

**Frequently Asked Questions Regarding:  
2018 Implementation of Interim Backlog Mitigation Measures  
for  
Entities Cleared by DoD under the National Industrial Security Program**

1. What is deferment?

- Deferment refers to the process implemented by DoD, in July 2018, and currently being used by departments and agencies to permit the focus of investigative resources on the inventory of pending initial investigations. New reinvestigation requests are screened using a risk management based approach, where the Standard Form 86 (SF-86) is analyzed using deferment protocol(s) and is identified for either enrollment in Continuous Evaluation (CE) or submission to an Investigation Service Provider (ISP) for a reinvestigation. This process was authorized by both the Director of National Intelligence, in his capacity as the Security Executive Agent, and the Director of the Office of Personnel Management, in his capacity as the Suitability & Credentialing Executive Agent, through the issuance of the June 2018 memorandum “Transforming Workforce Vetting: Measures to Reduce the Federal Government’s Background Investigation Inventory in Fiscal Year 2018.”

2. Is there still a requirement to submit investigation requests for periodic reinvestigations (PRs)?

- Answer: Yes. You are still required to submit a completed SF 86 and the reinvestigation request, six years from the date of last investigation for T5Rs (in accordance with January 2017 guidance) and ten years from the date of the last reinvestigation for T3Rs.

3. When should a PR be submitted, if an individual is enrolled in CE?

- If deferred (recognized by a message in JPAS and/or confirmation from VROC): Absent additional guidance, submit new investigation request on the PR anniversary (6 or 10 year mark) from the CE enrollment date.
- If not deferred: Absent additional guidance, enrollment in CE due to circumstances other than deferment does not otherwise impact current guidance, so continue to submit new investigation request on the PR anniversary (6 or 10 year mark) from the last PR.
- If you have a new employee (transferred eligibility) and their PR anniversary is reflected in JPAS and they are reflected as enrolled in CE, but you are unsure if they have a deferred PR, you can contact VROC directly to verify (see answer to question #8).

4. Does the PR deferment and enrollment into CE include the TS/SCI population?

- Answer: Yes.

5. Does the PR deferment and enrollment into CE include the Special Access Program (SAP) population?

- Answer: Yes; for specific requirements please refer to the April 2, 2019, “Implementation Guidance – Bridging the Gap to Continuous Evaluation Enrollment in Support of the Special Access Program Nomination Process” memorandum. A copy of the above memorandum is located on page 4 of this document for ease of reference

6. Does the deferment include investigation requests supporting non-DOD agencies/signatories within the NISP?

- Answer: Yes, personnel performing on contracts for NISP signatories are included.

7. Will I be notified when a submitted PR request has been deferred and enrolled in CE?

- Answer: Yes. Vetting Risk Operations Center (VROC) will send a Joint Personnel Adjudication System (JPAS) message advising when the Subject's investigation has been stopped in JPAS and the Subject has been enrolled in CE. We ask that you inform any deferred personnel of their status, so that in the event they transfer to new employment, their new security manager can verify their deferment status directly, via the procedures identified in the answer to Question #8, vice submitting a new PR.

8. What can I or a government customer do to confirm deferment status?

- Answer: Although the CE enrollment date can be confirmed by accessing the subject summary in the Defense Information System for Security (DISS), it does not currently provide the reason for enrollment, and as such, cannot be used to explicitly confirm deferment status. If you wish to confirm deferment status directly, members of industry should contact VROC by submitting a Research, Recertify, and Upgrade/Customer Service Request (RRU/CSR), and their government customers, should email VROC at [dss.ncr.dssdvd.mbx.askvroc@mail.mil](mailto:dss.ncr.dssdvd.mbx.askvroc@mail.mil).

9. What is the screening criteria for deciding who will be enrolled into CE or submitted for the traditional ISP investigation process?

- Answer: VROC reviews submitted SF-86s and any unresolved incident reports for potential adjudicative relevance. For security reasons, specific criteria cannot be shared.

10. What should I do if a government customer requests an open investigation date be reflected in JPAS?

- Answer: The Office of the Under Secretary of Defense for Intelligence signed a memorandum on December 7, 2016, “Personnel Security Clearances in Industry,” reminding DoD Components that personnel security clearances do not expire. Individuals with current eligibility in JPAS, or its successor system, should not be denied access based solely on an out-of-scope investigation. A copy of the above memorandum is located on page 6 of this document for ease of reference. If you encounter any challenges with this process, please email [dss.ncr.dssdvd.mbx.askvroc@mail.mil](mailto:dss.ncr.dssdvd.mbx.askvroc@mail.mil) for assistance.



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APR 02 2019

MEMORANDUM FOR DIRECTORS OF THE DOD COMPONENT AND PRINCIPAL STAFF  
ASSISTANT SPECIAL ACCESS PROGRAM CENTRAL OFFICES

SUBJECT: Implementation Guidance – Bridging the Gap to Continuous Evaluation Enrollment  
in Support of the Special Access Program Nomination Process

References: (a) DoDM 5205.07-V2, Special Access Program (SAP) Security Manual: Personnel Security, November 24, 2015  
(b) OUSD(I) Memorandum, "Department of Defense Guidance for the Implementation of Measures to Reduce the Federal Government's Background Investigation Inventory in Fiscal Year 2018", July 27, 2018  
(c) OUSD(I) Memorandum, "Extension of Periodic Reinvestigation Timelines to Address the Background Investigation Backlog", January 17, 2017

In an effort to improve the personal security process for the Department of Defense, the Under Secretary of Defense for Intelligence (USD(I)) is moving to replace the current periodic investigation requirement with a system called Workforce Vetting that blends the Continuous Evaluation (CE) of all personnel with lesser, tailored, requirements for periodic investigation. Although USD(I) is working aggressively to burn down the backlog of investigations and enroll personnel in Continuous Evaluation, the full transition to Workforce Vetting is not expected until late 2020.

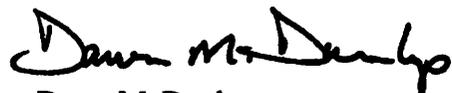
The current investigation backlog has resulted in more than thirty thousand "out-of-scope" investigations for Special Access Program (SAP)-cleared personnel which has placed a *strain on operations and security personnel across the Department*. This memo provides two methods consistent with USD(I) policy to accelerate SAP access nominations for out-of-scope investigations. The first is enrollment of the individual into CE, and the second is to request an exception to the requirement when submitting the Program Access Request (PAR).

To standardize SAP access nominations for "out-of-scope" personnel, effective immediately, the PAR process is supplemented as follows:

- a) Nominee must have a completed or open investigation recorded in Joint Personnel Adjudication System (JPAS), Scattered Castles (SC) or Defense Information System for Security (DISS) not older than 6 years from date of SAP nomination, or;
- b) If the nominee is enrolled in CE as recorded in DISS or SC:
  - The SAP Personnel Security Official (SPO) will validate CE enrollment on the Program Access Request (PAR) on the date an eligibility determination is rendered and will add the comment, "CE enrollment validated in DISS" in the remarks section of the PAR.

- The SPO will reflect favorable JPAS or SC results in block 25.
- c) If unable to meet either of the requirements listed above, the Requester may seek an exception to the requirement with a Letter of Compelling Need (LOCN) or in block 26 of the PAR.
  - The compelling need should be clearly stated, and sufficient to address risk acceptance of the nominee's out-of-scope condition. The justification will clearly reflect why the nominee is the best or only available fill for the position, specific qualifications required, and the benefit to the program by their access.
  - The Oversight Authority (OA) or Cognizant Authority (CA) SAPCO will acknowledge risk acceptance in block 35 of the PAR.

As a reminder, any initial background investigations or periodic reinvestigations with adverse information will still require formal investigation and adjudication. Please contact DoD SAPCO Security with any questions at (703) 697-1282.



Dawn M. Dunlop  
Major General, USAF  
Director, DoD Special Programs

cc: OUSD(I) CI&S



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INTELLIGENCE

MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: Personnel Security Clearances in Industry

It has come to my attention that Department of Defense (DoD) Components are denying contractor employees access to defense facilities and classified information because the contractor employees have a personnel security clearance based on an out-of-scope investigation. Recent delays in processing background investigations have resulted in many periodic reinvestigations (PRs) being overdue.

Personnel security clearances (PCLs) do not expire. Contractor employees are eligible for access to classified information if current eligibility is indicated in the Joint Personnel Adjudication System (JPAS) or replacement system of record. An individual with current eligibility in JPAS should not be denied access based on an out-of-scope investigation, unless DoD is aware of relevant derogatory information related to an individual's continued eligibility for access. However, when the system of record flags an individual as having current adverse information, and eligibility is still valid, access may continue.

Please ensure that this memorandum receives widest dissemination. The point of contact is Mr. Justin Walsh at (703) 692-3597 or [justin.a.walsh.civ6@mail.mil](mailto:justin.a.walsh.civ6@mail.mil).

A handwritten signature in blue ink, appearing to read "Garry P. Reid".

Garry P. Reid  
Director for Defense Intelligence  
(Intelligence & Security)

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