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**CENTRAL INTELLIGENCE AGENCY**

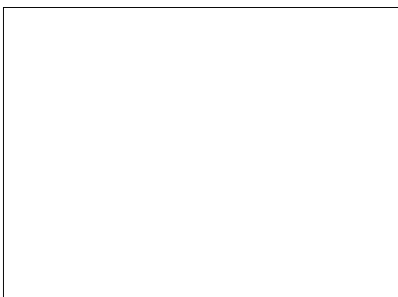
**Office of Inspector General**



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# **REPORT OF AUDIT**

**(U) The Agency's Security Clearance Process**



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**30 June 2003**

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**Report of Audit**

**(U) The Agency's Security Clearance Process**

**(U) EXECUTIVE SUMMARY**

**(U) OBJECTIVE**

(U) The objective of the audit was to determine whether the Agency conducts security clearance investigations and adjudicates the results of those investigations in an efficient manner and in keeping with sound security management practices.

**(U) BACKGROUND**

(C) A security clearance represents a determination that an individual is eligible for access to classified information of a designated level. During the period 1 April 2001 through 31 March 2002, the Agency processed [redacted] security clearances for applicants, staff employees, and contractor representatives. (b)(3)

(U//AIUO) Within the Agency, the Office of Security (OS) is responsible for granting security clearances to individuals before the Agency gives them access to classified material. For staff applicants, the Recruitment Center and the Office of Medical Services (OMS) make determinations regarding suitability of individuals to become Agency employees. The Recruitment Center is responsible for prescreening applicants for suitability issues and for scheduling medical and polygraph examinations. OMS conducts physical and psychological evaluations of applicants.

(C) Case managers within OS's Clearance Division recommend whether to grant security clearances for individuals based on information collected. Case managers rely on information from the polygraph examination, the background investigation, and other personnel security sources in making their decision.

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**SECRET//X1****(U) RESULTS IN BRIEF**

(U//AIUO) We found that OS follows security clearance practices that comply with applicable regulations and that OS compiles comprehensive evidence to support security clearance decisions. We also found that OS has taken some steps to improve the timeliness of the clearance process by reinforcing the authority of the Recruitment Center related to the processing of applicants and empowering case managers to take actions necessary to complete the adjudication of cases.

(S) Statistics provided to Agency senior management regarding the time required to process applicants for security clearances do not present a complete picture of the length of time it takes to clear applicants. Agency officials established a median goal of 120 days to clear staff applicants for security clearances. We applied the methodology used by OS and determined that the median time to process all applicants during the period 1 April 2001 through 31 March 2002 was 108 days. This is within the median goal of 120 days, but the methodology is misleading because it includes applicants who were not granted a security clearance and individuals who received a clearance outside of the normal process.<sup>1</sup>

(S) In reality, the Agency cleared within 120 days only 25 percent of the applicants processed during the timeframe who went through the normal process and were granted a security clearance. Inclusion of the processing time for individuals who did not receive a clearance or complete the normal process understates the time reported for processing new applicants.

(S) In addition, use of the median statistic does not provide a complete picture of applicant processing time. For the period 1 April 2001 through 31 March 2002, the median processing time for all applicants was 108 days, but the average (mean) processing time was 170 days. Processing times for applicants who exceeded the median ranged from 109 to 1,355 days; the time for 25 percent of the applicants exceeded 200 days. For those who went through the normal process and were granted a clearance, the median time was 128 days; the mean time was 188 days.

(U//AIUO) For the timeframe that we reviewed, the adjudication process represented a significant portion of the total processing time. We found that there were no established milestones, and senior case managers did not perform periodic supervisory reviews in the applicant, reinvestigation, and

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<sup>1</sup> (U//AIUO) As used in this report, the term "normal process" refers to completing all the steps through which an applicant would process. These include the prescreening for suitability, the physical examination and the psychological assessment, the polygraph examination, the background investigation, and the adjudication determination.

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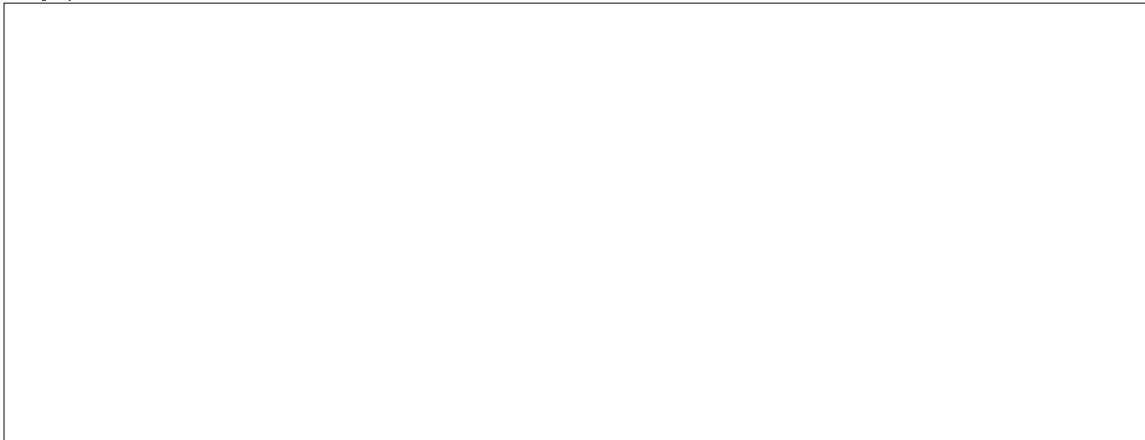
industrial branches to ensure that all cases are adjudicated as quickly as possible. Case managers work independently to prioritize and complete adjudication of their cases, and there is little oversight of their progress or the status of cases.

**(U) SUMMARY OF RECOMMENDATIONS**



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**(U) MANAGEMENT COMMENTS AND OUR EVALUATION**

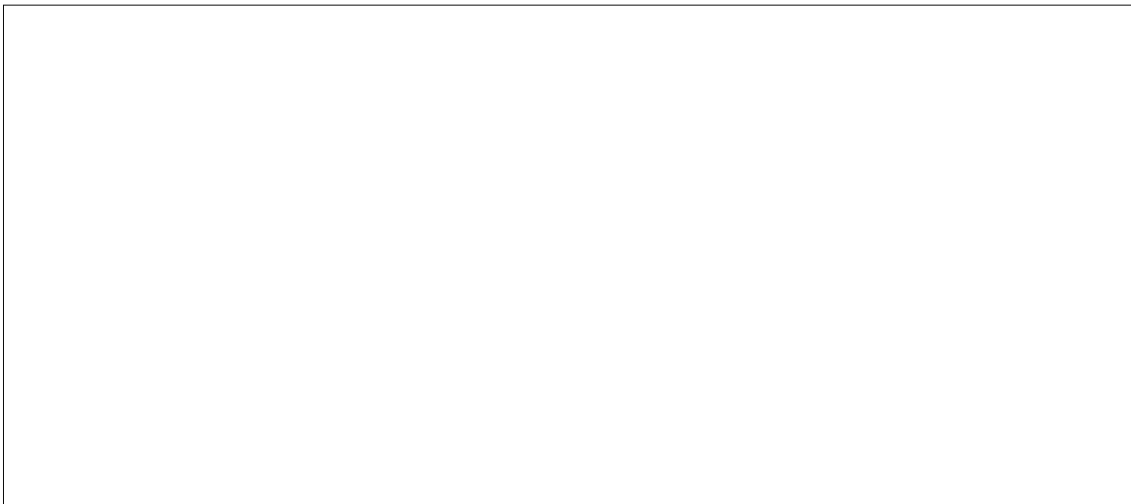


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(U//AIUO) The scope of the audit included a review of the efficiency of the security clearance process for all categories of personnel, including applicants, staff reinvestigations, industrial contractors, and operational cases. Because only applicant processing had a stated goal or criteria for granting security approvals—120 days as depicted in the CBJ—we concentrated our audit effort on measuring the Agency’s success in processing applicants against that goal. However, the audit review of the efficiency of the adjudication process was

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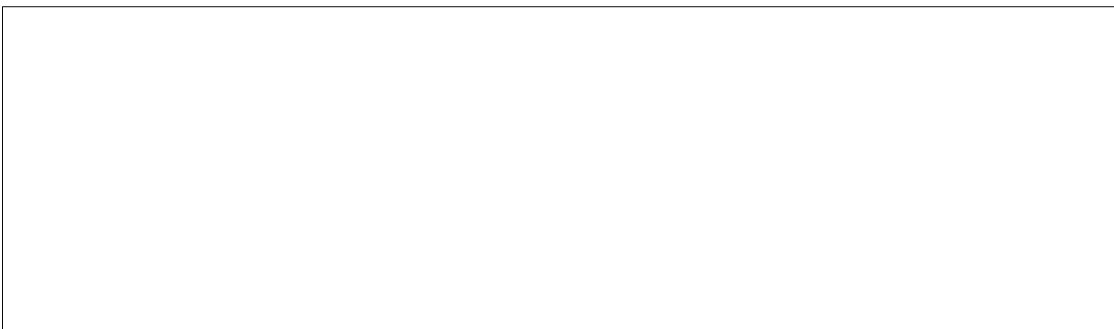
conducted not only for applicants, but also for staff reinvestigations and industrial contractors. The sample period used during the audit, 1 April 2001 to 31 March 2002, was selected to provide us with the most recent information regarding the processing of security clearances.



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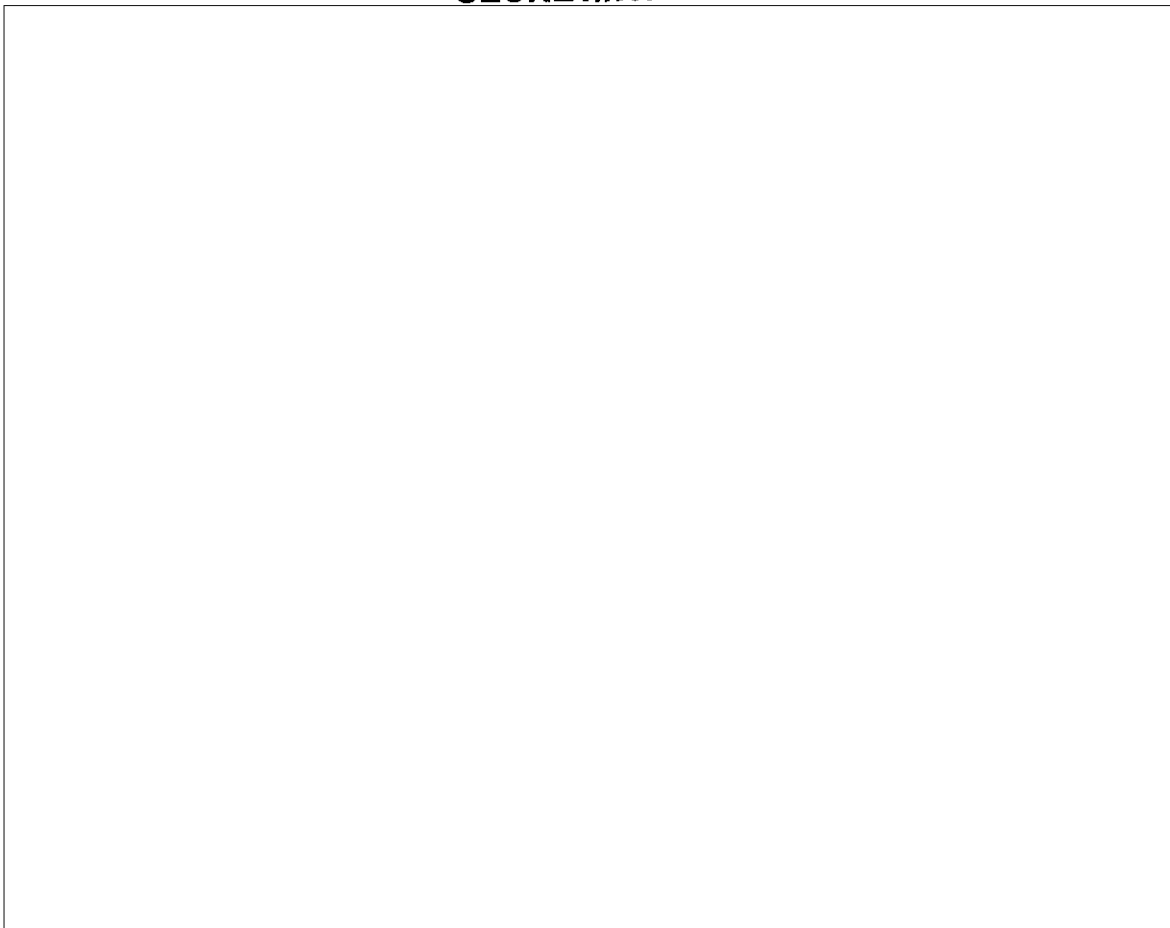
(C) In our opinion, using the mean number of days to measure success for approving applicants for employment is reasonable. The median is insensitive to large, outlying values. This property is a defect when looking at a performance metric for a production process, such as the granting of security clearances. By using the median as a measure of the security clearance process, OS emphasizes the success of 50 percent of the applicants who obtained security clearances within the 120-day goal and diverts attention from applicant cases that significantly exceed that goal. We do not advocate eliminating the median to report applicant processing time, but recommend that OS supplement its reporting by also showing the mean processing time.

(C) We measured the timeliness of the security clearance process for staff applicants in accordance with the goals set forth by the Agency and communicated to Congress in the CBJ. Including individuals who are quickly eliminated from consideration for staff employment or individuals who because of special circumstances received a security clearance in a matter of days does not present a fair representation of the Agency's performance in approving applicants for employment with the Agency.



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OS currently provides Agency management with only one measurement of applicant processing time (the median), and we believe that is misleading.



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**SECRET//X1****(U) OBJECTIVE, SCOPE, AND METHODOLOGY**

(U) The objective of the audit was to determine whether the Agency conducts security clearance investigations and adjudicates the results of those investigations in an efficient manner and in keeping with sound security management practices.

(U//AIUO) We reviewed Agency and Intelligence Community directives that establish personnel security policies, procedures, and standards for granting security clearances. We evaluated internal Agency studies, Office of Inspector General inspection reports, and other Federal agency audit reports that deal with the security clearance process. We discussed with Agency security personnel and with personnel at other Federal agencies actions planned or taken to automate their security clearance process and personnel security files.

(U//AIUO) We discussed the security clearance process with managers from the Office of Security (OS), the Recruitment Center, and the Office of Medical Services (OMS) to determine the current procedures to process personnel for Agency security clearances. We met with personnel from the Counterintelligence Center to evaluate procedures for performing name traces of personnel identified during the security clearance process. We also obtained flow charts that delineated the process to grant security clearances to staff and contract applicants and to renew security clearances for current Agency staff and contract personnel. (b)(3)

(U//AIUO) We interviewed [ ] program managers, [ ] senior case managers, and [ ] case managers who adjudicate cases within the Office of Security's Clearance Division to obtain general information regarding the adjudication process. We met with [ ] Agency managers and [ ] recently hired employees to discuss their opinions about the timeliness of the security clearance process. (b)(3) (b)(3) (b)(3)(3) (b)(3)(3)

(U//AIUO) From the Agency's [ ] database, we selected a statistical sample of 107 security files of individuals who received security clearances during the periods 1 April 1999 through 31 March 2000 and 1 April 2001 through 31 March 2002. We assessed whether the data collected and used by the OS to compute and report processing times was accurate and agreed with supporting documentation contained in personnel security files. We also reviewed the files to determine if the information required by DCID 6/4, *Personnel Security Standards* (b)(3)

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*Governing Eligibility for Access to Sensitive Compartmented Information (SCI)* was collected. We did not assess the quality of background investigations. The Office of Inspector General reported on issues related to background investigations in the *Inspection Report of the Central Intelligence Agency's Operational Counterintelligence and Counterespionage Programs*, dated February 2003.

(U//AIUO) We reviewed the processing times for Agency applicants, current staff employees, and contract employees who received security clearances during the periods 1 April 1999 through 31 March 2000 and 1 April 2001 through 31 March 2002. We calculated the processing times for each step of the security clearance process to identify areas where significant elapsed time had occurred.

(U//AIUO) We conducted our audit work at Agency facilities within the Washington, D.C. area from March 2002 to October 2002. Our audit was performed in accordance with generally accepted government auditing standards. Comments on a draft of this report were provided by officials from OS and OMS and were considered in the preparation of the final report.

**(U) BACKGROUND**

(S) Executive Order 12968, *Access to Classified Information*, requires that all Federal agencies establish a security program to ensure individuals are cleared before they are given access to classified material. A security clearance represents a determination that an individual is eligible for access to classified information of a designated level. Agency Regulation 10-1, *Security Clearances, Accesses, and Approvals*, defines a security clearance as "a formalization of a security determination that an individual is authorized access, on a 'need-to-know' basis, to a specific level of classified information (that is, TOP SECRET, SECRET, CONFIDENTIAL)." According to OS records, the Agency processed [ ] individuals for security clearances during the period 1 April 2001 through 31 March 2002.

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(U//AIUO) Director of Central Intelligence Directive (DCID) 6/4, *Personnel Security Standards Governing Eligibility for Access to Sensitive Compartmented Information (SCI)*, sets forth policy to protect classified information through the application of personnel security standards, procedures, and continuing security programs. Among other things, DCID 6/4 requires a background investigation and verification of all information provided by an applicant before an individual is granted a Top Secret security

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clearance. Agencies may require polygraph examinations when deemed necessary by the agency head.

**(U) Office of Security**

(U//AIUO) OS is responsible for granting or determining the eligibility of individuals to receive an Agency security clearance. The Polygraph and Investigations Divisions within OS collect information, which is then forwarded to Clearance Division to assess whether an individual meets the standards to be cleared for access to classified material required under DCID 6/4 and Agency Regulation 10-1.

**(U) Clearance Division**

(S) The Clearance Division is the hub for all security clearance processing. It is responsible for monitoring and tracking the progress of assessments occurring on individuals being processed for access to Agency activities, information, and facilities. In the Clearance Division, case managers work [redacted]

[redacted]. Case managers (adjudicators) recommend whether to grant a security clearance based on their analysis and adjudication of the information collected about an individual; in particular, data obtained from the background investigation and the polygraph examination. Senior case managers approve or disapprove the recommendation.<sup>2</sup>

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**(U) Polygraph Division**

(U//AIUO) The Polygraph Division is responsible for conducting polygraph examinations on individuals as part of the Agency security clearance process. The type of polygraph depends on the status of the individual. [redacted]

[redacted] After the polygraph examination is administered, the results are passed to the responsible case manager within one of Clearance Division's [redacted] adjudication programs.

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(U//AIUO) [redacted] is responsible for administering background investigations of Agency employees, applicants, and contractors.

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Background investigations include interviews with the individuals being investigated, with their designated references, and with other individuals who have been referred by these references. The investigations also include police record checks and interviews with neighbors who live in close proximity to the individual. For staff applicants, the background investigation is usually conducted after completion of the polygraph examination. As with the polygraph examination results, [redacted] forwards the summary of the background investigation to the appropriate case manager within Clearance Division.

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**(U) The Recruitment Center**

(U//AIUO) The Recruitment Center is responsible for recruiting Agency employees, coordinating and supporting recruitment initiatives, monitoring hiring requirements, and prescreening applicants for suitability issues. Once an applicant returns the conditional offer of employment packet that documents an intent to be employed with the Agency, the Recruitment Center ensures that the information in the packet is complete and schedules the medical and polygraph examinations for the applicant. If the Recruitment Center notes adverse suitability issues during the prescreening process, the applicant may be disqualified from further processing at that time. After the Agency approves the applicant's security clearance, the Recruitment Center is responsible for scheduling an entrance-on-duty date.

**(U) Office of Medical Services**

(U//AIUO) As part of the Agency's hiring process, OMS conducts medical and psychological assessments of applicants. The medical assessment includes a physical evaluation that includes blood tests, hearing and visual examinations, and an overall physical assessment.<sup>4</sup> The psychological evaluation requires the applicant to complete a mental health questionnaire, undergo psychological testing, and meet with a psychologist or psychiatrist for a suitability evaluation. OMS may disqualify an applicant if adverse suitability issues arise from the physical or psychological examinations. OMS shares its determinations with the Clearance Division.

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**SECRET//X1****(U) DETAILED COMMENTS**

(U//AIUO) The Agency conducts a security clearance investigation to examine an individual's life history, character, trustworthiness, reliability, and soundness of judgment before granting or renewing a security clearance. We found that OS performs the investigations and adjudications in accordance with sound security management practices. We also found that the Agency has taken positive steps to improve the security clearance process for applicants in the last two years. However, statistics reported to Agency senior management regarding the time required to process applicants do not present a realistic picture of how long it takes to clear applicants. Although the Agency generally conducted security clearance investigations efficiently, additional controls and oversight may help to reduce the time expended to adjudicate cases.

**(U) Security Clearance Investigations  
Comply With DCID 6/4 and Agency  
Regulation 10-1**

(U//AIUO) OS security clearance practices comply with the requirements of DCID 6/4 and Agency Regulation 10-1. These requirements include completing the required background investigation, national and local agency checks, credit checks, and polygraph examination. Our review of a sample of [ ] investigations for Agency and contractor applicants and reinvestigations for current Agency and contractor personnel indicated that OS compiled a comprehensive file of evidence to support the decisions to grant security clearances to new applicants or to renew security clearances for current Agency and contractor personnel.

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**(U) Actions Taken by the Agency to  
Improve the Applicant Security  
Clearance Process**

(S) The Agency has conducted numerous studies and reviews to improve the timeliness of the applicant security clearance process. Among the actions taken as a result of these studies are the following:

- [ ]  
[ ] the Recruitment Center was to start exercising its authority to withdraw a conditional offer of employment to a staff applicant if they determine early in the process that an applicant would not be approved for Agency employment because of suitability issues. Prior to that time, the

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Recruitment Center did not withdraw a conditional offer of employment until the OS case manager decided that the applicant should not be granted a security clearance.

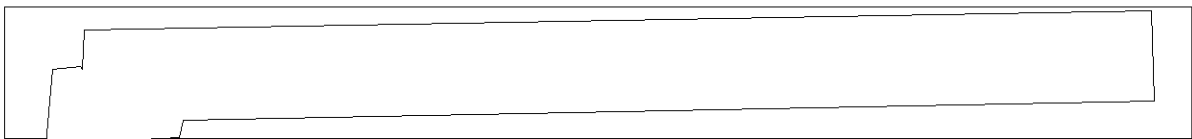
- OS placed an officer within the Recruitment Center to improve overall coordination and expedite the processing of applicants. One of the functions of the officer is to provide oversight of Recruitment Center officers who screen personal history statements for missing information and other issues that may indicate potential suitability issues before the applicant is scheduled for the polygraph interview, medical/psychological examination, and background investigation.
- Case managers within the Clearance Division are empowered to make unilateral decisions and take a more proactive approach in completing individuals' security clearance cases. For example, case managers can now contact applicants directly for additional information. In the past, only the Recruitment Center had the authority to directly contact applicants for this purpose.
- In its correspondence requesting additional information from applicants, the Recruitment Center now instructs the applicant to respond with an answer by a given time period or the Agency will discontinue processing the case for employment.

**(U) Reporting of Applicant Processing Time to Senior Management Needs To Be More Comprehensive**

(S) The reporting of the time expended to process staff and operational applicants for security clearances does not provide senior management with a complete assessment of the actual time elapsed to clear applicants, and therefore, may create a false impression of the actual success of the program. During the period 1 April 2001 through 31 March 2002, OS processed

security clearance investigations and granted security clearances to  staff and operational applicants

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**(U) Applicants Who Did Not Receive Security Clearances**

(S) The processing time for applicants who did not obtain security clearances was included in the reporting statistics. Based on data obtained from OS, about [ ] percent of Agency applicants who start the security process after their initial interviews either withdraw or are not cleared for Agency positions. For example, during the period 1 April 2001 through 31 March 2002 [ ] percent) applicants did not obtain security clearances. Applicants do not receive clearances because they withdraw from the process due to personal reasons or are disqualified based on

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<sup>6</sup> (U//AIUO) The median is a value that represents the mid-point of a set of values, above and below which lie an equal number of values. In this instance, the Agency meets the median goal when OS clears 50 percent of the applicants put into process in 120 days or less.

<sup>7</sup> (U//AIUO) As used in this report, the term "normal process" refers to completing all the steps through which an applicant would process. These include the prescreening for suitability, the physical examination and the psychological assessment, the polygraph examination, the background investigation, and the adjudication determination.

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suitability issues. Therefore, including the elapsed processing time for these applicants distorted the reporting of the overall performance of OS in granting security clearances to applicants.

**(U) Some Individuals Did  
Not Go Through the Normal  
Clearance Process**

(S) The statistics also included processing times for individuals who received clearances but did not go through the normal applicant clearance process. For example, during the period 1 April 2001 through 31 March 2002, [redacted] percent) individuals, who OS categorized as applicants, received a security clearance within 60 days.<sup>8</sup> Even more significant, OS cleared [redacted] of these [redacted] individuals in 10 days or less.

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(S) To better understand the circumstances that permit the Agency to grant security clearances to individuals in less than 60 days, we examined the security files of [redacted] of the [redacted] individuals who were cleared within 10 days. We noted that the four individuals were not Agency applicants but were individuals who were granted a permanent or temporary security clearance for various reasons. For example, OS granted a temporary security clearance within one day to allow an individual to attend a two-day, classified conference. After the conference, OS terminated the security clearance. Another individual, a member of the DCI's National Security Advisory Panel, required access to classified material. Since he had previously received a background investigation and a polygraph by the Department of Defense, OS cleared him immediately. Inclusion of individuals who have not completed all phases of the security process in the processing statistics understates the time reported to clear new applicants.

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**(U) Other Statistical Measures  
May Be More Insightful**

(S) In our opinion, by using the median as the sole reported statistic, Agency officials do not have a true picture of the overall applicant processing time. For example, for the period 1 April 2001 through 31 March 2002, the median time to process all applicants, based on the OS methodology, was 108 days. The applicants who were processed in more than 108 days took from [redacted] to [redacted] days to complete the process, with [redacted] ([redacted] percent) of the applicants requiring more than 200 days to process. Using the same data as above, we determined that OS took an average (mean) of 170 days to process

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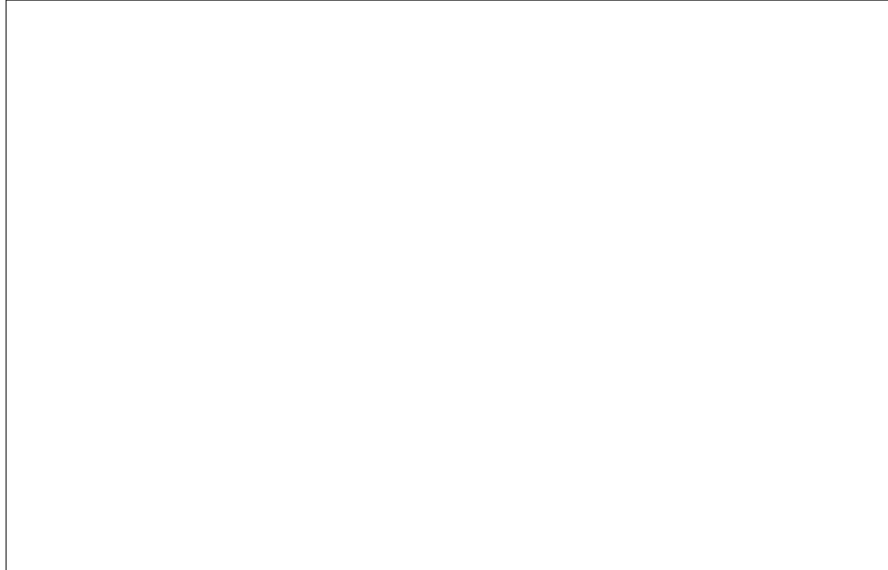
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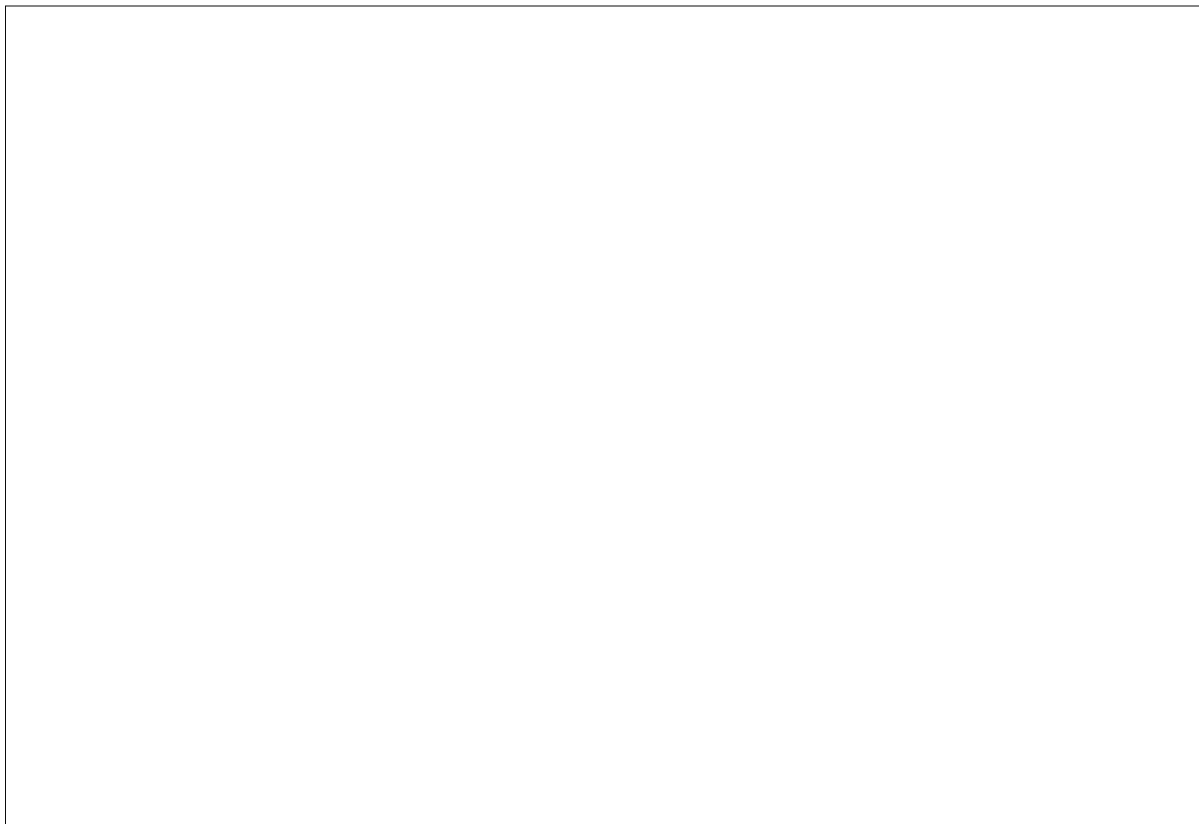
<sup>8</sup> (U//AIUO) Based on our review of the time required to complete all phases of the security clearance process, we believe it would be highly unlikely that OS could complete the process in less than 60 days.

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all applicants. This value is much closer to the six months that many in the Agency believe it takes to clear a new applicant and may be a better indicator of performance. In addition, for those staff applicants who went through the normal process and were granted a security clearance, the median time was 128 days; the mean time was 188 days.



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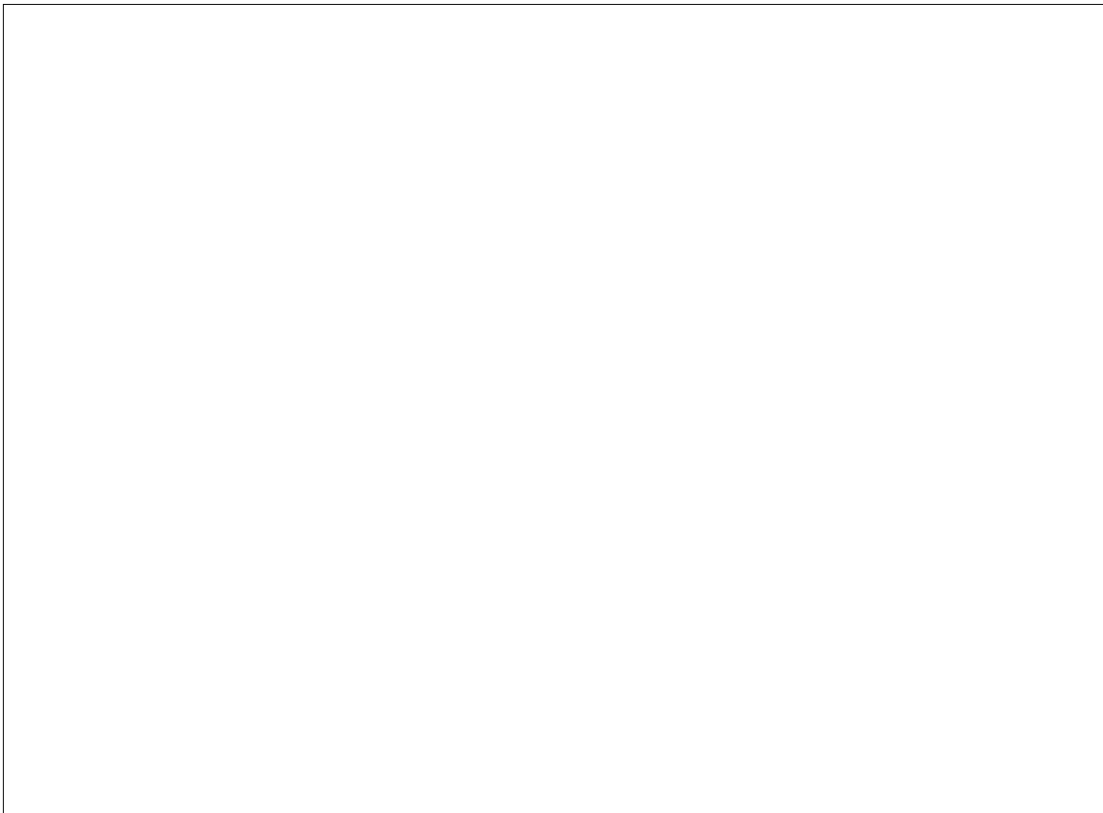
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(C) In our opinion, using the mean number of days to measure success for approving applicants for employment is reasonable. The median is insensitive to large, outlying values. This property is a defect when looking at a performance metric for a production process, such as the granting of security clearances. By using the median as a measure of the security clearance process, OS emphasizes the success of 50 percent of the applicants who obtained security clearances within the 120-day goal and diverts attention from applicant cases that significantly exceed that goal. We do not advocate eliminating the use of the median to report applicant processing time, but recommend that OS supplement its reporting by also showing the mean time to process applicants.

(C) We measured the timeliness of the security clearance process for staff applicants in accordance with the goal set forth by the Agency and communicated to Congress in the CBJ. Including individuals who are quickly eliminated from consideration for staff employment or individuals who because of special circumstances received a security clearance in a matter of days does not present a fair representation of the Agency's performance in approving applicants for employment with the Agency. We agree that OS should track cases to ensure accurate budget and personnel requirements, but to accurately report the time required to clear applicants it should include the statistics of only those applicants who completed the normal process and obtained clearances.



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(b)(5)**(U) Adjudication of Cases  
Could Be Improved**

(S) During the period 1 October 2001 through 31 March 2002, we determined that the time to complete the adjudication portion of the security clearance process represented a significant portion of the total time to complete the entire process. For example, a total of [ ] applicants were granted security clearances between 1 October 2001 and 31 March 2002; the time to adjudicate their cases ranged between one day and 647 days, with an average of 62 days. We found that there were no established milestones or periodic supervisory reviews conducted in the applicant, reinvestigation, and industrial branches to ensure that all cases are adjudicated as quickly as possible.

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(U//AIUO) Once a case is ready for adjudication (when the background investigation, polygraph, and all other required checks are completed), the case file is passed to the appropriate adjudication office within the Clearance Division. The case is reviewed, logged in, and placed in a cabinet with other case files waiting to be adjudicated. A senior case manager periodically selects case files from the cabinet and distributes them to the case managers. Other than cases designated as a high priority, files are distributed randomly among case managers. Each case manager has about [ ] cases to be adjudicated at any one time. Once the case managers adjudicate their cases, they pass them to the senior case manager for review and concurrence. When the senior case manager concurs with the decision of the case manager, the file is passed on to a processor, who closes out the case in the [ ] database.

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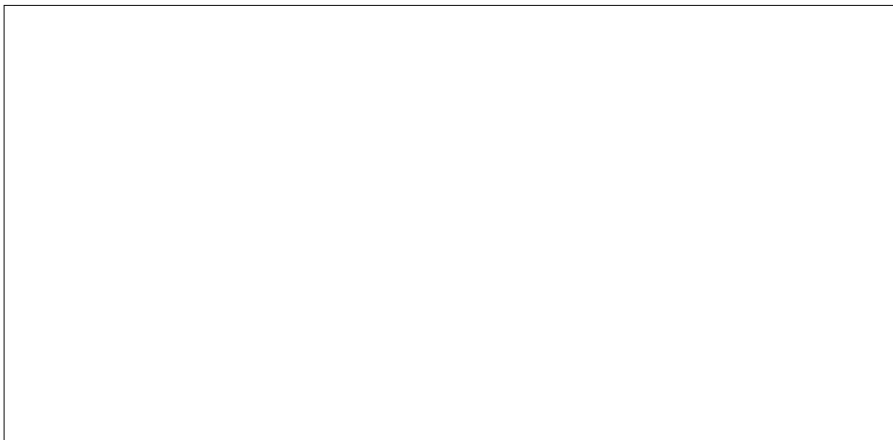
(U//AIUO) Individual case managers are not given deadlines for completion of reviews and are not required to provide justification when the cases remain open for an inordinate amount of time. In most instances, case managers work independently to prioritize and complete cases. Some case managers have developed their own systems for tracking cases, but no one tracks all cases to ensure they are processed as quickly as possible.

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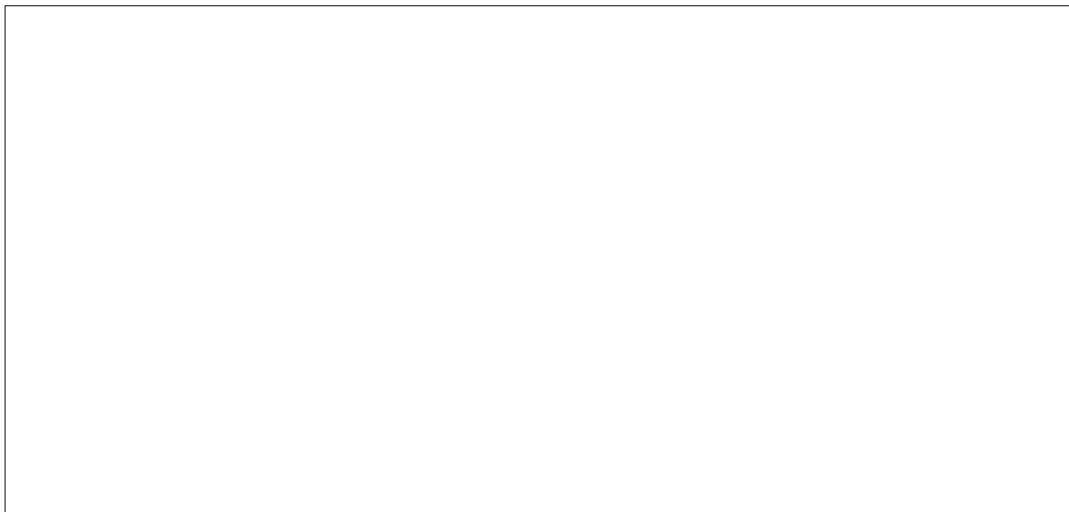
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(U//AIUO) Case managers only provide status reports to the senior case manager when contentious issues arise during adjudication. Clearance Division senior case managers have access to monthly Excel spreadsheets that list pending cases. However, the senior case managers do not periodically conduct status reviews of all pending cases; supervisory reviews are generally conducted only after the case manager has completed the review and made an adjudication decision. For example, OS completed a reinvestigation of an Agency employee in 1,489 days—84 percent of the time (1,252 days) was spent adjudicating the case. When we discussed this case with a Clearance Division senior manager, he explained that senior case managers would meet with case managers on a monthly basis to discuss the 25 oldest cases assigned to the case manager. In this instance, the case was not one of the 25 oldest and therefore was not discussed.

(U//AIUO) Establishment of time milestones for cases in adjudication and regularly scheduled supervisory reviews of case manager workloads would enable Clearance Division management to more accurately evaluate the actions taken by the case managers and would better ensure that security clearance decisions are made in a more timely manner.



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(C) During our audit, we did not find evidence of specific milestones relating to cases that we reviewed to ensure their prompt and efficient completion. However, we do consider the indicated actions to improve the timeliness of the adjudication process to be in accordance with the thrust of our recommendation.

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**Exhibit A**

**(U) List of Recommendations**



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**Exhibit B**

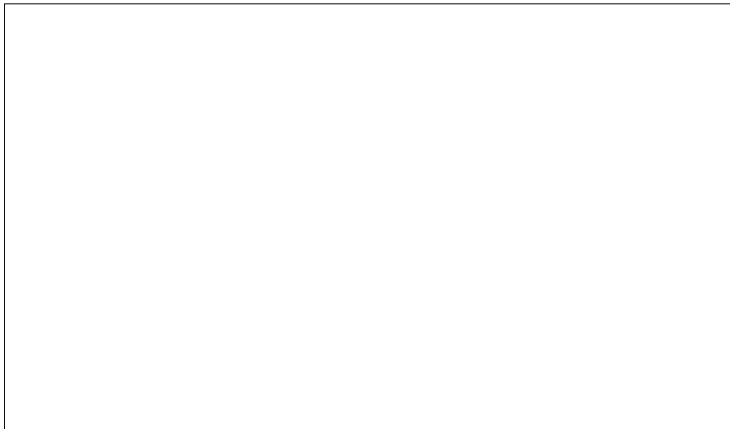
**(U) Audit Team Members**

(U//AIUO) This audit report was prepared by the   
 Audit Staff, Office of Inspector General.

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