



EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D.C. 20503

DEPUTY DIRECTOR  
FOR MANAGEMENT

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MEMORANDUM FOR DEPUTIES OF EXECUTIVE DEPARTMENTS AND AGENCIES

From: Clay Johnson III  
Deputy Director for Management

Subject: Reciprocal Recognition of Existing Personnel Security Clearances

The OMB memorandum of December 12, 2005, on this same subject, outlined the various issues that inhibit reciprocity of security clearances and the actions required to address them. Since then, it has become apparent that additional actions are required to further reciprocity with respect to special access programs (SAPs). In that vein, paragraph 3(d) of the referenced memorandum is revised as follows:

**(d) Required Action: While Executive Order 12968 allows agency heads to establish additional but not duplicative investigative or adjudicative requirements for SAPs (including SCI) or for detail or assignment to their agencies,\* agencies will limit such additional requirements to the following:**

- Administering polygraph examinations.
- Disqualifying individuals based upon non-U.S. immediate family members.<sup>†</sup>
- Requiring personnel security investigations completed within seven years irrespective of the classification level of the SAP. The requirement to submit the Periodic Reinvestigation packet NLT the 5<sup>th</sup> year anniversary remains unchanged.

**In lieu of the polygraph, agencies may require personnel:**

- Seeking initial access to a SAP at each agency<sup>‡</sup> (or access to a SAP at a higher classification level than a SAP currently accessed) to submit a current SF 86 (defined as completed and signed within the last year).
- Already accessed to a SAP to submit an updated and signed SF 86 or a SF 86C on an annual basis.

The Checklist of Permitted Exceptions to Reciprocity, provided with the referenced OMB memorandum, is revised to reflect the above and is attached.

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\* That is, special access programs in the specific sense of EO 12958, sec. 4.4.

<sup>†</sup> Other than this one exception, access eligibility determinations for SAPs will be made in accordance with national adjudicative guidelines.

<sup>‡</sup> For purposes of reciprocity, all components of the Department of Defense to include the Military Departments and Defense Agencies shall be considered one agency.

Any agency head who determines that it is necessary to impose additional requirements, other than the above, for the purpose of determining eligibility for access to classified information will notify the Director of OMB.

Agencies will make SAP access eligibility determinations with the goal of making 80% of all determinations within 30 days.

The Records Access and Information Security PCC will initiate action to formalize the above change in existing policy documents.

Attachment

## Checklist of Permitted Exceptions to Reciprocity

(to be used whenever you make an eligibility determination for access to classified information for an individual who has a current access eligibility based upon the requisite investigation (i.e. ANACI, NACLC, SSBI, or SSBI-PR))

For the purpose of determining eligibility for access to classified information, to include highly sensitive programs (i.e. SCI, SAPs and Q), as the gaining activity/program for an individual who has current access eligibility with another Federal agency or program:

- **you cannot request the individual to complete a new security questionnaire;**
- **you cannot review existing background investigations for the individual;**
- **you cannot review existing security questionnaires for the individual;**
- **you cannot initiate any new investigative checks;**

unless one or more of the questions below can be answered in the affirmative.

	Yes	No	N/A
1. Is the existing clearance granted on an interim or temporary basis?			
2. Is the investigation upon which the existing clearance is based more than seven years old for TOP SECRET, ten years old for SECRET and fifteen years old for CONFIDENTIAL? (See Note 1)			
3. Is your activity (i.e. the gaining activity) aware (i.e. <b>already</b> in possession) of substantial information indicating that the standards of E.O. 12968 may not be satisfied?			

**If the individual is being considered for access to a highly sensitive program (i.e. SCI, SAP or Q) at your activity:**

4. Is the existing access eligibility determination based upon a waiver or deviation, or is access otherwise subject to conditions?			
5. <b>If applicable</b> , does the individual <b>not</b> satisfy a polygraph requirement imposed by the new program, as approved by the agency head or deputy? (See Note 2)			
6. <b>If applicable</b> , does the individual <b>not</b> satisfy a requirement imposed by the new program that prohibits <b>any</b> non-U.S. immediate family or non-U.S. cohabitants, as approved by the agency head or deputy? (See Note 2)			
7. <b>For SAP access</b> , is this the individual's initial consideration for a SAP access eligibility determination (i.e. the individual does not have a current access eligibility determination at the same or higher classification level with the same agency)? (See Notes 3, 4 & 5)			
8. For SAP access where the individual has current SAP access, has the individual failed to submit a certification of a prior security questionnaire or an updated SF 86C as required within the past year? (See Notes 3,4 & 5)			

Items 1 and 2 and 4 through 6 above can be verified by querying OPM's Clearance Verification System (CVS), the Department of Defense's Joint Personnel Adjudication System (JPAS), or the Intelligence Community's Scattered Castles database. If you do not have on-line access to the appropriate database, or if the record is otherwise incomplete, you can fax an "Inter-Agency Clearance Verification Request" to the appropriate agency. The request form and appropriate fax numbers can be found at:

<https://opmis.xsp.org>

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Note 1 – An investigation for SAP access will be considered current if it is no more than five years old (seven years old if a periodic reinvestigation was submitted prior to expiration of the investigation and is currently pending), regardless of the classification level.

Note 2 – Under such circumstances, only additional – not duplicative – investigative or adjudicative procedures will be completed.

Note 3 – For purposes of reciprocity, all components of the Department of Defense to include the Military Departments and Defense Agencies shall be considered one agency.

Note 4 – Under such circumstances, a current SF86, an SF 86C, or pen/ink changes to an existing SF 86 can be required.

Note 5 – You can review an existing background investigation for the individual and/or request an investigative check only if the SF 86 or SF 86C contains new substantive information of security concern not previously considered in the prior SAP access eligibility determination or the last security clearance adjudication and could serve as the basis for disqualification. New substantive information will be adjudicated by a CAF in accordance with national adjudicative guidelines.