



---

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE  
INTELLIGENCE COMMUNITY POLICY MEMORANDUM  
NUMBER 2006-700-5

---

**SUBJECT:** INTELLIGENCE COMMUNITY MODIFICATIONS TO DCID 6/4, "PERSONNEL SECURITY STANDARDS AND PROCEDURES FOR GOVERNING ELIGIBILITY FOR ACCESS TO SENSITIVE COMPARTMENTED INFORMATION (SCI)," ANNEX F, "RECIPROCITY OF SCI ELIGIBILITY DETERMINATIONS"

**A. AUTHORITY:** The National Security Act of 1947, as amended; the Intelligence Reform and Terrorism Prevention Act of 2004; Executive Order 12333, as amended; Executive Order 13354; Executive Order 13355; and other applicable provisions of law.

**B. PURPOSE:** Effective immediately, Director of Central Intelligence Directive 6/4, Annex F, is amended to include new procedures to be used throughout the Intelligence Community (IC) for processing "crossover" cases as reflected in the attachment.

**C. EFFECTIVE DATE:** This IC Policy Memorandum becomes effective on the date of signature and the contents will be incorporated into an IC Directive.

*John Negroponte*

\_\_\_\_\_  
Director of National Intelligence

*7/12/06*

\_\_\_\_\_  
Date

Attachment:

DCID 6/4, Annex F, "Reciprocity of SCI Eligibility Determinations"

## Reciprocity of SCI Eligibility Determinations

### 1. Reciprocity Policy.

a. Within the Intelligence Community, subject to the conditions set forth below, a favorable DCID 6/4 eligibility determination for access to SCI made by one adjudicative authority under SOIC cognizance is a favorable determination for all SOICs. Reciprocity of eligibility determinations does not in itself constitute reciprocity of need-to-know determinations. Need-to-know determinations are always distinct and separate decisions.

b. Reciprocity requires adjudication by trained government adjudicators under SOIC cognizance and a system for monitoring continuing security eligibility. Eligibility decisions, including the presence of exceptions, must be a matter of record accessible to the Intelligence Community's access granting authorities.

c. DCID 6/4 eligibility determinations are mutually acceptable and will not be readjudicated if:

- (1) They are made without an exception being noted, i.e. a waiver, condition, or deviation annotated to the case;
- (2) No substantial issue information has surfaced since the most recent adjudication; and
- (3) The appropriate type of polygraph examination, if one is required, has been satisfactorily completed.

d. Agencies may accept or reject DCID 6/4 eligibility determinations where exceptions exist based upon their own assessment of risk. Any agency rejecting another's determination of eligibility where exceptions exist will notify, to the extent it is able to do so, all adjudicative authorities having an eligibility interest in the person of its decision. Those authorities, in turn, may reassess the appropriateness of continuing to hold the person eligible with an exception.

e. Where an agency or organization has additional but not duplicative requirements, the actual granting of access is contingent upon satisfying those requirements. Failure to meet an additional but not duplicative requirement may not necessarily adversely affect a person's continued eligibility for reciprocal access with other organizations and agencies. However, the agency that made the original eligibility determination may use new information obtained by another organization to rejudge the person's continued eligibility subject to restrictions

---

<sup>1</sup> Annex F was signed by the DCI on 13 Oct 99. At that time, the number of DCID 1/14 was changed to 6/4 to correspond to an appropriate section in DCID 1/1



placed on use of the information by the organization that obtained it. No additional investigative or adjudicative requirements (other than the requirements for the conduct of a polygraph examination) may be established without the approval of the director of OMB.

f. A person determined ineligible for SCI access will remain ineligible for a minimum of one year. However, SOICs or their designees may waive this requirement in individual cases based on operational necessity and an assessment by the relevant determination authority that there is no unacceptable security risk in doing so.

g. A change of clearance or access approval sponsorship from one agency to another for a contractor employee or a Government employee being hired as a contractor is referred to as a "crossover" case. In crossover cases, the current access level must be the same as or higher than the access level required by the gaining sponsor. For the purposes of crossovers, there are five levels; in ascending order they are Secret, Top Secret, SCI without polygraph, SCI with counterintelligence-scope polygraph, and SCI with expanded-scope polygraph. Crossover cases will not apply when individuals change employment from one company to another and the agency sponsoring their SCI access approvals remains the same. In such cases, the government sponsor will simply update its records to show which contract(s) the person now supports. Government-to-Government or contractor-to-Government transfers will not qualify as crossover cases as suitability requirements may exist.

h. The IC's Scattered Castles database is the authoritative repository for all clearance and SCI eligibility information and shall be used by all IC agencies, according to established guidelines and procedures, to verify an individual's crossover eligibility. The database query shall determine:

- (1) If an individual has a final clearance or SCI access approval or has been previously indoctrinated for SCI;
- (2) If an individual's background investigation is current within seven years for an issue free case and five years otherwise;
- (3) If an individual has been determined eligible for access at a level, as defined in paragraph 1g above, the same as or higher than the one required for the nominated position; and
- (4) If an individual's official security record is free of exceptions as defined in paragraph 2a below.

i. If all Scattered Castles queries are positive, the crossover shall be considered complete. The new Government sponsor shall be responsible for making all internal administrative record keeping changes. However, if the response to any of the above queries is "no", the gaining organization or new sponsoring agency may either reject the nomination or

apply such additional measures as are necessary for an individual to meet DCID 6/4 eligibility requirements.

j. The above guidelines and procedures will not apply when agencies possess substantial issue information on an individual, as defined in paragraph 2b(2) below, that is not reflected in the individual's official security file and is indicative that the individual may be ineligible for continued access. The gaining organization, or new sponsoring agency, may proceed as it would have had any of the questions addressed to Scattered Castles been answered "no."

k. Nothing in this annex is applicable for suitability decisions for employment.

## 2. Definitions.

a. *Exception:* An adjudicative decision to grant or continue access eligibility despite a failure to meet adjudicative or investigative standards. Regarding SCI access eligibility, only the DNI or, as appropriate, the concerned Senior Official of the Intelligence Community (SOIC) or designee will make such decisions. An exception precludes reciprocity without review of the case by the gaining organization or program. There are three types:

(1) *Condition:* Access eligibility granted or continued with the proviso that one or more additional measures will be required. Such measures include additional security monitoring, restrictions on access, and restrictions on the individual's handling of classified information. Submission of periodic financial statements, admonishment regarding use of drugs or excessive use of alcohol, and satisfactory progress in a government-approved counseling program are examples of conditions.

(2) *Deviation:* Access eligibility granted or continued despite either a significant gap in coverage or scope in the investigation or an out-of-date investigation. "Significant gap" for this purpose means either complete lack of coverage for a period of six months or more within the most recent five years investigated or the lack of an FBI name check or technical check or the lack of one or more relevant investigative scope components (e.g., employment checks or a subject interview for an SSBI, financial review for any investigation) in its entirety.

(3) *Waiver:* Access eligibility granted or continued despite the presence of substantial issue information that would normally preclude access. The DNI, SOIC, or SOIC's designee approve waivers pursuant to their authorities outlined in DCID 6/4, paragraphs 6a and b, only when the benefit of access clearly outweighs any security concern raised by the shortcoming. A waiver may require special limitations on access, additional security monitoring and other restrictions on the person's handling of classified information beyond normal need-to-know. Paragraph 6 of DCID 6/4 governs the granting of waivers insofar as they pertain to SCI access eligibility. In the Intelligence Community, waivers may be contemplated when the person under consideration for SCI access is not a United States citizen, when any member of that person's immediate family is not a US citizen, or when any member of the immediate family or other person with whom there is a bond of affection or obligation is subject to duress.



b. *Issue information*: Any information that could adversely affect a person's eligibility for access to classified information. There are two types:

(1) *Minor issue information*: Information that meets a threshold of concern set out in "Adjudicative Guidelines for Determining Eligibility for Access to Classified Information" (see Annex C to DCID 6/4), but for which adjudication determines that adequate mitigation, as provided for by the Guidelines, exists. Minor issue information does not provide the basis for a waiver or condition.

(2) *Substantial issue information*: Any information, or aggregate of information, that raises a significant question about the prudence of granting access eligibility. Substantial issue information constitutes the basis for granting access eligibility with waiver or condition, or for denying or revoking access eligibility. Granting access eligibility when substantial issue information exists is predicated upon meeting the requirements of paragraphs 12a and b of DCID 6/4 for tailored security programs whose purpose is to resolve issues.

c. *Need-to-know*: A determination made by an authorized holder of classified information that a prospective recipient requires access to specific classified information in order to perform or assist in a lawful and authorized governmental function.

d. *Reciprocity*: Acceptance by one SOIC of an SCI access eligibility determination made by another. It applies both to granting access when another SOIC has approved and denying access when another SOIC has denied or revoked. Reciprocity does not include agency determinations of employment suitability. Nothing precludes SOICs or their designees from exercising authority to grant or to deny access for reasons of operational necessity regardless of another SOIC's decision.

### **3. The Effect of the Polygraph on Reciprocity.**

The Intelligence Community uses the polygraph in defined circumstances to provide additional information to the adjudicative process. Reciprocity of an SCI eligibility determination when a polygraph requirement exists is conditional upon satisfactory completion of that requirement.

### **4. Review of Access Determinations.**

All denials or revocations of access eligibility are subject to the review proceedings outlined in Annex D, above.