DoD personnel. The frequency is particularly high for enlisted revocations, with over one-third of initial reports concerning drug use. (The enlisted category alone accounts for 74% of all revocations in FY98.) Only in the case of civilian employees is drug use, as an initial issue, exceeded by another issue (financial problems). For most or all group, higher-frequency initial issues are drug use, financial issues, and criminal conduct.



## **Reasons for Final Revocations**

Researchers also coded information from documents in the adjudicative files that cite all reasons for final revocation and the sources of this information. The key document was the SOR that accompanies each Letter of Intent (LOI) to revoke a security clearance. SORs are typically issued several weeks following an initial report of security concern and generally enumerate a much broader range of issues than those which are the focus of initial reports to a CAF. The data show that revocations are usually based on several issues of varying levels of concern. In fact, over 80% of SORs for military revocations list three or more reasons. (For civilians the percentage is 78% and for contractors, 43%.)

For all groups, virtually all reasons cited fall into eight adjudicative issues. In addition to the general category of personal conduct, four categories account for most of the revocation actions: alcohol abuse, criminal conduct, drug use, and financial problems. Three others—sexual behavior, falsification of personal information, and mental problems—are less frequent. Personal conduct accounts for over a quarter of the reasons stated for revocations in all but the contractor employee group.

Among military personnel revocations, personal conduct is the most frequently cited reason followed by criminal conduct, drug use and financial issues. For civilian employees, personal conduct is the leading reason cited for revocation followed by financial issues, criminal conduct, and drug use. In contrast to other groups, contractors are most often cited for criminal conduct followed by drug use and personal conduct.

## **Productivity of Various Sources of Issue Information**

A wide range of information sources exists for adjudicative issues cited in SORs with at least 19 sources producing valuable information in one or more issue areas. The most generally productive sources in order of frequency are: subject interviews, unit security office, supervisors, police reports, PRs, and local agency checks (LACs). For the enlisted group, these percentages are 16%, 13%, 13%, and 8%, respectively. The subject interview (as part of the PR or SSBI) is cited as 17% of all sources coded for civilian cases; it is 19% for contractor revocations. These figures, of course, reaffirm the value of the standard subject interview in the investigative process.

In comparing productivity of sources across occupational groups, researchers found that while some sources are consistently productive, the supervisor is significantly more important in military revocations (13% of source references). The PR is more productive for civilians and officers (10% and 16%) than for contractors or enlisted personnel.

A more detailed evaluation of source productivity for specific types of issue information for each occupational group revealed that while several sources are highly productive across all or most issue areas, for certain issues there are different combinations of productive sources. PRs appear to be highly productive concerning information about adverse personal conduct but of marginal importance for alcohol abuse, drug use, or mental conditions. LACs and police reports

are especially productive with information about alcohol abuse and criminal conduct; and the local security office, the subject interview, and supervisors are valuable as sources of information on alcohol abuse, criminal conduct, and drug use.

A comparison of distributional differences among occupational groups confirmed the relatively greater importance of the immediate supervisor, which includes commanding officers, as a source of issue information in military revocations. The analysis also showed that criminal investigations weigh heavily in enlisted revocations, whereas SIIs and LACs are more influential in contractor cases.

### **Timing the Process of Revocation**

Having also captured dates at which actions or events occurred in the processing of revocations, researchers were able to compare average time spans between milestones in the revocation process for each occupational group. In FY98 clear differences in average duration existed among groups at various stages of administrative action from the date of the trigger event until the date of final resolution. (Admittedly, these findings may not apply to the current year since procedures or internal policies may have changed since FY98.)

With the possible exception of contractor revocations, recorded time spans are distributed over many months: from the trigger event to the LOI (18 months or more) and from the LOI to the Letter of Revocation (LOR) (10 months or more). The personnel security system's response to serious issues arising in the contractor population is somewhat faster, with over 60% of LOIs issued within two months of the trigger event and, on the average, a final revocation is issued in less than two-thirds of the time than for other employment groups.

### **Conclusions**

This exploration into the causes and sources of issue information leading to clearance revocations confirms the efficacy of much of what the Department of Defense does to ensure the continued reliability and trustworthiness of the cleared workforce.

In addition to validating the importance of the PR and the subject interview as valuable sources of issue information, this study demonstrates that the collection of information from a wide variety of documentary and human sources continues to produce valuable data related to an employee's continued trustworthiness. Some sources are highly productive for several adjudicative issues; others focus on a single concern and serve as the best single source on that issue. A few sources are virtually nonproductive; one may question whether, for example, the commitment of resources to seeking out neighbors or ex-spouses can be justified in terms of risk-management.

While revocations across all four employment categories are based on a wide range of issues, the issues of allegiance and outside activities appear to lack importance to the revocation process. In addition, the fact that both foreign preference and foreign interest are rarely cited as reasons to revoke suggests that the distinction between these two criteria may be an

unnecessarily fine point. These findings will be relevant in the ongoing review of the utility of adjudicative criteria being undertaken by PERSEREC.

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## Introduction

The Department of Defense clearance policy and process for granting, denying, or revoking security clearances continue to attract controversy and congressional attention. Opinions abound as to the appropriate scope of investigations and what adjudicators should be taking into account when determining an individual's eligibility for access to classified information or to hold other positions of public trust. (Appendix A offers the reader an overview of the revocation and appeal process as it is applied to each of the four occupational groups included in this study.) We believe that personnel security must be based on solid evidence rather than tradition, guesswork, or intuition. Thus this study is designed to strengthen the empirical foundation for policy-building and to offer insight that may have important implications for future resource commitment.

The granting of clearances (determining eligibility for access to classified information) is the most important function of an adjudicative facility. Inherent in this function is the initial denial or the revocation of a clearance for individuals who do not meet the adjudicative standards. According to regulation, the standards for denial and revocation of clearances are the same as both types of decisions are essentially risk assessments. However, since revocation concerns personnel who have previously been judged to be eligible and who have spent a period of years in a position of trust, the body of information on which this determination is made will be fundamentally different for both types of decisions. Sources of information and types of disqualifying issues leading to unfavorable determinations differ, depending on whether the information is based on on-the-job observations or comes from outside of the work environment. Revocations (as well as initial denials) occur only for the most extreme and compelling reasons and constitute a tiny fraction of the total determinations in each year. For example, the number of revocations in FY98 was less than one-tenth of one percent of the cleared DoD workforce.

While questions have been raised about the efficacy and cost-effectiveness of the Periodic Reinvestigation (PR) as one of several methods of continuing evaluation for personnel in positions of trust, it is beyond the scope of the present study to evaluate this policy or recommend alternative mechanisms for employee monitoring or for ensuring continued reliability among the trusted workforce. However, Defense and Federal-wide reinvestigation and continuing evaluation policy, as it is currently implemented, does beg the following questions: Why are employees losing clearances? What type of derogatory information in practice is so compelling that it results in a formal denial of access to national security information? Where does information of this type originate—if not through the PR, how is it discovered?

This analysis revisits subjects examined in an earlier study that looked at revocations and denials in the Army and Air Force, *Army and Air Force Security Denials and Revocation* (Schroyer, Crawford, & Mason, 1989). This earlier report provides an opportunity to compare data on issues and sources of data leading to revocation about 10 years prior to the current study. Its authors examine sources of relevant issue information and the reasons for the revocation and denials in these two military departments. However, it does not include data on Navy, Defense agency, or contractor revocations. A summary of its findings is presented in Appendix B.



The present study examines a similar body of information from all DoD sources with regard to revocations but not initial denials and addresses the question of how clearance revocations evolve, from the surfacing of initial issue information to the events that lead to removing of a person's clearance. The time frame for data collection is FY 98 (October 1997 to September 1998), a period that was considered to be recent enough to draw reasonable conclusions about revocations in the present, but distant enough in time to allow for all relevant records to have been archived and for final determinations (following appeals) to have been documented and archived.

The documentary source was limited to adjudicative files in the five principal adjudicative facilities or their archival facilities. Using data entry software designed for this study, PERSEREC researchers examined nearly 900 complete files and captured data pertaining to types of issue information, sources of that information, and initial evidence of security concerns that ultimately led to an adverse adjudicative decision for an employee, service member, or contractor.

In each case, the initial issue information is identified as a *trigger event*. This is an event or report that initially raises a question about a person's allegiance, trustworthiness, or reliability whether it indicates an initial or a longer-standing personal vulnerability. In these cases an initial report often triggered an administrative inquiry that surfaced other information of adjudicative concern. In most cases of revocation, the data show that multiple issues compounded the personal vulnerability of a cleared employee or service member.

This study also sought to determine what issues or types of personal vulnerabilities are the prevalent causes of revocation and what are the sources of this information by issue. The issues themselves are derived from the 13 guidelines used to make clearance determinations throughout the Federal Government. (DoD Regulation 5220.6, 1992). Although we had a foreknowledge of many sources useful in the process, an identification of the full range of sources emerged from the examination of documents included in adjudicative files.<sup>1</sup>

## **Research Questions and Procedure**

One central question that this study addresses within the limited scope of the investigation is: In what proportion of cases has the PR produced new issue information that has led to a revocation? One estimate, based on the 1989 report, was that only 5-10% of the revocations were based on periodic reinvestigations. If this was confirmed for 1998 as well, we were aware that some might argue for a reexamination of whether the PR is a cost-effective element in the personnel security program.

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<sup>1</sup> Sources of issue information identified for initial trigger events are listed in Table 4. A listing of all sources coded for issue information cited in Statements of Reasons in FY98 can be seen in the Tables in Appendix E.

## Specific Research Questions

- For various *categories of previously cleared personnel* (military officers and enlisted personnel; civilian government and contractor employees), what *types* of issue information led to revocations? [e.g., financial issues, substance abuse, mental problems, etc.]
- For these same categories of personnel, what are the *sources* of issue information that have led to a clearance revocation?
- In each category of personnel, what proportion of revocations resulted from issue information divulged first in the course of conducting a Periodic Reinvestigation or Single Scope Background Investigation (SSBI) for a clearance upgrade to Top Secret versus other local investigations? And does this proportion differ significantly for types of issues and types of personnel?
- Are these differences in sources and types of issue information reflected in revocations for SCI level clearances as well as in collateral clearances?

## Procedure

All information for this study came from the DCII and from documents found in adjudicative files retained by adjudicative facilities or their respective records repository. These files do not contain investigative reports typically produced by the Defense Security Service but are retained by the investigative agency. However, adjudicative files do contain key documentation related to a revocation and the appeal of that revocation, should a subject choose to appeal an unfavorable determination. When there is an appeal, with a personal appearance before a Defense Office of Hearings and Appeals (DOHA) judge, the personal appearance report written by the judge provides a detailed history of the case and its issues.

Adjudicative files typically contain the following documents concerning the causes for revocation and sources of information leading to that revocation.

- *Reports of Unfavorable Information for Security Determination*: These reports tend to follow a standard format used by each component and are issued by the employee's security manager.
- *Letter of Intent (LOI) to Revoke a Security Clearance*: This is a formal standard letter from an adjudication facility to an employee and his or her security manager.
- *Statement of Reasons (SOR)* (always attached to a LOI): The SOR is always attached to the LOI and identifies all issues that would justify the revocation. Each reason is related directly to an adjudicative guideline and often quotes the wording of that guideline.
- *Statement of Rebuttal*: This is prepared with the assistance of the employee's security manager and provides new and clarifying information in response to specific reasons in the SOR that might be mitigating.

- *Letter of Revocation (LOR)*: This is issued by the adjudicative facility should new and mitigating information not be considered satisfactory and is the final word on the revocation unless the employee decides to appeal.
- *Notice of Intent to Appeal*: This is written with the assistance of a security manager. The employee may also ask for a hearing by a DOHA Administrative Judge.
- *Full Transcript of a hearing by a DOHA Administrative Judge*
- *Decision by an Administrative Judge*: The written decision by a judge is usually rich with additional chronological facts of the case. For military and government civilian cases, a decision by an administrative judge is not binding on an appeal board. For contractor revocations, an appeal board may not consider new evidence and can overrule the judge only where the judge has not complied with standards of due process.
- *Letter of Determination (LOD)* following a review by a Personnel Security Appeals Board (PSAB): This is the final decision of the PSAB which accepts or rejects the recommendation of a DOHA Administrative Judge when one has been rendered.
- *Memorandum on a change or reaffirmation of clearance status*: Occasionally the adjudicative facility will issue a memorandum that clarifies an employee's clearance status following a review or protracted appeal process.

Occasionally these files contain copies of the Standard Form 86 leading to a DSS investigative report; references to Special Investigative Inquiries; peer or coworker reports; unit commander/supervisor, security officer, or FSO reports; drug test results; police reports; and creditor complaints, self-reports, or medical evaluations.

### **Scope of the Study**

While most cases from FY98 had been resolved by the time of data collection, revocations still undergoing judicial review were, nevertheless, included in the population for sampling, even though a few of these resulted in a reinstatement after September 31, 1998. In contrast to the earlier study cited, information related to initial denials was not collected, as this research issue was outside the scope of the present inquiry.

Regrettably, due to time-consuming administrative procedures regarding access to the file repositories, the data collection phase took months longer than anticipated. Thus the issuance of this technical report some two years after the most recent events coded in the data set, raises concern as to whether its conclusions apply to the current year (FY01). This is more likely to be true of our findings about the time it takes for revocation actions to be completed since, over a period of two to three years, policies or administrative procedures may have been implemented that affect efficiency and processing speed.

### **Selection of Cases**

Initially, with the assistance of the Defense Manpower Data Center, West (DMDC-West), a list of all FY98 revocations was obtained for each facility from the Defense Clearance and Investigations Index (DCII). This allowed the researchers to estimate total population size,

execute a sampling procedure, and provide a list of cases by Social Security Number (SSN) to each facility so that the files could be pulled in advance. I was anticipated that a total sample of at least 800 cases would be necessary due to the number of categories of personnel in this population that were to be compared.

As a result of the DCII query, researchers found that 2,033 revocations in FY 98 were issued by the five principal adjudicative facilities. Of these, 201 previously held clearances at the SCI level. Cases from each adjudicative facility are shown in Table 1. The collection includes cases in all components and categories of personnel. Files were then studied at the following five principal DoD adjudicative facilities or at their associated records repositories: U.S. Department of Navy Adjudicative Facility (DoNCAF); U.S. Army Investigative Records Repository (IRR), U.S. Air Force Central Adjudicative Facility, Defense Office of Hearings and Appeals Board (DOHA), and Washington Headquarters Central Adjudicative Facility (WHS-CAF).

Case files are maintained in original hard-copy dossiers, microfilm, and digital format by these facilities or in an associated archival facility. (See Table C.3, Appendix C.) Files were retrieved by SSN and reviewed by a qualified personnel security professional or PERSEREC researcher. Contractor personnel who were cleared at the SCI level by the Army, Navy, or Air Force CAFs were included in the sample.

**Table 1**  
**Total Revocations in FY98 Issued by Five Principal Adjudicative Facilities<sup>2</sup>**

<i>Subject Category</i>	<i>Army</i> <i>N</i>	<i>USAF</i> <i>N</i>	<i>Navy</i> <i>N</i>	<i>WHS</i> <i>N</i>	<i>DOHA</i> <i>N</i>	<i>Total</i> <i>N</i>
Active enlisted <sup>a</sup>	523	254	226			1,003
Active officer	11	9	10			30
Active warrant officer	3					3
Reserve enlisted <sup>a</sup>	228	5	22			255
Reserve officer	35		8			43
Reserve warrant officer	2					2
Guard enlisted <sup>a</sup>	244	3				247
Guard officer	13					13
Guard warrant officer	1					1
Civilian (government)	84	11	44	75		214
Contractor		39			170	209
ROTC cadet <sup>b</sup>	2					2
Academy cadet <sup>b</sup>	1	1				2
Dependents <sup>b</sup>		2				2
Civilian & reserve	5					5
Civilian & guard	2					2
<b>TOTAL</b>	<b>1,154</b>	<b>324</b>	<b>310</b>	<b>75</b>	<b>170</b>	<b>2,033</b>

<sup>a</sup> Enlisted groups that were sampled at 20%.

<sup>b</sup> Not included in the population under study.

<sup>2</sup> The source of these data is the Defense Manpower Data Center-West, Seaside, CA.

To avoid unnecessary expenditure of resources and time in reviewing all adjudicative files, 20% of the military enlisted revocations were sampled while reviewing all military officers, civilian employees of the DoD, and defense contractor employees, and all revocations of SCI access. This 20% sample of 1,353 collateral-level revocations for enlisted cases was systematically drawn to ensure equal probability of selection and a high level of confidence of the representativeness of that sample. The disadvantage of sampling one category of cases and not others is that this limits the ability to make generalizations about the entire population of DoD revocations. This procedure resulted in a total of 888 cases selected for review and identified by SSO. A few of these cases did not meet the criteria for selection, resulting in a slightly lower *N* for this study (864). A more detailed description of sampling, coding, and data collection procedures appears in Appendix C.

### Data Collection and Analysis

Prior to CAF site visits, PERSEREC developed a data-entry program that assisted researchers in collecting information on all variables while reviewing case files. This program also included automated data entry and coding functions. (The screen format is seen in Appendix D.) The data were key-entered directly to an electronic database using a computer. No case files were removed from the facilities. Researchers spent approximately one week at each CAF; however, the length of time spent at each site depended largely on the size of the pre-selected sample at that facility. After additional coding of descriptive information, all resulting data were analyzed at PERSEREC using the Statistical Package for the Social Sciences (SPSS). Information for a total of 864 cases was included in this study. Table 2 shows the number of revocations coded from each of five central adjudicative facilities (CAFs) and the employment status of personnel at the time of revocation:

**Table 2**  
**Employment Status of Personnel Included in This Study**

<i>Adjudicative Facility</i>	<i>Employment Status</i>				
	<i>Enlisted</i>	<i>Officers</i>	<i>Civilians</i>	<i>Contractors</i>	<i>Total</i>
	<i>n</i>	<i>n</i>	<i>n</i>	<i>n</i>	<i>n</i>
Army	271	59	70	1	401
Navy	89	18	42	-	149
Air Force	53	8	10	-	71
DOHA	-	-	-	168	168
WHS	-	-	75	-	75
<b>Total <i>n</i></b>	<b>413</b>	<b>85</b>	<b>197</b>	<b>169</b>	<b>864</b>

## Findings

### Trigger Events Leading to a Revocation

A review of adjudicative files selected for this study has led to the conclusion that while these employees may have exhibited or been afflicted by a vulnerability for an extended period of time (e.g., alcoholism, mental illness, indebtedness, or drug use), the loss of clearance status can usually be traced back to a precipitating event such as an arrest or complaint. At that time, evidence of a personal vulnerability or potentially disqualifying issue may become known to a security manager or to an adjudicator through one or more channels.

The initial event itself is, of course, a significant fact. However, as its occurrence may ultimately impact on the clearance status of the subject, it is essential to determine how each event or report becomes a matter of record in the personnel security system that leads to an adverse determination. Table 3 examines the question of original sources and precipitating events and shows the absolute frequency and percentage of types of reports that were determined to be the original source of information leading to the revocation process. In most instances, a single report began the process of inquiry, but, in 51 cases, more than one report was present in the file related to the same trigger event or issue. When coding information related to trigger events, our researchers attributed information from such sources as supervisors, medical records, coworkers, etc., to the periodic reinvestigation if in fact collections from these various sources occurred as part of a reinvestigation process.

Frequencies shown for SSBI are the number of cases in which investigations for an upgrade in an existing clearance status (e.g., Secret to Top Secret or SCI) have resulted in the discovery of new and significant information that ultimately leads to a revocation. Of particular interest to policymakers considering alternative models for continuing evaluation is whether information leading to a revocation comes to light as the result of a routine PR or as a result of other reports or actions. As the presumed purpose of the PR is to confirm continued suitability to hold a clearance, one might anticipate that a high percentage of revocations come about as a result of issue information first disclosed during the PR. If not, other sources that play a stronger role need to be identified. Table 3 shows that the answer is significantly different for various categories of employees. PRs as an original source of information range from only 5.8% of enlisted military cases to 28.1% of cases involving civilian government employees, with 13.1% for officers and 20.7% for contractor employees.

One might assume that these differences regarding the PR as the initial source result from the fact that many enlisted personnel are likely to have left the service before they were due for even a first five-year reinvestigation. Career civilian employees and Defense contractor personnel may have several PRs during their professional lifespan. However, in comparing dates of initial clearance for enlisted personnel, we find that the proportion of revocations triggered by the PR for more senior enlisted personnel (who have been employed long enough to have received a PR) is about the same as first-term enlisted personnel. Thus, a more likely reason for the contrast between military and civilian employees is that members of the former group are routinely subject to more intensive personal monitoring and supervision. Because of this, disqualifying issues are more likely to be reported by sources other than a PR, and adverse

adjudicative actions taken with less delay. Nevertheless, any evaluation of the importance of the PR as a source of initial significant issue information must be made with reference to a particular occupational group. When the number of SSBI is added to the PRs for each occupational

**Table 3**  
**Reports and Other Sources of Information Associated with the Initial or Trigger Event**  
 [Frequency of cases and percentages of total in each occupational group]

<i>Source</i>	<i>Enlisted</i>		<i>Officers</i>		<i>Civilians</i>		<i>Contractors</i>	
	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>
Periodic reinvestigation	24	5.8	11	13.1	55	28.2	35	20.7
National agency check (not for PR)	14	3.4	1	1.2	4	2.1	33	19.5
SSBI	50	12.1	8	9.5	6	3.1	12	7.1
Drug test	70	17.0	12	14.3	14	7.2	2	1.2
SII (issue unspecified)	4	1.0	0		14	7.2	72	42.6
Police report of alcohol abuse	17	4.1	2	2.4	13	6.7	0	
Report of criminal behavior	72	17.5	18	21.4	25	12.8	1	.6
Prosecution for criminal acts	55	13.3	8	9.5	3	1.5	0	
Creditor complaint	8	1.9	1	1.2	13	6.7	0	
Failure to comply with CC <sup>a</sup>	7	1.7	0		7	3.6	0	
Report of mental illness	2	.5	4	4.8	4	2.1	0	
Misuse of government property	5	1.2	2	2.4	5	2.6	0	
Self-report of security relevant information	8	1.9	1	1.2	2	1.0	3	1.8
Revocation by another CAF	0		1	1.2	5	2.6	2	1.2
Report of misconduct by command	14	3.4	3	3.6	7	3.6	1	.6
Report by family or coworker	0		1	1.2	1	.5	0	
Security Access Eligibility Report	17	4.1	3	3.6	3	1.5	1	.6
Multiple reports	30	7.3	4	4.8	11	5.6	5	3.0
Other types of reports	2	.5	1	1.2	1	.5	0	
Unknown (records do not indicate)	13	3.2	3	3.6	2	1.0	2	
<b>TOTAL (n=860)</b>	<b>412</b>	<b>100</b>	<b>84</b>	<b>100</b>	<b>195</b>	<b>100</b>	<b>169</b>	<b>100</b>

<sup>a</sup> Failure to comply with the terms of a conditional clearance.

category, the percentages of revocations triggered by the two very similar investigations combined increase sharply, particularly for the two military groups: 18% for enlisted, 23% for officers, 31% for civilians, and 28% for contractors.

Two other types of reports stand out as particularly important trigger events, particularly for military personnel and government civilians: (a) positive drug test (urinalysis) results and (b) reports of criminal behavior or prosecution by court martial or in civil courts. While the most productive source of initial information for civilians is the PR, for contractor employees it is the Special Investigative Inquiries (SIIs). After the SII, the PR and National Agency Checks (NACs) are about as frequent. SIIs investigations are invariably undertaken to resolve adverse information from other sources that may not have been recorded in the files.

In contrast to Table 3, Table 4 displays the type of *issues* associated with each of the initial or precipitating reports where those issues can be determined through a review of the adjudicative file. In many cases it was not possible to make this determination. The identification of issues associated with trigger events is, of course, quite different from capturing the formally stated reasons for each final revocation that, in an overwhelming number of cases, include multiple issues. However, even for what might be considered trigger events, it was not possible in 64 cases to narrow the cause down to a single issue.

**Table 4**  
**Initial Issues Associated with a Trigger Event Leading to Revocation**  
 [Frequency and percentage of cases by type of issue for each occupational group]

<i>Precipitating Issue</i>	<i>Enlisted</i>		<i>Officers</i>		<i>Civilians</i>		<i>Contractors</i>	
	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>
Alcohol abuse	28	8.6	2	3.1	14	10.4	1	2.6
Drug use	108	33.1	17	26.2	25	18.5	17	43.6
Criminal conduct	42	12.9	14	21.5	13	9.6	3	7.7
Mental problems	16	4.9	8	12.3	13	9.6	2	5.1
Sexual behavior	30	9.2	5	7.7	5	3.7	3	7.7
Financial issues	53	16.3	7	10.8	41	30.4	6	15.4
Personal conduct	9	2.8	6	9.2	6	4.5	6	15.4
Security violations	1	.3	0		0		0	
Multiple issues	39	12.0	6	9.2	18	13.3	1	2.6
<b>TOTAL (n=565)</b>	<b>326</b>	<b>100</b>	<b>65</b>	<b>100</b>	<b>135</b>	<b>100</b>	<b>39</b>	<b>100</b>

*Note.* Initial issues were identified in these cases for eight out of 13 adjudicative criteria.



As can be seen in Table 4, for enlisted military personnel, officers, and defense contractors, drug use predominates as the initial issue leading to revocation, while the incidence of financial problems is the most frequent issue for civilians. Criminal conduct is also high for officers, whereas financial issues are high for enlisted and contractor personnel. These initial events typically lead to additional investigation or, as in the military services, a suspension of access to classified information by a unit commander. When access is suspended, it can be reinstated by the relevant CAF usually only after corrective action or mitigating information is provided to the adjudicator. For cases in this study, additional information either was not sufficiently mitigating or added to the argument for revocation.

### Types of Issue Information Leading to a Revocation<sup>3</sup>

The initially reported issue information is invariably one of the factors cited for the ultimate revocation of a clearance that may take place weeks or even months following the trigger event or initial report. The subsequent analysis in this report examines the full range of information developed (and all contributing sources) following and including the initial event. A review of SORs for a revocation that are routinely attached to LOIs, reveals that revocation is rarely based on a single issue of security concern. For military revocations, over 80% of the SORs list three or more reasons. For civilian and contractor revocations these percentages are 77.5% and 43.3% respectively.

Because consideration of various adjudicative issues in revocations must evaluate their importance as well as their frequency of occurrence, a code was assigned to each *reason* in a SOR as to whether it was major, significant, or minor.<sup>4</sup> A *major* reason is one that is serious enough by itself to warrant revocation. A *significant* reason is one that is serious, but not necessarily disqualifying by itself. However, two or more significant reasons would be sufficient for a revocation. A *minor* reason is unfavorable, but not disqualifying by itself. Several minor reasons may be cause for a revocation since they show an accumulated pattern of behavior. Tables 5 through 8 display the frequency of occurrence of each type of issue for each of the four employment categories. Since minor reasons as stated in the SORs were relatively infrequent, these tabulations show only major and significant reasons.

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<sup>3</sup> The adjudicative guidelines identify 13 adjudicative issues that follow. For the sake of brevity and consistency in this report and in its tables, the authors assign an abbreviated name in brackets to several of these: A. Allegiance to the United States [allegiance]; B. Foreign Influence; C. Foreign Preference; D. Sexual behavior; E. Personal Conduct; F. Financial Considerations [financial issues]; G. Alcohol Consumption [alcohol abuse]; H. Drug Involvement [drug use]; I. Emotional, mental, and personality disorders [mental problems]; J. Criminal Conduct; K. Security Violations; L. Outside Activities; and M. Misuse of Information Technology Systems [Misuse of IT systems]. Guidelines are published in Department of Defense Regulation 5220.6, Enclosure 2 (1992).

<sup>4</sup> The distinction between what are termed major, significant, and minor reasons is commonly accepted by DoD adjudicative personnel who have a clear operational understanding of these levels of severity, as described above.

**Table 5**  
**Frequency of Adjudicative Issues Listed in Statements of Reasons for**  
**Revocation of Enlisted Personnel**

<i>Issues</i>	<i>Major</i>		<i>Significant</i>	
	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>
Allegiance	0			
Foreign influence	0			
Foreign preference	0			
Sexual behavior	40	4	6	5
Personal conduct	222	25	3	2
Financial issues	120	13	12	10
Falsification of PSQ	40	4	6	5
Alcohol abuse	59	7	28	24
Drug use	133	15	10	8
Mental problems	21	2	4	3
Criminal conduct	252	28	47	40
Security violations	5	1	2	2
Outside activities				
Misuse of IT systems	6	1		
<b>TOTAL</b>	<b>898</b>	<b>100</b>	<b>118</b>	<b>100</b>

**Table 6**  
**Frequency of Adjudicative Issues Listed in Statements of Reasons for**  
**Revocation of Officer Personnel**

<i>Issues</i>	<i>Major</i>		<i>Significant</i>	
	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>
Allegiance	0	0		
Foreign influence	1	1		
Foreign preference	1	1		
Sexual behavior	10	5	2	12
Personal conduct	51	27		
Financial issues	19	10	3	18
Falsification of PSQ	12	6	1	6
Alcohol abuse	4	2	4	24
Drug use	23	12		
Mental problems	12	6		
Criminal conduct	49	26	5	29
Security violations	4	2	1	6
Outside activities				
Misuse of IT systems	3	2	1	6
<b>TOTAL</b>	<b>187</b>	<b>100</b>	<b>17</b>	<b>100</b>

**Table 7**  
**Frequency of Adjudicative Issues Listed in Statements of Reasons for**  
**Revocation of DoD Civilian Personnel**

<i>Issues</i>	<i>Major</i>		<i>Significant</i>	
	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>
Allegiance				
Foreign influence				
Foreign preference				
Sexual behavior	14	3	1	2
Personal conduct	128	27	2	4
Financial issues	100	21	3	5
Falsification of PSQ	29	6	15	26
Alcohol abuse	42	9	4	7
Drug use	46	10	2	4
Mental problems	28	6	3	5
Criminal conduct	73	16	25	44
Security violations	2	<1	2	4
Outside activities				
Misuse of IT systems	4	1		
<b>TOTAL</b>	<b>466</b>	<b>100</b>	<b>57</b>	<b>100</b>

**Table 8**  
**Frequency of Adjudicative Issues Listed in Statements of Reasons for**  
**Revocation of Contractor Personnel**

<i>Issues</i>	<i>Major Issues</i>		<i>Significant Issues</i>	
	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>
Allegiance				
Foreign influence	1	<1		
Foreign preference	1	<1		
Sexual behavior	14	5		
Personal conduct	49	16		
Financial issues	34	11		
Falsification of PSQ	39	13	2	40
Alcohol abuse	41	13		
Drug use	55	18		
Mental problems	1	<1		
Criminal conduct	70	23	3	60
Security violations	1	<1		
Outside activities				
Misuse of IT systems	1	<1		
<b>TOTAL</b>	<b>305</b>	<b>100</b>	<b>5</b>	<b>100</b>

Tables 5 through 8 show a very similar distribution pattern for enlisted personnel, officers, and civilian government employees, with (adverse) personal conduct, financial issues, drug use, and criminal conduct accounting in each group for approximately 70% of all issues cited. For the contractor community, the pattern is somewhat different in that issues are more or

less evenly distributed among six issue categories. With regard to major issues versus significant issues, alcohol abuse and criminal conduct are frequently cited as significant issues in enlisted cases, but not for officers. Among government civilians, PSQ falsification and criminal conduct appear as higher-frequency significant issues. Very few *significant*-level issues are cited for contractor employee revocations. Rather, contractor revocations are based almost wholly on *major* issues. Summarizing the distributions and percentages in Tables 5 to 8, with only a few exceptions, issues cited in SORs fall into the eight issue categories listed in Table 9 for all four occupational groups.

**Table 9**  
**Major and Significant Issues with Higher Frequencies Listed in Statements of Reasons**  
 [Percentage of total major and significant issues for each occupational group cited in Tables 5 to 8]

<i>Issues</i>	<i>Enlisted</i>	<i>Officers</i>	<i>Civilians</i>	<i>Contractors</i>
	%	%	%	%
Sexual behavior	5	6	3	5
Personal conduct	22	25	25	16
Financial issues	13	11	20	11
Falsification of PSQ	5	6	8	13
Alcohol abuse	9	4	9	13
Drug use	14	11	9	18
Mental problems	2	6	6	<1
Criminal conduct	30	27	19	23
Percent of all issues	100	96	99	99

Two issue categories, personal conduct and criminal conduct, stand out as being the most frequently cited reasons, particularly for enlisted and officer revocations. High frequencies for drug use and financial issues also appear for the military in general. High frequencies of personal conduct and financial issues occur for revocations for civilian government employees while contractor personnel typically appear to lose their clearances due to criminal conduct, drug use, and adverse personal conduct. In general all four groups exhibit very similar distributions. In the population sample of revocations in FY98, there are no instances of foreign allegiance or outside activity<sup>5</sup> recorded.

With regard to the two most frequently cited issues, both categories of conduct (criminal and personal) are composites of a set of behaviors and in some SORs frequently overlap other issue areas. For example, behavior resulting from alcohol abuse, sexual misconduct, and possession of narcotics are often cited as criminal conduct. Criminal conduct covers a multitude of other adverse behaviors—larceny, assault, fraud, misuse of government property, and driving

<sup>5</sup> *Outside activity* as an adjudicative criterion that can be disqualifying for access to classified information is defined in the adjudicative standards as “Any service, whether compensated, volunteer, or employment with (a) a foreign country; (b) any foreign national; (c) a representative of any foreign interest; (d) any foreign, domestic, or international organization or person engaged in analysis, discussion, or publication of material on intelligence, defense, foreign affairs, or protected technology.”

while intoxicated—all of which represent a major security concern with regard to continued access to classified information.

Personal conduct, when cited by adjudicators as a reason for revocation, falls into one of six clearly defined subcategories and almost without exception were considered major by the adjudicator and, therefore, grounds for revocation without reference to other issues. Again, almost without exception, personal conduct reasons are listed in the SOR along with other major reasons for the revocation (e.g., drug use, alcohol abuse, criminal conduct, etc.). Table 10 displays the frequencies of occurrence in the SORs for each employment group by type of conduct.

**Table 10**  
**Type and Frequency of Personal Conduct as an Adjudicative Issue Coded from SORs**  
 [Frequency and percentage of total in each employment group]

<i>Type of Conduct</i>	<i>Enlisted</i>		<i>Officers</i>		<i>Civilians</i>		<i>Contractors</i>	
	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>	<i>n</i>	<i>%</i>
Refusal to cooperate or provide information	92	23	20	21	19	9	9	9
Falsification of information on a form or to an agent/investigator/agency official	52	13	17	18	48	24	41	42
Reliable, unfavorable information provided by other people	20	5	5	5	8	4	0	-
Potential for blackmail or pressure	9	2	2	2	1	<1	1	1
Behavior that tends to show the person as untrustworthy or unreliable	212	54	50	53	125	62	47	48
Association with persons involved in criminal activity	7	2	1	1	1	<1	0	-
Total frequency in which personal conduct was coded as an adjudicative issue <sup>a</sup>	392		95		202		98	

<sup>a</sup> Some SORs listed a concern with more than one type of personal conduct issue. These were coded from the study's summary comment on each case. In Tables 5 through 8, the frequency of personal conduct as a significant or major issue is based on whether or not one or more personal conduct issues were listed in each SOR.

The first two categories above pertain to documented resistance to cooperate honestly and openly with the investigative process. The remaining four types require the subjective judgment of the adjudicator and in general focus on security concerns about the employee's trustworthiness and vulnerability to compromise that would not in themselves represent illegal behavior. In each employment category, personal conduct citations indicative of untrustworthy or unreliable behavior constitute about half of the personal conduct reasons in the SORs. As stated earlier, personal conduct citations in SORs of this type are almost invariably associated with other more specific adverse behavior. For the military revocations, refusal to cooperate or provide information is the second most frequent issue, and for government civilian and

contractor employees, falsification or misrepresentation of fact is the second most frequent issue. Other types of disqualifying personal conduct are rarely cited.

### **Productivity of Sources among Occupational Categories**

While sources and types of issue information related to trigger are displayed in Tables 3 and 4, a final revocation is typically based on a much more comprehensive range of reasons and sources. From the first evidence of a serious security concern until the issuance of a LOI with the attached SOR, an adjudicative facility solicits, assembles, and evaluates facts relevant to the question of continued eligibility. For example, often an adjudicator will request a medical evaluation, or, particularly where a nonhealth issue is present, a SII will be opened to validate or establish facts regarding criminal behavior or other misconduct. Consequently, it is not unusual for an adjudicative file to contain a wide variety of reports and other documents from diverse sources.

Considering the fact that the significance of the PR as a source of initial information leading to revocation varies dramatically from one occupational group to another (Table 3), it is appropriate to ask whether we can see similar variations in the productivity of other sources of issue information across these groups. Table 11 displays the percentages in each occupational group of references coded from each source. [It is important to clarify at this point in the interpretation of these data that source references leading to a final revocation decision, such as supervisors reports, medical records, SIIs or NACs, which were initiated or solicited as part of a PR are included in the tabulation (Tables 11 and 12). Consequently, the PR as a source of information on any adjudicative issues is not mutually exclusive of other source references related to the same issue.]

While consistency of productivity across groups for sources such as the subject, police reports, and medical records is clear, others show marked differences. The SII is particularly productive for civilian employee and contractor cases, but much less so for military cases. The supervisor as a source of information is very productive for military cases and much less useful for government civilian and industry cases. Although the PR as an original source that triggers the revocation process is more important for nonmilitary personnel, as one of many sources linked to reasons in the final revocation decision, it appears to be slightly more frequently cited for government civilians and military officers than for contractors.

**Table 11**  
**Sources of Issue Information by Occupational Group**  
 [Percentages of Source References in Each Category]

<i>Source</i>	<i>Enlisted</i> %	<i>Officers</i> %	<i>Civilians</i> %	<i>Contractors</i> %
Criminal investigation	8	7	2	
Local agency check	5	6	6	13
Periodic reinvestigation	5	10	16	6
Background investigation	4	3	2	5
Special investigative inquiry	1		9	14
Coworkers		1	1	
Creditors	6	6	7	4
Police reports	8	8	8	10
Unit security office	13	13	10	2
Subject	16	16	17	19
Initial PS			2	6
UCMJ proceedings	9	4		1
Supervisor	13	13	4	5
Urinalysis	4	3	3	2
Medical records	4	4	6	7
Other agencies	2	3	5	5
Total percent provided by above sources	98	97	98	99

*Note.* Cell values show percentages above 1% rounded to the nearest whole percentile. For sources not listed, values were less than 1% in all occupational categories.

### **Productivity of Sources for Types of Issue Information**

Obviously some sources will provide information relevant to one or a very limited number of issue areas. For example, a urinalysis will produce information relevant to drug use and possibly alcohol consumption, but little else, and creditor complaints concern almost exclusively financial issues. However, the productivity of other sources vis-à-vis specific types of issue information is less clear, and these relationships may differ from one occupational group to another.

The questions are: Which sources have been most useful or productive for specific issues? And given any source—security office, former spouse, medical records, police reports—what categories of issue information do these most frequently provide? The answers to these questions may have implications for the conduct of background investigations and continuing evaluation programs regarding the optimal allocation of scarce resources. Frequencies of all SORs for 864 cases included in this study for each occupational group is displayed in Appendix E.

These matrices (E.1-E.4) show the distribution of sources identified for each issue cited in the SORs leading to revocations in FY98. In all, researchers coded 3,915 source references in which each reference from one of 25 possible sources is associated with one of 14 issues. Mapping these reference-frequencies by issue and by source provides insight into the relative productivity of various sources for each issue area.

A cursory examination of these patterns demonstrates that seven issue areas account for over 90% of all sources references coded in this study: alcohol abuse, criminal conduct, drug use, financial issues, mental problems, personal conduct, and sexual behavior.<sup>6</sup> In addition, it is clear that these inputs to the decision-making process originate from a remarkably wide variety of sources. The finding that information related to a particular issue cannot be narrowed to even three or four highly productive sources is perhaps one of the most useful contributions of this analysis. For example, references from at least 23 sources were recorded for criminal conduct and 17 for drug use, reinforcing the argument for seeking information from a wide variety of sources as a productive investigative strategy.

Two issue areas, allegiance and outside activity,<sup>7</sup> are essentially inactive criteria for persons already in positions of trust. Several other adjudicative criteria appear to be of minimal importance in identifying those relatively few individuals who have exceeded the risk threshold for continued eligibility. Higher frequencies for specific sources, however, result from some issues, such as drug use, being cited more often than others.

Table 12 presents a summary of the data seen in Appendix E for the seven issue areas in which virtually all of the source references are associated. This presentation compares distributional patterns among the four occupational groups. This matrix identifies for each employment category those sources that provided at least 10% and 30% or more of the references for each issue area. Data clearly indicate (not surprisingly) that, in addition to the subject, two sources closest to the subject, the subject's security officer and supervisor, tend to be relatively more productive than others across several issue areas. In contrast, however, coworkers appear to be a very weak source. This confirms the view that coworkers are very reluctant, for various reasons, to voluntarily provide security-relevant information about others with whom they have close contact.

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<sup>6</sup> Personal conduct, although listed frequently in statements of reasons, tends to be a reflection of other cited reasons such as criminal conduct and falsification of the PSQ as noted in Table 10.

<sup>7</sup> The adjudicative guidelines define *Allegiance* [Allegiance to the United States] as a security concern when an employee is involved in any act whose aim is to overthrow the Government of the United States or alter the form of government by unconstitutional means, sympathy with persons who attempt these acts, association or sympathy with persons or organizations that advocate the unconstitutional overthrow of the United States Government, or involvement in activities which advocate or practice the commission of acts to prevent others from exercising their rights under the Constitution.

*Outside Activities* is defined as involvement in certain types of outside employment or activities that pose a conflict with an individual's security responsibilities and which could create an increased risk of unauthorized disclosure of classified information. This would include any service whether compensated, volunteer, or employment with a foreign government, a foreign national, a representative of any foreign interest or any foreign, domestic, or international organization or person engaged in analysis, discussion, or publication of material on intelligence, defense, foreign affairs, or protected technology. Department of Defense Regulation 5220.2, Enclosure 2 (1992).



**Table 12**  
**Assessment of Best Information Sources for Specific Adjudicative Issues**  
**and by Occupational Category**

<i>Sources</i>	<i>Alcohol Abuse</i>	<i>Criminal Conduct</i>	<i>Drug Use</i>	<i>Mental Problems</i>	<i>Financial Issues</i>	<i>Personal Conduct</i>	<i>Sexual Behavior</i>
Background investigation							
CI Investigation							
Criminal Invest.		E O	E				
Local agency check	O G I	I G			I		E I
NACLC							
Periodic reinvestigation		G			O G	<b>E O G I</b>	E O I
SSBI			I				G
Special investigative inquiry	G I	I	I	G I	G I	I	I
Neighbor							
Coworker							G
Creditor					<b>E O G I</b>		
Ex-spouse							
FBI							
Police	<b>E O G I</b>	<b>E O G I</b>	G				E O
Family							
Security	E G	<b>E O G</b>	<b>E O G</b>	<b>E O G</b>		<b>E O G</b>	O
Self							G
Subject	<b>E O G I</b>	<b>E O G I</b>	<b>E O G I</b>	<b>E O G I</b>	<b>E O G I</b>	<b>E O I</b>	<b>E O G I</b>
Initial PS							
Spouse							G
UCMJ action		E					E
Supervisor	E	<b>E O</b>	<b>E O</b>	<b>E O</b>		<b>E O I</b>	O G
Urinalysis			<b>E O G</b>				
Media reports							G
Medical records	<b>E G I</b>			<b>E O G I</b>			E I
Unknown							
Other agency					I		G
<b>TOTAL</b>	691	1070	871	139	806	183	66

*Note.* Sources that provide 10% or more of information in each issue area are annotated as E, O, G, or I (indicating that they provide 10% or more of the issue information in the enlisted, officer, government employee, or industry groups). Letters in bold indicate that the source provides more than 30% of the information for each group identified by E, O, G, or I.

With regard to specific issue areas—alcohol abuse, criminal conduct, drug use, and financial issues—there appear to be several highly and moderately productive sources of relevant information. However, for each issue there is a different combination of useful sources. PRs appear to be highly productive of information on adverse personal conduct, but of marginal importance for alcohol abuse, drug use, or mental conditions. LACs and police reports are especially productive of information on alcohol abuse and criminal conduct; and the local

security office, the subject,<sup>8</sup> and supervisors are uniquely valuable as sources of information on alcohol abuse, criminal conduct, and drug use.

Several sources are highly productive across all or most issue areas. These include, in order of frequency, subject interviews, the local security office, supervisory reports, and police reports. The combined effect of these sources appears to account for a large proportion of the information leading to final revocations. However several sources are frequently cited in a single-issue area for all occupational groups. Not surprisingly, medical reports are, for all groups, the most productive source regarding mental problems, the routine urinalysis reveals drug use, and creditors are the primary source about financial issues.

When comparing distributional differences among occupational groups, the summary matrix reveals the relatively greater importance of the immediate supervisor (which includes commanding officers) and security offices as a sources of issue information in military revocations and SIIs and LACs in contractor cases.

### **Time Lines: How Quickly the System Responds to the Disclosure of Serious Issue Information**

Another dimension of the revocation process for which data were readily available in adjudicative files was responsiveness to the surfacing of serious issue information. This is no small issue related only to administration efficiency. While access to classified information is normally suspended with a first serious report of a security issue for military personnel, in the civilian workforce this may not be the case, even while a counterintelligence investigation is under way. In some cases a highly vulnerable employee can continue in a position of trust for many months prior to a final revocation action. Our review of past espionage case studies (not included in the present study) provides accounts in which an employee's vulnerability over time became so severe that it led to espionage. In these situations, early intervention through the adjudicative process might have prevented damage to both the person or to national security.<sup>9</sup>

Specifically, we were concerned with the time it took for the system to act on serious issue information in revocation cases. What is the typical time span from the date of the trigger event report to the issuance of a Letter of Intent and from the LOI to the final Letter of Revocation? Furthermore when a subject appeals a revocation, how long does it take until there is a final decision in these cases? Data on time-intervals that address these questions are shown in Table 13. Our measurement of time intervals is based solely on the dates recorded on official letters and documents. The date of the initial or trigger event is the date of any report of an event or condition that re-opens an investigative process ultimately leading to an adverse adjudicative decision.

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<sup>8</sup> The *subject* as a source includes all information provided by subjects in the course of criminal investigations, interviews with security authorities, subject interviews in the course of a PR or SSBI, or any situation in which the employee or service member is responding to a request for information. The *self* as a source is information voluntarily provided by a cleared employee concerning an issue of security concern.

<sup>9</sup> Although the case of Aldrich Ames is frequently cited as one in which adjudicative action at an early stage as a result of severe drinking problems might have prevented damage, cases in the DoD such as Jonathan Pollard, Craig Kunkle, Kurt Lessenthien, and David Boone may also be cited to illustrate this point.

The data reveal a widely distributed pattern of response intervals from the report of initial and serious issue information to the issuance of a LOI sent to the subject. Very often a LOI follows a local decision, made by a commanding officer or local security professional to remove the employee's access to classified information. For military personnel, few LOIs are issued in the same month as the trigger event or even in the following month. Although the LOI is typically issued in the 2<sup>nd</sup> or 3<sup>rd</sup> month, this still represents fewer than 25% of the cases.

For government civilian employees the pattern is similar in that the frequency of LOIs issued peaks around the 2<sup>nd</sup> month. For all three categories, significant numbers (more than 25%) of subjects whose clearances are later revoked do not receive a LOI until after the 9<sup>th</sup> month. The contractor group, however, is clearly different in that issuing of LOIs peaks in the month following the trigger event with virtually all issued before the 10<sup>th</sup> month.

While the distribution of time spans between the LOI and the Letter of Revocation (LOR) is much tighter, no dramatic differences appear when comparing the four occupational categories. The modal frequency for contractors is the 5<sup>th</sup> month compared to the 3<sup>rd</sup> or 4<sup>th</sup> month for the other groups. It appears overall, that for the contractor group, adjudicative action is taken more expeditiously, with far more actions occurring in the first few months following a trigger event, and far fewer seriously delayed actions than those for military and government civilian cases which can take up to two years in some cases.

Table 13 compares means and standard deviations for these four categories. In general, the administrative processing time for contractor revocations is visibly shorter, with less deviation from the central tendency. This table also includes average time lines between the LOR and the date of final decisions by Personnel Security Appeal Boards (PSABS) for those revocations that are appealed and are not reversed in the same fiscal year. On the average, these final decisions tend to be made one or two months sooner in civilian cases than in military cases. Except in one case, all of the contractor PSAB decisions were issued within six months of the LOR. For other categories many decisions did not occur for six months and in some cases, over a year.

**Table 13**  
**A Comparison of Means for Months Elapsed between Trigger Event and Final Revocation**

		<i>Enlisted</i>	<i>Officers</i>	<i>Civilians</i>	<i>Contractors</i>
Months from trigger event to LOI	Mean	7.9	9.3	7.3	2.2
	Std. Dev. <sup>a</sup>	7.0	7.0	7.8	2.5
	<i>n</i>	342	76	188	159
Months from trigger event to LOR	Mean	11.3	14.5	11.7	7.6
	Std Dev.	7.5	8.0	8.6	3.8
	<i>n</i>	384	81	188	164
Months from trigger event to Appeals Board decision	Mean	20.8	25.5	19.7	13.1
	Std Dev.	10.4	21.6	11.0	5.8
	<i>n</i>	46	17	90	28
Months from LOI to LOR	Mean	4.3	5.4	4.6	5.7
	Std. Dev.	2.2	3.6	3.0	2.4
	<i>n</i>	335	75	186	157
Months from LOR to final Appeals Board decision	Mean	7.4	8.7	6.4	4.5
	Std. Dev.	5.2	10.1	3.5	2.1
	<i>n</i>	44	15	86	28

<sup>a</sup> Standard Deviation is a measure of the tendency for cases to cluster near their mean value. The lower the Standard Deviation, the more likely for cases to come close to the average on that single measure. Usually almost all cases fall within a range of plus or minus two standard deviations from the mean value.

### Summary and Conclusions

This study of revocations during FY98 has resulted in a number of observations concerning their causes and the most productive sources of issue information leading to this adjudicative decision.<sup>10</sup> With regard to causes of revocation, sociological trends in the larger society—crime rates, economic conditions, trends regarding the use of drugs or alcohol, and general stress in the workplace—can impact on the frequency of types of issues which surface in the process of background investigations. These trends may also possibly affect the productivity of various sources of this information.

For this reason it has been instructive to compare findings on the causes of revocation and sources of information seen here with findings from the earlier PERSEREC report based on data on Army and Air Force revocations for calendar year 1987 (Schroyer et al., 1989). (See Appendix B.) The earlier report finds dissimilarities in the types of most frequently seen issues between Army and Air Force cases of revocation; nevertheless, as with the present findings, drug use, criminal conduct, sexual behavior, and mental problems are the most frequently cited issues.

<sup>10</sup> Appendix F presents a comparison of findings on these research questions for SCI and non-SCI revocations which is not discussed in the main body of this report due to its specialized focus.

With regard to sources of information, police reports, unit commanders and supervisors, and victims of assaults accounted for most of the reports leading to revocation.

### **Principal Observations from the FY98 Data**

- The proportion of revocations for which adverse issue information is initially revealed in the process of a periodic reinvestigation varies significantly among employment groups.
  - Revocations initiated or triggered by a PR that involve military personnel are less than 6% for enlisted personnel and about 13% for officers.
  - The proportion of PR-initiated revocations is higher for government civilians and contractor employees, with 28% and 21% respectively.
- Information that initiates the revocation process concerns a diverse number of issue areas that vary in frequency of occurrence according to the employment group. However, drug use is the most frequently cited issue in the DoD population of cleared employees.
  - For enlisted personnel, drug use is followed by financial issues and criminal conduct.
  - For officers, drug use and criminal conduct are the issues most frequently cited.
  - For civilian employees, financial issues are by far the most frequent, followed by drug use.
  - For contractor employees, drug use is by far the most frequently identified initial issue leading to revocation.
- Information that initiates the revocation process originates from a wide range of sources or types of reports (18 were coded in this study) for the four occupational categories.
  - For military personnel and government civilians, reports of criminal behavior, drug testing, and the PR are the most productive of initial information leading to revocation.
  - The most productive reports for contractors appear to be the PR, NACs, and SSIs.
- Statements of Reasons, typically issued several weeks following an initial report of security concern, generally cite a much broader range of issues than those that are the focus of initial reports to a central adjudicative facility. Typically, revocations are based on several issues of varying levels of concern with more than 80% of military SORs citing three or more reasons.
  - For all occupational categories, the general issue of personal conduct accounts for over a quarter of reasons stated for the revocation in all but the contractor employee group.
  - For enlisted personnel and officers, after personal conduct, criminal conduct is the most frequently cited issue, followed by drug use and financial issues.
  - For civilian employees, after personal conduct, financial issues are cited most frequently, followed by criminal conduct and drug use.

- For contractor employees, criminal conduct is the most frequent issue, followed by drug use and personal conduct.
- For all groups, virtually all reasons cited fall under eight adjudicative issues. In addition to the general category of personal conduct, four appear to account for most of the revocation actions: alcohol abuse, criminal conduct, drug use, and financial issues.
- While many of the reasons stated as personal conduct have to do with non-cooperation by the subject in the investigative process, the most frequently cited subcategory is “behavior that tends to show the person as untrustworthy or unreliable.”
- A wide range of information sources exists for adjudicative issues cited in SORs, with at least 19 information sources identified as being productive in one or more issue areas.
  - The most generally productive sources for information leading to revocations are in order of frequency: subject interviews, unit security office reports, supervisor reports, police reports, PRs, and local agency checks.
  - Two sources closest to the subject, the security office and the supervisor, tend to be relatively more productive than other sources, particularly coworkers, who appear to be a very weak source.
- Several sources are highly productive across all or most issue areas. These include, in order of frequency, subject interviews, local security office reports, supervisory reports, and police reports.
- For several issue areas, a different combination of more productive arises.
  - Local area checks and police reports are especially productive for information on alcohol abuse and criminal conduct.
  - The local security office, the subject interview, and supervisors are uniquely valuable as sources of information on alcohol abuse, criminal conduct, and drug use.
  - PRs appear to be highly productive regarding information about adverse personal conduct, but of marginal importance for alcohol abuse, drug use, or mental problems.
- Comparing productivity of sources across occupational groups, only the subject interview is shown to be consistently high. Other sources stand out as being important for specific occupational categories.

- Supervisory reports are significantly more important in military revocations than for other groups.
  - The PR is more productive for civilians and officers than for contractors or enlisted personnel.
  - Criminal investigation reports are very productive in enlisted revocations.
  - SIIs and local agency checks are relatively more productive in contractor cases than for other groups.
- Concerning the length of time it takes to complete the revocation process, clear differences exist among groups at various stages from the date of the trigger event until the date of final resolution.
- Adjudicative action in response to serious issues is faster in the contractor group, with over 60% of LOIs issued within two months of the trigger event. For other employment groups, a final revocation is issued, on the average, in less than two-thirds of the time required.
  - With the possible exception of contractor revocations, recorded time spans are widely distributed over many months: from the trigger event to the LOI it takes 18 months or more and the period of time from the LOI to the LOR is 10 months or more.

## **Conclusions**

This study of the causes and sources of issue information leading to clearance revocations in one year has led to observations that confirm the efficacy of much of what the Department of Defense does in order to ensure the continued reliability and trustworthiness of the cleared workforce. While few question the continued need for formal periodic investigations at prescribed intervals, the fact that the routine PR is the initial source of as much as 28% of the serious issue information that leads to a revocation is evidence of the PR's continued importance in the personnel security program. The lower percentage for military personnel can be attributed to military members being routinely subject to more intensive personal monitoring and supervision than are other personnel. Consequently, serious issue information for this group is more likely to be reported by other sources and to be addressed prior to a scheduled periodic reinvestigation.

In addition, the scoping of investigations that includes information from a wide variety of documentary and human sources continues to produce valuable information related to an employee's continued trustworthiness. Some sources are highly productive of information on many adjudicative issues, others focus on a single concern and serve as the best single source on that issue. Other sources appear to be of marginal value, being virtually nonproductive. One may question whether, for example, the deliberate commitment of resources to seeking out neighbors or ex-spouses can be justified in terms of risk-management.

While revocations in any employment group are based on a wide range of issues, at least two, allegiance and outside activities, appear to be lacking in importance to revocations. In addition, the fact that both foreign preference and foreign interest are rarely cited as reasons for adverse action suggests that the distinction between these two adjudicative criteria may be an unnecessarily fine point. These findings on the issue information and its sources may be of relevance to the ongoing review of the utility of specific criteria.





## References

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## **Appendix A**

### **Revocation and Appeal Process**



## **Revocation and Appeal Process**

This appendix explains the actions involved in a denial or revocation of security eligibility. The actions described are general in nature as each military department and defense agency establishes its own internal procedures to manage its Personnel Security Program (PSP). Each uses the Department of Defense PSP policies and requirements as the basis for their implementation.

The central adjudication facilities (CAFs) are responsible for adjudicating personnel under their jurisdiction. The military departments are responsible for military and civilian clearance adjudications and military, civilian, and contractor Sensitive Compartmented Information (SCI) adjudications. Washington Headquarters Services (WHS) is responsible for clearance adjudications of civilian employees for the majority of defense agencies. The Defense Office of Hearings and Appeals (DOHA) is responsible for clearance adjudications of all defense contractors.

The denial and revocation process involves the CAFs as well as the employer, employee, investigative agencies, medical facilities, or any other organizations that could provide information relevant to an employee's security determination. The time periods to complete the process vary from weeks to years, depending upon the various actions needed for each case. The following chart describes of actions taken in the process and is broken down by category of personnel: military personnel (officer and enlisted) civilian employees and contractors.



**Revocation and Appeal Process**

<i>Number</i>	<i>Action</i>	<i>Military Personnel</i>	<i>Civilian Employees</i>	<i>Contractors</i>
1	<p><b>Establish the requirement for security clearance.</b></p> <p>Before an individual's security eligibility/clearance is denied or revoked, he or she must be nominated for a position or duties that require a security clearance, or currently be occupying a position that has already have been determined to require a clearance although a formal clearance has not been issued.</p>	<p>Requirement for clearance is established in the various staffing documents used by the military departments. Each organization identifies the type and number of personnel necessary to accomplish its mission. Each position identifies the job requirements, such as, officer/enlisted by grade, military occupational specialty (MOS) or rating, or by other essential requirements, to include clearance/access level.</p>	<p>Each civilian position requires a job description (JD) that identifies all requirements of the person who is to occupy the position, such as job series, grade, special requirements, education, security clearance level, etc.</p>	<p>The government contract specifies requirements for the contractor. The DD Form 254 identifies security requirements, to include clearance levels, accesses, etc.</p>
2	<p><b>Filling positions</b></p> <p>Once a position requiring a security clearance has been identified, an individual is selected for the position.</p>	<p>When a military member is assigned or detailed to a position, he or she must meet the requirements of the staffing document. If not, actions may be taken to qualify the member, such as training.</p>	<p>When a civilian applicant is selected for a position, he or she must meet the requirements of the JD.</p>	<p>When the company selects individuals to work on the contract, the prospective contractor employee must meet the requirements stated in the contract.</p>



**Personnel Security Investigations (PSI).**

Does the person currently have the required PSI (initial or reinvestigation) for the position or must it be conducted?

Each level of clearance has certain PSI requirements. If the service member is already eligible at that level or has the proper PSI, a clearance can be issued. If he or she is not eligible or has the proper PSI, a new PSI and adjudication is required before a final clearance can be issued. Depending upon the age of the current PSI, the member may require a reinvestigation or other update. The amount of time required to complete the PSI determines when the final clearance can be issued. This can range from a very short time if the person is eligible or has the PSI, to a longer time for a full background investigation or reinvestigation.

Each level of clearance has certain PSI requirements. If the person is already eligible at that level, or has the proper PSI, a clearance can be issued. If the person is not eligible or does not have the proper PSI, a new PSI and adjudication is required before a final clearance can be issued. Depending upon the age of the current PSI, the person may require a reinvestigation or other update. The amount of time needed to complete the PSI affects the time it takes to issue the final clearance. This can range from very short time if the person is eligible or has the PSI, to a longer time for a full background investigation or reinvestigation.

Each level of clearance has certain PSI requirements. If the person is already eligible at that level, or has the proper PSI, a clearance can be issued. If the person is not eligible or does not have the proper PSI, a new PSI and adjudication is required before a final clearance can be issued. Depending upon the age of the current PSI, the person may require a reinvestigation or other update. The amount of time needed to complete the PSI affects the time it takes to issue the final clearance. This can range from a very short time if the person is eligible or has the PSI, to a longer time for a full background investigation or reinvestigation. Since a contractor's clearance is tied to each contract, the employee may be required to have several clearances to work on multiple contracts. Usually this will require only one PSI at the highest level necessary to support all clearances.

#### Continuous evaluation of personnel.

Once persons are determined to be eligible, they are under continuous evaluation as long as they are in a cleared or eligible status. If the duties for any person do not currently require a security clearance or access, it may be administratively withdrawn. Cleared individuals are under continuous evaluation as long as they maintain eligibility for clearance. A clearance can be administratively reinstated without reinvestigation if the need for access arises. A denial or revocation action can be taken for anyone nominated for a clearance, or currently holding a clearance, or who is eligible but without a clearance issued at the time.

**Applies.** If the CAF determines that the preliminary information is significant, it may order temporary suspension of access until a final decision is made. In this case, the CAF notifies the employer first and the employer knows of the information, the employer may temporarily suspend access and notify the CAF. The CAF and the employer can exchange information about the member as it may be reviewed for official use only.

**Applies.** If the CAF determines that the preliminary information is significant, it may order temporary suspension of access until a final decision is made. In this case, the CAF notifies the employer to suspend. If the employer first knows of the information, the employer may temporarily suspend access and notify the CAF. The CAF and the employer can exchange information about the person as it used for official use only.

**Applies.** If the CAF determines that the preliminary information is significant, it may order temporary suspension of access until a final decision is made. Only the government can order temporary suspension of access for a contractor. Due to privacy concerns, the government cannot share specific information with the contractor which does not have an official need to know. The company only needs to know whether or not the contractor employee is cleared or not to work on the contract. The information gathered by the government is to be used solely for government purposes.

**Initial adjudication at the CAF.**

When a CAF receives any information that may question the person's allegiance, trustworthiness, or reliability, it must be evaluated and confirmed that it is complete. If it is not, then additional information is needed through an investigation, medical evaluation by a government doctor, interrogatories, etc. Once the information is complete, the CAF determines if the person may pose a potential security risk. If so, then a formal procedure to deny or revoke the security eligibility is initiated.

If additional information is needed, the CAF may request the Defense Security Service to conduct an investigation including a medical evaluation, an interview with the subject, and releases signed by the service member.

If additional information is needed the CAF may request the Defense Security Service to conduct an investigation whereby the employer arranges for a medical evaluation, interviews the person to obtain the information; or has the person sign releases.

If additional information is needed, the DOHA may request the Defense Security Service to conduct an investigation, coordinate with the employee to arrange for a medical evaluation, send interrogatories to the employee, or has the employee sign releases. The DOHA then sends information to the employee in a sealed envelope to protect his or her privacy. Medical evaluations are conducted by board-certified psychiatrists or clinical psychologists under contract to perform those evaluations.

### Issuing a Statement of Reasons (SOR).

An SOR is the document that initiates an official process to deny or revoke a person's security eligibility. A denial is issued to a person who has been nominated, but does not currently have eligibility or clearance. A revocation is issued to a person who is already eligible or has an active clearance. An SOR may also be called a Letter of Intent (LOI) by some agencies. The SOR provides authority for the action, potential consequences of the action, adjudicative issues involved, a detailed listing of the information considered (as specific as national security and privacy requirements permit), actions for the person, and time periods. Evaluation of security information is made using DoD adjudication guidelines for SOR, final CAF determinations, and appeals.

The CAF issues an SOR package to the employer which contains administrative instructions for the employer that may include ordering a temporary suspension of access pending a final decision. The service member's package also includes the agency authority, consequences of the potential action, adjudicative issues involved, specific information considered, request for additional time to reply, and a request for records. The employer is required to deliver the package and obtain a receipt from the service member.

The CAF issues an SOR to the employer. The SOR package contains several elements. It includes administrative instructions for the employer. This may include ordering temporary suspension of access pending a final decision. The employee package includes the agency authority, consequences of the potential action; adjudicative issues involved; specific information considered; request for additional time to reply; request for records. The employer is required to deliver to package and obtain a notice of receipt from the employee.

The DOHA issues an SOR to the company in a sealed package, which the contracting company is instructed to deliver the package unopened to the employee. The company is required to send the signed receipt for the package to DOHA. If access suspension is ordered, it will tell the company only that access is temporarily suspended. It will not include specific reasons. The SOR package for the employee contains the agency authority, consequences of the potential action, adjudicative issues involved, specific information considered; request for additional time to reply, and a request for records.

**Employer actions.**

The employer may have to take certain actions during the process. For military and civilian personnel there is an employer-employee relationship. The information can be officially used by other employer offices to take action separate from the security actions, such as, military/civilian retention, disciplinary actions, personnel reliability programs, etc. For contractors there is no employer-employee relationship. The only action the government can take is to prevent the contractor employee from having classified access. Employment actions are solely the responsibility of the contractor.

The SOR may require temporary suspension of classified access if this has not already been done by the employer. This may require temporary reassignment or duties not involving classified access and will impact on how the employer performs its assigned mission. Based on the nature of the information in the SOR the employer may have to make a retention decision under military personnel rules. If the information is serious enough, it may also be used for action under the Uniform Code of Military Justice and may be used for any other programs the member is involved in such as personnel reliability. These actions are separate from the SOR action, but are taken by other officials under different authority.

The SOR may require temporary suspension of classified access if not already done by the employer. This may require temporary reassignment or duties not involving classified access. This will impact on how the employer performs its assigned mission. Based on the nature of the information in the SOR the employer may have to make an employment decision under civilian personnel rules. If the information is serious enough it may also be used for disciplinary action under civilian personnel regulations and may be used for any other programs the employee is involved in such as personnel reliability. These actions are separate from the SOR action, but are taken by other officials under different authority.

Since there is no employer-employee relationship between the government and the contractor employee, the action is limited to classified access. The government can only instruct the company not to permit the employee to have any classified access. Any personnel action must be done under company rules such as when the company cannot use the employee in other jobs on a temporary basis pending a final DOHA decision.

### Replies to an SOR.

The person may reply to the SOR, but is not required and may request additional time to reply or provide records are options for the person.

The member can reply to the SOR, but is not required to do so. If the member elects not to reply, a decision will be made based on the information available. If the service member replies, he or she may submit any information to the CAF. If additional time to reply is needed, the member can request a stated period of time and reasons for it. The CAF will determine if the request is appropriate and grant the request is appropriate and grant the member can also request copies of the information used in the SOR as the basis for the action. The CAF can release files it initially created, but all other releases must be approved by the agency initiating the information. These requests are processed under the Privacy Act. The member may be represented by a military attorney, a private attorney, or other representative at the service member's expense.

The employee can reply to the SOR, but is not required to do so. If the employee elects not to reply, a decision will be made based on the information available. If the employee replies, he or she may submit any information to the CAF. If additional time to reply is needed, the employee can request a stated period of time and reasons for it. The CAF will determine if the request is appropriate and grant the employee can also request copies of the information used in the SOR as the basis for the action. The CAF can release files it initially created, but all other releases must be approved by the agency initiating the information. These requests are processed under the Privacy Act. The employee may be represented by a private attorney or other representative at the employee's expense.

The contractor can reply to the SOR, but is not required to do so. If the contractor elects not to reply, a decision will be made based on the information available by a DOHA administrative judge. If the contractor replies, he or she may submit any information to be considered by the DOHA judge. The contractor may also request a hearing with an administrative judge from DOHA instead of providing a written reply. If a hearing is elected, a hearing date is established. If additional time to reply is needed, the contractor can request an extended period of time and reasons for it. DOHA will determine if the request and time period are appropriate. The contractor can also request copies of the information used in the SOR as the basis for the action. DOHA can release files they initially create, but all other releases must be approved by the agency initiating the information. These requests are processed under the Privacy Act. The contractor may be represented by a private attorney or other representative at the contractor's expense.

**Employer endorsements.**

The employer may optionally provide comments for the CAF to also consider. The employer may agree or disagree with the proposed action and the endorsement provides supporting reasons for the position.

The employer, at its option, may include comments and recommendations with the reply back to the CAF. The employer may agree or disagree with the proposed action and would provide information to support its position. This is possible since the information is seen by the employer who has an official need to know.

The employer, at its option, may place comments and recommendations with the reply back to the CAF. The employer may agree or disagree with the proposed action and would provide information to support its position. This is possible since the information is seen by the employer who has an official need to know.

The government has not provided information to the company about the action. The employee may elect to provide the information to the company and request an endorsement to be considered by DOHA in its decision. In this case, the government has protected the information, but the company has become aware of it through the employee.

**CAF final determinations.**

The CAF considers the person's reply, if submitted, and any employer endorsements. The CAF can decide to deny or revoke the eligibility and clearance; grant the eligibility and clearance; grant them with a warning about future behavior in "borderline" cases; grant them with conditions for the person, such as providing future financial statements, agreeing to drug testing, counseling, etc. to ensure continuing reliability. CAFs are required to provide the basic reasons for the final determination, whether favorable or unfavorable.

If the CAF clears the member with a warning, it is with official notice that future behavior will be evaluated for continuing eligibility. By this notice, the employer is aware of what to watch for. If the CAF grants the eligibility with conditions, the employer may be asked to help monitor the conditions to ensure continuing reliability. This could involve periodic financial statements, drug testing, or other conditions.

If the CAF clears the employee with a warning, it is official notice that future behavior will be evaluated for continuing eligibility. By this notice, the employer is aware of what to watch for. If the CAF grants the eligibility with conditions, the employer may be asked to help monitor the conditions to ensure continuing reliability. This could involve periodic financial statements, drug testing, or other conditions.

DOHA may issue eligibility with a warning directly to the employee. DOHA may establish conditions for eligibility, but would deal directly with the employee. The company would only know that the contractor employee is cleared and able to work on the classified contract.



**Employer actions.**

The employer may complete final actions. If the person elects to appeal, then the employer may elect to delay final action until the appeal decision is returned. The person may not have any classified access during this time, as he or she is ineligible unless the decision is reversed by the appellate authority.

If the member indicates an intent to appeal, the employer may elect to defer final reassignment or transfer action until the appeal is decided. During this time the service member may not have any classified access as the CAF has determined that he or she is ineligible.

If the employee indicates an intent to appeal, the employer may elect to defer final reassignment or transfer action until the appeal is decided. During this time the member may not have any classified access as the CAF has determined that he or she is ineligible.

The company only knows if the contractor employee is cleared or not. If the company proposes action because the employee cannot work on the contract, the employee may inform the contractor of the circumstances and request additional time to appeal the decision before any company action. The only action of the company is to ensure the employee does not have classified access. If employment problems arise between the company and employee, it is strictly a company issue.

### Personal appearances.

The person has an option to request a personal appearance before a designated official or appeal directly in writing to the appellate authority. DOHA conducts the personal appearances for the Military Departments and Defense Agencies. Contractors are instead offered a hearing before an administrative DOHA judge. The personal appearance or hearing is to present information and evidence that the person would like to be considered. The contractor's hearing also provides for cross-examination of witnesses.

The personal appearance is an option in lieu of a written appeal directly to the appellate authority. DOHA arranges the appearance, receives information from the member, asks questions, and submits a written record and recommendation to the appellate authority.

The personal appearance is an option in lieu of a written appeal directly to the appellate authority. DOHA arranges the appearance, receives information from the employee, asks questions, and submits a written record and recommendation to the appellate authority.

The hearing is an option in lieu of a written decision by the DOHA judge and is arranged by the judge. DOHA has counsel representing the government in the case, and the employee may be represented by counsel at his or her own expense. Witnesses can be called by both sides and may be cross-examined. Other information may be received and questions asked to clarify issues. The judge renders a final decision.

**Personnel Security Appeal Board (PSAB) decisions.**

This is the final review for clearance eligibility within the agency. It is composed of at least three members who consider the appeal and personal appearance, if conducted, and can decide to sustain or overturn the CAF determination. The PSAB can overturn the action and issue a warning about future behavior. In some cases the PSAB can also remand the case back to the CAF for further action. The PSAB provides the basic reasons for the appeal decision, both favorable and unfavorable. This is the last administrative action within the agency. If the person wishes to pursue the action further, he or she must then go into the federal courts. PSAB may also make sanitized copies of cases available for public review under the Freedom of Information Act.

The appeal process is a review of records (case file and personal appearance, if conducted). The members vote to decide the action. The CAF, employer, and member are notified of the decision and reasons for it.

The appeal process is a review of records (case file and personal appearance, if conducted). The members vote to decide the action. The CAF, employer, and employee are notified of the decision and reasons for it.

The appeal process is a review of records (case file and hearing, if conducted). The members vote to decide the action. The appeal board notifies the DOHA judge who is making the initial decision and the contractor employee of the decision and reasons for it.

**Employer actions.**

The employer can take final action with the PSAB decision.

The employer can take any final action necessary. If the decision is unfavorable, the member is removed from duties requiring classified access. Other personnel actions may also be necessary depending upon the member's MOS rating.

The employer can take any final action necessary. If the decision is unfavorable, the employee would be removed from duties requiring classified access. Other personnel actions may also be necessary depending upon the employee's JD.

The employee is removed from any classified work. Any further employment actions are at the discretion of the company. The government decision only precludes classified access.

**Reconsideration**

Reconsideration is the process for future review, typically in one to two years at the minimum. Reconsideration is not automatic, and depending on agency requirements, the request may come from either the person or the employer. The CAF may decide to grant reconsideration and clearance eligibility if the person appears to meet the security eligibility standards. If not, the CAF may deny reconsideration and re-issuance of clearance eligibility. If additional information is needed, the CAF may request investigation, interrogatories, medical evaluation, etc. necessary to provide complete information. A decision can then be made to grant or deny reconsideration. The CAF can also grant with conditions to ensure continuing reliability, which is the same as the granting of a clearance with conditions.

If reconsideration is requested, the member is not automatically entitled to due process again if the decision is to deny reconsideration, as the service member received due process procedures in the initial decision and appeal. The member is not currently eligible for classified access. If the agency desires, it can elect to provide due process on reconsiderations.

If reconsideration is requested, the employee is not automatically entitled to due process again if the decision is to deny reconsideration, as the employee received due process procedures in the initial decision and appeal. The employee is not currently eligible for classified access. If the agency desires, it can elect to provide due process on reconsiderations.

DOHA elects to provide due process procedures if it accepts the request for reconsideration and DOHA procedures describe when reconsideration requests are appropriate. Unlike military/civilians where the person can be retained, there is no employer-employee relationship to consider with contractor employees.



## **Appendix B**

### **Causes of Revocation and Productivity of Sources in 1987**



## Causes of Revocation and Productivity of Sources in 1987

The following information has been reproduced from an earlier PERSEREC report of research on a similar subject, "Army and Air Force Security Denials and Revocation" (Schroyer, Crawford, & Mason, 1989). This earlier study provides an opportunity to compare data on issues and sources of data leading to revocation about 10 years prior to the current study. It looks at not only sources of relevant issue information, but also the reasons for the revocation and denials in these two military departments. However, it does not include data on Navy, Defense agency, or contractor revocations. In the current study, a similar body of information from all DoD sources is examined with regard to revocations (but not initial denials).

Both research efforts establish that most revocation determinations are based on multiple issues, and that valuable information is provided by a wide variety of sources. While in 1987, 62% of SORs contained two or more reasons, this increased in 1998 to 75% having three or more reasons. Although the analysis provided in the 1989 study does not separate out the effects of the PR as a source of information leading to revocation, one can infer from Table B.1 that it is probably responsible for less than 5% of major issue information for Army military and Air Force enlisted revocations—very much in agreement with what researchers found for 1998. The higher percentage for Air Force civilians and officers confirms the finding on this question for 1998 that the PR as a source of information is far more significant for nonmilitary employee groups.

**Table B.1**  
**Sources of Information for Army and Air Force Revocations in 1987**  
**[Percent of revocations in each group]**

Source	Army Revocations			Air Force Revocations		
	Officers	Enlisted	Civilians	Officers	Enlisted	Civilians
	%	%	%	%	%	%
Urinalysis	0	4	2	0	33	0
BI/PR/SII	7	3	4	19	5	35
OSI	13	6	6	31	11	23
Friend	3	1	0	13	12	6
Supervisor <sup>a</sup>	29	53	45	6	5	6
Victim	18	3	2	13	8	0
Relative	0	1	0	0	4	0
Police	21	22	17	0	2	6
Self	3	2	12	6	7	6
Creditor	3	2	6	0	2	0
Other	0	1	2	6	0	0
Unknown	3	2	4	6	11	18
	<i>n</i> =38	<i>n</i> =268	<i>n</i> =51	<i>n</i> =16	<i>n</i> =90	<i>n</i> =17

<sup>a</sup> Supervisor includes information from commanding officers.



With regard to specific sources of information, the earlier report finds that police (military and civilian), unit commanders and supervisors, and victims of assaults account for most of the reports leading to revocation. Although dissimilarities between the two reports exist in the naming and definition of coding categories, this is essentially what is established in the 1998 data. One important difference is that since 1987 the subject interview has become a required element of the investigative process for SSBIs and PRs. Consequently, in 1998 the *subject* has emerged as a prominent source of information in contrast to 1987.

It is also instructive to compare findings on reasons or issues leading to revocation to determine whether over the passage of a decade this pattern has significantly altered. The earlier report, as shown in Table B.2, finds dissimilarities in the types of most frequently appearing issues between Army and Air Force revocations particularly in regard to drug use, mental problems, and criminal conduct. However, as with the findings for 1998, drug use, financial issues, criminal conduct, sexual behavior, and mental problems are among the most frequently cited behaviors and conditions that lead to the loss of a clearance.

**Table B.2**  
**Reasons for Army and Air Force Revocations in 1987**  
[Percent of revocations in each group]

Issue	Army Revocations			Air Force Revocations		
	Officer %	Enlisted %	Civilian %	Officer %	Enlisted %	Civilian %
Alcohol abuse	7	7	16	0	1	12
Drug use	3	18	6	38	0	12
Financial issues	8	4	10	12	3	24
Emotional/mental	7	3	24	19	10	17
Criminal conduct	25	17	14	6	2	35
Sexual misconduct	18	3	4	25	0	0
AWOL/desertion	3	20	7	0	0	0
Court Martial/incarceration	13	25	12	0	78	0
Falsification	3	2	0	0	4	0
Other	13	4	8	0	1	0

The rank-ordering of the issues based on frequency of occurrence differs when comparing three groups (officers, enlisted personnel and civilian employees) examined by both studies. In fact, rankings of issues by frequency of occurrence are dissimilar for Army and for Air Force revocations in 1987. Overall, among the many reasons for revocations, mental problems as well as sexual behavior are cited less frequently in 1998. The frequency of issue information related to criminal conduct is high in almost all occupational categories in both studies. It is not clear whether differences seen in the two studies result from the way in which information is being recorded or coded, or whether this reflects demographic change. Contrasts between reasons stated for revocation in 1987 and in 1998 can be attributed partially to the fact that in these two years adjudicators used different guidelines. For example, the guidelines issued in January 1987 (Department of Defense Regulation 5200.2-R. (1987)) did not contain personal conduct as an adjudicative criterion and, because of this, it does not appear as a reason cited for revocations in that year.

**Appendix C**  
**Data Collection Procedures**



## Data Collection Procedures

### Introduction

The data collection effort for this task was accomplished by reviewing files at the following Department of Defense (DoD) central adjudication facilities (CAFs): the Army, Navy, Air Force, Washington Headquarters Services (WHS), and Defense Office of Hearings and Appeals (DOHA). Selected files were reviewed from FY 98 involving denial/revocation of security eligibility, and project sampling involved all categories of personnel adjudicated by each facility. The term "revocation action" is used to describe all actions involving the denial or revocation of security clearance eligibility by the CAFs. It will also be used to describe the denial or revocation of Sensitive Compartmented Information (SCI) eligibility actions taken by the Army, Navy, and Air Force.

A software database format was established to identify types of information to be collected. Each of the nine data fields contain several data elements related to that field. The table below identifies the fields and a summary of the elements in the field. Several fields contain information from the Defense Clearance and Investigations Index (DCII). A pre-test of the data collection software was conducted at WHS and minor adjustments were made to the data entry format. The modified format was used in the data collection effort for all CAFs. Microsoft Access 97 was used to create the database. The database of revocation data is unclassified and contains no personal or other Privacy Act protected information.

**Table C.1**  
**Definition of Data Fields**

<i>Data Field</i>	<i>Summary of Information</i>
<b>Adjudicative facility</b>	This identifies the CAF.
<b>Basis</b>	This identifies four elements: The eligibility/access code as it appeared in the DCII for FY98, type of investigation (The Defense Security Service Case Category Code), date of most recent PSI, and subject category code as it appears in the DCII. If the date was not present in the DCII printout, the case would be reviewed for the date. If not found, the element was left blank.
<b>Trigger event: source of information</b>	This identifies three elements: The event that "triggered" or led to the revocation process, the date of the trigger event, and the date of the LOI/SOR.
<b>Periodic reinvestigation</b>	This poses the question: Was the reinvestigation the basis for the revocation action? (Yes, No, or Unknown).
<b>Eligibility level revoked</b>	This identifies the level of classified access revoked or if sensitive duties were involved without access.
<b>Basis for previous clearance</b>	This identifies the type of PSI used for prior clearance and date. If the date was not present in the case, the element was left blank.
<b>Letter of revocation reasons</b>	This identifies the 13 adjudication guideline areas plus a field for falsification of Personnel Security Questionnaire information. The field also identifies the significance of the information in each guideline area. Code 1 indicates Major - serious enough by itself for revocation. Code 2 indicates Significant- serious, but not usually enough by itself to cause revocation. Code 3 indicates

	Minor - must be considered, but not significant or major by itself. The importance is based on the nature, seriousness, and time of the information.
<b>Source of revocation information</b>	This identifies where the information came from that led to the revocation action. Since PSIs and criminal/counterintelligence investigations are not included in the files, sources are identified if they are mentioned in the LOI/SOR or other correspondence. Sources are also mentioned if the information could only have come from that source, if known. Example: An LOI/SOR indicates the person was arrested and convicted for a crime in a certain city. There would have to be both a police report (arrest) and local agency (court for the conviction) as the bases of the information. If the LOI/SOR indicates a financial garnishment or judgment, then a court would have issued the order, which would be recorded as a local agency. If the financial issue is an IRS lien or a bankruptcy from the Federal Bankruptcy Court, then another federal agency would be checked.
<b>Appeal process</b>	Appeals identify: If the person responded with or without new information; if there was no response to the LOI/SOR; if the person appealed, was a personal appearance requested and; if the appellate authority agreed or disagreed with the DOHA personal appearance recommendation. The field also provides for any comments about the case. It was also decided to include a code for the personal conduct guideline and how the CAF applied it to the case. Whether or not the CAF used the personal conduct guideline was also noted. The table below identifies the codes.

**Table C.2  
Personal Conduct Identifiers**

<i>Number</i>	<i>Meaning</i>
1	Refusal to cooperate or provide information
2	Falsification of information on forms or to an agent/investigator/agency official
3	Reliable, unfavorable information provided by other people
4	Potential for blackmail or pressure
5	Behavior that tends to show the person as untrustworthy or unreliable
6	Association with persons involved in criminal activity
N/A	In those cases where the personal conduct guideline was not shown as a reason for the denial
Unknown	When this information is not known

*Note.* In the "Comments on Case" block at the bottom of each record, the personal conduct (PC) identifier information includes the above.

**Data Collection Pre-test**

Due to uncertainty about the difficulty of finding data on specific variables in the body of case files, researchers conducted a pre-test based on a number of case files (10-15 cases) at one facility. This initial visit to a CAF was also a pre-test of the data-entry software by which the researchers entered data from the test files to create a test data file. (The test file was to be sent to

PERSEREC to assist in the development of a procedure for generating the final statistical analysis of the data.)

An additional aspect of the pre-test was an evaluation of time and effort it would take to make one additional determination for all revocation cases: The researchers needed to know how much time it would take to review each case file and determine whether a revocation resulted from information developed from a Periodic Reinvestigation (Yes or No). It was also necessary to assess how unambiguously this coding decision could be made.

### Data Collection at the CAFs

Appointments were made at each facility to review the selected files. Some facilities retained in-house files, while others retrieved them from an agency or other federal storage facilities. Each CAF was assigned a block of case numbers, depending upon the number of cases to be reviewed. The table below provides the CAF, case number assignments, and storage formats.

**Table C.3**  
**Storage Format at Each CAF**

<i>CAF</i>	<i>Case Numbers</i>	<i>Storage Format(s)</i>
WHS	1001 - 1100	Paper files
Navy	1101 - 1300	Microfiche Automated (on-screen) retrieval
Air Force	1301 - 1500	Paper files
Army (IRR)	1501 - 2000	Paper files Automated (on-screen) retrieval
DOHA	2001 - 2200	Paper files

Each CAF provided the space and necessary support to review the files, with the exception of the Army where the files were reviewed at the Investigative Records Repository (IRR). The personnel at IRR provided space and support for the review of files where data were entered into the database on a laptop computer at the site.

The types and amount of information in the files varied considerably, depending upon the circumstances of the revocation action. The files did not contain the personnel security investigation (PSI) on record, nor did they contain criminal/counterintelligence investigations conducted by DoD investigative agencies. Each file was reviewed according to the following areas:

- a. What was the event that started the revocation action?* This could be the completed PSI (initial or reinvestigation) information reported by the employing

activity/base, urinalysis results, items appearing in the news media, FBI arrest records sent to the last DoD agency submitting an inquiry, criminal/counterintelligence investigations referred to the CAF, or any other sources of information with a security interest.

**b. *What were the reasons for the proposed revocation action?*** These are the stated reasons appearing in the Letter of Intent (LOI) or Statement of Reasons (SOR) that initiated the revocation action. The emphasis is on the significance of the information and the adjudication guideline(s) cited in the LOI/SOR.

**c. *Did the person reply to the LOI/SO?*** Did the person offer new, clarifying, or mitigating information for the CAF to consider? Did the person elect not to reply, or did he or she not reply in the time period permitted?

**d. *What were the reasons for the final CAF action?*** These are the reasons why the CAF granted or revoked the clearance. Did the CAF address each of the guideline areas cited in the LOI/SOR as to what was mitigated or not? Was the final revocation based on fewer guidelines than originally cited in the LOI/SOR? As an example, the CAF cited four guidelines in the LOI/SOR, but the final CAF determination indicated that one guideline area was sufficiently mitigated, resulting in the final revocation being based on three guideline areas, not the four initially cited. For contractors adjudicated by DOHA, did the person request an administrative hearing instead of a determination based on a written reply? What reasons for the final determination were stated in the hearing report? The same emphasis on information and guidelines apply to contractors - only the process is different.

**e. *Did the person request a personal appearance?*** Was a personal appearance requested after the final CAF revocation? This does not apply to contractors adjudicated by DOHA, as they are offered an administrative hearing. DOHA conducts personal appearances for the other CAFs and makes a recommendation to the appellate body.

**f. *If the revocation was appealed, what were the reasons for the appellate body determination?*** Did the appellate body agree or disagree with the recommendation of a personal appearance? In these cases, the DOHA official makes a recommendation as to whether it is clearly consistent with the national security to maintain the security eligibility.

No significant problems were encountered during the data collection. The most time-consuming aspect of the process was familiarizing oneself with how the files are organized in each CAF. The most critical components of the files are the LOI/SOR and CAF final determinations, as they must be present in all revocation actions. Personal appearances and appeals appeared only if the person appealed the revocation. In many cases the person did not appeal the revocation action. The only problem areas concerned some files that did not contain the necessary correspondence. If an LOI/SOR was missing, then the information as to dates and guidelines could usually be found in the final determination. When the detailed information and significance could not usually be identified in the final determination, the information could be

obtained from a personal appearance report in the case as it appeared in the DOHA summary and recommendation.

In cases where the documentation was incomplete and could not be located elsewhere in the case, the data fields were left blank. The few cases where the file was not immediately available required a return visit to review it. In the few cases where the file was classified, it was not entered in the database, as approval would be necessary from the originator to ensure that classified information was not included in the unclassified database. There were a small number of instances where the cases were incomplete or full due process was not indicated or provided. Those cases were identified by coding one data element with additional codes. The table below describes those instances and codes.

**Table C.4  
Codes Added to the Source of Revocation Information Field**

<i>Code</i>	<i>Explanation</i>
WW	Administratively revoked. Due process procedures not used. Mostly used in DOHA cases. The person usually did not comply with a required processing action or time period.
XX	Incomplete case file. LOI/LOR or other necessary correspondence not in the file reviewed.
YY	Administratively revoked when person confined in prison for more than one year. Mostly used for Air Force military personnel convicted by General Court-Martial. Some Army and Navy cases also used this.
ZZ	Reciprocal acceptance of revocation action by another DoD CAF. Used mostly by WHS when the SCI authority has revoked SCI eligibility, and the employee's clearance would be adjudicated by WHS. Also, in one case where WHS revoked the security clearance of a civilian employee who was also a reserve military member, the CAF gave due process because of military status.

*Note.* The above data-entry codes were added to the "Source of Revocation Information" field in the "Do Not Know Source" element.

**Observations on Data Collection**

The following observations provide general comments about the review.

- No special problems arose during the review. The CAF files were generally complete, except those noted as incomplete. The information was usually easy to locate depending on how or where the information was stored in the file. The larger files took longer to review. The vast majority of files were stored in chronological order, with the newest information on top and the oldest on the bottom. Files not stored similarly took considerably longer to review.
- The overall impression of the review was that the majority of issues that lead to revocation actions involve four areas: criminal conduct, alcohol consumption, drug involvement, and financial considerations.



- The level of detail in the LOI/SOR varied among CAFs. This was most noticeable in the areas of criminal information and financial information. Some CAFs provided basic information about the arrest/conviction, while others provided more details about the matter. As an example, one CAF may cite the arrest, conviction, and sentence information only. Another may cite the circumstances surrounding each event, bail bond information, and statements by the person to law enforcement authorities. The most obvious differences among CAFs are how financial information is described. One CAF may indicate financial delinquencies by showing the account name, account number, and amount owed, whereas CAFs may go into more detail about each account, including a history of the person's account activity. In all of the cases reviewed, the amount of detail provided was sufficient so that the reader could understand the information. The more detailed information involved additional time to prepare the LOI/SOR.
- A number of LOI/SORs included unnamed sources and references, which were shown as separate paragraphs or subparagraphs in the LOI/SOR as reasons for the action. They stated that a source had provided information and described the information, usually in general terms. The references were cited as not recommending the person for a position of trust and why. In these cases the person receiving the LOI/SOR was told that one or more reasons for the proposed revocation was based on the report of an unnamed source or reference. If the person did not know the person making the statement, then it was difficult to understand the context in which it was made, which affects the credibility and reliability of the information used in revocation actions. This practice can have a detrimental impact on how the person replies to the LOI/SOR. If the person cannot fully understand the reasons for the proposed action, it could make it difficult, if not impossible, to adequately reply to it. In all of the cases reviewed, the other information in the LOI/SOR was sufficient to support the proposed revocation without the unnamed sources or references.
- A number of the final CAF determinations did not address all of the adjudicative guideline areas cited in the LOI/SOR. If the LOI/SOR cited the guidelines involving criminal, alcohol, drug, financial, and personal conduct information, the final determination should address these also. If not addressed, this could leave a question in the reader's mind as to whether or not the information was mitigated, and how it affected the final determination.
- Several of the appeal determinations did not address the reasons why the CAF revocation action was being sustained. As a result, the reader did not know if any information submitted were mitigating.
- Information reported from local commands/bases varies considerably in the amount of supporting documentation. One base may report results of a urinalysis on a form or letter with minimal information and no supporting documents, whereas, other bases provide urinalysis results with the report. Details of crimes committed off-base also vary considerably with some bases reporting the off-base crimes and including copies of civilian police reports, court records, etc. Variations also occur with financial information. Some provide detailed documentation; others may provide only the results on the reporting form or letter with no supporting documentation. Such lack of documentation can affect the workload of the Defense Security Service (DSS) that may be asked to open an investigation

to obtain the data. The CAF must then wait for the results of investigations. Normally, however, documentation is initially provided, and the CAF can make a determination sooner unless other information or interviews are needed.

- Each file reviewed included a DCII tracing, a copy of which was provided on microfiche and on-screen files. One problem did arise identifying the type of PSI and date; if the DSS had conducted an SII (complaint investigation), the coding was replaced (1 W6 for example) in the Case Category Code (CSS) and was now shown as an SII. The original PSI may have been a Secret PR, SSBI, or SSBI PR, etc. The only way to determine if this was a PSI that supported a clearance was to look elsewhere on the DCII tracing or in the case file itself. Most of the time the CAF clearance tracing entry would show the type of PSI and date. Sometimes when it appeared as "Other," the only recourse was to look for the PSI information in the case file which may or may not have the data. Another problem involved dates of the PSI. Whereas a large number of older PSIs (BI and SBI primarily) show no date in the DSS entry bloc, the CAF clearance tracing may or may not have a date. Therefore, several dates in the database are blank because a PSI date could not be located either from the DCII tracing or the case file itself.



**Appendix D**  
**Data Entry Form**



# Clearance Revocation Study

Case Number

## Data From DCII

### Adjudicative Facility

- |                                    |                               |                               |                                |
|------------------------------------|-------------------------------|-------------------------------|--------------------------------|
| <input type="checkbox"/> Air Force | <input type="checkbox"/> DIA  | <input type="checkbox"/> Navy | <input type="checkbox"/> WHS   |
| <input type="checkbox"/> Army      | <input type="checkbox"/> DOHA | <input type="checkbox"/> NSA  | <input type="checkbox"/> DISCO |

### Basis

- |                      |   |
|----------------------|---|
| <input type="text"/> | Eligibility/Access Code (R, F, or other)          |
| <input type="text"/> | Type of Investigation Code (DSS Case Category)    |
| <input type="text"/> | Year/Mo of the Most Recent Investigation (yymmdd) |
| <input type="text"/> | Subject Category Code                             |

## Data From Revocation File

### Trigger Event: Source of Information

What event triggered the revocation process?

Year/Mo of Trigger Event (yymmdd)

Year/Mo of LOI (yymmdd)

### Periodic Reinvestigation

Is Periodic Reinvestigation the basis for revocation (Yes/No/Uknown)?

- |                                       |   |
|---------------------------------------|---|
| <input type="checkbox"/> Confidential | <input type="checkbox"/> Level Not Stated                               |
| <input type="checkbox"/> Secret       | <input type="checkbox"/> Upgrade Denied + Existing Revoked              |
| <input type="checkbox"/> Top Secret   | <input type="checkbox"/> Still Eligible for TS; SCI Revoked             |
| <input type="checkbox"/> SCI          | <input type="checkbox"/> Still Eligible for Secret; TS/SCI Revoked      |
|                                       | <input type="checkbox"/> Sensitive Duties, No clearance/access required |

### Basis for Previous Clearance

- |                                   |                                    |  |
|-----------------------------------|------------------------------------|--|
| <input type="checkbox"/> SSBI     | <input type="checkbox"/> SSBI-PR   | <input type="text"/> Year/Mo of this Previous Investigation (yymmdd) |
| <input type="checkbox"/> NAC/NACI | <input type="checkbox"/> Secret-PR |  |

### Letter of Revocation Reasons

Enter (1) for significant, (2) major, or (3) for minor.

<input type="text"/> Year/Mo of LOR (yymmdd)	<input type="text"/> Foreign influence (FI)
<input type="text"/> Year/Mo of LOR (yymmdd)	<input type="text"/> Foreign Preference (FP)
<input type="text"/> Alcohol Consumption (AC)	<input type="text"/> Misuse of Info Tech Systems (MS)
<input type="text"/> Allegiance to the US (AU)	<input type="text"/> Outside Activities (OA)
<input type="text"/> Criminal Conduct (CC)	<input type="text"/> Personal Conduct (PC)
<input type="text"/> Drug Involvement (DI)	<input type="text"/> Security Violations (SV)
<input type="text"/> Emotional, Mental + Personality (EP)	<input type="text"/> Sexual Behavior (SB)
<input type="text"/> Financial Considerations (FC)	
<input type="text"/> Falsification of PSQ Information (FQ)	

### Source of Revocation Information

Enter Two-Letter Code for each issue on which this source provided information, separated by a comma and one space.

<input type="text"/> Bkground Invest for Upgrade	<input type="text"/> Non-Spouse Family Member
<input type="text"/> CI Investigation	<input type="text"/> Security Office
<input type="text"/> Criminal Investigation	<input type="text"/> Self-report
<input type="text"/> Local Agency	<input type="text"/> Subject
<input type="text"/> NACLC	<input type="text"/> Internal PS
<input type="text"/> PR	<input type="text"/> Spouse
<input type="text"/> SSBI	<input type="text"/> UCMJ action
<input type="text"/> SII	<input type="text"/> Unit CO or supervisor
<input type="text"/> Neighbor	<input type="text"/> Urinalysis
<input type="text"/> Coworker	<input type="text"/> Media
<input type="text"/> Creditor Complaint	<input type="text"/> Medical Records
<input type="text"/> Ex-Spouse	<input type="text"/> Do Not Know Source
<input type="text"/> FBI arrest records	<input type="text"/> Other Government Office/Agency
<input type="text"/> Police Report	

### The Appeal Process

<input type="checkbox"/> Response to LOI with New Info	<input type="checkbox"/> Requested Personal Appearance
<input type="checkbox"/> Response to LOI w/No New Info	<input type="checkbox"/> Appeal Board Disagreed with DOHA Judge
<input type="checkbox"/> No Response to LOI	<input type="checkbox"/> Appeal Board Agreed w/DOHA Judge
<input type="checkbox"/> Appealed Revocation	

Year/Mo of the Fina Appeal Decision (yymmdd)

Comments on Case

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**Appendix E**

**Frequency of Sources Referenced in each Adjudicative Issue Area by  
Occupational Group**



Table E.1  
 Frequency of Source References in Each Adjudicative Issue Area (Enlisted Personnel)

Enlisted	Alcohol Abuse	Allegiance	Criminal Conduct	Drug Use	Mental Problems	Financial Issues	PSQ	Foreign Influence	Foreign Preference	Misuse of IT System	Outside Activities	Personal Conduct	Security Violations	Sexual Behavior	Total
Background															0
CI investigation			1												1
Criminal invest.	8		93	46		4				1					154
Local agency	24		41	6		14									85
NACLC	5		2	1		6						1			15
PR	8		13	1	2	30	8					25			89
SSBI	17		17	8	3	23						5			73
SII	3		7	1		7						1			19
Neighbor	1											1			2
Coworker	3		6			1						5			16
Creditor			3			104									107
Ex-spouse						1									1
FBI			2												2
Police	40		82	14		2									140
Family			3												3
Security	45		67	78	8	27				1		11	2		241
Self	2			1								1			4
Subject	57		80	83	6	53	3			1		9	1		294
Initial PS	2		2			4	2					1			11
Spouse			1												1
UCMJ action	21		100	39		5						2			170
Supervisor	42		85	71	6	18				1		8	4		236
Urinalysis				82											82
Media			1	1											2
Medical	39			7	25							2			75
Unknown	1			1		1						1			5
Other agency			8	1	1	18									28
Total	318	0	614	441	51	318	13	0	0	4	0	73	7	17	1856

**Table E.2  
Frequency of Source References in Each Adjudicative Issue Area (Officers)**

Officers	Alcohol Abuse	Allegiance	Criminal Conduct	Drug Use	Mental Problems/Issues	Financial PSQ	Foreign Influence	Foreign Preference	Misuse of IT Systems	Outside Activities	Personal Conduct	Security Violations	Sexual Behavior	Total
Background														0
CI investigation														0
Criminal invest.			18	6					1		1	1		27
LAN	5		10	2		6								23
NACLCL				1	1									2
PR	2		6	2	2	10	4		1		9	1		39
SSBI	1		3	1	1	2		1			1			10
SII			2			1								3
Neighbor					1									1
Coworker			1	1	1	1					1			4
Creditor						22								22
Ex-spouse														0
FBI	2		1											3
Police	6		17	5	1	1								31
Family														0
Security	1		14	14	6	5	1	1			7	1		52
Self			1											1
Subject	4		19	14	7	11			1		3	1		61
Initial PS						1								1
Spouse			1											1
UCMJ			12	2							1			15
Supervisor	2		18	13	5	6					4	2		52
Urinalysis			2	11										13
Media				1										1
Medical	1				12						1			14
Unknown														0
Other agency	1		3	1		7					1			13
Total	25	0	128	73	36	74	5	2	0	3	0	29	6	389

Table E.3  
 Frequency of Source References in Each Adjudicative Issue Area (Civilian DoD Employees)

Civilians	Alcohol Abuse	Allegiance	Criminal Conduct	Drug Use	Mental Problems	Financial Issues	PSQ	Foreign Influence	Foreign Preference	Misuse of IT Systems	Outside Activities	Personal Conduct	Security Violations	Sexual Behavior	Total
Background						1									1
CI investigation															0
Criminal invest.	1		11	1						1		1			15
LAN	14		14	5		17						1			51
NACLCL	1			1	1	2									5
IPR	7		15	7	3	45	20					34			131
SSBI	1		1	7	1	4								1	15
SII	15		10	6	5	33						2			71
Neighbor															0
Coworker	1					2						4		2	9
Creditor						60									60
Ex-spouse															0
FBI	2		4												6
Police	16		34	10		3						1			64
Family			1												1
Security	17		14	11	5	18				3		7	2		77
Self														1	1
Subject	25		20	16	7	62	1			1		3		2	137
Initial PS			1	1	1	10									13
Spouse														1	1
UCMJ	1		1									1			3
Supervisor	8		6	5	3	6						4	2		35
Urinalysis				20											20
Media			1											1	2
Medical	21			9	21							1			52
Unknown					1										1
Other agency	3		7	4	1	20						3		1	39
Total	133	0	140	103	49	283	21	0	0	5	0	62	4	10	810

**Table E.4  
Frequency of Source References in Each Adjudicative Issue Area (Contractor Employees)**

Contractors	Alcohol Abuse	Allegiance	Criminal Conduct	Drug Use	Mental Problems	Financial Issues	PSQ	Foreign Influence	Foreign Preference	Misuse of IT Systems	Outside Activities	Personal Conduct	Security Violations	Sexual Behavior	Total
Background															0
CI Investigation															0
Criminal Invest.			3	3											6
LAN	34		31	24		19		1				1		4	114
NAGLE															0
PR	6		13	9		6	8					8		4	54
SSBI	1		3	36		3									43
SII	30		30	30	1	19		1	1	1		3		3	118
Neighbor															0
Co-Worker															0
Creditor			2			33	1	1							37
Ex-Spouse															0
FBI	1		1												2
Police	35		25	24		1								2	87
Family			1											2	3
Security	4		4	5								1		1	15
Self			1											1	2
Subject	37		42	45	1	25		1	1	1		3		5	160
Initial PS	14		10	12		9		1	1	1		1		1	48
Spouse			1												1
UCMJ	7			4		1									12
Supervisor	11		6	19		1		1				2			40
Urinalysis	1			16											17
Media															0
Medical	30		2	19	1									8	60
Unknown															0
Other Agency	4		13	8		14		1							40
Total	215	0	188	254	3	131	9	6	3	0	0	19	0	31	860

## **Appendix F**

### **Issues and Sources of Information for Cases of SCI Revocation**





## Issues and Sources of Information for Cases of SCI Revocation

An analysis of data related to issues and sources of information may not be complete without addressing the question of whether revocations of access to Sensitive Compartmented Information (SCI), as compared with "collateral" (non-SCI) clearances, occur for different reasons and are based on facts from different sources.<sup>11</sup>

Approximately 20% of all revocations reviewed in this study fall into the SCI category. However, almost all are for military personnel—90% of SCI revocations are for enlisted personnel, and 8% are for officers, corresponding roughly to the demographics of the intelligence community.<sup>12</sup> For this reason, contrasts between the SCI and collateral cases of revocation are dominated by differences between enlisted revocations and those for the other three groups. Consequently, in order to control for intergroup differences, the following assessment of SCI/non-SCI differences is based on enlisted, cases among which only 36% were SCI revocations and 64% were collateral clearance revocations. With regard to the PR as the initial source (target event) of information leading to revocation, the percentage for SCI revocations is only slightly higher than for collateral cases. For all enlisted revocations the percent in which issue information was revealed first by the PR is 5.8% (See Table 3). This figure is 8.2% for SCI cases and 4.6% for non-SCI revocations.

Tables F.1 and F.2 show these differences when tabulating trigger event reports and initially reported issues using the proportion of SCI to non-SCI cases as a baseline. Based on the proportion of revocations that are at the SCI level, one might expect about twice as many reports to be associated with non-SCI revocations. The data in the Table F.1 indicate that this is the case for certain types of reports such as alcohol abuse and criminal conduct. However, in other issue areas, the percentages deviate sharply from the expected values; different types of initial reports are relatively more important for one category of cases than another. For the SCI cases, the SSBI, creditor complaints, reports of misconduct, and security access eligibility reports clearly exceed the expected percentage. For non-SCI cases, NACs, drug test reports, criminal prosecution, and reports of mental illness are clearly more productive in initial information that ultimately leads to revocation.

A similar contrast can be seen in Table F.2 when comparing types of adjudicative issues associated with trigger events for enlisted personnel. For SCI revocation cases, mental problems appear to be more frequent than expected as initially reported issues, whereas for the non-SCI category, initial drug use and sexual behavior exceed the expected percentage. This pattern is confirmed in Table F.3 that displays the distribution of major reasons by issue cited in SORs for both categories of revocation.

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<sup>11</sup> As this topic may have limited interest, it appears as an appendix.

<sup>12</sup> Author's note: Not all CAFs perform SCI adjudications. Army, Navy, and Air Force CAFs adjudicate collateral clearances and SCI for their personnel. WHS and DOHA adjudicate only collateral clearances. For personnel adjudicated by WHS, DIA conducts SCI revocations. The Army, Navy, Air Force, NSA, or DIA adjudicate SCI for contractors. Revocations by WHS or DOHA at the collateral level may also be adjudicated for SCI by another CAF. In this study there were only a few WHS cases in which the case file indicated that the collateral revocation was based on an SCI revocation. Those contractors having an SSBI or PR may have had their SCI access revoked by another CAF, but the DOHA case files did not mention this.

**Table F.1**  
**SCI/Non-SCI Trigger Event Reports (Enlisted Personnel)**  
 [Percent of Reports by Source and Numbers of Reports by Source]

	<i>SCI Access Revocation</i>	<i>Non-SCI Revocation</i>	<i>Total Cases Initiated by Each Type of Report</i>
<i>Percent of Enlisted Revocations in Each Category</i>	35.7	64.3	
	<i>Percent of Each Type of Initial Report in SCI and Non-SCI Revocations</i>		
	%	%	<i>n</i>
Periodic reinvestigation	50.0	50.0	24
National agency check		100.0	14
Single scope background investigation	71.4	28.6	49
Urinalysis	7.2	92.8	69
SSI (issue unspecified)	25.0	75.0	4
Police report of alcohol abuse	35.3	64.7	17
Report of criminal behavior	26.4	73.6	72
Prosecution for criminal acts	3.6	96.4	55
Creditor complaint	75.0	25.0	8
Failure to comply with conditional clearance	42.9	57.1	7
Report of mental illness		100.0	2
Misuse of government property	60.0	40.0	5
Self-report of security relevant info.	37.5	62.5	8
Report of misconduct by command	85.7	14.3	14
Security Access eligibility report	100.0		15
Multiple reports	53.3	46.7	30
Other types of reports	50.0	50.0	2
Unknown (records do not indicate)	46.2	53.8	13

**Table F.2**  
**SCI/Non-SCI Initially Reported Issues (Enlisted Personnel)**  
 [Percent and numbers of initial events in each issue category]

	<i>SCI Revocations</i>	<i>Non-SCI Revocations</i>	
<i>Percent of Enlisted Revocations in Each Category</i>	35.70	64.3	<i>Total Number of Cases</i>
	<i>Percent of trigger events in each issue area which pertain to SCI and non-SCI Revocations<sup>a</sup></i>		
	%	%	<i>n</i>
Alcohol abuse	42.9	57.1	28
Drug use	12.1	87.9	107
Criminal conduct	28.6	71.4	42
Mental problems	75.0	25.0	16
Sexual behavior	16.7	83.3	30
Financial Issues	51.9	48.1	52
Personal misconduct	37.5	62.5	8
Multiple issues	53.8	46.2	39

<sup>a</sup> Several issue areas had no trigger events coded; only one case in which an initial failure to comply with security rules ultimately led to a revocation.

**Table F.3**  
**SOR Major Issues in SCI and Non-SCI Revocations**  
 [Number and percent of cases for which an issue is major]

	<i>SCI Revocations</i>	<i>Non-SCI Revocations</i>	
<i>Percent of Enlisted Revocations in Each Category</i>	35.7	64.3	<i>Total Number of Cases<sup>a</sup></i>
	<i>Percent of Cases in Each Issue Areas Which Pertain to SCI and Non-SCI Revocations</i>		
	%	%	<i>n</i>
Alcohol abuse	44.1	55.9	59
Drug use	18.9	81.1	132
Criminal conduct	22.2	77.8	252
Mental problems	85.7	14.3	21
Sexual behavior	22.5	77.5	40
Financial issues	50.0	50.0	118
Personal misconduct	46.1	53.9	219
Falsification of PSQ	53.8	46.2	39
Security violations	75.0	25.0	4
Misuse of IT systems	33.3	66.7	6

<sup>a</sup> In many cases more than one major reason is cited in the SOR.

Finally, when comparing SCI with non-SCI revocations, it is appropriate also to look at the overall productivity of sources of all information leading to a final revocation. Table F.4 shows a distribution of source references for all issues for enlisted personnel. Marginal totals for each source correspond to those shown in Table E.1 (Appendix E). Although coding categories for sources differ somewhat from those used to assess the productivity of sources for trigger events, patterns seen in the distribution below generally correspond to those seen in Table F.1. For SCI cases, the frequency of source references exceeds the expected level for SSBIs and coworker reports. For non-SCI revocations, source references exceed the expected level for reports of criminal investigations, NACs, drug testing, and the initial PSQ.

**Table F.4**  
**Sources of Issue Information for Enlisted Revocations**  
 [Percentages and numbers of source references in each category for  
 SCI and non-SCI revocations]

	<i>SCI Revocations</i>	<i>Non-SCI Revocations</i>	
<i>Percent of Enlisted Revocations in Each Category</i>	35.7	64.3	<i>Total Number of Source References Coded</i>
	<i>Percentage of Source References Coded for Each Source Category from all Reasons Cited in SORs<sup>a</sup></i>		
<i>Source</i>	<i>Coded for SCI Revocations</i> %	<i>Coded for non-SCI Revocations</i> %	<i>n</i>
Criminal investigation	13.6	86.4	154
Local agency check	37.6	62.4	85
National agency check	6.7	93.3	15
Periodic reinvestigation	55.0	45.0	89
Background investigation	76.1	23.9	71
Special investigative inquiry	21.1	78.9	19
Coworkers	81.3	18.8	16
Creditors	55.7	44.3	106
Police reports	37.1	62.9	140
Unit security office	33.5	66.5	239
Subject	36.7	63.3	294
Initial PS	9.1	90.9	11
UCMJ proceedings	25.3	74.7	170
Supervisor	35.7	64.3	235
Urinalysis	9.9	90.1	81
Medical records	52.0	48.0	75
Other agencies	42.9	57.1	28

<sup>a</sup> For sources of issue information not listed above the number of references were too few to include.

Findings relevant to the causes of SCI revocation and the productivity of sources that lead to this adverse action may not be generalizable to nonmilitary occupational groups due to the contextual differences in the professional life-style of military and civilian personnel. However, as stated earlier, revocation of access to sensitive compartmental information (essentially related to the intelligence community) almost exclusively (98%) occurs also in military populations. Nevertheless, information reviewed here on the relative importance of specific types of issue information and its source may have implications for future policy decisions about where and how to apply scarce investigative resources to ensure the continued reliability of the cleared workforce.