



**U.S. OFFICE OF PERSONNEL MANAGEMENT
OFFICE OF THE INSPECTOR GENERAL
OFFICE OF AUDITS**

Final Audit Report

**AUDIT OF THE NATIONAL BACKGROUND
INVESTIGATIONS BUREAU'S BACKLOG OF
BACKGROUND INVESTIGATION CASES AND THE
EFFECTIVENESS OF THE QUALITY ASSURANCE
PROCESS**

**Report Number 4A-IS-00-18-042
January 21, 2021**

EXECUTIVE SUMMARY

Audit of the National Background Investigations Bureau's Backlog of Background Investigation Cases and the Effectiveness of the Quality Assurance Process

Report No. 4A-IS-00-18-042

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Why Did We Conduct The Audit?

The objectives of our audit were to determine if (1) the reported backlog of background investigation cases was accurate and to perform a review of the backlog mitigation plan; (2) the U.S. Office of Personnel Management's National Background Investigations Bureau (NBIB) Federal and contractor staff were following procedures for the case oversight process; and (3) NBIB Federal and contractor staff had controls in place to ensure personnel were trained to perform their duties.

What Did We Audit?

The Office of the Inspector General completed a performance audit on the status and mitigation of NBIB's backlog of background investigation cases as well as the effectiveness of NBIB's quality assurance process. Our audit was conducted from February 28, 2019, through July 18, 2019, at the U.S. Office of Personnel Management's headquarters located in Washington, D.C. and NBIB field offices located in Fort Meade, Maryland and Boyers, Pennsylvania.



Michael R. Esser
Assistant Inspector General for Audits

What Did We Find?

It should be noted that NBIB was transferred to the Department of Defense on October 1, 2019, and is now known as the Defense Counterintelligence Security Agency (DCSA). We determined that NBIB reported on its background investigations' backlog and submitted a mitigation plan to Congress, as required by the Securely Expediting Clearances Through Reporting Transparency Act of 2018. However, we identified three areas where DCSA's controls should be strengthened. Specifically:

- NBIB could not provide sufficient and appropriate documentation to validate data included in the reports. As a result, we were unable to validate the increase/decrease of the reported inventory of cases.
- NBIB and its contractors did not follow policies and procedures for case processing oversight in the following areas – check rides, telework, reopen cases, deficient cases, and other investigative quality checks.
- NBIB did not provide sufficient documentation to support that 36 of the 379 Investigations Case Analysts tested were properly trained to perform their duties. In addition, none of the 65 Investigative Assistants received formal training.

REBUTTAL TO THE DEFENSE COUNTERINTELLIGENCE SECURITY AGENCY'S DRAFT REPORT RESPONSE

It should be noted that OPM's National Background Investigations Bureau (NBIB) was transferred to the U.S. Department of Defense (DoD) on October 1, 2019, and is now known as the Defense Counterintelligence and Security Agency (DCSA).

We submitted a draft audit report to Charles S. Phalen, Jr., former NBIB Director, and who subsequently became the Acting Director of DCSA, in order to elicit comments on our findings, conclusions, and recommendations. DCSA's comments to the draft report were considered in preparing this final report and are included as an Appendix.

We note that DCSA did not agree with the findings presented in our report, not because the findings were inaccurate or lacked merit, but rather based on their belief that the U.S. Office of Personnel Management's (OPM) Office of the Inspector General (OIG) failed to follow proper audit procedures. However, all findings, conclusions, and recommendations were developed based on information provided by the NBIB's subject matter experts (SMEs), during meetings and walk-throughs, as well as documentation provided by NBIB's points of contact (POCs). Furthermore, we developed audit steps and conducted our audit based on laws (e.g., the Securely Expediting Clearances Through Reporting Transparency Act of 2018), regulations (e.g., U.S. Government Accountability Office Standards), and NBIB guidance and instructions (e.g., Standard Operating Procedures, contracts, etc.) obtained during our audit survey phase. The bases for the findings presented in this final report are the laws, regulations, and guidance which govern the audit, as well as the answers and documentation (or lack thereof) received from NBIB. We conducted this performance audit in accordance with generally accepted government auditing standards as established by the Comptroller General of the United States.

The OIG initiated the audit with a notification letter sent to NBIB's Director on June 7, 2018. This letter discussed our plan to begin a performance audit of NBIB's backlog of background investigation cases and the effectiveness of the quality assurance review. On July 2, 2018, we held an entrance conference with relevant personnel to officially begin the audit process. At this meeting, we discussed, among other things, the scope and approach for the audit, as well as a brief description of each phase of our audit (survey, fieldwork, and reporting). On February 28, 2019, we concluded the survey phase of the audit by discussing the survey results with NBIB and the plan for more detailed, targeted testing as we moved into the fieldwork phase of the audit. Although the draft report was issued on January 14, 2020, after NBIB transitioned to the DoD, reporting the results of the audit and gathering feedback is an important step in the audit process.

Prior to conducting the audit, we also conducted a risk assessment in 2018. Since the beginning of the risk assessment and leading into this audit, the NBIB POCs assigned to the risk assessment and the audit were uncooperative, acting in ways that made conducting our audit extremely and unnecessarily difficult. Throughout the entire risk assessment and audit, the POCs sat in on and oversaw every meeting and walk-through, and dictated which responses the SMEs were allowed

to provide to the OIG. The POCs also did not allow the SMEs to give us any documents that they brought with them to the meetings to provide to the OIG as support, without providing it to them first, delaying receipt of the information. We note that attempts to delay access to agency records run counter to the Inspector General Act of 1978, as amended, which explicitly recognizes that our office is entitled to timely access to agency information.¹

Throughout the audit, NBIB closely monitored OIG personnel, imposing new and unique requirements which appeared to have no purpose other than to impede our audit process. As a case in point, when the audit team went on their first audit site visit, they were hindered from entering NBIB's Boyers, Pennsylvania, office located in an OPM facility inside Iron Mountain by the imposition of additional security measures. Under these new security measures, certain OIG team members had to be escorted everywhere, even to the restroom. In addition, when our Deputy Assistant Inspector General for Audits requested to sit in an empty office near the training room occupied by our audit team, so that she could have some privacy to join a work-related teleconference or to make work-related phone calls, the POC did not agree to the use of an empty office. Rather, he told her she could sit at the table in the office he was occupying. Coincidentally, these types of incidents did not occur prior to this audit (not even during the risk assessment), nor did they occur when another OIG audit team subsequently came to Iron Mountain for a site visit related to another U.S. Office of Personnel Management (OPM) program office.

Furthermore, one of the POCs behaved in a manner that our Auditor-in-Charge (AIC) and audit team felt was unprofessional and unproductive. In many instances, he could not answer our directorate-specific questions or provide any supporting documentation without going to the SMEs. However, this POC would not let us meet independently with the SMEs, insisting on being present at all our meetings and frequently preventing the SMEs from answering questions. At one point during the audit, the Acting IG described this disruptive behavior to the NBIB Director, who responded that he would address it. While this may have resulted in a temporary improvement, it did not last long.

During both the risk assessment and the audit, there were several instances when the more senior POC would contact us the day documentation from an information request was due, stating that they could not provide the documentation and needed an extension. This occurred even though during the entrance conference we asked them not to wait until the last minute to ask for an extension. In addition, the POCs refused to provide us the documentation on a rolling basis as it became available, even though we discussed and included this preference in our information requests. This caused delays to our audit because many times the documentation we requested was readily available, but was held up until NBIB gathered all of the documents we requested in an information request. Also, during a meeting at our Boyers site visit where our Deputy

¹ See 5 U.S.C. App. 3 § 6(a)(1)(a) (providing that IG's are entitled to receive "timely access to all records, reports, audits, reviews, documents, papers, recommendations, or other materials" available to the agency they oversee).

Assistant Inspector General for Audits and the Counsel to the Inspector General were in attendance, the more junior POC became visibly agitated and started yelling because he did not agree with something that the AIC said. In addition, at our Fort Meade site visit, he physically stood over one of the SMEs during the walk-through meetings and again, constantly interrupted other meetings when he did not want the SMEs to speak or provide readily available supporting documentation.

During our audit, NBIB stated that our audit conclusions and recommendations were not important, as the background investigation function would soon be transferring to DoD. However, our audit focused on the plan to reduce the backlog of cases, NBIB's compliance with reporting requirements, and the quality review process. As was discussed with NBIB officials numerous times, these areas did not become irrelevant or insignificant simply because the background investigation function was, at some point in the future, going to be transferred to DoD. Ultimately, the goal of this audit, and any potential recommendations, was to focus on issues that would be relevant, regardless of whether the program was with OPM or DoD.

Additionally, DCSA stated that even if the findings were valid and they failed to implement the recommendations, there would be no negative impact. This statement is representative of DCSA's attitude toward this audit. The belief that the audit was not important or significant permeated throughout all interactions with NBIB's POCs, to the point that they were a roadblock to our ability to conduct meetings and gather information from the relevant SMEs, causing numerous delays. This occurred in spite of the fact that, as previously stated, we explained on multiple occasions that our audit objectives were selected based on the fact that the areas would still apply to NBIB's operations, even after the move to DoD.

We attempted to work with NBIB by 1) granting extensions to due dates; 2) holding a significant number of meetings to explain what information was needed; and 3) working in a hostile environment that historically we have never dealt with during any previous audits of the background investigations program. While we were able to complete our audit and present the results based on our review and testing of the information provided, the entire process was significantly impacted and delayed by the POCs' unwillingness to cooperate. A key factor in making an audit and its recommendations useful is timeliness. We are obviously not issuing this audit report in a timely manner, but point to the delays caused by NBIB as a primary reason for this.

Our responses to DCSA's non-concurrence with each of our findings can be found in the Audit Findings and Recommendations section of this final report.

ABBREVIATIONS

AFLC	Automated Federal Leads Centers
CACI	CACI Premier Technology Inc.
DCSA	Defense Counterintelligence and Security Agency
DoD	U.S. Department of Defense
FIRE	Federal Investigative Records Enterprise
FIS	Federal Investigative Service
FY	Fiscal Year
KeyPoint	KeyPoint Government Solutions, Inc.
KPI	Key Performance Indicator
NBIB	National Background Investigations Bureau
OCIO	Office of the Chief Information Officer
OIG	Office of the Inspector General
OPM	U.S. Office of Personnel Management
PII	Personally Identifiable Information
PIPS	Personnel Investigations Processing System
POC	Point of Contact
SECRET ACT	Securely Expediting Clearances Through Reporting Transparency Act of 2018
SME	Subject Matter Expert
SOP	Standard Operating Procedures

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I. BACKGROUND

This final audit report details the findings, conclusions, and recommendations resulting from our performance audit of the status and mitigation of the National Background Investigations Bureau's (NBIB) backlog of background investigation cases and the effectiveness of NBIB's quality assurance process. Effective October 1, 2019, NBIB transferred to the Department of Defense and is now known as the Defense Counterintelligence and Security Agency (DCSA). Throughout this report, we use NBIB for events that occurred prior to October 1, 2019, and DCSA for events occurring after that date. The audit was performed by OPM's Office of the Inspector General (OIG), as authorized by the Inspector General Act of 1978, as amended.

In January 2016, the President announced the establishment of NBIB, as a Bureau under OPM, which absorbed the majority of the OPM's then Federal Investigative Service's (FIS) mission, functions, and personnel. NBIB provided investigative reports to the employing agency or the agency sponsoring the request for a security clearance or credentials, so that these agencies could make determinations of various employment eligibilities.

In fiscal year (FY) 2018, the OIG Internal Audits Group conducted a risk assessment of NBIB. The purpose of the risk assessment was to gain an understanding of NBIB and identify high-risk areas. The risk assessment identified three directorates as high-risk - Federal Investigative Records Enterprise, Field Operations, and Quality Oversight.

- Federal Investigative Records Enterprise (FIRE)

FIRE is responsible for automating, standardizing, and managing Government-wide investigative records collection and retention, thereby reducing the burden on field investigators and the "paper footprint" by leveraging new and evolving data sources that meet the Federal Investigative Standards. FIRE personnel also oversee Government and contractor personnel performing record checks and support functions.

- Field Operations

Field Operations is responsible for conducting the fieldwork of background investigations, to ensure that investigations meet required standards and comply with appropriate laws, regulations, executive orders, adjudicative guidelines, and policies. Field Operations employs approximately 1,600 Federal background investigators and 6,600 contractor background investigators from four fieldwork contractors - CACI Premier Technology Inc. (CACI); KeyPoint Government Solutions, Inc. (KeyPoint); CSRA LLC.; and Securitas Critical Infrastructure Services, Inc. In addition, Field Operations conducts background investigations and reviews segments of open investigations.

- Quality Oversight

Quality Oversight is responsible for overseeing the quality and timeliness of NBIB’s investigative products to ensure they conform to federal investigative quality assessment standards and they comply with appropriate laws, regulations, executive orders, adjudicative guidelines, and policies. Quality Oversight directs initiatives designed to enhance and streamline quality processes, and participates in interagency efforts to formulate overarching policies and procedures. Their duties include reviewing cases prior to closure, providing a deficient rating for any case that does not meet established NBIB investigative standards, and randomly reviewing cases that have been closed. They are also responsible for conducting audits of staff that telework.

CONTRACTS

NBIB’s four fieldwork contracts state, “The Contractor shall conduct investigative fieldwork directly related to a federal background investigation. The contractor will be expected to address quality issues on investigative reports identified during case review at no additional cost to the Government and provide hearing support on a reimbursable basis” Specific contract work requirements include²:

- case control/assignment – work assignments, including deadlines, shall be recorded on OPM-FIS’s³ Investigative Enterprise Systems for management purposes;
- management of inventory to ensure appropriate deadlines are met;
- ensuring all cases meet OPM’s Investigator Handbook requirements; and
- monitoring the quality control of deliverables to ensure quality standards are met.

In addition, the fieldwork contractors are responsible for providing OPM with a

- quarterly, or as otherwise directed, Program Management Review, and
- quarterly report summarizing monthly timeliness and quality ratings for the reporting period.

NBIB has six support contractors that perform records checks and support functions, while also instituting outreach at all levels (law enforcement, federal repositories, and commercial vendors) to improve overall performance.

² There were other deliverables due from the contractors, however we only discuss deliverables related to the background investigation backlog and quality assurance process.

³ The system has been in use since the organization was called FIS and the name was not changed.

CASE OVERSIGHT PROCESS

The Integrity, Assurance, Compliance and Inspections office is responsible for ensuring the overall integrity of NBIB investigative products, Bureau staff, and resources. They conduct inspections of various aspects of the investigative output performed by NBIB's Federal and contractor staff. This office is comprised of three subgroups:

- Inspections group - conducts inspections of various aspects of the investigative output performed by NBIB's Federal and field contract employees, as well as the major support and consolidated leads contracts. The inspections can be either scheduled, random, or quarterly. These inspections assess policy compliance and performance in relation to contract performance standards and requirements.
- Recoveries and Contractor Complaints group - oversees all recoveries of investigations conducted by Federal employees and contractors and handles all complaints for the contractors. Recoveries include rework of falsified investigations and sending out re-contact letters to identify potential falsification. NBIB notifies the OIG of the initial inquiry and then a preliminary investigation takes place.
- Special Investigations group - analyzes the results from the recovery process for both Federal employees and contractors; identifies the next course of action with guidance from the OIG and the Department of Justice; and handles complaints made by Federal employees.

QUALITY ASSURANCE OVER THE BACKGROUND INVESTIGATION CASE PROCESS

The Quality Support Branch provides quality assurance for background investigations by conducting random reviews of cases previously reviewed by Investigations Case Analysts. The Investigations Case Analysts receive feedback informing them of the rating, which can be at or below standards, for the closed cases.

The Quality Assurance Branch is responsible for working closed cases that need to be reopened to clarify an issue; obtaining additional information within the scope of the background investigation; completing an investigation previously closed and labeled "Discontinued" or "Incomplete"; and/or allowing an agent [background investigator] to transmit work obtained after the original case closed. Upon receiving a reopen case request from an agency, an Investigations Case Analyst notes the reason for the reopening and determines if additional information is needed to process the reopening. If additional information is needed, a reopen authorization is entered and processed through the FIS-II Database⁴. The information entered in

⁴ The database has been in use since the organization was called FIS and the name was not changed.

the FIS-II Database is reviewed by a Case Analyst to ensure it is accurate and complete. Upon completion of the review, a *Reopen Authorization Form* is printed directly from the database, attached to the agency request, and placed on the proper shelf for processing.

The Re-Contact Letter program, performed by NBIB employees, is an integral element of the quality oversight program and operates in tandem with the Integrity, Assurance, Compliance and Inspections program. Sources, such as neighbors, teachers, or employers, interviewed by both Federal and contractor background investigators, receive re-contact letters to solicit feedback regarding the interview process and any pertinent information from the sources interviewed about the content of the interview.

The information provided in the returned re-contact letters may be used to determine potential falsification by the Investigator. According to the Re-Contact Letter Program Standard Operating Procedures, “All instances of possible developed information will be referred to Integrity Assurance for further examination to determine possible investigator involvement or additional investigative work to be done.”

BACKLOG OF BACKGROUND INVESTIGATION CASES

In 2014, OPM cancelled the contract between FIS and one of its field contractors. As a result, the inventory of background investigation cases increased to approximately 700,000. Since its inception in 2016, NBIB has worked to reduce the current investigative inventory to a normal workload⁵. NBIB considers its normal pending case inventory to be 180,000 to 220,000 investigative products.

In FY 2018, Congress passed the Securely Expediting Clearances Through Reporting Transparency Act of 2018 (SECRET Act), requiring the Director of NBIB, in coordination with the Director of OPM, to submit a report on the backlog of personnel security clearance investigations. The SECRET Act requires that the report be submitted no later than 90 days after the date of enactment, and quarterly thereafter for five years. NBIB is required to include the following information in the report:

1. The size of the backlog of personnel security clearance investigations including, for each sensitivity level, the number of:
 - a. interim clearances granted;
 - b. initial investigations and periodic reinvestigations for Federal employees and contractors;

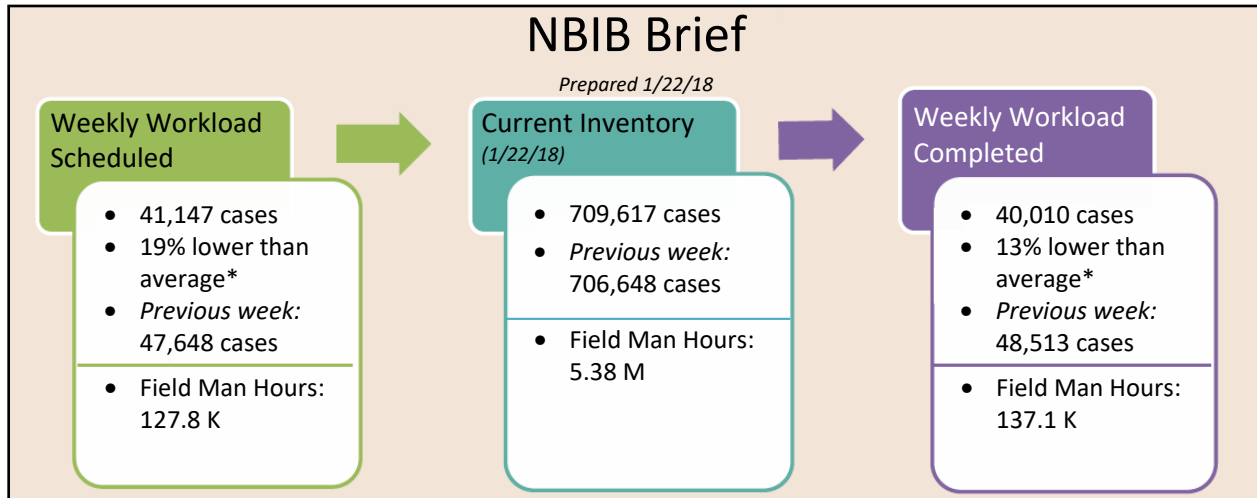
⁵ A normal inventory of work is defined as the pending investigative inventory that can be completed within NBIB’s timeliness objectives.

- c. initial investigations and periodic reinvestigations for Federal employees and contractors of the Department of Defense; and
 - d. Federal employees and contractors of NBIB conducting background investigations for NBIB.
2. The average length of time, for each sensitivity level, to carry out an initial investigation and a periodic reinvestigation.
3. A discussion of the factors contributing to the average length of time to carry out an initial investigation and a periodic reinvestigation.
4. A backlog mitigation plan, which shall include:
 - a. the identification of the cause of, and recommendations to remedy, the backlog;
 - b. the steps that the Director of NBIB will take to reduce the backlog;
 - c. process reforms to improve efficiencies in, and the quality of, background investigations; and
 - d. a projection of when the backlog will be sufficiently reduced to meet required timeliness standards.
5. A description of improvements in the information and data security of NBIB.

NBIB produces weekly *Key Performance Indicators* (KPI) reports (see Exhibit 1) to help provide programmatic monitoring of background investigation cases. The KPI presents numeric details that capture information such as *Weekly Workload Scheduled*, *Current Inventory*, *Weekly Workload Completed*, *Timeliness*, and *Projections*. The numbers reported for *Weekly Workload Scheduled*, *Current Inventory*, and *Weekly Workload Completed* derive from the Dashboard⁶ system based on queries, created in past years, which interface with the Personnel Investigations Processing System (PIPS). NBIB uses the data from the Dashboard system to run an Excel report. The data in the Excel report is used in the KPI reports. The *Current Inventory* represents all outstanding cases, which includes the normal inventory and backlog cases.

⁶ A system that contains information relating to a subject such as name, date of birth, and employment. Dashboard extracts data from PIPS and converts it on a form that is user friendly. PIPS is the computer system which maintains the Security/Suitability Investigations Index, a repository containing background investigation records of Federal employees, military personnel, and contractors.

Exhibit 1: Excerpt from the KPI Report for the week ending January 20, 2018



TRAINING

Each of the four fieldwork contracts outline the training, experience, and educational requirements that an employee must meet in order to hold a position as an investigator or support personnel. This includes training to comply with the National Training Standards' 78 performance indicators. Specifically, the contracts state that all contractor personnel shall complete the *Background Investigator National Training Standards* compliant investigator training course, or the contractor must verify that the investigator has met the National Training Standards, in order to perform background investigations for the Federal Government.

NBIB's Investigations Case Analysts are required to complete the Investigations Case Analyst Program, and background investigators are required to complete the Federal Background Investigator Training Program.

PREVIOUS OFFICE OF THE INSPECTOR GENERAL REPORTS

The OIG has issued the following reports related to background investigations:

- Audit of the Quality Assurance Process over Background Investigations, Report No. 4A-IS-00-09-060, issued June 22, 2010.
- Audit of the Federal Investigative Services' Case Review Process over Background Investigations, Report No. 4A-IS-00-13-062, issued June 4, 2014.
- Audit of OPM's Federal Investigative Services' Adjudications Group, Report No. 4A-IS-00-15-054, issued June 17, 2016.

All audits are closed; however, during this audit we determined that prior findings related to check rides, training, and record checks (now called testimony reviews) from the aforementioned reports are still areas where controls should be strengthened.

II. OBJECTIVES, SCOPE AND METHODOLOGY

OBJECTIVES

The objectives of our audit were to determine if:

- the reported backlog of background investigation cases was accurate and to perform a review of the backlog mitigation plan;
- NBIB Federal and contractor staff are following procedures for the case oversight process; and
- NBIB Federal and contractor staff have controls in place to ensure personnel are trained to perform their duties.

The recommendations included in this final report address our objectives.

SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards as established by the Comptroller General of the United States. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.

The scope of our audit covered NBIB's October 1, 2017, to February 28, 2019, processes associated with reporting and mitigating the backlog of background investigation cases and the quality assurance process. Our audit universe and sample selections consisted of:

Audit Area	Scope	Total Universe	Total Samples Selected
Inspections	October 1, 2017 - September 30, 2018 (FY 2018)	715	40
Re-Contact Letters - Contractor Background Investigators	FY 2018	136,190	30
Re-Contact Letters - Federal Background Investigators	FY 2018	52,576	30

Audit Area	Scope	Total Universe	Total Samples Selected
Investigative Analysts	FY 2018	65	6
Reopen Cases	FY 2018	2,250	8
Deficient Cases	FY 2018	35,035	5
Investigations Case Analysts	October 1, 2018 - February 28, 2019	379	36
Federal Background Investigators	FY 2018	1,633	5
Contractor Background Investigators	FY 2018	6,654	20
Contractor Employee Check Rides	FY 2018	4,204	80
Federal Employee Check Rides	FY 2018	1,529	40

For Federal and Contractor Employee Check Rides, we randomly selected the samples for testing using IDEA, a data analytics software tool. For the remaining audit areas, we used stratified random sampling to select the samples for testing, utilizing Microsoft Excel, in order to accomplish our audit objectives.

We performed our audit from February 28 through July 18, 2019, at OPM’s headquarters located in Washington, D.C. and NBIB field offices located in Fort Meade, Maryland and Boyers, Pennsylvania.

To accomplish the audit objectives noted above, we:

- held meetings with NBIB representatives;
- validated information in NBIB’s reports;
- tested training records to determine whether NBIB and contractor staff were properly trained;

- sampled and tested quality and timeliness inspection reports to determine if inspections were conducted on contractors;
- sampled and tested re-contact letters and testimony reviews to determine if the required number of re-contact letters were sent and reviews were completed;
- sampled and tested reopen and deficient cases to determine if cases were processed according to investigation standards and NBIB's policies;
- sampled and tested telework agreements to ensure supervisors approved staff telework schedules; and
- sampled and tested check rides conducted on NBIB and contractor background investigators.

In planning our work and gaining an understanding of the internal controls over the status and mitigation of the backlog of background investigation cases as well as the effectiveness of NBIB's quality assurance process, we considered, but did not rely on, NBIB's internal control structure to the extent necessary to develop our audit procedures. These procedures were substantive in nature. We gained an understanding of management procedures and controls to the extent necessary to achieve our audit objectives. The purpose of our audit was not to provide an opinion on internal controls but merely to evaluate controls over the reporting of backlog data for background investigations and the quality assurance process.

Our audit included testing and analysis of case backlog data, the quality assurance process, timeliness and quality of inspections, training for staff, and other procedures, as we considered necessary.

In conducting our audit, we relied to varying degrees on computer-generated data. To assess the reliability of computer-processed data obtained from the Dashboard system, we looked for obvious errors in accuracy and completeness. We determined that the data was sufficiently reliable for achieving our audit objectives. We did not evaluate the effectiveness of the general application controls over computer-processed performance data.

The results of our review indicated that with respect to the items tested, NBIB reported on its background investigations backlog and submitted a mitigation plan to Congress, as required by the SECRET Act. However, we recommend that DCSA strengthen controls over its backlog reporting, training, and quality assurance processes.

The samples selected during our review were not statistically based. Consequently, the results from our samples were not projected to the populations tested.

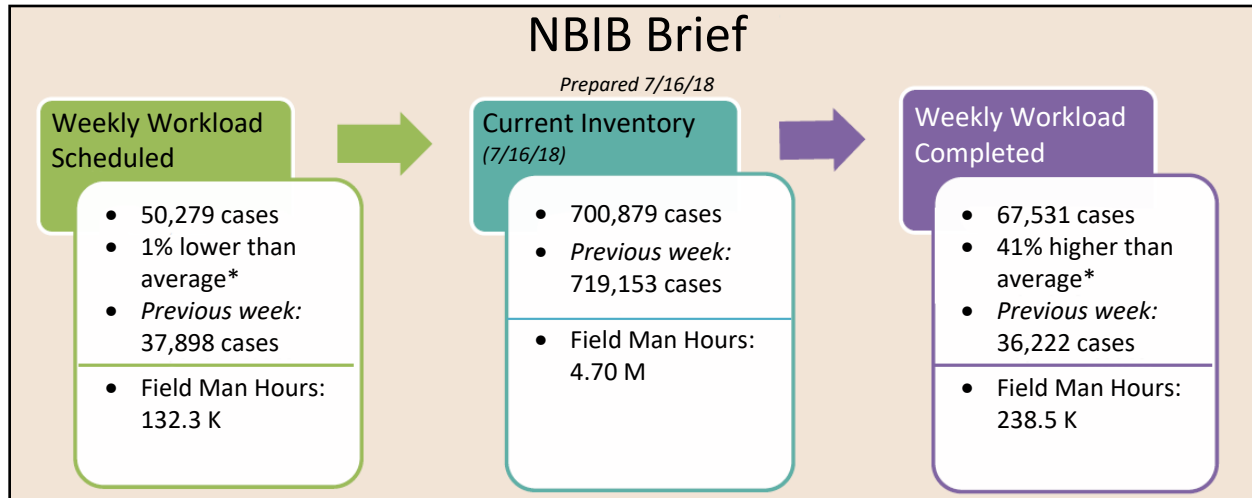
III. AUDIT FINDINGS AND RECOMMENDATIONS

The sections below detail the results of our audit of the status and mitigation of NBIB's backlog of background investigation cases as well as the effectiveness of NBIB's quality assurance process. We determined that NBIB is conducting inspections according to its procedures, NBIB's contractors met the training requirements, and NBIB issued reports required by the SECRET Act. However, we identified three areas, detailed below, where DCSA (formerly NBIB) should strengthen controls.

A. Support for Backlog of Background Investigation Cases

NBIB could not provide sufficient and appropriate documentation to validate data reported in the Key Performance Indicator (KPI) and the SECRET Act reports. We were unable to validate the increase/decrease of the *Current Inventory* data reported in NBIB's weekly FY 2018 KPI reports. We were able to calculate the increase/decrease based on the *Current Inventory* statistics reported on the KPI report (see Exhibit 2), which is used to report the backlog of background investigations cases. For example, we calculated a decrease of 18,274 in the case backlog by subtracting 700,879 cases in *Current Inventory* for the current week from the previous week's total of 719,153. We requested documentation to support the decrease of 18,274 cases; however, NBIB was unable to provide details to support the decrease. NBIB stated that at the time of our audit, OPM's Office of the Chief Information Officer (OCIO) was the "owner" of background investigation case data, which is stored in PIPS, and the Dashboard Management System (Dashboard), an interface that generates reports from PIPS. Since NBIB is an authorized user and not the system owner, it was their understanding that validation data for these systems should be addressed to the OCIO.

Exhibit 2: Excerpt from *KPI Report for the week ending July 14, 2018*⁷



We also determined that although NBIB complied with the SECRET Act by submitting the required reports, which included their backlog mitigation plan, we could not validate the numeric data reported in the SECRET Act reports. We reviewed the *Report on Backlog of Personnel Security Clearance Investigations* and the *Report on Backlog of Personnel Security Clearance Investigations Update: FY 2019 Quarter 1*, and requested documentation to support the data reported in each of these reports. NBIB provided an Excel spreadsheet (see Exhibit 3) as documentation to support the data in the reports.

⁷ The difference between the cases completed (67,531) and the cases scheduled (50,279), which is 17,252, does not match the inventory decrease of 18,274 because reports generating the workload numbers and the inventory numbers are run on different days.

Exhibit 3: Excerpt of Excel spreadsheet, cases pending as of July 2, 2018

Cases Pending As of: 07/02/18				
<i>SECRET Act DoD vs Non-DoD</i>				
<i>Federal vs Contractor</i>				
	Contractor		Federal	
Case Type Decoded	DOD	NON_DOD	DOD	NON_DOD
SSBI	1332	176	2536	214
T5	25179	6190	56674	5686
Subtotal: Top Secret/Q	26511	6366	59210	5900
ANACI	-	-	3	0
NACLC	2	0	13	12
T3	42843	1997	153907	16816
Subtotal: Secret/Conf/L	42845	1997	153923	16828
PHASE PR	2324	213	3056	502
SSBI-PR	1397	507	2148	849
T5R	32952	14997	42403	18055
Subtotal: TS Reinvest	36673	15717	47607	19406
T3R	27386	1481	65920	3531
Subtotal: Sec/Conf/L Reinvest	27386	1481	65920	3531

The Excel spreadsheet was produced based on our request and the figures in the spreadsheet were hard coded (no formulas or links to other documents) and were not supplemented with supporting documentation. NBIB also provided a Word document (see Exhibit 4), which provided an explanation of the origins of the figures in the Excel spreadsheet.

Exhibit 4: Excerpt from *Supporting Data for Narrative Final Secret Act*

As of July 2, 2018, there were 85,721¹³ Top Secret and 196,768¹⁴ Secret initial national security clearance investigations for employees of, and employees of contractors of, the Department of Defense.

- Of the total Top Secret initial clearance investigations, 59,210¹⁵ are on Federal employees and 26,511¹⁶ are on employees of Federal contractors.
- Of the total Secret initial clearance investigations, 153,923¹⁷ are on Federal employees and 42,845¹⁸ are on employees of Federal contractors.

(G) The number of periodic reinvestigations for employees of and employees of contractors of the Department of Defense

As of July 2, 2018, there were 84,280¹⁹ Top Secret and 93,306²⁰ Secret periodic national security clearance reinvestigations for employees of, and employees of contractors of, the Department of Defense.

- Of the total Top Secret periodic clearance reinvestigations, 47,607²¹ are on Federal employees and 36,673²² are on employees of Federal contractors.
- Of the total Secret periodic clearance reinvestigations, 65,920²³ are on Federal employees and 27,386²⁴ are on employees of Federal contractors.

(H) The number of employees of the Bureau conducting background investigations for the Bureau

As of July 2, 2018, NBIB has 1,714²⁵ Federal investigative staff.

¹² Cells B20 + C20

¹³ Cells B10 + D10

¹⁴ Cells B14 + D14

¹⁵ Cell D10

We could verify that the totals in the Excel document tied to the totals in the Word document; however, we could not tie the totals to detailed documentation because support was not provided. For example, we were able to verify that the 59,210 U.S. Department of Defense Top Secret initial clearance investigation total consisted of 2,536 plus 56,674 cases as shown on the Excel document. However, there was no detailed report or any documentation to support the 2,536 and 56,674 cases reported. We were unable to validate the information shown in the KPI and Secret Act reports. The documentation NBIB provided was summary or hard coded information and could not be traced to the actual, detailed source information. NBIB's subject matter expert stated "I originally thought I had the ability to pull the inventory data [October] 2018 by case listing; however, I researched my capability further and I only have the ability to get the summary level data. This data is provided in a report that runs in our system and is pushed to us every Monday."

NBIB stated that it could not accurately reproduce the summary data used for previous reports. NBIB could generate detailed back-up data supporting the summary report at the time the reports are generated; however, this is not routinely done. NBIB stated, "Inventory data that NBIB uses

for deliverables such as the SECRET Act, Backlog Mitigation Plan, and KPIs are pulled on the current day. The data constantly changes from minute to minute based on the case actions. Due to these changes, the historic data files for previous dates cannot be accurately reproduced, unless the data was previously stored. Therefore, NBIB is unable to provide the requested listing at this time. NBIB does have detailed inventory data for the dates requested at summary level. Any historical case data should come directly from the OPM C[chief] I[information] O[officer], since NBIB does not have access to the systems holding the data.”

Another concern is that the queries used to extract data from PIPS to produce the totals for NBIB reports were created many years ago and NBIB could not provide any documentation to support the methodologies or any dates/details of the last time the queries were validated. Therefore, we are also unable to determine if the queries are pulling complete and accurate data from the proper categories/sources. Using Exhibit 4 as an example, there were 85,721 initial Top Secret investigations in the backlog; however, per the footnote, this number is pulled from two different categories. Since we could not validate the methodologies, we cannot verify that the numbers are pulled from the correct two categories and if the amounts pulled are complete and accurate.

We also found an error in the percentage reported for the increase of NBIB Federal and contractor background investigators work force. NBIB reported their background investigative workforce increased by 48 percent in their mitigation plan when the percentage reported should have been 51 percent. DCSA acknowledged the error, noting that it was due to version control. However, DCSA provided no supporting documentation to show they made an amendment to the mitigation plan, which originally presented inaccurate information.

The U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government, Principle 10 – Design Control Activities*, states, “Management clearly documents internal control and all transactions and other significant events in a manner that allows the documentation to be readily available for examination. The documentation may appear in management directives, administrative policies, or operating manuals, in either paper or electronic form. Documentation and records are properly managed and maintained.”

Furthermore, *Principle 10* also states, “Transaction control activities are actions built directly into operational processes to support the entity in achieving its objectives and addressing related risks. ‘Transactions’ tends to be associated with financial processes (e.g., payables transactions), while ‘activities’ is more generally applied to operational or compliance processes. For the purposes of this standard, ‘transactions’ covers both definitions. Management may design a variety of transaction control activities for operational processes, which may include verifications, reconciliations, authorizations and approvals, physical control activities, and supervisory control activities.”

NBIB does not have controls in place to ensure that supporting documentation for data reported in the KPI, and in response to the SECRET Act, are maintained.

Without support for the details of the summary data used to generate the figures reported in the KPI and SECRET Act reports, background investigations data, including the backlog, reported to Congress and the public may be inaccurate. In addition, not knowing what inputs make up the queries could affect the output used in reporting background investigations data.

Recommendation 1

We recommend that DCSA maintain proper documentation to support all background investigations data, including the backlog, which is reported in the KPI and SECRET Act reports. Documentation should include but not be limited to detailed reports, calculations, and methodology, to ensure the data is valid, complete, and transparent.

DCSA's Response:

“Non-concur. NBIB maintained proper, required documentation to support all background investigations data, including the investigation case backlog, which is reported in the weekly KPI and quarterly SECRET Act report. Documentation included detailed reports, programmed and validated summary reports, calculations, and methodology, as deemed appropriate, to ensure the data is valid, complete, and transparent.

Furthermore, DCSA conducts ongoing efforts to improve products, services, and processes. For example, as stated above, the quarterly SECRET Act query has been amended to a generated case listing in case it should be needed in the future. Additionally, as part of our continuous process improvement efforts, DCSA has improved its reporting capability with the functionalities available in its reporting system. We established a set of ‘datamarts,’ designed to query and hold multiple years’ worth of data at the case level. As such, DCSA is now able to produce case listings related to all workload data (including the inventory) reported in its weekly KPIs for any date from July 8, 2019 to present. Moving forward, DCSA is working to migrate other report topics to datamarts to enable this detailed capability.”

OIG Comment

Throughout the audit, we requested detailed case listing documentation to support the backlogged case statistics. This included documentation to support the increases and decreases to the case inventory to reach the current inventory of backlogged cases reported on the weekly FY 2018 KPI reports. However, NBIB did not provide this information. In addition, NBIB did not provide supporting documentation for the numerical data reported in the two SECRET Act reports that we reviewed during our fieldwork. Although OPM’s OCIO maintained PIPS and the Dashboard, they are not the “owner” of the data, nor do they bear the responsibility for

developing methodologies or creating queries. Rather, NBIB owns the data and is responsible for its accuracy. It is extremely concerning to the OIG that NBIB appears to believe that they have no responsibility to validate and ensure the accuracy of background investigations data it reports to Congress.

Since NBIB was unable to provide a detailed listing of the cases that comprised the summary data shown in the KPI and SECRET Act reports, we could not determine the accuracy of the background investigations case backlog data included in these reports. In DCSA's response to our draft report, they state that they are "now able to produce case listings related to all workload data (including the inventory) reported in its weekly KPI's for any date from July 8, 2019 to present." However, as part of their response we were not provided an example of said case listings; therefore, we cannot confirm their improvement efforts.

B. Case Oversight Process

NBIB and their contractors did not follow policies and procedures for case processing oversight. Details of our results were provided to NBIB separately from this report. Specifically, we identified the following:

Check Rides

- Thirty-two out of 40 NBIB check ride forms sampled did not contain all the proper signatures that are required by the *NBIB Field Operations Standard Operating Procedures Check Ride August 2018*. In addition, electronically signed forms had expired certificates or revoked certificates on the signature lines.
- Eleven out of 20 CACI check rides sampled did not have a check ride form.
- KeyPoint did not provide a check ride form for 1 out of the 20 we sampled. In addition, the check ride form provided was out of our scope. The investigator and field trainer signed the check ride form on July 2, 2013.

In NBIB's four field contracts, Section C.7.2 states, "The Contractor will provide to OPM certification that evaluations have been performed in accordance with Section C.13.3.3.2.4 [Evaluation of Investigative Personnel] of this Contract. Supporting documentation for the evaluations will be maintained by the Contractor and made available to OPM upon request."

NBIB did not adequately conduct oversight of the supporting documentation for the contractor check ride evaluations submitted in the contractor's monthly spreadsheets. Not completing the required check rides properly for each background investigator, or maintaining documentation to show the check rides were completed, increases the risk that inefficiencies or weaknesses in the

background investigations process are not revealed or that background investigations may be compromised.

Telework

- Forty out of 379 Investigations Case Analysts' telework manifests we reviewed were not created in accordance with NBIB's Personally Identifiable Information (PII) policy. All of the manifests tested were missing the case name and did not identify the specific documents that the Investigations Case Analysts transported from the building when teleworking.
- One out of 34 Investigations Case Analysts sampled did not sign the most recent Telework Agreement that included the current telework guidelines.

NBIB's telework guidance only requires each manifest to include the employee's initials, date, staff identification, and full case number for each case worked on while the employee is teleworking, instead of including all of the required information outlined in the PII policy.

Not signing the current telework agreements, and not completing all required information on the manifests, could result in the mishandling or loss of PII by personnel who do not have the proper authorization to telework.

Reopen Cases

- One out of four Federal employees reopen case samples tested and two out of four contractor employees reopen case samples tested did not have the *Reopen/Reimbursable Suitability Investigations Request Form*. In addition, none of the eight cases had the *Quality Rating Form* completed as required by the *Reopen Standard Operating Procedures* (SOP).

Deficient Cases

- One out of five deficient case samples tested did not have a final satisfactory rating from the Federal review, showing the rework cycle was completed.

By not completing the quality rating forms, NBIB may be unable to track trends resulting in the reopening of previously closed cases. Not being able to track reoccurring deficiencies may make it more difficult for NBIB to reduce the number of cases reopened for quality issues. In addition, lack of documentation to support that deficient cases received a final satisfactory rating increases the risk that requirements may not have been met.

Other Investigative Quality Checks

- NBIB FIRE Automated Federal Leads Centers (AFLC) Supervisory Team Leaders did not conduct the required 60 testimony reviews for 59 out of 65 Investigative Analysts for FY 2018.
- NBIB's 2019 *Re-Contact Letter Program SOP* has outdated and erroneous information. Specifically, we noticed that a former field contractor, US Investigative Services, who ceased being a contractor in 2014, was still referenced. In addition, the annual cost calculation amount in the Re-Contact Letter Program SOP was incorrectly calculated at \$143,170 when it should have been \$144,220, a difference of \$1,050.

DCSA stated that the 59 testimony reviews that were not reviewed included employees who were not employed in AFLC during the entire fiscal year and were out of work due to extended absences, on military leave, or on special projects during the fiscal year. However, they did not provide supplemental documentation (i.e., employee start dates) to verify these claims; therefore, we cannot adjust the reported results.

Not conducting the required testimony reviews on Investigative Analysts could lead to background investigations not meeting the required quality standards and outdated procedures can result in the re-contact letters being processed incorrectly.

NBIB's Field Operations Standard Operating Procedures Check Ride August 2018 states, "A check ride record may only be edited and completed by its creator. After both parties have signed the form, the creator must 'complete' it (close) in the database."

NBIB's Policy on the Protection of Personally Identifiable Information (PII) section 5.3 states, "Personnel with the need to transport material containing PII will be responsible for completing a detailed manifest. At a minimum, the manifest will contain the following information:

1. Date of Manifest
2. Staff name
3. Case name (last), case number
4. Identification of the document(s) (case papers, release(s)/type of release(s), entire file)[.]"

NBIB's Reopen SOP states, "If a case is reopened to correct a **Quality** error, you will be required to complete a **Quality Rating Form**. The form data is used to track errors and identify trends. Quality Assurance also uses the data on the form to provide feedback to the individual/group who committed the error."

In NBIB's four field contracts, Section F.3.3.2 states, "When a case is found to be deficient, it will be returned to the Contractor for the additional work necessary to bring the case up to the contractual quality requirements; defined as rework. Once the Contractor has completed the rework, the case will once again receive a final inspection by the Federal Review staff [Investigations Case Analysts]."

The GAO *Standards for Internal Control in the Federal Government* states, "Management clearly documents internal control and all transactions and other significant events in a manner that allows the documentation to be readily available for examination. The documentation may appear in management directives, administrative policies, or operating manuals, in either paper or electronic form. Documentation and records are properly managed and maintained."

Recommendation 2

We recommend that DCSA verify that all Federal Investigator check rides closed in the database are thoroughly completed, properly signed, and reviewed in accordance with procedures.

DCSA's Response:

"Non-concur. The OPM OIG did not consider that the information absent from the database may exist in other forms or other locations"

OIG Comment

NBIB's *Field Operations Standard Operating Procedures Check Ride August 2018* states, "After both parties have signed the form, the creator must 'complete' it (close) in the database." NBIB did not communicate to the OIG that the check ride information may exist in other forms or other locations outside of the database and their written procedures do not address information being stored outside of the database.

When we requested supporting documentation for our samples, NBIB could have explained why there was information missing from their database and provided documentation, such as the "hard copies of the check ride form(s) preserved by supervisors in the local field offices or by electronic signatures stored elsewhere," that they mentioned in their response. However, an explanation was not provided during our audit. Further, DCSA did not provide any supporting documentation to show that the check ride forms were actually completed.

Recommendation 3

We recommend that DCSA implement internal controls to ensure that the contracting officer's representative validates information included in the contractor's check ride report(s) submitted to DCSA. Controls should include maintenance of documentation supporting the contracting

officer's representative validation of the information, to include but not be limited to, the supporting documentation, exceptions, and follow-up questions with the contractor.

DCSA's Response (to Draft Recommendation):

“Non-concur. NBIB Contractors provided, or attempted to provide, evidence that all check-rides were performed to OPM OIG. The OPM OIG did not consider mitigating information provided by CACI and Perspecta in October 2019. Therefore, there is no evidence that check-rides were not performed or documented. Further, it is not prudent, reasonable, or a cost-effective use of DCSA's resources to recommend that all contractor check-ride documentation be reviewed, as there are over 4,000 contract investigators.”

OIG Comment

On April 18, 2019, during our fieldwork, CACI provided an Excel spreadsheet with the results of the check rides; however, neither CACI nor NBIB provided the actual check ride forms, as we requested. Therefore, we could not validate the information on the Excel document without tracking it back to at least a sample of the check ride forms. On October 15, 2019, DCSA provided 9 check ride forms instead of the 20 check ride forms we requested during our fieldwork. We reviewed the 9 forms and updated our finding to show that we did not receive the remaining 11 check ride forms.

Recommendation 4

We recommend that DCSA implement controls to review and approve Investigations Case Analyst telework agreements to ensure all personnel who telework have current agreements on file. Without approved telework agreements, employees should immediately cease teleworking.

DCSA's Response:

“Non-concur. DCSA believes it has sufficient controls in place to ensure all employees who telework have a signed telework agreement. We found that all six of the employees the OPM OIG deemed to be missing telework agreements did in fact have telework agreements signed and readily available.”

OIG Comment

Our finding from the draft report has been revised based on DCSA's response to the draft report; however, we found that one of the Investigations Case Analyst had not signed the most recent telework agreement, “Updated Telework Guidelines-FINAL 1.24.2019.” The Quality Oversight Program Manager for Quality Review provided the OIG an email dated Wednesday,

February 20, 2019, that reads “The telework documents have been blessed at all levels and we can now implement”; however, the telework agreement provided was dated April 27, 2015.

Recommendation 5

We recommend that DCSA implement controls to ensure that telework manifests are accurately completed for all cases used while teleworking.

DCSA’s Response:

“Non-concur. All manifests are completed in adherence to established policy and contain the necessary information. Additionally, case names are no longer required to be included on manifests, per NBIB’s updated PII Policy, which was disseminated subsequent to the completion of the OIG’s fieldwork and prior to the draft audit report. Furthermore, Quality Oversight telework manifest auditing practices already exist.”

OIG Comment

During the time period included in our audit, NBIB’s Policy on the Protection of PII states that “At a minimum the manifest will contain the following information: 1. date of the manifest[,] 2. staff name[,] 3. case name (last), case number[, and] 4. identification of the document(s) (case papers, release (s)/type of release(s), entire file)[.]” In its response, DCSA stated that an updated policy was disseminated after we completed our fieldwork. However, DCSA did not provide a copy of the updated PII policy, showing that case names are no longer required to be included on the manifests, to the OIG. Further, the policy in place when the reviewed manifests were created required the inclusion of the case name. The subsequent removal of that requirement applies to manifests created after the implementation of the updated policy, not to those created under the prior policy. In addition, many of the manifests did not include identification of the documents that the Investigations Case Analyst removed from the office during telework, which was and apparently still is a requirement. Therefore, the oversight of the telework manifests is not effective and additional controls are warranted.

Recommendation 6

We recommend that DCSA strengthen internal controls to ensure all required forms are completed for quality reopen cases.

DCSA’s Response:

“Non-concur. All eight of the Quality Rating Forms found to have been missing in the audit were in fact completed. An OPM OIG misinterpretation of NBIB terminology regarding the Quality Rating Form, led to the conclusion that a (physical) form was required and thus was not completed- where in fact the Quality Rating Form had been

completed for all sample cases. Additionally, two out of the three cases OPM OIG concluded were missing the Reopen Request Form did not require the form. DCSA believes there are strong internal controls in place and there is no specific action identified in the recommendation to implement at this time.”

OIG Comment

On April 11, 2019, the OIG requested the “Quality Rating Form” for all reopen cases due to Quality error. On April 29, 2019, NBIB responded to our information request but did not provide the quality rating forms. During our audit, NBIB did not provide documentation or explanations stating that the quality rating form is not a physical form; that the information could have been located elsewhere; or that some of our sampled cases did not require the form, including an explanation of why the form was not required. As part of DCSA’s response to the draft report, they still did not provide support to show that “All eight of the Quality Rating Forms found to have been missing in the audit were in fact completed.”

NBIB’s Reopen Standard Operating Procedures, which were applicable during our audit, states OPM’s current policy requires OPM approval to reopen any closed investigations to conduct additional fieldwork and/or National Agency Check items. As a result, when an adjudicating agency or another FIS group determines additional work is needed for a closed case, they submit a request detailing the required work that needs to be completed. In addition, nowhere in NBIB’s procedures did it state that the form is not required due to an internal quality audit.

Recommendation 7

We recommend that DCSA maintain documentation to show that deficient cases received a final satisfactory rating.

DCSA’s Response

“Non-concur. DCSA already maintains documentation to show that deficient cases receive a final satisfactory rating. The OPM OIG identified three of five cases that were allegedly missing the final rating within the Quality Tool. A review of the OPM OIG sample data by DCSA Subject Matter Experts, determined that two of the three cases did in fact receive the required training. The remaining case was entered into the Quality Tool and due to the passage of time, it could not be determine if the lack of a final rating was due to user or system error. DCSA believes there are strong internal controls in place and there is not specific action identified in the recommendation to implement at this time. The final closing of a case, by DCSA Quality review staff, in and of itself established a final satisfactory case.”

OIG Comment

Based on DCSA's response to our draft report, we agree that only one case did not receive a final satisfactory rating and we updated the finding accordingly. However, since DCSA could not determine if the lack of a final rating was due to user or system error shows they do not have strong internal controls.

Recommendation 8

We recommend that DCSA strengthen its controls to ensure that the required number of testimonies for all Investigative Analysts are completed.

DCSA's Response:

“Non-concur. While DCSA accepts in principle that FIRE AFLC should strengthen controls to ensure that the required number of testimonies for all IAs are completed, due to the methodical deficiencies documented in the previous section, it considers the finding to be invalid. Additionally, the recommendation fails to identify the specific, corrective actions.”

OIG Comment

Although DCSA stated that they do not concur, they accepted that FIRE AFLC should strengthen controls to ensure that the required number of testimonies for all Investigative Assistants are completed. The reason for the non-concurrence is another example of DCSA's disregard of the need to improve controls, even ones that they acknowledge could be strengthened, simply because DCSA takes issue with the audit methodology and mistakenly believes that it was deficient. This pattern of disregarding legitimate issues is disturbing as it is further evidence of DCSA's unwillingness to consider and implement practical control improvements.

Recommendation 9

We recommend that DCSA immediately update the re-contact letter SOP to include current practices and implement procedures to ensure the SOP is reviewed and updated as needed.

DCSA's Response:

“Non-concur. The Re-Contact Letter SOP is reviewed on a bi-annual basis or whenever procedures are modified. The information cited on page 18 of the draft audit report regarding US Investigative Services and annual costs calculations was removed from the current version of the SOP.”

OIG Comment

During our audit, the Re-Contact Letter SOP that was provided for our scope contained outdated information. DCSA did not provide an updated Re-Contact Letter SOP to support that the information cited in our finding has been removed from the current version of the SOP.

C. Training

NBIB requires Investigations Case Analysts to complete the Investigations Case Analyst Program. NBIB did not provide sufficient documentation to support that 36 out of 379 Investigations Case Analysts we tested completed the Investigations Case Analyst Program. NBIB stated that the 36 Investigations Case Analysts completed their initial training prior to the creation of NBIB's National Training Center. We requested the name of the training that the Analysts would have completed and documentation to support that they completed training; however, NBIB did not provide any documentation. For subsequent training, which was taken at the National Training Center, NBIB provided PDF copies of the agendas or sign-in sheets with the title of the class typed in a text box onto the PDF document. Because the name of the course was added to the original sign-in sheet, instead of being imprinted on the original document, we do not know if the sign-in sheets were for the actual training course and therefore, we do not deem them acceptable proof of completion of training. Details of our results were provided to NBIB separately from this report.

We also noted that none of the 65 Investigative Assistants working for AFLC received standardized formal training. When we inquired about the training requirements for Investigative Assistants, the Lead Investigations Case Analyst Trainer for AFLC prepared a document outlining the training program and provided it to us. The trainer confirmed that the document was created for us and that there was no documented standardized formal training program for the Investigative Assistants. The trainer also stated that they conduct on-the-job training. An Investigations Case Analyst for the AFLC Training Team trains the Investigative Assistant and once the on-the-job training is complete, the supervisor sends an email to the, AFLC Program Manager, Supervisory Investigations Case Analyst, Investigative Assistant, and all of the Supervisory Team Leaders stating that the Investigative Assistant has successfully completed the requirements for the position and is released from training. The trainer provided an example of an email, dated February 13, 2019, and stated that the emails were the only document that was maintained to support that the Investigative Assistants had been trained. By not having a formal, documented training program in place, Investigative Assistants may not be receiving consistent or sufficient training, and may not have been trained properly to perform their duties, which could lead to delays and errors in processing cases.

The U.S. Government Accountability Office's Standards for Internal Control in the Federal Government, Principle 4, states, "Management [should establish] expectations of competence for

key roles, and other roles at management’s discretion, to help the entity achieve its objectives. Competence is the qualification to carry out assigned responsibilities. It requires relevant knowledge, skills, and abilities, which are gained largely from professional experience, training, and certifications.”

In addition, Principle 10 - Design Control Activities, advises, “Management designs control activities in response to the entity’s objectives and risks to achieve an effective internal control system. Control activities are the policies, procedures, techniques, and mechanisms that enforce management’s directives to achieve the entity’s objectives and address related risks ... [and] clearly documents internal control ... in a manner that allows the documentation to be readily available for examination. The documentation may appear in management directives, administrative policies, or operating manuals, in either paper or electronic form. Documentation and records are properly managed and maintained.”

Recommendation 10

We recommend that DCSA improve internal controls to ensure that completion of all training is documented and maintained. At a minimum, the original documentation should clearly identify the name of the training, date of the training, and the name of the person who completed the training.

DCSA’s Response (to Draft Recommendation):

“Non-concur. ... Training records for all Investigations Case Analyst were provided to the OPM OIG during their fieldwork.” In addition, DCSA stated that “During the audit, NBIB’s Automated Federal Leads Center employed a Training Team, comprised of three trainers who implemented AFLC’s official training program. The training program utilized a blend of class-room style (instructor-led) training, job aides and on-the-job (OTJ) training with a trainer/mentor, and a standardized 100 percent quality review of new IA [Investigative Assistant] work.”

OIG Comment:

Our finding and recommendation from the draft report has been revised based on DCSA’s response to the draft report.

As stated in our finding, during our audit, the Lead Investigations Case Analyst Trainer for AFLC, who was a part of the Automated Federal Leads Center training team, informed us that there was no documented standardized training program for the Investigative Assistants. Although DCSA’s response states that there was an official training program that included various components, they did not provide any supporting documentation to show that there was a program in place or that the 65 Investigative Assistants completed said program.

Recommendation 11

We recommend that DCSA formally document their training program for Investigative Assistants. At a minimum, the training program should outline the requirements for Investigative Assistants and should include control activities to ensure that completion of the training is documented and maintained.

DCSA's Response:

This is a new recommendation that was not included in our draft audit report; therefore, DCSA was unable to respond.

APPENDIX

MEMORANDUM FOR OFFICE OF PERSONNEL MANAGEMENT
(ATTN: NICOLE BROWN-FENNEL)
INTERNAL AUDITS GROUP CHIEF (OFFICE OF THE
INSPECTOR GENERAL)

SUBJECT: Defense Counterintelligence and Security Agency Response to the Office of Personnel Management, Office of Inspector General Report Number 4A-IS-00-18-042, Audit of the National Background Investigations Bureau's Backlog of Background Investigation Cases and the Effectiveness of NBIB's Quality Assurance Process

The Defense Counterintelligence and Security Agency (DCSA) appreciates the opportunity to review the subject draft audit report of the Office of Personnel Management's, Office of the Inspector General (OPM OIG). DCSA non-concurs with the findings and recommendations within this audit report because the OPM OIG:

- Did not establish "significance" with respect to all findings and conclusions,
- Did not identify specific, practical, cost-effective, and/or measurable actions within all recommendations,
- Did not identify audit program-specific criteria or perform sufficient audit work to support all findings; and,
- Did not accurately and/or adequately provide support for all findings.

In addition, and as noted in Footnote 2 of the draft OPM OIG report, the resources, personnel and functions transferred entirely to DCSA, a U.S. Department of Defense (DoD) Agency, effective October 1, 2019. This transfer was directed by Executive Order 13869, issued on April 24, 2019. OPM OIG initiated its audit of the National Background Investigations Bureau (NBIB) on February 28, 2019, after the announcement of the pending transfer of the program from OPM to DoD and during the time when the text of the pending executive order was being finalized by DoD, OPM, the White House and other Federal agencies. The OPM OIG continued its audit of NBIB until July 18, 2019, and issued the current draft audit report on January 14, 2020, after NBIB ceased to operate as an agency, and after the operations of the former NBIB had been transferred entirely from OPM to DoD.

As preliminary matters before DCSA comments on specific findings, we note the following general issues with the report.

Audit Findings Lack Significance:

The Generally Accepted Government Auditing Standards (GAGAS), state that "*the concept of significance assists auditors throughout a performance audit, including when deciding the type and extent of audit work to perform, when evaluating results of audit work, and*

when developing the report and related findings and conclusions”¹. Significance is: “the relative importance of a matter within the context in which it is being considered.”

Throughout the audit report, the OPM OIG failed to demonstrate any significant or measureable linkage between its objectives, findings, and recommendations and NBIB’s performance, the investigations backlog, or case oversight processes. DCSA contends that even if the OPM OIG’s findings were valid, that failure to implement the OPM OIG’s recommendations would have no measureable negative impact on the now eliminated backlog of background investigations cases and continuously improving quality assurance processes.

From April 2, 2018 to January 21, 2019, the background investigation case inventory decreased from approximately 726,000 cases to approximately 220,000 cases- the latter number being one that the OPM OIG identifies on page 5 of their report to be a “*normal case pending inventory*.” But with respect to backlog reduction, the OPM OIG’s audit objectives and findings focus solely on materially insignificant mathematical discrepancies and unsupported issues with NBIB’s inventory reporting. There is no more relevant and significant measure of DCSA’s backlog reduction performance than the elimination of backlog of case inventory, which is unmentioned within this report.

During the same timeframe, with respect to the case oversight process referred to by the OPM OIG, NBIB:

- Implemented the Director of National Intelligence’s Quality Reporting Tool (QART) - a source of direct quality assessment and feedback from customer agencies. Each year over 20,000 cases are evaluated by customer agencies through this tool.
- Reinstated and significantly increased the “random review” of closed cases.
- Implemented an audit program for Case Reviewers that examines system activity to assess the thoroughness of the quality review process.
- Implemented a change to the Reimbursable Suitability Investigations (RSI) process to resolve developed issues prior to sending an RSI to the requesting agency.
- Established a semi-annual Quality Report that consolidates all data from the various quality assurance processes and provides metrics and trends.
- Conducted “root cause” analyses of trends identified in the aforementioned semi-annual Quality Report. These analyses are disseminated to the Quality Oversight and Field Operations directorates, as well as the National Training Center and Office of Policy, Strategy and Business Transformation.
- Implemented quarterly meetings and roundtables between Quality Assurance and Investigations Quality Review Branch Chiefs.

As a result, cases re-opened because of quality issues identified by customer agencies represented less than 1 percent of NBIB’s investigative case output. But with respect to the case oversight process, the OPM OIG’s methodology and findings focused solely on office-level mentoring or administrative processes. In the view of DCSA, the significant measure of the

¹ GAGAS 6.04

“effectiveness of the quality assurance process” was NBIB’s nearly-null customer agency re-opened case percentage, which is also unmentioned within this report.

Overly-Broad Recommendations: Many of the OPM OIG’s recommendations are variations on the statement “*implement (or strengthen) internal controls for... (insert the subject matter of the finding).*” GAGAS states that “*Recommendations are effective when ... the recommended actions are specific, practical, cost effective and measurable.*”² Contrary to this GAGAS standard, these recommendations do not provide specific, practical, and measurable actions, nor do they consider cost-effectiveness.

Methodological Deficiencies: Per GAGAS, “*Auditors should design the (audit’s) methodology to obtain reasonable assurance that the evidence is sufficient and appropriate to support the auditor’s findings and conclusions in relation to the audit objectives*”³. To support findings B and C, and associated recommendations 2-11, the OPM OIG requested NBIB provide specific documents to support its audit tests, which are referred to as “samples.” NBIB provided these documents. The OPM OIG then generated their own data, based upon their perceived sufficiency of the documents provided to satisfy their interpretation of particular audit criteria. To support the OPM OIG’s work, during the audit exit conference⁴, NBIB requested that its Subject Matter Experts review the OPM OIG’s underlying self-generated data to help ensure:

- 1) Criteria documents (typically NBIB policies) were accurately interpreted,
- 2) “Sample” documentation provided were correctly interpreted; and,
- 3) Requested documentation were the most-applicable and comprehensive.

OPM OIG Senior Leadership agreed to this request. Subsequently, on conference calls, with multiple NBIB Subject Matter Experts, the OPM OIG Auditor-in-Charge stated the audit team had concluded their fieldwork and would not consider any additional information or documentation regarding its evidence (the self-generated data), even if the information would correct errors or provide relevant context; this statement was reiterated various times between the initial exit conference and the release of the OPM OIG’s draft audit report, nearly 6 months following the audit exit conference. The OPM OIG never informed NBIB of a specific fieldwork closure date, nor did they allow NBIB to review their self-generated data or notify NBIB of matters they deemed significant⁵ during fieldwork⁶. DCSA contends that prohibiting an auditee from providing information to correct errors within their methodology or analysis because of their internal timeline, prior to issuance of their audit report, impairs the report’s integrity and objectivity, and stands in opposition to the OPM OIG’s adherence to Government Auditing Standards, which are intended to “*provide a framework for conducting high quality audits with competence, integrity, objectivity, and independence*”⁷.

² GAGAS 7.29

³ GAGAS 6.10

⁴ Conducted on July 18, 2019

⁵ Significant used in the context of inclusion in the audit report, rather than GAGAS’s definition.

⁶ GAGAS 6.78 Early Communication of Deficiencies- “Auditors report deficiencies in internal control, fraud, noncompliance with provisions of laws, regulations, contracts, or grant agreements, or abuse. For some matters, early communication to those charged with governance or management may be important because of their relative significance and the urgency for corrective follow-up action.”

⁷ GAGAS1.04

Over seventy-five days after the exit conference⁸ and several days after NBIB transitioned to DoD, the OPM OIG provided its self-generated data to DCSA. Upon receiving the data, Subject Matter Experts, who by then were DCSA employees, identified multiple instances where:

- 1) NBIB records the OPM OIG claimed were missing were provided during the audit's fieldwork phase,
- 2) NBIB contractor records the OPM OIG claimed were missing were provided during the audit's fieldwork phase; and,
- 3) The OPM OIG omitted that NBIB Subject Matter Experts informed them during fieldwork interviews that a/the conclusion(s) they were drawing from their "samples" were not valid because the auditors 1) had not properly understood criteria documentation, or 2) requested irrelevant or insufficient documentation, or 3) simply did not acquire appropriate evidence, to support broad findings.

Additionally, the OPM OIG Auditor-in-Charge informed DCSA that the only method to provide corrections to factual inaccuracies or contextual information to the audit report would be within the official agency response. To comply with the OPM OIG's instructions, DCSA's Subject Matter Experts provided, and in the sections below, again provides the following corrections to factual inaccuracies and contextual information regarding NBIB's control environment, which note flaws and inaccuracies in the OPM OIG's findings, in the sections below.

Agency Responses, Corrections to Factual Inaccuracies and Contextual Information, per Finding and Associated Recommendation:

Finding A) *NBIB could not provide sufficient and appropriate documentation to validate data included in their reports. As a result, we were unable to validate the increase/decrease of their reported inventory of cases*

Per GAGAS, auditors should identify criteria, such as a law, regulation, contract, grant agreement, standard, specific requirement, measure, expected performance, defined business practice, and/or benchmark against which performance is compared or evaluated⁹. For this finding the OPM OIG cites a broad GAO internal control principle as the criteria, namely "*Management clearly documents internal control and all transactions and other significant events in a manner that allows the documentation to be readily available for examination.*" To be clear, NBIB documented and provided to the OPM OIG supporting documentation (e.g. detailed reports, programmed and validated summary reports, calculations, and methodology) for every vintage of the KPIs and SECRET Act Report, during the audit. In fact, the OPM OIG states that they were able to "*calculate the increase/decrease based on the Current Inventory statistics reported on the KPI report*" and determined that "*NBIB complied with the SECRET Act by submitting the required reports*" on pages 12 and 13 of their report, thus satisfying NBIB-specific reporting requirements.

⁸ On October 3, 2019

⁹ GAGAS 6.37

OPM's Office of Chief Information Officer (OPM CIO) was, at the time of the OPM OIG audit, the "owner" of background investigation case data¹⁰ and the Personnel Investigations Processing System (PIPS) in which that data is stored. OPM CIO also "owns" the Dashboard Management Reporting System (or Dashboard) - an interface which generates reports from PIPS. NBIB was an authorized user, not the system owner, of PIPS and Dashboard, which it used to generate the KPIs and SECRET Act reports. Unfortunately, the OPM OIG failed to provide criteria requiring NBIB to document another Federal agency's transactional records, namely OPM CIO's historical PIPS records, to validate Dashboard reports against. To DCSA's knowledge, no such requirement exists. Additionally GAGAS states that "*Recommendations are effective when they are addressed to the parties that have the authority to act*".¹¹ As OPM CIO owns both PIPS and the Dashboard interface, any recommendation regarding the maintenance of transactional records and validation data for these systems should be addressed to the OPM CIO, as they would have "the authority to act" if disparities were discovered. Without the clear establishment of criteria requiring DCSA to maintain the OPM CIO's transactional records and validate data within the OPM CIO's information systems, the OPM OIG has failed to establish the elemental requirements for a finding and is without grounds to make a recommendation or require corrective action from DCSA.

Furthermore, for reasons not apparent in the draft OPM OIG report, the OPM OIG did not validate Dashboard reports against PIPS data, despite the fact that OPM OIG has the authority to request data from the OPM CIO, the actual system owner. Such a validation is the only method to satisfy the audit's first objective "*determine if the reported backlog of background investigation cases was accurate.*" At any time during the audit, the OPM OIG could have requested the OPM CIO pull data using the same query fields at the same time as a KPI or Secret Act Dashboard report¹², and compare outputs. On multiple occasions during this audit NBIB Subject Matter Experts informed the OPM OIG of the MOU between NBIB and OPM CIO, NBIB's status as a PIPS user, and provided source data for the KPIs and SECRET Act reports, and referenced calculations, where applicable. This audit spanned 19 weeks and 2 quarters; as KPIs are generated weekly and SECRET Act reports quarterly, the OPM OIG had 21 collective opportunities to conduct this validation during the audit and provided NBIB no explanation as to why they chose not to. Therefore, without a validation of OPM CIO's data, the OPM OIG lacks any evidence, let alone relevant, sufficient, and/or appropriate evidence, to support any finding about the accuracy of data within NBIB's KPI's or SECRET Act reporting.

In response to the specific findings in the draft OPM OIG report, DCSA provides the following comments:

Finding A: Factual Inaccuracies and Contextual Information:

- The OPM OIG stated, "*NBIB stated that it could not accurately reproduce the summary data used for previous reports,*" on page 14. This statement is inaccurate. NBIB maintained historical records of summary level inventory data. The issue presented by the

¹⁰ All background investigation case material formerly owned by NBIB and OPM was transferred to DCSA ownership by agreement between DOD and OPM, effective October 1, 2019.

¹¹ GAGAS 7.29

¹² Applying any applicable calculations, and methodology.

OPM OIG was regarding detailed case listings. DCSA notes that, as of July 2019, NBIB/DCSA maintained detailed case listings.

- The OPM OIG stated, “*We determined that in the mitigation plan NBIB used the wrong total for Federal and contractor Investigators when calculating the increase in its investigative workforce. The mitigation plan stated, ‘NBIB increased the capacity of its investigative workforce from 5,843 Federal and contractor Investigators on October 1, 2016 to 8,800 as of November 2018, an increase of 48 percent.’ While verifying the calculation, we noted that the increase should be approximately 51 percent based on the cited workforce statistics. NBIB acknowledged that the number of Federal and contractor Investigators as of November 2018 should have been 8,665 instead of 8,800. The increase from 5,843 to 8,665 represents the 48 percent increase,*” on page 15. This is inaccurate. During the audit, the OPM OIG requested NBIB “provide supporting calculation of the increase of 48 percent.”¹³ As further outlined below, the total for Federal and contractor Investigators stated in the mitigation plan is correct. The reported increase of 48 percent stated in the mitigation plan is incorrect. NBIB identified and explained that the 48 percent calculation was an error due to version control. NBIB then reported the correct percentage (51 percent) to the OPM OIG.
- The OPM OIG stated, “*Lastly, we determined that in the mitigation plan NBIB used the wrong total for Federal and contractor Investigators when calculating the increase in its investigative workforce*” on page 15. This is inaccurate. The total for Federal and contractor investigators stated in bullet two of the Executive Summary of the Backlog Mitigation Plan, dated December 2018 is correct. “*NBIB increased the capacity of its investigative workforce from 5,843 Federal and contractor investigators on October 1, 2016 to 8,800 as of November 2018.*”
- The OPM OIG’s statement, “*The mitigation plan stated, ‘NBIB increased the capacity of its investigative workforce from 5,843 Federal and contractor Investigators on October 1, 2016 to 8,800 as of November 2018, an increase of 48 percent. While verifying the calculation, we noted that the increase should be approximately 51 percent based on the cited workforce statistics,*” is inaccurate. DCSA identified and explained that the 48 percent calculation was an error due to version control. DCSA reported the correct percentage (51 percent) to the OPM OIG in response to an OPM OIG fieldwork information request. NBIB stated the investigative workforce increased “*from 5,843 on October 1, 2016 to 8,800 as of November 2018, which is approximately a 51 percent increase when rounded.*” NBIB went on to explain that “*When the Backlog Mitigation Plan began final internal coordination, the document showed the investigative workforce increasing from 5,843 on October 1, 2016 to 8,665 as of September 2018, an increase of 48 percent.*” When the total was updated within the November figure, the percentage showing the increase was inadvertently missed and therefore was reported erroneously.

¹³ OIG Fieldwork Information Request #24

- The OPM OIG’s statement, “NBIB acknowledged that the number of Federal and contractor Investigators as of November 2018 should have been 8,665 instead of 8,800. The increase from 5,843 to 8,665 represents the 48 percent increase,” is inaccurate. Again, the number (total) for Federal and contractor investigators stated in bullet two of the Executive Summary of the Backlog Mitigation Plan, dated December 2018 is correct. “NBIB increased the capacity of its investigative workforce from 5,843 Federal and contractor investigators on October 1, 2016 to 8,800 as of November 2018,” which is a 51 percent increase. NBIB identified and explained that the 48 percent calculation was an error due to version control. NBIB reported the correct percentage (51 percent) to the OPM OIG.
- The OPM OIG stated, “For example, we calculated a decrease of 18,274 in the case backlog by subtracting 700,879 cases in Current Inventory for the current week from the previous total of 719,153. We requested documentation to support the completion of the 18,274 cases; however, NBIB was unable to provide details to support the decrease,” on page 12. This statement suggests the change in inventory is only a function of completed cases. Rather, as stated during discussions with the OPM OIG and as shown in the KPIs, there are thousands of investigations scheduled and completed each week. Both of these metrics factor into the change in inventory. It is incorrect to state the inventory reduction of 18,274 implies DCSA only completed 18,274 cases during the period.
- The OPM OIG stated, “We reviewed the Report on Backlog of Personnel Security Clearance Investigation, September 2018 and the FY 2019, Quarter 1 Update to the Report on Backlog of Personnel Security Clearance Investigations, 2019 and requested documentation to support the data reported in each of these reports. NBIB provided an Excel spreadsheet (see Exhibit 3) as documentation to support the data in the reports ... The Excel spreadsheet was produced based on our request and the figures in the spreadsheet were hard coded (no formulas or links to other documents) and were not supplemented with supporting documentation. NBIB also provided a Word document (see exhibit 4), which provided an explanation of the origins of the figures in the Excel spreadsheet,” on page 13. The supporting documentation for the SECRET Act reporting would not contain formulas or links to other documents. The data is captured using a report built (created) in the Dashboard Management Reporting System on June 6, 2018 and last modified on June 12, 2018. The report output is specifically programmed to satisfy the SECRET Act requirements. As OPM OIG acknowledges, “The data constantly changes from minute to minute based on the case actions. Due to these changes, the historic data files for previous dates cannot be accurately reproduced, unless the data was previously stored” on page 14. Since the time of the audit, the statistical report has been enhanced to include a pending case listing as a tab on the existing Excel spreadsheet. The case listing provides verification for the various case categories.

Finding A Recommendation:

1) Non-concur. NBIB maintained proper, required documentation to support all background investigations data, including the investigation case backlog, which is reported in the

weekly KPI and quarterly SECRET Act reports. Documentation included detailed reports, programmed and validated summary reports, calculations, and methodology, as deemed appropriate, to ensure the data is valid, complete, and transparent.

Furthermore, DCSA conducts ongoing efforts to improve products, services, and processes. For example, as stated above, the quarterly SECRET Act query has been amended to a generated case listing in case it should be needed in the future. Additionally, as part of our continuous process improvement efforts, DCSA has improved its reporting capability with the functionalities available in its reporting system. We established a set of “datamarts,” designed to query and hold multiple years’ worth of data at the case level. As such, DCSA is now able to produce case listings related to all workload data (including the inventory) reported in its weekly KPIs for any date from July, 8, 2019 to present. Moving forward, DCSA is working to migrate other report topics to datamarts to enable this detailed capability.

Finding B) *NBIB and its contractors did not follow policies and procedures for case processing oversight in the following areas – check rides; telework; reopen cases; deficient cases; and other investigative quality checks*

The OPM OIG’s evidence is insufficient to support this conclusion and fails to establish relevance¹⁴, as defined by GAGAS. The check ride and telework program, cited by the OPM OIG as evidence to support finding B, are considered (one of many) office-level mentoring or administrative processes, and do not represent the primary control activity for the “*background investigations case oversight process*.” Drawing conclusions about the “background investigations case oversight process” citing office-level mentoring or administrative processes is tantamount to the OPM OIG drawing conclusion about their own audit oversight process, by the reviewing a small percent of auditor telework agreements for signatures, rather than reviewing documentation within their audit files. GAGAS states “*Evidence is not sufficient or appropriate when... the evidence does not provide an adequate basis for addressing the audit objectives or supporting the findings and conclusions. Auditors should not use such evidence as support for findings and conclusions*”¹⁵. Additionally, OPM OIG’s evidence to support findings regarding re-opened cases or deficient cases and testimony review forms are invalid due to methodological or factual inaccuracies described in the following section.

NBIB’s Quality Oversight directorate (Quality Oversight), is responsible for reviewing NBIB background investigations, both Federal and contractor, to ensure compliance with the Federal Investigative Standards. The OPM OIG omitted from this report that Quality Oversight’s work (referred to as case review) is the primary control mechanism for the “*background investigations case oversight process*.” DCSA is unsure why the OPM OIG did not assess the performance of Quality Oversight’s case review control activities, as they would constitute the most-adequate basis for addressing the audit objectives and supporting findings and conclusions. Therefore the OPM OIG’s finding B, lacks the significant evidence to adequately satisfy their

¹⁴ GAGAS 6.60, a. “*Relevance refers to the extent to which evidence has a logical relationship with, and importance to, the issues being addressed*”

¹⁵ GAGAS 6.71, b. (3)

objective “*determine if NBIB Federal and contract staff are following procedures for the case oversight process.*”

Finding B Factual Inaccuracies and Contextual Information ¹⁶:

- The OPM OIG stated “*These three directorates, along with the Integrity Assurance, Compliance, and Inspections (IACI) office, are largely responsible for addressing the backlog of background investigation cases and overseeing the quality assurance process of all cases. The IACI office is responsible for ensuring the overall integrity of NBIB investigative products, agency staff, and resources. They conduct inspections on various aspects of the investigative output performed by NBIB’s Federal and contractor staff; conduct scheduled and random audits of cases to ensure cases meet quality standards; and address quality issues identified on a case before it is completed*” on page 2. This is inaccurate as IACI had no direct relationship with the “*backlog of background investigation backlog*” nor did it have a direct relationship with the “*quality assurance process of all cases.*” IACI was a separate directorate, reporting directly to the Director of NBIB, with responsibility for investigating allegations of misconduct and conducting inspections of contractor deliverables, separate and apart from NBIB’s regular Quality Oversight Process.

The investigation of alleged conduct violations include, but are not limited to, fraudulent time and attendance reporting, misuse of a Government Owned Vehicle, professionalism concerns, and the submission of inaccurate or falsified investigative reports, etc. - none of which have any direct or material effect on “*backlog of background investigation cases and overseeing the quality assurance process of all cases.*” IACI does not “*conduct audits of cases to ensure it meets quality standards.*” In cases where misconduct includes reporting of inaccurate investigative records, the records are “re-worked” and subject to regular quality oversight processes.

Furthermore, IACI’s inspections are conducted on investigative process outputs performed by NBIB’s field and support contractor. No inspections are conducted on the overall case quality by the Inspections branch. At the time of this audit, no inspections were performed on the Federal staff, by IACI.

Additionally, for the reasons listed above, the classification of the IACI directorate under the “Quality Oversight” (page 2) and “Case Oversight Process” (page 3) section headers misrepresents IACI’s mission and objectives and is contrary to both the organizational charts and briefings provided to the OPM OIG.

- The OPM OIG stated “*(the) Inspections group - conducts inspections on various aspects of the investigative output performed by NBIB’s Federal and field contract employees, as well as the major support and consolidated leads contracts. The inspections can be either scheduled, random, or quarterly. These inspections assess policy compliance and*

¹⁶ Some factual inaccuracies included in this section of DCSA’s agency response are reported in the Background section of the audit report, but pertain to finding B and its associated recommendations.

performance in relation to contract performance standards and requirements. In addition to conducting these inspections, they are responsible for addressing all quality issues before the case is completed” on page 3. This is inaccurate as IACI’s Inspection branch does not have any responsibility for addressing the quality issues before a case is completed as this would be addressed by Quality Oversight’s directorate. As previously noted, IACI’s Inspection branch was not responsible for inspections on NBIB’s Federal staff at the time of this audit. Inspections are, primarily, performed in accordance with an established inspection schedule which determines the frequency of the inspections. A random sampling is utilized for each inspection unless a targeted inspection is necessary to assess an overall issue.

- The OPM OIG stated “*(the) Special Investigations group - ... handles complaints made by Federal Employees*” on page 3. This is inaccurate because, although the Special Investigations group handles complaints made regarding NBIB Federal employees, any party can submit a complaint to IACI, through various methods. During initial case processing, the Special Investigations groups intakes cases involving Federal Employees.
- The OPM OIG stated “*The information provided in the returned re-contact letters may be used to determine potential falsification by the Investigator. The IACI program office receives all instances of developed information for further examination to determine Investigator involvement, or if additional investigative work is needed.*” on page 4. This is inaccurate because the IACI directorate only receives instances of alleged inaccurate reporting or misconduct; routine letters or those with other developed information are handled outside of IACI.
- The OPM OIG stated “*In 2014, OPM cancelled the contract between FIS and one of its field contractors.... As a result, the inventory of background investigations increased to approximately 700,000*” on page 4. This is inaccurate because (a) OPM declined to exercise its remaining options on the contract with the vendor, and – as such – the contract was not cancelled and (b) the declination to exercise contractual options with this vendor was not the only contributing factor to inventory growth. Changes in the Federal Investigative Standards and technological limitations, among other factors, can also be cited as causes.
- The OPM OIG stated “*11 out of 20 CACI check ride samples did not have a check ride form.*” on page 16. This is factually incorrect because electronic check ride results for the Investigators were previously provided to the OPM OIG in April 2019. Unfortunately, within the OPM OIG’s sample data received by DCSA in October 2019- after the OPM OIG’s closure of fieldwork- determined that the check ride forms did not exist. Upon learning about the OPM OIG’s erroneous determination- CACI explained that, at the time these check rides were conducted, it utilized an electronic storage method for the check ride results and therefore did not maintain physical check-ride forms- which is contractually permissible. CACI provided this explanation to the OPM OIG in October 2019, but it appears this information was not considered. As noted previously in our response, the OPM OIG Auditor-in-Charge both stated and actually failed to consider

information that was provided or submitted after the conclusion of fieldwork, but prior to the release of the draft audit report.

- The OPM OIG stated “*Keypoint did not provide check ride forms for two out of the 20 samples.*” on page 16. This is factually incorrect because NBIB provided the 2 check-ride forms to the OPM OIG. Unknown to NBIB, Perspecta¹⁷ inadvertently failed to attach the 2 check ride forms to an email to the OPM OIG Auditor-in-Charge, during fieldwork. Once the error was detected in October 2019, the contractor immediately provided the check ride forms to NBIB, who provided them to the OPM OIG. As noted previously in our response, the OPM OIG Auditor-in-Charge both stated and actually failed to consider information that was provided or submitted after the conclusion of fieldwork, but prior to the release of the draft audit report.
- The OPM OIG indicates, on page 9, that the “*Total Universe of Contractor Employee Check Rides was 4,204, with 80 total samples selected, for a sample size of 1.9 percent. Further, the Total Universe of Federal Employee Check Rides was 1,529, with 40 total samples selected, for a sample size of 2.6 percent.*” In addition, the OPM OIG recognizes a Total Universe of Contractor Background Investigators of 6,654, with 20 samples selected, for a sample size of 0.3 percent. Lastly, the Total Universe of Federal Background Investigators was 1,633, with 5 samples selected, for a sample size of 0.3 percent. All of these sample sizes fall significantly short of the 5.0 percent standard typically considered to be the benchmark of statistical significance. As such, any findings pertaining to these samples are not projectable to the check ride universe – invalidating a broad comment such as “*NBIB and contractors did not follow policies and procedures for case processing oversight*” which the OPM OIG makes on page 16.
- Page 16 calls into question the quality of the check ride process by stating that “*32 out of 40 NBIB check ride forms sampled did not contain all the proper signatures that are required by the NBIB Field Operations Standard Operating Procedures Check Ride August 2018*” and that “*electronically signed forms had expired certificates or revoked certificates on the signature lines.*” The absence of signatures in the sample selected by the OPM OIG may be mitigated by hard copies of the check ride form(s) preserved by supervisors in the local field offices or by electronic signatures stored elsewhere. Statistical significance issues noted above also apply to this statement.
- The OPM OIG stated “*NBIB did not adequately conduct oversight of the supporting documentation for the contractor check ride evaluations submitted in the contractor’s monthly spreadsheets*” on page 16. Neither this statement nor the report provides any evidence that adequate oversight was not conducted.
- Page 17 indicates that “*not completing the required check rides properly for each Investigator or maintaining documentation to show the rides were completed increases the risk that inefficiencies or weaknesses in the background investigations process are*

¹⁷ In 2018, as part of a merger and acquisition, Keypoint’s name was changed to Perspecta. The OIG was previously notified of this change.

not revealed or that background investigations may be compromised.” The absence of signatures within the OPM OIG’s sample does not equate to an incomplete check ride nor does it demonstrate that check rides were not completed. Further the statement that absent signatures may result in compromised background investigations is entirely unsupported.

- The OPM OIG stated “*Field Operations also conducts and reviews segments of closed Federal investigations for both national security and suitability positions in the Federal government*” on page 2. This is inaccurate because Field Operations doesn’t review closed investigations-they conduct background investigations and review segments of open investigations.
- The OPM OIG stated “*Quality Oversight is responsible for overseeing the quality and timeliness of NBIB’s investigative products*” on page 2. This is inaccurate because Quality Oversight does not oversee the overall timeliness of investigations, just the quality of those investigations and a portion of overall timeliness of the quality oversight processes.
- The OPM OIG stated the Inspections Group is “*responsible for addressing all quality issues before the case is completed*” on page 3. This is inaccurate as the Quality Oversight directorate serves that role.
- The OPM OIG stated that Investigative Case Analysts receive feedback on the random reviews conducted by Quality Support and the ratings assigned, “*which can be above or below standards,*” on page 4. This is inaccurate as the random review process only evaluates cases as at or below standards.
- The OPM OIG stated “*Once the Quality Assurance Branch receives a reopen request from an agency, an Investigative Case Analyst notes the reason for the reopening and determines if additional information is needed to process the reopening*” on page 4. This is inaccurate because this is not a function of the Quality Assurance branch. The Quality Assurance branch is one team within the Quality Interface group and does not receive case reopen requests from agencies. The Customer Initiatives team is responsible for this function. Additionally, the OPM OIG’s description of this process does not mention that once the request is received from the agency, NBIB also determined if the request was in accordance with the Federal Investigative Standards prior to reopening the case for correction.
- The OPM OIG stated “*Upon completion of the review, a Reopen Authorization Form is mailed to the agency with an explanation of the additional information needed to complete the request*” on page 4. This is inaccurate for a couple of reasons. First, the Reopen Authorization Form is an internal document that initiates a case reopening and is never sent to an agency. Second, if additional information is needed from an agency to initiate a case reopen, communication would be made via phone or email and not by mail.
- The OPM OIG stated “*6 out of 34 Investigative Case Analysts sampled did not sign the most recent Telework Agreement that included the current telework guidelines*” on page

17. This is inaccurate as all six of the employees had telework agreements signed and readily available for OPM OIG's review. DCSA notes the previously mentioned methodological deficiencies as a possible reason for this inaccurate statement.

- The OPM OIG stated *“One out of four Federal employee reopen samples tested and two out of four Contractor reopen samples tested did not have the Reopen/Reimbursable Suitability Investigations Request Form. In addition, none of the eight cases had the Quality Rating Form completed as required by the Reopen Standard Operating Procedures (SOP)”* on page 17. This is inaccurate for several reasons. Of the three cases cited as missing the Reopen Request Form, two of those did not procedurally require this form. The form mentioned by the OPM OIG is used when an agency requests a case be reopened, however two of the three cases were reopened as a result of internal quality audits and would therefore not require this form. NBIB was not given the opportunity to explain this and clarify the misunderstanding. While the remaining case was missing the Reopen Request Form, emails between NBIB and the requesting agency were sufficient to identify the cause of the reopen- customer agency request. Due to passage of time it was impossible to determine why the Reopen Request Form was not included in the file.

In addition, all cases referenced in the OPM OIG's sample had the Quality Rating Form completed as required, contrary to the OPM OIG's finding. The OPM OIG appears to misunderstand what the Quality Rating form is. The phrase “Quality Rating Form” within Quality Oversight's SOP, refers to a portion/screen of the Quality Tool that a Case Reviewer populates when rating the Field Operations staff that worked the case, not a separate, physical form. Again, DCSA was not given the opportunity to clarify the OPM OIG's misunderstanding.

- The OPM OIG stated *“NBIB did not have a final satisfactory rating from the Federal review, on three out of five deficient case samples tested, showing the rework cycle was completed”* on page 17. This is inaccurate because two of the three cases cited by the OPM OIG did in fact have this final rating entered within the Quality Tool as either “Complete” or “Justified.” The remaining case did not have the final rating, however case deficiencies were appropriately noted in the Quality Tool- the system used to track case deficiencies. Upon review by DCSA Subject Matter Experts, there were several anomalies noted which may have contributed to the lack of final rating for this case. However, due to passage of time it could not be determined if the lack of a final rating was due to user error or a system problem. Regardless, the case had originally been rated and reopened for correction, closed on a later date, and then sent to the agency, which is sufficient evidence to conclude the rework cycle was completed. The final closing of the case, in and of itself, exhibits a final level of acceptable quality for the case.
- The OPM OIG stated *“By not completing the quality rating forms, NBIB was unable to track trends resulting in the reopening of previously closed cases. Not being able to track reoccurring deficiencies may make it harder for NBIB to reduce the number of cases reopened for quality issues”* on pages 17 and 18. This is inaccurate because the deficiencies were noted in the Quality Tool and, as described above, the Quality Rating

Form is a page/screen within the Quality Tool, not a separate form. As such, DCSA is both able to and actively does track trends in case deficiencies.

- The OPM OIG stated “*not signing the current telework agreements, and not completing all required information on the manifests, could result in the mishandling or loss of PII by personnel who do not have the proper authorization to telework*” on page 17. The OPM OIG provides no evidence to support the conclusion that unsigned telework agreements could result in mishandling of PII. Furthermore, Quality Oversight employees were subject to NBIB’s PII policy and practices, regardless of a signed telework agreement.
- In their description of Quality Oversight’s responsibilities, the OPM OIG stated “*They are also responsible for conducting audits of staff that telework*” on page 2. To clarify, Quality Oversight was responsible for auditing teleworking employees within their directorate, not all employees within NBIB.
- The OPM OIG stated “*all of the manifests tested were missing the case name and did not identify the specific documents that the Investigative Case Analysts transported*” on page 17. This is inaccurate because the manifestation of a case infers/refers to the entirety of the transported case contents- which are all subject to NBIB’s PII policy. Furthermore, the case name can be derived from the case number, which is included in the manifest via an electronic barcode. Clarification to the NBIB PII Policy, stating that omission of the case number on a manifest is acceptable when using a barcode scanner, was disseminated agency-wide in September 2019.
- The OPM OIG stated the Investigative Analysts (IA) sample size was 67 in the table on page 9. This is inaccurate as the correct sample size was 65. The OIG incorrectly “double-counted” two Investigative Analysts within the Excel file which recorded their sample data.
- The OPM OIG stated “*NBIB FIRE AFLC Supervisory Team Leaders did not conduct the required 60 testimony reviews for 59 out of 67 Investigative Analysts for FY 2018*” on page 18. This is inaccurate because of the 65 Investigative Assistants (corrected sample size- as noted above) sampled, only 21 required 60 annual testimony reviews. This is due to multiple employment-related factors. The OPM OIG’s 59 non-reviewed figure included employees who; 1) were not employed in AFLC during the entire fiscal year, 2) were out of work due to extended absences, and 3) on military leave or on special projects during the fiscal year.

AFLC’s current supervisory standards require 15 quarterly testimony reviews, per Investigative Analyst (IA). But, if an IA is not employed during a specific quarter then no quality reviews are required. Additionally, if an IA is employed but on extended absence, on military leave, or detailed to a special project, no testimony reviews are required for that time frame, all of which apply to IA’s within the OPM OIG’s sample.

Furthermore, it appears that the OPM OIG relied upon incomplete data as the database they utilized to calculate their findings implemented in quarter 2, of FY 2018 (therefore, this report only captures a portion of the testimony reviews completed during that fiscal year). Prior to this system, quality reviews were tracked with in AFLC's internal shared drive. NBIB Subject Matter Experts explained this to the OPM OIG during their fieldwork, but OPM OIG never requested additional documents to satisfy missing records within their sample- even though such records were readily available. Additionally, the OPM OIG never asked or requested any information concerning an employee's hire/departure dates or any other mitigating circumstances as it related to finding.

Finding B Recommendations:

2) Non-concur. The OPM OIG did not consider that the information absent from the database may exist in other forms or other locations, as described above.

3) Non-concur. NBIB Contractors provided, or attempted to provide, evidence that all check-rides were performed to OPM OIG. The OPM OIG did not consider mitigating information provided by CACI and Perspecta in October 2019. Therefore, there is no evidence that check-rides were not performed or documented. Further, it is not prudent, reasonable, or a cost-effective use of DCSA's resources to recommend that all contractor check-ride documentation be reviewed, as there are over 4,000 contract investigators.

4) Non-concur. DCSA believes it has sufficient controls in place to ensure all employees who telework have a signed telework agreement. We found that all six of the employees the OPM OIG deemed to be missing telework agreements did in fact have telework agreements signed and readily available.

5) Non-concur. All manifests are completed in adherence to established policy and contain the necessary information. Additionally, case names are no longer required to be included on manifests, per NBIB's updated PII Policy, which was disseminated subsequent to the completion of the OIG's fieldwork and prior to the draft audit report. Furthermore, Quality Oversight telework manifest auditing practices already exist.

6) Non-concur. All eight of the Quality Rating Forms found to have been missing in the audit were in fact completed. An OPM OIG misinterpretation of NBIB terminology regarding the Quality Rating Form, led to the conclusion that a (physical) form was required and thus was not completed- where in fact the Quality Rating Form had been completed for all sample cases. Additionally, two out of the three cases OPM OIG concluded were missing the Reopen Request Form did not require the form. DCSA believes there are strong internal controls in place and there is no specific action identified in the recommendation to implement at this time.

7) Non-concur. DCSA already maintains documentation to show that deficient cases receive a final satisfactory rating. The OPM OIG identified three of five cases that were allegedly missing the final rating within the Quality Tool. A review of the OPM OIG sample data by DCSA Subject Matter Experts, determined that two of the three cases did in fact receive

the required rating. The remaining case was entered into the Quality Tool and due to the passage of time, it could not be determined if the lack of a final rating was due to user or system error. DCSA believes there are strong internal controls in place and there is no specific action identified in the recommendation to implement at this time. The final closing of a case, by DCSA Quality review staff, in and of itself establishes a final satisfactory case.

8) Non-concur. While DCSA accepts in principle that FIRE AFLC should strengthen controls to ensure that the required number of testimonies for all IAs are completed, due to the methodical deficiencies documented in the previous section, it considers the finding to be invalid. Additionally, the recommendation fails to identify the specific, corrective actions.

9) Non-concur. The Re-Contact Letter SOP is reviewed on a bi-annual basis or whenever procedures are modified. The information cited on page 18 of the draft audit report regarding US Investigative Services and annual costs calculations was removed from the current version of the SOP.

Finding C) *NBIB did not provide sufficient documentation to support that 36 out of 379 of the Investigative Case Analysts tested are properly trained to perform their duties. In addition, none of the 67 Investigative Assistants received formal training*

The OPM OIG provided no valid evidence to support this finding. NBIB provided training certificates or detailed training records, where applicable, for *all* individuals within the OPM OIG's sample, including an explanation of any anomalies (further explained below), during the audit's fieldwork, invalidating the statement that "*NBIB did not provide sufficient documentation to support that 36 out of 379 of the Investigative Case Analysts tested are properly trained to perform their duties.*"

Additionally, the OPM OIG audit report states "*none of the 67 Investigative Assistants (within NBIB's Automated Federal Leads Center) received formal training*", which is wholly inaccurate. During the audit, NBIB's Automated Federal Leads Center employed a Training Team, comprised of three trainers who implemented AFLC's official training program. The training program utilized a blend of class-room style (instructor-led) training, job aides and on-the-job (OTJ) training with a trainer/mentor, and a standardized 100 percent quality review of new IA work. The OPM OIG omitted this information from their report and failed to identify a specific training requirement not satisfied by AFLC's training program. Furthermore, the OPM OIG failed to demonstrate any deficiency with AFLC's training program with respect to program outcomes. AFLC's overall quality rating for FY 2018 was 99.8 percent for all closed items. Therefore, further requirements for the AFLC training program are unnecessary.

Finding C Factual Inaccuracies and Contextual Information:

- The OPM OIG stated "*NBIB did not provide sufficient documentation to support that 36 out of 379 of the Investigative Case Analysts tested are properly trained to perform their duties*" on page i. They also stated that "*NBIB did not provide sufficient documentation to support that 36 out of 379 Investigative Case Analysts tested completed the Investigative Case Analyst Program*" on page 20. These statements are both inaccurate.

The National Training Center (NTC) provided detailed training record information for all the individuals within the OPM OIG's sample, including copies of certificates and/or sign in sheets to document training participation as requested, in April 2019- during the audit fieldwork. Furthermore, upon review of the OPM OIG's self-generated data in October 2019- after the conclusion of the audit, DCSA confirmed that training records for all individuals within the OPM OIG sample were provided to the OPM OIG in April 2019- including training records for Investigations Case Analysts, the OPM OIG deemed "unsupported." DCSA's review of the documentation provided to the OPM OIG in April concluded that, of the 36 Investigations Case Analysts the OPM OIG claimed didn't have sufficient documentation support they were "*properly trained to perform their duties*":

- Eighteen were performing work as Investigations Case Analysts prior to the inception of the Fundamentals of Review course in 2010. As a result, these individuals were not required to participate in the basic training course, which is intended for new hires. Prior to 2010, individuals would have completed training that was available when they were hired into their positions and would receive continuing training when relevant,
 - Six of the remaining eighteen employees attended the Fundamentals of Review (FOR) course, which was the pre-cursor to the accredited Investigations Case Analyst Program (ICAP),
 - Eleven students completed the Investigations Case Analyst Program; and,
 - Thirty of these individuals completed training at the Tier 5 Level. One of the individuals who did not complete Tier 5 Level is an Adjunct Instructor and worked with the NTC to develop and deliver the Tier 5 training to the Investigations Case Analysts. The remaining five individuals who did not complete Tier 5 Level, may not be closing investigations at the Tier 5 level, and as such, may not have been required to participate in the Tier 5 training at this point. NBIB notes that any individual whose employment at their current position pre-dates the training requirement, would not have a training certificate, but is also not required to.
- The vernacular used by the OPM OIG in this report is inaccurate. The OPM OIG report refers to the position title as "*Investigative Case Analyst*" on pages i, 4, 7, 9, 17, 18, 19, and 20. The correct position title is "Investigations Case Analyst." The basic course these individuals complete is the Investigations Case Analyst Program, not the Investigative Case Analyst Program, as noted on pages 7 and 20.
 - The DCSA's NTC notes that its program-specific training document requirements are established by the Federal Law Enforcement Training Accreditation (FLETA). The NTC was accredited by FLETA in 2013 and has since been subject to its documentation requirements. Since initial accreditation, the NTC academy and its various training programs have been accredited or re-accredited a cumulative 5 times. Re-accreditation includes an in-depth review of training records by independent FLETA peer reviewers, to ensure compliance.

- The OPM OIG stated that “*In addition, none of the 67 Investigative Assistants working for AFLC received formal training because NBIB does not have standardized formal training requirements for Investigative Assistants.*” on page 20. This statement is inaccurate because during the audit AFLC had standardized, formal training requirements. In fact, AFLC employed a Training Team, which was expanded from two to three employees during FY 2018. The Training Team was dedicated to implementing AFLC’s training program which consists of both customized, individualized training – utilizing a blending of class-room style (instructor-led) training, job aides and on-the-job (OTJ) training with a trainer/mentor and a standardized 100 percent quality review of new IA work.

Finding C Recommendations:

10) Non-concur. As noted above, this recommendation is based on an erroneous finding. AFLC had formal training for all Investigative Analysts.

11) Non-concur. As noted above, this recommendation is based on an erroneous finding. Training records for all Investigations Case Analyst were provided to the OPM OIG during their fieldwork. Additionally, the OPM OIG’s (erroneous) evidence for this recommendation, focused solely on NBIB’s Investigations Case Analysts and Investigative Assistants. The OPM OIG does not provide evidence to support a recommendation intended for “all staff.”



Charles S. Phalen Jr.
Acting Director



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