



Base Closures Raise Need for Complete SF86 Reviews

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The Base Realignment and Closure (BRAC) plan of 2005 may soon begin to have a real impact on the security clearance world. Under the plan, ten DoD Central Adjudication Facilities (CAFs) will move from their current homes to a newly-constructed complex in Fort Meade, Maryland. Among the CAFs scheduled to move by September 15, 2011 are DISCO and DOHA. Clearance activities will no longer be conducted at the Columbus, Ohio branches of DISCO and DOHA. While this move may ultimately streamline the process and undoubtedly improve communications among the various DoD CAFs, it will also likely slow down the adjudication process for security clearances in the coming months.

Relocation of the CAFs requires relocation or replacement of personnel who operate in those CAFs. DOHA, alone, had well over fifty adjudicators at its Columbus facility. It is anticipated that many of these adjudicators will not make the move to Fort Meade. The same can be said for DISCO employees who have already experienced an 80 percent attrition rate among adjudicators. The loss of experienced adjudicators will have a significant impact and likely cause delays, particularly if an employee fails to fully explain a security concern such as a foreclosure, employment situation, or an overseas bank account. At least for the foreseeable future, fewer investigators and adjudicators means the process for obtaining a security clearance for your employees will take longer. This is especially true for financial and foreign influence/preference situations.

While several plans to cover this gap have been proposed, there will still undoubtedly be delays in services. DISCO anticipated the move and opened a temporary facility near Fort Meade in 2009. While it began hiring then, competition for qualified national security personnel in the Washington, D.C. area has meant that DISCO may be hiring at least some uncertified adjudicators. Less experience likely means these investigators and adjudicators will spend more time with each file to ensure procedures and protocols are followed. Other temporary solutions may include hiring independent contractors or auto adjudication. In the past, the Army Central Clearance Facility has hired temporary contractors to help clear its backlog. However, these contractors are unable to make ultimate decisions on clearance cases, and if a similar strategy is employed by DISCO and DOHA, trained adjudicators would still have to review every case. Inevitably, the backlog in processing clearances that already exists will only get much larger.

With the relocations that BRAC requires, FSOs should take steps to ensure that they are reviewing SF 86s for "accuracy and completeness" as mandated by section 2-202a of the NISPOM. Ensuring that all relevant information is provided to the government before an investigation takes place has always been the best way to expedite the clearance process and increase the likelihood that key employees receive their clearance. Also, providing a well-written explanation of any concerns will save government resources during this transition. The explanation in the additional comments section of the SF 86 should weave in the adjudicative guidelines and emphasize the appropriate mitigating factors. Now, it is simply even more vital to the success of your company. The most important step that you can take while the CAFs are realigning is to ensure your employees turn in detailed SF 86s that fully explain the circumstances surrounding any potential security concerns. In summary, while FSOs should not write or edit the additional comments for an employee, FSOs should ensure that the information is complete and accurate to avoid costly delays. If you have any questions, please do not hesitate to contact [Brian Kaveney](#) or [John McAnnar](#).