

REVIEW OF OPERATING POLICIES
AND PROCEDURES FOR USERS OF THE
DEFENSE CENTRAL INDEX OF INVESTIGATIONS

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**The Office of the Inspector General
Department of Defense**

Criminal Investigations Policy and Oversight

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A. PURPOSE AND METHOD OF REVIEW

The Office of the Assistant Inspector General for Criminal Investigations Policy and Oversight, Office of the Inspector General, Department of Defense (AIG-CIPO, OIG, DoD), conducted a review of guidelines and standards established for users of the Defense Central Index of Investigations (DCII). The report presents specific findings and recommendations.

The purpose of the review was to evaluate the operational policies and procedures governing participation in the DCII by the major users, and recommend policy and actions that would promote uniformity, improve the effectiveness, and improve the reliability of information in the indices.

Interviews were conducted with representatives from the Defense Criminal Investigative Service (DCIS), the Defense Investigative Service (DIS), the National Security Agency (NSA), the Army Criminal Investigative Command (CID), the Naval Investigative Service (NIS), the Air Force Office of Special Investigations (AFOSI), and the Army Crime Records Depository (ACRD).

B. SUMMARY

The DCII was established in February 1966, pursuant to Secretary of Defense memorandum dated December 3, 1965. The memorandum was subsequently codified in Title 5, United States Code, Section 301. The statute intended that the indices constitute an automated, computerized central index of investigations for all DoD investigations.

The central index was managed and operated by the United States Army until 1972, at which time the DCII management responsibilities were transferred to the Information Systems Division, Personnel Investigations Center (PIC), of the Defense Investigative Service (DIS), physically located in Baltimore, Maryland.

The DIS serves to "house" and manage the indices on behalf of the users. The files represented on the DCII tracings (computerized printouts) are owned, maintained, and controlled by the contributing user organizations. There are approximately 23 million records contained in the DCII at the present time. The DCII is a valuable tool to many diversified users who need and rely on the information. Those needs include the assessment of a prior criminal history, identification of previous investigative subjects, backgrounds on potential security risks, and other law enforcement/investigative uses of the files identified in the DCII. There are over 100 users, of which 10 are actual contributors/requestors, and the remainder are only requesting organizations.

Outside the DoD community, other requesting organizations include, but are not limited to, the Central Intelligence Agency, the Criminal Division of the Department of Justice, the Drug Enforcement Administration, the Federal Bureau of Investigation (FBI), the Internal Revenue Service, the United States Customs Service, the United States Secret Service, and six statutory Inspectors General. There are seven DoD organizations that conduct investigations and do not currently participate as contributors.

The DCII indices identify investigations conducted by the DoD and provide a location guide to assist requestors in finding and retrieving files. While the contributors routinely index investigations, they do not, as a rule, index surveys and crime threat assessments. These proactive efforts should be indexed.

We observed significant deficiencies in the areas of quality control over information indexed in the DCII and the retention policies and procedures utilized by the DCII users. A summary of our major findings are as follows:

- o A combination of routine discretionary expungements of information and failure to index all DoD investigations weakens the overall credibility of the indices.

- o The DoD investigative organizations and traditional Federal intelligence and investigative organizations rely on the accuracy and credibility of indices, and too often the indices are incorrect, incomplete, or erroneous.

C. FINDINGS/RECOMMENDATIONS

1. THE ARMY SHOULD DISCONTINUE THE EXPUNGEMENT OF DCII ENTRIES WHICH IDENTIFY CRIMINAL INVESTIGATIONS IN WHICH THE ALLEGATIONS WERE PROVEN TO BE UNFOUNDED OR UNSUBSTANTIATED.

- a. Finding: The Army has routinely deleted entries which identify investigations of juveniles and cases in which allegations were not substantiated. Those deletions from the DCII reportedly now number 160,000. After expungement, the records of these particular investigations are then indexed in an "in house" Law Enforcement Index maintained by the ACRD and not routinely accessible to law enforcement agencies or DCII users. That policy results in the removal of vital information from the system, restricts access to system users, and frustrates the intent behind the creation of the DCII.

The DCII is an index of all DoD investigations. The fact that a particular contributor refutes or otherwise determines an allegation which is the basis for opening an investigation is unfounded or unsubstantiated does not change the fact that it was a lawfully conducted investigation.

- b. Recommendation: The Army, with the noted exception of juvenile cases, should revise, amend, or rescind that policy and leave records of investigations indexed in DCII intact and in place. Until that policy is rescinded, the Law Enforcement Index should be well-publicized to the respective DCII users to allow access to prior investigations deleted from the DCII, and routine access procedures should be established.

ARMY RESPONSES:

- o Recommendation #1 is contrary to established policies of the Department of the Army. Department of the Army and the United States Army Criminal Investigation Command regulations would need revision to provide for the retention of the names of all subjects, suspects, and victims listed in the title block of a report of investigation. Deletions of any of these, either for insufficient evidence or because the offense in question was determined to be unfounded, would be meaningless since the names would continue to be retained in the DCII.
- o The expungement of investigations, otherwise authorized and approved under the Privacy Act, would also be meaningless, again because the names in question would continue to appear in the DCII.
- o The actual or perceived stigma resulting from the existence of a criminal record could remain, even though the investigation in question established that allegations were untrue or that an offense did not occur. This could be detrimental both to an individual and the DoD if information concerning unfounded or unproven crimes was used for administrative, as contrasted to law enforcement, purposes.
- o The Army policies and procedures relating to crime records management were sound and acceptable and prevent placing juveniles, innocent persons, and the Army in jeopardy. Currently, information concerning investigations involving juveniles, unfounded offenses or cases of insufficient evidence, is tightly controlled but still available to the law enforcement community on a-need-to-know basis.

NAVY RESPONSE:

- o The expungement of investigations identifying juveniles and unsubstantiated allegations would not impact on the use of the DCII as a law enforcement tool. However, we feel it is an Army decision.

DCIS RESPONSE:

- o Concur.

DIS RESPONSE:

- o Concur. With the exception of juvenile cases, the Army should continue to leave records of all investigations in the DCII regardless of whether or not allegations can be substantiated.

DLA RESPONSE:

- o Concur.

IG, DOD, POSITION:

- o In addressing the comments from the Army, the Army must be cognizant of the fact that the DCII indices which identify investigations conducted by the Army result from input, additions, changes, modifications, and deletions initiated by the Army and done solely at the discretion and direction of the Army. Army policy of routinely deleting entries to the DCII identifying investigations of juveniles and cases in which allegations are unsubstantiated or proven to be unfounded, has effectively caused these entries to be deleted and removed from the DCII files. This policy and resultant actions has caused the removal of vital information from the system, restricted access to system users, and frustrated the intent behind the creation of the DCII.
- o Based on the comments from the Army, it appears there is some confusion in that it appears as though the Army believes the names of investigative subjects remain in the DCII even though the Army initiated deletion of the entry from the DCII files. Our review disclosed that these Army initiated deletions remove all identifying information from the DCII.
- o Consistent with our report, we concur with the Army in their concern regarding identifying investigations of juvenile

subjects. We are also supportive of the Army concern regarding the rights of innocent persons and the desire to minimize the Army exposure to civil liability. We must point out, though, that the DCII entry in part serves only to identify the subject of an investigation, provide an identifying file number, and location of the file repository. Information in the DCII entry does not disclose the results of investigation. This information can only be provided by the agency, in this case the Army, holding the investigative file. In this regard, while the Army is correct in their concern of protecting the rights of the innocent, the disclosure of investigative information is entirely within the domain of the Army. The fact the entry in DCII discloses that an investigation was conducted is not in and of itself a threat to innocent parties or a threat to the Army.

- o With respect to the Navy comments, we take partial exception. We concur that expungement of investigations identifying juveniles is appropriate; however, the expungement of information identifying investigations in which the allegations are unfounded or unsubstantiated could conceivably impact on ongoing investigations by DCII users. For example, contributor rationale used in determining whether or not allegations are unsubstantiated or unfounded are often subjective in nature and may be based on acquittals, dismissals, retirements, resignations, insufficient or unsatisfactory investigations, prosecution declinations, and/or a failure to coordinate administrative and civil remedies. The fact that there was an investigation conducted could provide the requesting user organization valuable insight and intelligence which otherwise would escape discovery if the entries were deleted from the DCII.

2. ALL DOD INVESTIGATIVE ORGANIZATIONS SHOULD CONTRIBUTE TO THE INDEX.

- a. Finding: During the course of the review, it was determined that not all of the DoD components that perform

investigations input as contributors, as visualized during the initial formation of DCII. Specifically, it was determined that the following DoD organizations conduct preliminary felony criminal investigations and minor offense investigations but do not index those investigations into DCII: Defense Logistics Agency; Defense Nuclear Agency; Army and Air Force Exchange Service (Safety and Security Division); Air Force Office of Security Police; and the Marine Corps Criminal Investigations Division. Other organizations not indexing investigations include the Defense Intelligence Agency (which conducts investigations related to personnel security clearances and suitability functions and minor criminal offenses) and the Director for Personnel and Security, Washington Headquarters Services, Office of the Secretary of Defense (who conducts personnel security investigations).

- b. Recommendation: The DoD organizations identified as not currently participating in the DCII should contact PIC, DIS, regarding accreditation as contributors.

ARMY RESPONSE:

- o Concur.

NAVY RESPONSE:

- o Concur, with one exception. The NSIC investigates all felony offenses in the Department of the Navy. The NSIC reviews and processes all U.S. Marine Corps Criminal Investigation Division (CID) and Master at Arms minor offense reports and enters those that meet appropriate criteria. This procedure ensures Department of Navy investigations are entered as required. It is not necessary for U.S. Marine Corps CID to have the capability to input directly to the DCII.

AIR FORCE RESPONSE:

- o Concur.

DCIS RESPONSE:

- o Concur.

**DEPUTY ASSISTANT SECRETARY OF DEFENSE, (ADMINISTRATION), OASD
(COMPTROLLER) RESPONSE:**

- o Concur. For this system to work effectively and give maximum benefit to all users, all users identified as contributors should be required to participate.

ARMY AND AIR FORCE EXCHANGE SERVICE RESPONSE:

- o We strongly agree with your recommendation. Each year, the Safety and Security Division of the AAFES processes about 350 investigations of fraud, waste, and abuse allegations, and another 17,000 incident reports related to criminal, illegal, and unethical conduct. We think this information should be available to DCII users.

DEFENSE INTELLIGENCE AGENCY (DIA) RESPONSE:

- o Concur.

DIS RESPONSE:

- o Concur. Those DoD organizations identified as not currently participating in the DCII should become contributors.

DLA RESPONSE:

- o Concur.

DEFENSE NUCLEAR AGENCY (DNA) RESPONSE:

- o This agency currently does not input information into the DCII. However, efforts are being made to obtain necessary computer

equipment that will allow recording security actions into the DCII as required by the Deputy Under Secretary of Defense (Policy) memorandum dated November 1, 1984, revised July 30, 1986 (copies included).

IG, DOD, POSITION:

- o We concur with all of the comments, with the only exception of offering clarification to those comments made by the Navy. With respect to the Navy comments, it should be pointed out that the DCII was intended to include indices on all DoD investigations and is not limited to a felony offense investigation. While it is not clear from the comments, it does appear as though the NSIC reviews and processes all U.S. Marine Corps CID and Master at Arms minor offense reports and selects "appropriate criteria" investigations for input into the DCII. If procedures are in place for the NSIC to input all investigations conducted by entities within the Department of the Navy, then this should continue to be accomplished by NSIC under existing procedures, and we would concur that it is not necessary for the Marine Corps CID to have the capability to input directly into the DCII. On the other hand, if all investigations conducted by the Marine Corps CID are not indexed in the DCII by the NSIC at the present time, then either procedures should be implemented to ensure the input of this information or the Marine Corps CID should develop the capability and input directly to the DCII.

3. THE DCII CONTRIBUTORS SHOULD VERIFY THAT INPUT DATA ARE CORRECT AND COMPLETE.

a. Findings:

- (1) The PIC, DIS, management commented on the need to update records and purge useless information from DCII. An example discussed was the DIS position that "name only" indices be purged because of their suggested dubious value to users without bona fide Personal

Identification Data (PID) information to identify positively subjects of investigations. The DIS gave as an example the fact that DCII has 1,200 files under the "name only" index as "Babe." The DIS advised that there are 500,000 "name only" indices in DCII. There is clearly a need to furnish more accurate descriptive personal identification data on subjects of investigations.

- (2) During the course of the review, we observed a significant number of incidents where incomplete or erroneous information was indexed, or information identifying investigations was not indexed by the contributors, creating information gaps which undercut the reliability of the information indexed or supposedly indexed. For example, the DIS conducted a random DCII search for investigations conducted by DCIS. The DIS randomly screened a provided list of opened and closed investigations and initiated DCII inquiries on 60 of those investigations. They determined that 18 investigations, or 30 percent of the selected sample, were not indexed.
- (3) Accurate and complete spellings of names of individuals and accompanying PID information will enhance the reliability of the tracing and result in more successful "hits." In regard to impersonal title entries, the exact description of facilities, unique DIS facilities code numbers, and official corporate names will improve the reliability of the system. User organizations also rely on the accuracy and completeness of the DCII indices. Information contained in reports identified through DCII inquiries often may have significant bearing on decisions regarding criminal, civil, contractual, or administrative actions contemplated as the result of investigations. Therefore, it is critical that these indices be accurate and factual.

b. Recommendations:

- (1) If the DCII can store the indices for all name only descriptions, those entries should remain in the system and not be purged.
- (2) Contributor organizations should perform periodic random DCII searches for their respective opened/closed investigations as a quality control measure.
- (3) Contributors should verify that input information is correct and complete, i.e., full names and PID information, exact corporate entity descriptions from Dun and Bradstreet (to include the Dun and Bradstreet number), and exact addresses for facility locations and the designated unique DIS facility code numbers for each facility should be indexed as part of the tracing.

ARMY RESPONSE:

- o We fully concur that "name only" tracings should remain in the DCII; to purge this information would result in the loss of many valuable investigative leads. We also agree that contributors should make periodic quality control checks of the information contributed to the DCII. It is recognized that there may be a failure to locate an entry relating to a business entity because of the variety of spellings and abbreviations of the names of business entities. A possible solution to this problem would be to enter the Federal Tax Identification number as part of the tracing.

NAVY RESPONSES:

- o Nonconcur. Recommend that name only tracings not be put in the DCII due to the difficulty in retrieving common name entries, plus the inability to identify whether the name only is identical to your subject without retrieving all of the information for review, which is often impractical. No entry

should be made without at least one personal identifying data (PID). Every effort should be made to obtain all PID. We recommend the DCII be enhanced to respond to inquiries utilizing social security numbers only.

- o Concur. Quality control measures should be taken upon initial input to the DCII to ensure any query would reflect all available information. Upon closing, the DCII should be queried to be sure the investigation is indexed. The NSIC places a copy of the DCII tracer in the investigative dossier upon completion of the initial input.
- o Concur. The first step taken by the NSIC on a case opening is a DCII inquiry. If the information on the opening document varies with the DCII, then steps are taken to verify the correct PID.

AIR FORCE RESPONSE:

- o Concur.

DCIS RESPONSE:

- o Concur.

DIS RESPONSE:

- o Concur. It has been our policy to require the DCII contributors to edit data in their records prior to inserting the records in the DCII. It is the contributor's responsibility to insure the information is correct. One recommended solution would be to have contributors systemize existing DCII records and agree on standardization of codes.

DLA RESPONSE:

- o Concur.

IG, DOD, POSITION:

- o The CIPO concurs fully with all the comments, with the exception of some of the observations expressed by the Navy. We agree

with the Navy position that it would be preferable to have at least one PID item for each entry; however, it is our opinion that it is better to err on the side of caution and at a minimum have at least the name only indexed in DCII for the purpose of salvaging information which might later be useful to a user organization. This is particularly true if during the course of an investigation appropriate PID information was cross-matched to a name only index and added to the indices. We fully concur with the other comments by the Navy.

4. THE DCII SHOULD REMAIN SOLELY AS AN INDEX OF INVESTIGATIONS AND NOT BE EXPANDED TO SERVE AS A REPOSITORY OF INVESTIGATIVE RESULTS.

- a. Finding: Many users suggested that the tracings be more descriptive by identifying the types of investigations, types of offenses, types of security actions, results of investigations, judicial/civil/administrative dispositions. A counter opinion expressed by some of the major users was that DCII was intended to be an index of investigations, not a "holder" of investigative information. The contention is that an index will "point" requestors in the right direction to request files which will contain sufficient details of investigations. Concern was expressed that with the increase in the number of remote terminals away from the PIC (40 terminals in 1980 compared to 101 in 1986), there are too many users who could have routine access to sensitive investigative information which may require some degree of control.
- b. Recommendation: With one exception, the DCII should essentially remain an index of investigations and should not be expanded to include investigative information, i.e., types of offense, results, dispositions. The exception is that codes should be established and included with original indexing to identify criminal, civil, administrative, and personnel security investigations.

ARMY RESPONSE:

- o Recommendation #4 does not take into consideration that offense codes are an integral part of the report of investigation (ROI) number and that the ROI cannot be located without these offense codes. It should also be noted that the offense code relates to the nature of the investigation and should not be interpreted as meaning the person in question committed the crime, but rather was only involved in the investigation. Neither is this number intended to be an indicator of the results of the investigation.

NAVY RESPONSE:

- o Concur. The NSIC position is that the DCII remain solely an index of investigations. With the exception of personnel security investigations, coding the DCII to identify the type of investigation would not significantly enhance the usefulness of the DCII as an investigative tool.

AIR FORCE RESPONSE:

- o Concur.

DCIS RESPONSE:

- o Concur that the DCII should essentially remain an index of investigations and should not be expanded to include investigative information. The proposed establishment of codes to identify types of investigations would not be beneficial to DCIS. Identification of individuals as subjects in pending criminal investigations could cause significant problems because the DCII has a large number of users at remote terminals with routine access to the sensitive information. Previously the user could only assume that the investigation was a particular type. With the addition of the codes, the assumption would be confirmed.

DEPUTY ASSISTANT SECRETARY OF DEFENSE, (ADMINISTRATION), OASD
(COMPTROLLER), RESPONSE:

- o We fully agree with the comment that there are too many users who could have routine access to sensitive investigative information which will require some degree of control. For effective programming purposes, all a user has to know is that an individual of interest to the user, i.e., an applicant for a position, a security clearance for a sensitive position, has had or is currently the subject of an investigation by a Defense Agency, be it DCIS, DIS, Army, Navy, Air Force, or other authorized Defense investigative agencies.

DIA RESPONSE:

- o The recommendation to exclude descriptive information or the results of background investigations, such as clearances, from the DCII is contrary to ongoing efforts by the Office of the Under Secretary of Defense (Policy) (OUSD(P)) to modernize the DCII. The exclusion of clearance information would significantly reduce the utility of the DCII and contribute to further delays in the clearance process. The nature of the clearance action taken by another member of the intelligence community frequently serves to avoid duplicative processing and assist in a more expeditious final clearance determination by this agency.

DIS RESPONSE:

- o Concur. If the results of an investigation are required, the appropriate investigative file can be requested.

DLA RESPONSE:

- o The DLA concurs with all the recommendations, except with the recommendation that the DCII should remain solely as an index of investigations and not expand it to serve as a repository of investigative results. On July 30, 1986, the OUSD(P) directed

all DoD components to "phase in" security clearance data to the DCII with a completion date of July 1, 1987.

- o The DLA agreed with the OUSD(P) proposal to expand the DCII, when it was first made in 1984 (revised July 30, 1986), and continues to support the OUSD(P) plan to create a centralized data base of security clearance information. An automated and centralized source of such information should expedite the adjudication process and reduce the time necessary to obtain a security clearance in DoD.

DNA RESPONSE:

- o The recommendation is not concurred in. The types of clearances, clearance actions, results, dispositions, are considered to be of vital concern when accessing the index, allowing rapid verification of existing clearances.

IG, DOD, POSITION:

- o We fully concur with all the responses, with the partial exception to selected comments offered by DCIS and NIS. With respect to their observations, we recommend that investigations should be coded to distinguish criminal, civil, administrative, personnel security investigations.

5. PROACTIVE OR SELF-INITIATED INVESTIGATIVE EFFORTS SHOULD BE INDEXED IN THE DCII.

- a. Finding: We observed that as a rule proactive investigative efforts, i.e., fraud prevention surveys, fraud surveys, and crime threat assessments, are not routinely indexed. The absence of this type information creates information gaps and denies the users access to what conceivably may be vital information. Experience has often demonstrated that the results of those proactive investigative efforts can assist in eliminating or avoiding duplication of effort, identify sources and witnesses, and serve to alert investigators to

vulnerabilities detected during the conduct of previous reviews.

- b. Recommendation: Proactive efforts, i.e., fraud prevention surveys, fraud surveys, and crime threat assessments, should be indexed in DCII.

ARMY RESPONSE:

- o The Army has in existence a separate indexing system for crime prevention surveys. However, since this and the other types of surveys mentioned in the draft report are oriented toward the Service conducting them, they normally would be of no assistance to agencies outside of that Service and their indexing in the DCII would not be cost-effective.

NAVY RESPONSE:

- o Nonconcurrency. Only proactive and reactive investigations should be indexed. All contributors have the capability to identify sources and witnesses without indexing surveys and crime threat assessments. Indexing surveys into the DCII would serve no investigative purpose.

AIR FORCE RESPONSE:

- o Concur.

DCIS RESPONSE:

- o Nonconcur. The information obtained as a result of a proactive or self-initiated investigation is normally suited to a subject indexing system such as the DCII without additional data.

DIS RESPONSE:

- o Concur.

IG, DOD, POSITION:

- o With regard to the comments by the Army, we do not concur. We have observed that crime conducive conditions often times noted and detected during the course of various proactive investigative efforts, i.e., crime prevention surveys, fraud prevention/detection surveys, are often indicative of patterns of behavior and can exist in and be present in various contracting activities at multi-Service installations. Valuable potential criminal intelligence, method of operation, detection techniques utilized during the course of these proactive efforts could be, and may be, very beneficial to other investigative agencies and users of the system and may prevent "re-inventing the wheel."
- o For essentially the above stated reasons, we do not concur with the comments as expressed by the Navy. We see the results of these proactive efforts, i.e., surveys, as being a credible source of information and useful to the users of the DCII and the investigative community as a whole.
- o We do not entirely concur with comments expressed by the DCIS. We do agree that surveys and other proactive efforts identified in broad generic terms, for all intents and purposes, is not useful to the users. This can be eliminated by entering specific identifying data, i.e., where the survey was conducted, activities surveyed (procured items and/or services, DIS facility code numbers, etc.), broad generic survey terms such as "operation..." would not provide sufficient identifying data to be useful.

6. DCII PARTICIPANTS NEED TO ADOPT UNIFORM FILE RETENTION PERIODS FOR SECURITY AND CRIMINAL INVESTIGATIONS.

- a. Finding: Another area needing appropriate attention concerns the wide differences in tracing and file retention policies practiced by the major contributors to the DCII. Criminal investigative files are retained by the respective

IG, DOD, POSITION:

- o With regard to the comments by the Army, we do not concur. We have observed that crime conducive conditions often times noted and detected during the course of various proactive investigative efforts, i.e., crime prevention surveys, fraud prevention/detection surveys, are often indicative of patterns of behavior and can exist in and be present in various contracting activities at multi-Service installations. Valuable potential criminal intelligence, method of operation, detection techniques utilized during the course of these proactive efforts could be, and may be, very beneficial to other investigative agencies and users of the system and may prevent "re-inventing the wheel."
- o For essentially the above stated reasons, we do not concur with the comments as expressed by the Navy. We see the results of these proactive efforts, i.e., surveys, as being a credible source of information and useful to the users of the DCII and the investigative community as a whole.
- o We do not entirely concur with comments expressed by the DCIS. We do agree that surveys and other proactive efforts identified in broad generic terms, for all intents and purposes, is not useful to the users. This can be eliminated by entering specific identifying data, i.e., where the survey was conducted, activities surveyed (procured items and/or services, DIS facility code numbers, etc.), broad generic survey terms such as "operation..." would not provide sufficient identifying data to be useful.

6. DCII PARTICIPANTS NEED TO ADOPT UNIFORM FILE RETENTION PERIODS FOR SECURITY AND CRIMINAL INVESTIGATIONS.

- a. Finding: Another area needing appropriate attention concerns the wide differences in tracing and file retention policies practiced by the major contributors to the DCII. Criminal investigative files are retained by the respective

contributors for periods ranging from 10 years to permanent retention. Security investigations are retained for periods ranging from 15 to 25 years. For comparative purposes, we determined that the FBI retains criminal investigative files for a minimum of 20 years, and security investigative files for a minimum of 10 years. Certain investigative files with potential historical significance are permanently retained. The FBI makes no distinction between cases in which the allegations are substantiated versus unsubstantiated.

b. Recommendations:

- (1) The DCII contributors should determine and designate types of investigative files, i.e., counterintelligence, espionage, arsons, homicides, etc., which should be retained permanently. All other criminal investigative files should be retained for a minimum period of 25 years and a maximum period of 40 years.
- (2) Security investigations which disclose no derogatory or adverse information should be retained for a maximum period of 15 years.
- (3) Security investigations which disclose derogatory or adverse information should be retained for a minimum of 20 years.

ARMY RESPONSE:

- o We concur that the Military Services should establish uniform retention periods for crime history records as suggested in Recommendation 6. In the Army, experience has established that recidivism by criminal offenders requires the retention of criminal history records for at least 40 years. This retention period has been approved by the Archivist of the United States. Beyond this, certain criminal records require permanent retention because of historical significance, such as the Army

investigation into the theft of the Hess crown jewels or the investigation into the activities of Tokyo Rose, both at the end of World War II. It should not, however, be necessary to retain personnel security records for a lengthy period of time following a military member or civilian employee leaving the Government.

NAVY RESPONSE:

- o Nonconcurrency. Recommend resolved arson and homicide investigations be retained for the minimum/maximum periods of time. Only exceptions should be unresolved homicides, counterintelligence, counterespionage, and compromise, which should be retained permanently.

AIR FORCE RESPONSES:

- o Concur in part. Personnel security investigative reports are retained for 15 years. Personnel Investigations Center, DoD, sets the retention period for these reports. The issue of changing the retention would be better addressed by that agency.
- o Currently, all AFOSI files on espionage and sabotage are retained permanently.
- o The majority of our criminal files are retained for 15 years. The rationale for adoption of this period is as follows:
 - (1) In most instances, if the incident was very serious the individual probably was discharged. The report would be of limited interest to the Air Force after 15 years.
 - (2) If the offense was minor or was not proven, and the individual was retained in the Air Force, we feel the information would be of questionable value after 15 years. We have always felt that the purpose of retaining a file was to satisfy the needs of the Air Force. It appeared that 15 years was sufficient to meet those needs. If AFOSI is required to change their retention period to 25 years for

criminal files, we would need additional storage space and personnel. With the current budget restraints, we would not be able to meet adequately this requirement.

DCIS RESPONSE:

- o Concur.

DIA RESPONSE:

- o Recommend combining the two recommendations as presently written into one recommendation to read as follows: "Security investigations, whether or not they disclosed derogatory or adverse information, should be retained for a minimum period of 25 years." Rationale: It is not uncommon for an extended period of time to elapse between investigations of military personnel. Occasionally, what may not seem significant in an early security investigation could be very significant in a later investigation.

DIS RESPONSE:

- o Concur. However, paragraph C.6.b.(2) is in conflict with paragraph 10-104b of DoD Directive 5200.2R, which states: "DoD record repositories authorized to file personnel security investigative reports shall destroy PSI (Personnel Security Investigation) reports of a favorable or a minor derogatory nature 15 years after the date of the last action." The file retention periods should be in consonance with DoD 5200.2R.

IG, DOD, POSITION:

- o We concur with the Army comments.
- o In regard to the Navy comments, we concur with those comments with the clarification that types of investigative files to be permanently retained should be identified and determined by the DCII contributors, and those policies should be made known to the DCII users.

- o We concur in part with the comments by the Air Force. Our only disagreement is minimum retention periods of security investigations which disclose derogatory or adverse information. We believe the minimum retention period of 20 years is satisfactory to ensure that the information is available to other users of the system.
- o With respect to the comments made by the DIA, the proposed retention period offered by DIA of 25 years for security investigations whether or not they disclosed derogatory or adverse information seems to be excessive, and the information which discloses no derogatory or adverse information appears to have dubious or questionable value to the users.
- o We fully concur with the comments offered by the DIS and, in recognition of the fact that DoD Directive 5200.2R requires a 15 year minimum retention period for security investigations which disclose no derogatory, unfavorable, or minor derogatory information, to be in consonance with the DoD Directive, we have changed the report to recommend a 15 year minimum period of retention for these types of investigative reports.

7. THE DCII SHOULD BE EXPANDED TO ESTABLISH A TOTALLY INTEGRATED CENTRAL INDEX OF PERSONNEL SECURITY INVESTIGATIONS.

- a. Finding: By memorandum dated November 1, 1984 (revised July 30, 1986), the Director of Counterintelligence and Investigative Programs, Office of the Under Secretary of Defense (Policy), proposed that the DCII be expanded to include a central index of personnel security investigations. The proposal provided for indices to include security data on all military, civilian, and contractor personnel who have been the subject of clearance/access investigations by the DoD. We understand that the proposed expansion of the DCII will necessitate an increase in the indices of an additional 10 million records. The proposed modernization of the DCII data storage and

retrieval capability will easily accommodate the input of the additional files. A centralized index of these type investigations will reduce the potential for information gaps and improve the Defense Department capabilities in the personnel security determination area.

- b. Recommendation: We concur with the proposal presented by the Office of the Under Secretary of Defense (Policy). Pursuant to a consensus of the users at the most recent user conference, we concur that the security clearance tracing include the agreed-on data elements to include name, date of birth, place of birth, agency that conducted the investigation, adjudication date, status of the clearance, eligibility, date of investigation, basis, review, and files. It is recommended that these data elements be incorporated as soon as practicable.

ARMY RESPONSE:

- o This information is important in that it provides immediate information concerning the level of clearance, thus allowing the rapid placement of persons into jobs with resulting savings in cost and manpower.

NAVY RESPONSE:

- o Concur. Recommend the Office of Personnel Management personnel security investigations conducted on DoD employees be entered in the DCII, if feasible. This would be especially beneficial to the central clearance facilities.

AIR FORCE RESPONSE:

- o We concur with the Deputy Under Secretary of Defense (Policy) memorandum dated November 1, 1984. We do not concur with the (CIP0) recommendation that modifies the intent of the above memorandum by advocating the DCII "not include descriptive investigative information or results, i.e., types of clearances,

clearance actions, the results of dispositions." This recommendation would merely allow PID/title block and investigative case numbers. Currently, the Air Force and Army use alpha-numeric codes which provide the dates of investigation, types of investigation, clearance granted and access to termination made (i.e., denied, terminated, revoked, ineligibilities, etc.). From our point of view, this information is vital to the fundamental purpose for which the DCII is used; to determine if pertinent/derogatory information is on file. In both criminal and counterintelligence investigations, DCII access to an index where this tracing information is on file can provide significant direction to the investigation. Similarly, source and applicant screening where locating and reviewing of security files is not feasible, this information is highly desirable. From an administrative perspective, this information is critical to the AFOSI Security Office in identifying required security investigations, bring ups, status of clearances and validating information furnished by the Air Force Security Clearance Office.

DIA RESPONSE:

- o Exclusion of clearance information could significantly reduce the utility of the DCII and result in further delays in the clearance process. The nature of the clearance action taken by another member of the intelligence community frequently serves to avoid duplicative processing and assists in a more expeditious final clearance determination by this agency.

DIS RESPONSE:

- o Concur. Procurement of a data base management system (DBMS) is currently under way. After the DBMS is in place, a complete rewrite of the DCII will be accomplished. All contributors will have input into the DCII rewrite to create a standardized index of investigations.

DLA RESPONSE:

- o The DLA agreed with the OUSD(P) proposal to expand the DCII, when it was first made in 1984, and continues to support the plan to create a centralized data base of security clearance information. An automated and centralized source of such information should expedite the adjudication process and reduce the time necessary to obtain a security clearance within the DoD.

IG, DOD, POSITION:

- o This recommendation clearly received the most indepth comment from the DCII users in comparison with comments to other recommendations contained in the report. Based on the majority consensus of the users, there is clearly a perceived need for personnel security investigation results regarding types of clearances, clearance actions, and other dispositions initiated. It can certainly be argued that it is more convenient for the DCII users to have ready access to this type information through remote terminals when conducting DCII inquiries. A concern to OIG, DoD, in this matter is the fact that there are over 100 remote terminals today as compared to 40 terminals in 1980, and, in our judgment, there are many users who could have routine access to sensitive investigative information or clearance information, and there is a need to gain some control as to accessibility to the information.
- o In consideration of the views and consensus of opinions expressed by a majority of the DCII users, our initial recommendation that the indices not include descriptive investigative information or results, i.e., types of clearances, clearance actions, results, dispositions, is amended to adopt the inclusion of the data elements agreed to by a consensus of the users. Further, as a security precaution, our recommendation would be that the status of the clearance remain as a coded alpha and/or numeric character.

Enclosures



POLICY

01 NOV 1984

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Central Index of Personnel Security Actions

In April 1982, the "DoD Select Panel Review of the DoD Personnel Security Program" recommended that a "complete centralized index of all security actions, such as clearances, denials and revocations" be created in order "to allow ready access to prior security determinations by each Component within DoD." The basis for this index has existed since 1977 when the Deputy Assistant Secretary of Defense for Administration gave final approval for implementation of the system that is in use today by the Army and Air Force.

Considering the vast size and scope of the DoD personnel security program and the increasing number of clearance actions taken each year, it has now become imperative to more effectively manage the DoD personnel security program using modern ADP technology. DoD has incurred its share of criticism from the DoD Select Panel, General Accounting Office and the House Appropriations Committee for deficiencies in the management of the DoD personnel security program. It has become increasingly difficult to respond in a timely and accurate fashion to inquiries for data on the total number of active clearances by category and type of subject and the number and type of clearances granted or denied in a given year. One reason for this is that much of the necessary clearance information is contained in manual systems at a variety of locations throughout DoD.

In order to achieve a rapid means of retrieval for adjudicators/policymakers and to better understand what is being accomplished in the personnel security field by DoD Components, creation of a truly centralized data base of security clearance/access actions is essential. Such an initiative will, among other things, enable all DoD Components to rapidly verify and reciprocally accept existing DoD clearances in accordance with DoD 5200.2-R.

A key prerequisite for the expansion of the existing index of security actions is already in place: a much larger and faster computer was installed at DIS in September 1983 to more effectively manage the Defense Central Index of Investigations (DCII) and other data bases. Inasmuch as the

Army and Air Force have over 2 million clearance entries in the DCII central clearance index, employing the basic format and codes described at the enclosures, it is intended that, to the extent possible, the same procedure be adopted by all DoD Components. It is envisioned that such a centralized DoD clearance index will contain security data on all military, civilian and contractor personnel who have been the subject of a clearance/access determination in DoD.

Therefore, it is requested that all addressees review the proposed format and codes at the enclosures and be prepared to discuss your agency's position in detail at a meeting to be held in December 1984. The format at Enclosure 1 which is currently utilized by Army and Air Force, is intended to be the model for utilization by all DoD Components. In order for a DoD central clearance index to be effective, all codes and formats must be uniform. Some components will not need to employ all the codes listed in the enclosures; however, if there is a clearance or investigative status code not listed which you require please be prepared to present your supporting arguments. Army and Air Force will notice revisions to the existing "Review" Codes and a modification to the purpose of the "Other" segment of the "Files" category. In order to maintain a manageable and accurate clearance index, it will also be necessary to incorporate a system for purging clearance/access records on persons who, have died, retired or otherwise completely severed their affiliation with DoD. Your views on this subject are invited. You are also requested to examine the necessity for the continued inclusion of the "REVIEW" codes, in light of the revised "STATUS" and "BASIS" codes.

Many activities already maintain automated clearance systems on their cleared personnel, an example is the Defense Industrial Security Clearance Office (DISCO) for contractor personnel. Whether automated or manual, the required clearance/access data will have to be extracted from the existing agency record system, converted to the uniform DoD coding format and entered into the DCII, either directly through a terminal or via tape to DIS. The initial input of clearance/access data should include all agency clearance/access records in existence on assigned personnel with subsequent regular updating.

While attainment of a totally integrated clearance index is a realistic expectation and one which is well within our capability, careful planning is necessary for successful implementation. Therefore, it is requested that all addressees be prepared to fully address the above issues at a meeting to be held on 12 December 1984 in Room 1E801, Pentagon.

Agency representatives should come prepared to present their comments orally to include also an estimate of the size of the initial input of clearance data as well as the expected size and frequency of subsequent submissions. Attendance should be limited to no more than two persons representing the security and ADP/personnel field. Shortly after this meeting, we plan to call for formal written component positions.

All questions on this subject should be referred to Mr. Peter Nelson, 697-3969.

John F. Donnelly
John F. Donnelly
Director, Counterintelligence
and Investigative Programs

Enclosures
a/s

Distribution:

Director, Defense Investigative Service

Director of Counterintelligence, Office
of the Assistant Chief of Staff for Intelligence
Department of the Army

Director, Security Policy Division
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Director, Information Security
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Support Services, Office of the Joint
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Command Security Officer
Defense Logistics Agency

Chief, Security & Intelligence Division
Defense Communications Agency

Director of Security
Defense Contract Audit Agency

Director, Intelligence & Security
Defense Nuclear Agency

Director, Security Office
Defense Mapping Agency

Chief, Personnel Security Division
Washington Headquarters Services

SAMPLE

DCII CLEARANCE TRACING FORMAT

DOE, JOHN JAMES DOB: 51010 SSN: 123456789 POB: 36
AGCY=ARMY ADJ=830924 STATUS=T INV= 830810 BASIS=BI
REV=CLNC FILES=1DDIS 1AIRR Ø ACRD Ø FOSI Ø NNIS Ø OTHER
CAT=ENL

EXPLANATION OF CLEARANCE TRACING ELEMENTS

FIRST LINE INCLUDES:

NAME ENTERED AS LAST NAME, FIRST, MIDDLE
DOB DATE OF BIRTH ENTERED AS YEAR-MONTH-DAY (YYMMDD)
SSN SOCIAL SECURITY NUMBER - WITHOUT HYPHENS
POB PLACE OF BIRTH, USING DOD STANDARD POB TABLES - NUMERIC FOR THE 50 STATES

SECOND LINE INCLUDES:

AGCY AGENCY (IN THIS CASE US ARMY CENTRAL CLEARANCE FACILITY); THE DCII CODE
 (MAXIMUM 4-POSITION) IDENTIFYING THE AGENCY THAT MADE THE ENTRY AND NOW
 OWNS THE RECORD. EACH CONTRIBUTING AGENCY WILL INPUT THEIR 4 POSITION
 IDENTIFIER IN THIS SPACE (ENCL 2).

ADJ ADJUDICATION DATE OR THE DATE THE CLEARANCE WAS ISSUED, DENIED OR REVOKED.
 IT IS ALWAYS RECORDED AS YYMMDD.

STATUS THIS IS THE TYPE OF CLEARANCE OR ACCESS DETERMINATION MADE: THE LATEST
 CLEARANCE/ACCESS STATUS IS TO BE RECORDED IN THIS TRACING (SEE ENCL 3)

INV INVESTIGATION DATE - THE DATE THE INVESTIGATION WAS COMPLETED ON WHICH THE CLEARANCE OR ACCESS DETERMINATION WAS BASED. IT MUST ALWAYS BE EARLIER THAN THE ADJUDICATION DATE AND IS ALWAYS RECORDED AS YYMMDD

BASIS INVESTIGATIVE BASIS OR TYPE OF INVESTIGATION ON WHICH THE CLEARANCE DETERMINATION IS MADE. IT MUST BE A VALID TYPE OF PERSONNEL SECURITY INVESTIGATION (SEE ENCL 4)

THIRD LINE INCLUDES:

REV REVIEW ACTION - OR THE REASON WHY THE CLEARANCE ACTION WAS TAKEN (THIS IS ONLY USED BY ARMY AT PRESENT). (SEE ENCL 5)

FILES SPECIFIES THE FILES THAT WERE REVIEWED IN CONJUNCTION WITH THE CLEARANCE/ ACCESS ACTION. THIS CATEGORY COMPRISES THE STANDARD DOD AGENCIES RESPONSIBLE FOR CONDUCT OF PERSONNEL SECURITY, CRIMINAL AND COUNTER-INTELLIGENCE INVESTIGATIONS. THE NUMERAL "1" IN FRONT OF THE AGENCY ABBREVIATION INDICATES A FILE WAS REVIEWED (AS OF THE DATE OF THE CLEARANCE ACTION). THE NUMERAL "0" INDICATES NO FILE FROM THAT AGENCY WAS REVIEWED.

IT IS PROPOSED TO EXPAND THE "OTHER" CATEGORY, TO INCLUDE ADDITIONAL DATA ELEMENTS (ENCL 6) TO DENOTE OTHER DOD AND NON-DOD AGENCIES WHICH MAY ALSO POSSESS A RECORD ON THE SUBJECT. THIS COULD INCLUDE AN INVESTIGATIVE FILE (FBI, OPM, CIA, STATE), OR AN ADJUDICATIVE RECORD (DIA, OJCS, DLA, ETC) OR BOTH. THIS ENTRY SHALL BE KEPT CURRENT BY THE AGENCY RESPONSIBLE FOR MAKING THE CLEARANCE/ACCESS DETERMINATION.

CAT THIS PROPOSED ADDITIONAL ITEM WILL DENOTE THE CATEGORY OF THE SUBJECT OF THE ENTRY, I.E., ENLISTED (ENL), OFFICER (OFC), CIVILIAN (CIV), CONTRACTOR (CON) (THREE POSITION CODE).

DCII CLEARANCE/STATUS CODES

<u>CODE</u>	<u>MEANING</u>
A	INVESTIGATION REOPENED
B	ASSIGNED - AWAITING INITIAL REVIEW/ACTION BY ISCR
C	CONFIDENTIAL
D	CLEARANCE DENIED
E	TOP SECRET - NOT ELIGIBLE FOR SIOP
F	FAVORABLE - NO CLEARANCE REQUIRED
G	TOP SECRET - CHEMICAL PRP
H	SECRET - CHEMICAL PRP
I	INVESTIGATION INITIATED
J	TOP SECRET - ADP
K	SECRET - ADP
L	RESTRICTED TO NON-SENSITIVE POSITION
M	SECRET - NUCLEAR PRP
N	TOP SECRET - NUCLEAR PRP
O	NOT USED
P	TOP SECRET - WHITE HOUSE
Q	TERMINATED - NO CLEARANCE ISSUED FAVORABLE INVESTIGATION
R	CLEARANCE REVOKED
S	SECRET
T	TOP SECRET
U	TOP SECRET - INTERIM SCI
V	TOP SECRET - ELIGIBLE FOR SCI

<u>CODE</u>	<u>MEANING</u>
W	TOP SECRET - INELIGIBLE FOR SCI
X	TERMINATED DEFAULT
Y	PENDING ADJUDICATION
Z	SEPARATED WHILE PENDING ADJUDICATION
1	INTERROGATORIES REQUESTED (ISCR ONLY)
2	SECOND ATTEMPT-INTERROGATORIES REQUESTED (ISCR ONLY)
3	INTERVIEWS REQUESTED (ISCR ONLY)
4	PSYCHIATRIC EVALUATION PARTICIPATION REQUESTED (ISCR ONLY)
5	PSYCHIATRIC EVALUATION REQUESTED (ISCR ONLY)
6	PENDING HEARING (ISCR ONLY)
7	PENDING APPEAL (ISCR ONLY)
8	CONFIDENTIAL GRANTED - SECRET DENIED (ISCR ONLY)
9	SECRET GRANTED - TOP SECRET DENIED (ISCR ONLY)

CODES FOR TYPE ("BASIS") OF INVESTIGATION

<u>CODE</u>	<u>DCII DISPLAY</u>	<u>MEANING/TRANSLATION</u>
1	ENAC	ENTRANCE NATIONAL AGENCY CHECK
2	NAC	NATIONAL AGENCY CHECK
3	NACI	NAC PLUS WRITTEN INQUIRIES
4	BI	BACKGROUND INVESTIGATION OR INTERVIEW-ORIENTED BACKGROUND INVESTIGATION
5	SBI	SPECIAL BACKGROUND INVESTIGATION
6	NACP	NAC PLUS 10 YEARS SERVICE
7	NACL	NAC PLUS SPECIAL INVESTIGATIVE INQUIRY (SII)
8	ENAL	ENTNAC PLUS SII
9		NOT USED
Ø		NOT USED
A		NOT USED
B	LFCN	LOCAL FILES CHECK PLUS NACI REQUESTED
C	NACW	NAC PLUS WRITTEN INQUIRIES REQUESTED
D	NACB	NAC PLUS BI REQUESTED
E	NACS	NAC PLUS SBI REQUESTED
F		NOT USED
G	BIPR	PERIODIC REINVESTIGATION FOR TOP SECRET
H	NPSB	NAC PLUS PARTIAL SBI
I		NOT USED
J	SBPR	PERIODIC REINVESTIGATION FOR SCI
K		NOT USED
L		NOT USED
M	SPRP	SBI PLUS CURRENT NAC FOR PRP/NATO

N	NNAC	NACI PLUS CURRENT NAC FOR PRP
O		NOT USED
P	BPRP	BI PLUS CURRENT NAC FOR PRP OR NATO
Q		NOT USED
R		NOT USED
S	SBBI	SBI PLUS CURRENT BI FOR PRP/NATO
T		NOT USED
U	UNKN	UNKNOWN

"REVIEW" CODES

<u>DCII DISPLAY*</u>	<u>CODE</u>	<u>MEANING</u>	
CLNC	A	CLEARANCE	
REV	B	REVALIDATION	
SCI	C	SCI	
SIOP	D	SIOP	(NEW)
CRIT SEN PSN	E	CSP	(NEW)
INV	F	INVEST DUTIES	(NEW)
NATO	G	NATO	(NEW)
LOY	H	LOYALTY	
CONT	I	CONTROLLED SURETY	(NEW)
CRIT	J	CRITICAL SURETY	(REVISED)
IMM	K	IMMIGRANT ALIEN	(NEW)
WH1	L	WHITE HOUSE I	(NEW)
WH2	M	WHITE HOUSE II	(REVISED)
RR	X	REVIEW REQUIRED	

"OTHER" CODES

<u>CODE/DISPLAY</u>	<u>MEANING</u>
BLANK	NO FILE
1	FBI
2	OPM
3	INSB (USAF)
4	STATE
5	CIA
6	AFSCO (USAF)
7	NSA
8	NSG (USN)
9	DIA
Ø	DLA
A	DCA
B	DNA
C	DMA
D	OJCS
E	DCAA
F	WHS (OSD)
G	ISCR



OFFICE OF THE UNDER SECRETARY OF DEFENSE

WASHINGTON, D.C. 20301

POLICY

30 JUL 1986

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Defense Central Security Index (DCSI)

Reference is made to ODUSD(?) memorandum dated 28 April 1986, and the meeting of June 12, 1986, both regarding this subject. The former circulated the revised security clearance access codes for comment by all DoD components and the latter served as a forum to discuss changes and modifications to these codes.

The codes at the enclosure reflect comments and observations made at the June 12th meeting as well as the recommendations received from Air Force and Army with respect to resolution of differences regarding the STATUS codes. With very few exceptions, all comments or recommendations received were incorporated into the changes at the enclosure. One significant exception is that we have chosen to continue with the two categories of clearance ELIGIBILITY and STATUS. We have also modified the title of this system from Defense Central Clearance Index to Defense Central Security Index in order to reflect a broader concept than just merely storing the record of clearances issued or denied.

You are requested to review these revised codes in preparation for a meeting to discuss this topic on August 27, 1986, from 0900 - 1600, in Conference Room #1, Room 1E801, Pentagon. It is anticipated that no further discussions will be held on this subject. Following this meeting a final policy memorandum will be developed and sent to all DoD components to plan for implementation. The DCSI policy will subsequently be incorporated as a change to DoD 5200.2-R. In either case, the Defense Central Security Index will be implemented by all DoD components on a phased basis to be completed NLT 1 July 1987.

The meeting will also include a presentation by the Navy regarding their initiatives in modifying the Joint Adjudication Clearance System (JACS), currently in use by the Air Force (but not Army) in support of their centralized clearance operation.

As at the previous meeting each agency is requested to limit attendance to a maximum of three persons. If you wish to provide formal written comments prior to the meeting you are welcome to do so. Arrangements are being made to reserve space in the Executive Dining Room for lunch from 1200-1300 hours.

Any questions regarding the above may be directed to Mr. Peter Nelson, 697-4917.



John F. Donnelly
Director, Counterintelligence
and Investigative Programs

Attachment

Distribution:

Director, Defense Investigative Service

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of the Assistant Chief of Staff for Intelligence
Department of the Army

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OP-09N

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Chief, Office of Security
Defense Intelligence Agency

Command Security Officer
Defense Logistics Agency

Chief, Security & Intelligence Division
Defense Communications Agency

Director of Security
Defense Contract Audit Agency

Director, Intelligence & Security
Defense Nuclear Agency

Director, Security Office
Defense Mapping Agency

Security Manager Defense Advanced
Research Projects Agency

→ Chief, Personnel Security Division
Washington Headquarters Services

Security Manager
DoD Inspector General

SAMPLEDCII CLEARANCE TRACING FORMAT (REVISED)

DOE, JOHN JAMES DOB: 51010 SSN: 123456789 POB: 36
 AGCY=ARMY ADJ=850715 STATUS=S *ELIG=T INV= 850610 BASIS=IBI
 REV=CLNC FILES=1DDIS 1AIRR Ø ACRD Ø FOSI Ø NNIS 2 OTHER
 *CAT=B *CZIP=U *SEP=8602

EXPLANATION OF CLEARANCE TRACING ELEMENTSFIRST LINE INCLUDES:

NAME ENTERED AS LAST NAME, FIRST, MIDDLE
 DOB DATE OF BIRTH ENTERED AS YEAR-MONTH-DAY (YYMMDD)
 SSN SOCIAL SECURITY NUMBER - WITHOUT HYPHENS
 POB PLACE OF BIRTH, USING DOD STANDARD POB TABLES - NUMERIC FOR THE 50 STATES

SECOND LINE INCLUDES:

AGCY AGENCY (IN THIS CASE US ARMY CENTRAL CLEARANCE FACILITY); THE DCII CODE IDENTIFYING THE AGENCY THAT MADE THE ENTRY AND NOW OWNS THE RECORD. EACH CONTRIBUTING AGENCY WILL INPUT THEIR ONE POSITION IDENTIFIER IN THIS SPACE WHICH WILL BE TRANSLATED AS A = ARMY, N = NAVY, ETC (ENCL 2).

ADJ THE DATE THE CLEARANCE/ACCESS TRANSACTION WAS FINALIZED. IT IS ALWAYS RECORDED AS YYMMDD.

STATUS REPRESENTS THE TYPE OF CLEARANCE/ACCESS DETERMINATION ISSUED; ONLY THE CLEARANCE/ACCESS REQUIRED IS TO BE RECORDED IN THIS POSITION (SEE ENCL 3) (ONE POSITION).

ELIG DEPICTS THE LEVEL OF CLEARANCE OR ACCESS THE SUBJECT IS ELIGIBLE FOR BASED ON THE INVESTIGATION. MAY DIFFER FROM STATUS CODE (SEE ENCL 4) (ONE POSITION).

INV INVESTIGATION DATE - THE DATE THE INVESTIGATION WAS COMPLETED ON WHICH THE STATUS AND ELIG CODES ARE BASED; IT MUST BE EARLIER THAN THE ADJUDICATION DATE AND IS ALWAYS RECORDED AS YYMMDD (SIX POSITIONS).

BASIS INVESTIGATIVE BASIS OR TYPE OF INVESTIGATION ON WHICH THE CLEARANCE/ACCESS, ETC. DETERMINATION IS MADE. IT MUST BE A VALID TYPE OF PERSONNEL SECURITY INVESTIGATION LISTED AT ENCL 5 (MAXIMUM ONE POSITION).

*New Category

THIRD LINE INCLUDES:

REV REVIEW ACTION - THE REASON FOR TAKING THE CLEARANCE/ELIGIBILITY ACTION (SEE ENCL 6)

FILES SPECIFIES THE INVESTIGATIVE FILES THAT WERE REVIEWED IN CONJUNCTION WITH THE STATUS/ELIG TRANSACTION. THIS CATEGORY COMPRISES THE AGENCIES RESPONSIBLE FOR CONDUCT OF PERSONNEL SECURITY, CRIMINAL AND COUNTER-INTELLIGENCE INVESTIGATIIONS. THE NUMERAL "1" IN FRONT OF THE AGENCY ABBREVIATION INDICATES A FILE WAS REVIEWED (AS OF THE DATE OF THE CLEARANCE ACTION). THE NUMERAL "0" INDICATED NO FILE FROM THAT AGENCY WAS REVIEWED.

IT IS PROPOSED TO EXPAND THE "OTHER" PORTION OF THE "FILES" CATEGORY, TO INCLUDE ADDITIONAL DATA ELEMENTS (ENCL 7) TO DENOTE OTHER DOD AND NON-DOD AGENCIES WHICH MAY ALSO POSSESS A RECORD ON THE SUBJECT. THIS COULD INCLUDE AN INVESTIGATIVE FILE (FBI, OPM, CIA, STATE), OR AN ADJUDICATIVE RECORD (DIA, OJCS, DLA, ETC) OR BOTH. THIS ENTRY SHALL BE KEPT CURRENT BY THE AGENCY RESPONSIBLE FOR MAKING THE CLEARANCE/ ACCESS DETERMINATION.

CAT THIS PROPOSED ITEM WILL DENOTE THE CATEGORY OF THE SUBJECT OF THE ENTRY, I.E., ENLISTED, OFFICER, CIVILIAN, CONTRACTOR (SEE ENCL 8) (ONE POSITION).

CZIP THIS PROPOSED ENTRY WILL DENOTE THE CITIZENSHIP STATUS OF THE SUBJECT AT THE TIME THE CLEARANCE/ELIGIBILITY ENTRY WAS MADE (SEE ENCL 9) (ONE POSITION).

SEP* THIS PROPOSED ENTRY WILL REFLECT THE DATE (YYMM) THE SUBJECT EITHER TRANSFERRED TO ANOTHER DOD AGENCY OR TERMINATED EMPLOYMENT OR AFFILIATION WITH DOD. THE CLEARANCE TRACING WILL BE DELETED TWO YEARS FROM THE DATE OF ENTRY AND PLACED IN AN INACTIVE FILE.

*Due to space constraints, this will become a future entry once the DCII program has been rewritten and expanded.

AGENCY CODES

<u>CODE</u>	<u>DCII DISPLAY</u>	<u>MEANING</u>
A	ARMY	U.S. ARMY
N	NAVY	U.S. NAVY/USMC
F	USAF	U.S. AIR FORCE
C	DCA	DEFENSE COMMUNICATIONS AGENCY
B	DCAA	DEFENSE CONTRACT AUDIT AGENCY
D	DIA	DEFENSE INTELLIGENCE AGENCY
I	DIS	DEFENSE INVESTIGATIVE SERVICE
E	DISCO	DEFENSE INDUSTRIAL SECURITY CLEARANCE OFFICE
L	DLA	DEFENSE LOGISTICS AGENCY
M	DMA	DEFENSE MAPPING AGENCY
N	DNA	DEFENSE NUCLEAR AGENCY
R	DISCR	DIRECTORATE FOR INDUSTRIAL SECURITY CLEARANCE REVIEW
S	NSA	NATIONAL SECURITY AGENCY
O	OJCS	ORGANIZATION OF THE JOINT CHIEFS OF STAFF
W	WHS	WASHINGTON HEADQUARTERS SERVICE S
G	IG	DOD INSPECTOR GENERAL

STATUS (CLEARANCE/ACCESS)CODE/DCII DISPLAYMEANING

A	INVESTIGATION REOPENED
B	NOT ELIGIBLE FOR CLEARANCE - LOYALTY
C	CONFIDENTIAL
D	DENIED
E	INTERIM CONFIDENTIAL
F	FAVORABLE INVESTIGATION - NO CLEARANCE REQUIRED
G	SECRET - SCI DENIED
H	SECRET - SCI REVOKED
I	INVESTIGATION INITIATED
J	FILE CREATED - NO CLNC/ADJUDICATION REQUIRED
K	ELIGIBLE FOR SCI W/WAIVER
L	RESTRICTED TO NON-SENSITIVE DUTIES/NOT ELIG FOR SENSITIVE DUTIES
M	TOP SECRET ONLY - SCI REVOKED
N	TOP SECRET ONLY - SCI DENIED
O	INTERIM SECRET
P	INTERIM TOP SECRET
Q	TERMINATED - FAVORABLE INVESTIGATION
R	REVOKED
S	SECRET
T	TOP SECRET
U	INTERIM SCI
V	TOP SECRET - SCI ELIGIBLE
W	TOP SECRET - SCI REQUIRES ADJUDICATION

CODE/DCII DISPLAYMEANING

X	ACTION PENDING
Y	PENDING ADJUDICATION/ACCESS SUSPENDED
Z	TERMINATED - UNFAVORABLE INVESTIGATION
1	PENDING REPLY TO INTERROGATORIES
2	PENDING LEGAL REVIEW OF SOR/INTENT LTR
3	PENDING ACTION BY DIRECTOR, DISCR
4	PENDING REPLY TO SOR/INTENT LTR
5	PENDING PSYCHIATRIC EVALUATION
6	PENDING HEARING
7	PENDING APPEAL
8	LAA CONFIDENTIAL
9	LAA SECRET

ELIGIBILITY CODESCODE/DCII DISPLAYMEANING

B	NOT ELIGIBLE FOR CLEARANCE - LOYALTY
C	CONFIDENTIAL
L	DENIED
E	INTERIM CONFIDENTIAL
F	FAVORABLE INVESTIGATION - NO CLEARANCE REQUIRED
G	SECRET - SCI DENIED
H	SECRET - SCI REVOKED
J	FILE CREATED - NO CLNC/ADJUD REQUIRED
K	ELIG FOR SCI W/WAIVER
L	RESTRICTED TO NON-SENSITIVE DUTIES/NOT ELIG FOR SENSITIVE DUTIES
M	TOP SECRET ONLY - SCI REVOKED
N	TOP SECRET ONLY - SCI DENIED
O	INTERIM SECRET
P	INTERIM TOP SECRET
Q	TERMINATED - FAVORABLE INVEST
R	REVOKED
S	SECRET
T	TOP SECRET
U	INTERIM SCI
V	TOP SECRET - SCI ELIGIBLE
W	TOP SECRET - SCI REQUIRES ADJUDICATION
Y	PENDING ADJUDICATION/ACCESS SUSPENDED
Z	TERMINATED - UNFAV INVEST
8	LAA CONFIDENTIAL
9	LAA SECRET

BASIS CODES

<u>CODE</u>	<u>DCII DISPLAY</u>	<u>MEANING/TRANSLATION</u>
1	ENAC	ENTRANCE NATIONAL AGENCY CHECK
2	NAC	NATIONAL AGENCY CHECK
3	NACI	NAC PLUS WRITTEN INQUIRIES
4	BI	BACKGROUND INVESTIGATION
5	SBI	SPECIAL BACKGROUND INVESTIGATION
6	NACP	NAC & 10 YRS SERVICE (OBSOLETE)
7	NACL	NAC PLUS SII
8	ENAL	ENTNAC PLUS SII
9	IBI	INTERVIEW ORIENTED BACKGROUND INVESTIGATION (NEW)
Ø	DNAC	DEFENSE NACI (NEW)
A	XNAC	EXPANDED NAC
B	LRCN	LOCAL RECORDS CHECK PLUS NACI REQUESTED
C	NACW	NAC PLUS WRITTEN INQUIRIES REQUESTED
D	NACB	NAC (OR NACI) PLUS BI OR IBI REQUESTED
E	NACS	NAC PLUS SBI REQUESTED
F	BITN	BI/IBI (10 YEAR SCOPE)
G	BIPR	PERIODIC REINVESTIGATION OF BI/IBI
H	NPSB	NAC PLUS PARTIAL SBI
I	CI	CHARACTER INVESTIGATION
J	SBPR	PERIODIC REINVESTIGATION OF SBI
K	LBI	LIMITED BACKGROUND INVESTIGATION (OPM)
L	MBI	MINIMUM BACKGROUND INVESTIGATION (OPM)
M	SBIP	SBI PLUS CURRENT NAC
N	NNAC	NACI PLUS CURRENT NAC

<u>CODE</u>	<u>DCII DISPLAY</u>	<u>MEANING/TRANSLATION</u>
O	SII	SPECIAL INVESTIGATIVE INQUIRY
P	IBIP	IBI/BI PLUS CURRENT NAC
Q	MBIP	MBI PLUS CURRENT NAC
R	LBIP	LBI PLUS CURRENT NAC
S	SBBI	SBI PLUS CURRENT BI/IBI
T	IBIR	IBI/BI REQUESTED
U	UNKN	UNKNOWN
V	SBIR	SBI REQUESTED
W	LRC	LOCAL RECORDS CHECK
X	MBIX	MBI - EXPANDED
Y	LBIX	LBI - EXPANDED

"REVIEW" CODES

<u>CODE</u>	<u>DCII DISPLAY</u>	<u>MEANING</u>
A	CLNC	CLEARANCE
B	TRNF	CLNC TRNSF FROM ANOTHER DOD AGENCY (REVALIDATION)
C	REV	REQUIRES REVIEW PRIOR TO PRP CERTIFICATION
D	SIOP	SIOP
E	CSP	CRITICAL SENSITIVE POSITION
F	INV	INVESTIGATIVE DUTIES
G	NOND	NO DEROG IN INVESTIGATIVE FILES
H	LOY	LOYALTY
I	CONT	CONTROLLED PRP
J	CRIT	CRITICAL PRP
K	NONE	NONE
L	WH1	WHITE HOUSE I
M	WH2	WHITE HOUSE II
N	CS	CHEMICAL SURETY
O	LAA	LIMITED ACCESS AUTHORIZATION
P	PRP	DEVOID OF DISQUALIFYING INFO FOR PRP
Q	ADP1	ADP-1 POSITION
R	ADP2	ADP-2 POSITION
S	WHA	WHITE HOUSE CAT A
T	ADP3	ADP-3 POSITION
U	NATO	NATO ACCESS
V	SCI	SCI ACCESS
W	FORN	FOREIGN CONNECTIONS

X	X	WARNING LETTER SENT - CLEARANCE CONDITIONAL
Y	Y	CLEARANCE GRANTED ON APPEAL
Z	RR	REVIEW REQUIRED
Q	NCS	NON-CRITICAL SENSITIVE POSITION
1	NSP	NON-SENSITIVE POSITION
2	USO	UNITED SERVICES ORGANIZATION
3	RX	RED CROSS

"OTHER" CODESCODE/DCII DISPLAYMEANING

BLANK	NO FILE
1	FBI - FEDERAL BUREAU OF INVESTIGATION
2	OPM - OFFICE OF PERSONNEL MANAGEMENT
3	INSB (USAF) - AIR FORCE INTELLIGENCE - PERSONNEL SECURITY DIVISION
4	STATE - DEPARTMENT OF STATE
5	CIA - CENTRAL INTELLIGENCE AGENCY
6	AFSCO (USAF) - AIR FORCE SECURITY CLEARANCE OFFICE
7	NSA - NATIONAL SECURITY AGENCY
8	NSG (USN) - NAVAL SECURITY GROUP
9	DIA - DEFENSE INTELLIGENCE AGENCY
Ø	DLA - DEFENSE LOGISTICS AGENCY
A	DCA - DEFENSE COMMUNICATIONS AGENCY
B	DNA - DEFENSE NUCLEAR AGENCY
C	DMA - DEFENSE MAPPING AGENCY
D	OJCS - ORGANIZATION OF THE JOINT CHIEFS OF STAFF
E	DCAA - DEFENSE CONTRACT AUDIT AGENCY
F	WHS (OSD) - WASHINGTON HEADQUARTERS SERVICES
G	DISCR - DEFENSE INDUSTRIAL SECURITY CLEARANCE REVIEW
H	IRS - INTERNAL REVENUE SERVICE
I	ATF - ALCOHOL, TOBACCO AND FIREARMS
J	SECRET SERVICE
K	CUSTOMS
L	INS - IMMIGRATION AND NATURALIZATION SERVICES

CATEGORYCODE/DCII DISPLAYMEANING

B	ACTIVE DUTY ENLISTED
C	ACTIVE DUTY OFFICER
D	RESERVE ENLISTED
E	RESERVE OFFICER
F	NATIONAL GUARD - ENLISTED
G	NATIONAL GUARD - OFFICER
H	CIVILIAN EMPLOYEE
I	NAFI EMPLOYEE
J	CIVILIAN - EDUCATION
K	CONTRACTOR
L	GENERAL OFFICER
M	ROTC - CADET
N	ACADEMY - CADET
O	RED CROSS EMPLOYEE
P	USO EMPLOYEE
Q	NATO EMPLOYEE

CITIZENSHIP
(as of the transaction date)

CODE /DCII DISPLAY

MEANING

U	-	U.S. CITIZEN BY BIRTH - BORN IN THE UNITED STATES
A	-	IMMIGRANT ALIEN
N	-	NON-U.S. CITIZEN
S	-	U.S. CITIZEN - NATURALIZED
K	-	U.S. CITIZEN - BORN ABOARD OF U.S. PARENTS OR IN U.S. TERRITORIES