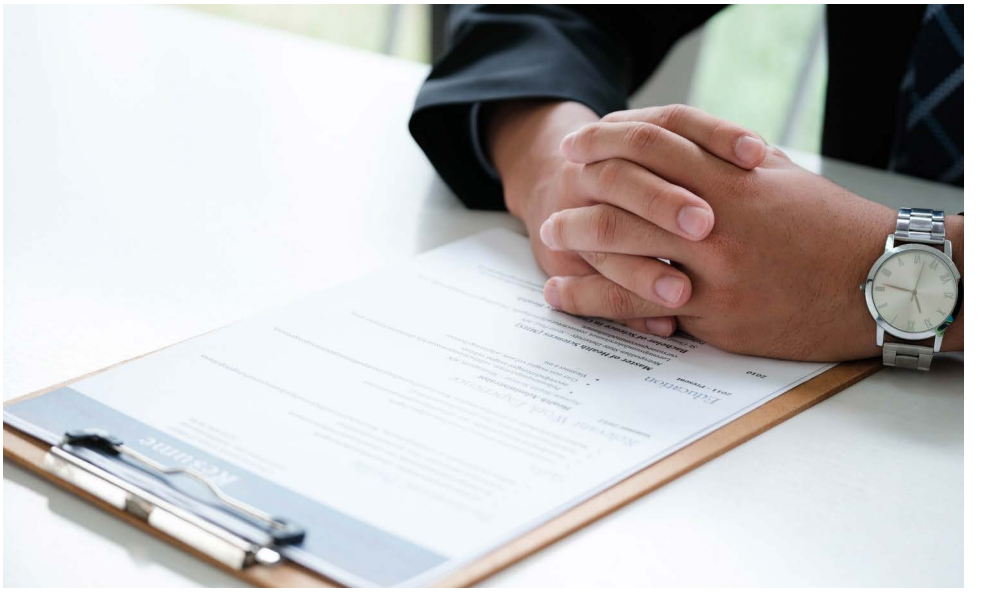
RAND

Research Report

STEPHANIE J. WALSH, SINA BEAGHLEY, DAVID STEBBINS,
NIKOLAY MASLOV, THEILINE PIGOTT

Vetting of Dual Citizens and Naturalized Citizens for Service in the National Security Workforce

Addressing Complexities, Challenges, and Opportunities Related to the Personnel Vetting Process



For more information on this publication, visit **www.rand.org/t/RRA3461-1**.

About RAND

RAND is a research organization that develops solutions to public policy challenges to help make communities throughout the world safer and more secure, healthier and more prosperous. RAND is nonprofit, nonpartisan, and committed to the public interest. To learn more about RAND, visit www.rand.org.

Research Integrity

Our mission to help improve policy and decisionmaking through research and analysis is enabled through our core values of quality and objectivity and our unwavering commitment to the highest level of integrity and ethical behavior. To help ensure our research and analysis are rigorous, objective, and nonpartisan, we subject our research publications to a robust and exacting quality-assurance process; avoid both the appearance and reality of financial and other conflicts of interest through staff training, project screening, and a policy of mandatory disclosure; and pursue transparency in our research engagements through our commitment to the open publication of our research findings and recommendations, disclosure of the source of funding of published research, and policies to ensure intellectual independence. For more information, visit www.rand.org/about/research-integrity.

RAND's publications do not necessarily reflect the opinions of its research clients and sponsors.

Published by the RAND Corporation, Santa Monica, Calif.

© 2025 RAND Corporation
RAND® is a registered trademark.

Library of Congress Cataloging-in-Publication Data is available for this publication.

ISBN: 978-1-9774-1566-0

Cover: Ijeab/Getty Images.

Limited Print and Electronic Distribution Rights

This publication and trademark(s) contained herein are protected by law. This representation of RAND intellectual property is provided for noncommercial use only. Unauthorized posting of this publication online is prohibited; linking directly to its webpage on rand.org is encouraged. Permission is required from RAND to reproduce, or reuse in another form, any of its research products for commercial purposes. For information on reprint and reuse permissions, visit www.rand.org/about/publishing/permissions.

About This Report

In this report, we examine the challenges and complexities that surround the personnel vetting (PV) process for dual or naturalized citizens (D/NCs) who are seeking roles in the national security workforce. Applicants for national security positions must navigate the federal PV process to adjudicate their eligibility for a security clearance. For individuals who are D/NCs, the process may be more complex due to such factors as perceptions about foreign citizenship, perceptions about the possession of a foreign passport, and government concerns about extensive foreign connections. D/NCs often have language skills and cultural knowledge that are needed for national security work. However, D/NCs can be deterred from even applying for clearances because of uncertainty and even misinformation about the citizenship requirements to obtain a clearance, the complex and sometimes confusing PV process, and perceptions regarding lengthy processing times and a higher potential for rejection. These issues can prevent departments, agencies, and cleared industry contractor organizations from fully using the needed skills and expertise of D/NCs in sensitive positions. We offer insights and recommendations to address relevant aspects of the PV process for D/NCs.

The research reported here was completed in April 2025 and underwent security review with the sponsor and the Defense Office of Prepublication and Security Review before public release.

RAND National Security Research Division

This research was sponsored by the Security, Suitability, and Credentialing Performance Accountability Council Program Management Office (PAC PMO) and conducted within the Personnel, Readiness, and Health Program of the RAND National Security Research Division (NSRD), which operates the National Defense Research Institute (NDRI), a federally funded research and development center sponsored by the Office of the Secretary of Defense, the Joint Staff, the Unified Combatant Commands, the Navy, the Marine Corps, the defense agencies, and the defense intelligence enterprise.

For more information on the RAND Personnel, Readiness, and Health Program, see www.rand.org/nsrd/prh or contact the director (contact information is provided on the webpage).

Acknowledgments

This study would not have been possible without the support of and contributions from several individuals. We thank the members of our PAC PMO sponsor team for their support of this research, responsiveness in assisting with information requests, and helpful feedback.

Additionally, we are grateful to our discussion participants from across the government, cleared defense industry professionals, and dual and naturalized citizens we spoke with for their time, candor, and engagement throughout our research. We also thank Chandra Garber for her assistance with refining the reference sheet on common questions and our quality assurance reviewers Douglas Ligor and Bradley Knopp, whose constructive feedback enhanced the quality and depth of this report.

Summary

Issue

Applicants for national security positions must navigate the federal personnel vetting (PV) process to adjudicate their eligibility for a security clearance. For individuals who are dual or naturalized citizens (D/NCs), the process may be more complex due to such factors as perceptions about foreign citizenship, perceptions about the possession of a foreign passport, and government concerns about extensive foreign connections. D/NCs often have language skills and cultural knowledge that are needed for national security work. However, D/NCs can be deterred from even applying for clearances because of uncertainty and even misinformation about the citizenship requirements to obtain a clearance, the complex and sometimes confusing PV process, and perceptions regarding both lengthy processing times and a higher potential for rejection. These issues can prevent departments, agencies, and cleared industry contractor organizations from fully using the needed skills and expertise of D/NCs in sensitive positions.

Purpose

The Security, Suitability, and Credentialing Performance Accountability Council Program Management Office sponsored this study to examine challenges, potential sources of confusion, and misperceptions related to the PV process for D/NCs and to consider how these factors might affect U.S. government (USG) efforts to meet national security workforce needs. Specifically, our study aims were to (1) understand U.S. PV policy and guidance that outlines security considerations and associated mitigating factors that might be especially relevant for D/NCs; (2) identify challenges, perceptions, and issues related to PV practices or policies that might affect the recruitment or retention of D/NCs; and (3) provide recommendations to address relevant aspects of the PV process for D/NCs.

Approach

We used a mixed-methods approach for this research. We reviewed relevant laws, statutes, and policies related to U.S. citizenship and PV; two small but meaningful subsets of challenges to security clearance denials that were heard by the Defense Office of Hearings and Appeals and the U.S. Department of Energy's Office of Hearings and Appeals; and individual posts related to PV on publicly available online discussion platforms. We also conducted interviews with subject-matter experts and stakeholders on this topic, including USG and industrial security PV professionals, legal professionals who specialize in security clearance

cases, and D/NCs who have gone through the security clearance process. Our analysis of all this information informed our findings and shaped our recommendations.

Findings and Recommendations

The key issue we identified was widespread misinformation about how PV requirements apply to D/NCs, which leads to confusion among stakeholders. Unclear forms, misinformation from some personnel, and the mistaken belief that dual citizenship is disqualifying have fueled negative perceptions by some D/NCs of the PV process and may deter D/NCs from careers in national security. By addressing misinformation about how PV requirements apply to D/NCs and improving the clarity, consistency, and transparency of the PV process, the USG can more effectively recruit and retain the talent needed to address complex global challenges and strengthen the national security workforce. Our findings are as follows:

- Finding 1: Vague and inconsistent language about reporting foreign connections on USG vetting forms, in policies, and in guidance is confusing for prospective D/NC applicants and USG and industrial security officers.
  - Recommendation 1: Update USG regulations, policies, forms, and guidance documents to include consistent and easy-to-understand language about the requirements for reporting foreign connections.
- Finding 2: Some workforce professionals (e.g., recruiters and human resources staff) and security clearance personnel (e.g., security officers and investigators) do not consistently convey accurate information about PV policies and requirements for D/NCs, and some PV personnel describe a lack of resources and training to address specific needs and requirements for handling D/NC applicant cases.
  - Recommendation 2: Create and distribute resources for USG personnel that summarize and clarify how PV requirements apply to D/NC applicants, and provide resources that are tailored to address D/NC applicant cases.
- Finding 3: Widespread misinformation about PV requirements for D/NC applicants can create confusion for the applicants and may deter them from seeking national security positions.
  - Recommendation 3: Create and distribute resources that clarify the PV requirements that are most relevant to D/NC applicants.

Contents

About This Report iii
Summary v
Tables ix

CHAPTER 1
Introduction 1
Project Objectives 1
Methodology and Limitations 1
Structure of This Report 3

CHAPTER 2
Personnel Vetting Structural Elements Related to Dual or Naturalized Citizen Applicant Cases 5
Citizenship Laws and Statutes 6
Personnel Vetting Questionnaire Data Requirements 7
Personnel Vetting Investigative and Adjudicative Requirements 8
Department- or Agency-Specific Requirements 12
Reporting Requirements 12
Case Analysis of Security Clearance Appeals 13

CHAPTER 3
Perspectives on Dual or Naturalized Citizen Applicant Cases and Experiences in the Personnel Vetting Process 15
Online Discussion Platform Scan 15
Interviewee Observations 20
Challenge 1: Confusion About Personnel Vetting Requirements for Dual or Naturalized Citizens 21
Challenge 2: Perceptions of Inconsistencies in Dual or Naturalized Citizen Applicant Treatment and Processing 24
Challenge 3: Hiring and Reciprocity Barriers in the Personnel Vetting Process 27
Challenge 4: Dual or Naturalized Citizens Being Deterred from Going Through the Personnel Vetting Process 32

CHAPTER 4
Conclusion, Findings, and Recommendations 37

APPENDIX
Reference Sheet: Addressing Common Questions and Concerns from Dual or Naturalized Citizens Regarding the Security Clearance Process 43

Abbreviations 51
References 53

Tables

2.1. Security Executive Agent Directive 4 National Security Adjudicative Guidelines 9
3.1. Summary of Dual or Naturalized Citizen Eligibility Thread from a Post on the Subreddit r/SecurityClearance 17

CHAPTER 1

Introduction

Applicants for national security positions must navigate the federal personnel vetting (PV) process to adjudicate their eligibility for a security clearance. For individuals who are dual or naturalized citizens (D/NCs), the process may be more complex due to such factors as perceptions about foreign citizenship, perceptions about the possession of a foreign passport, and government concerns about extensive foreign connections. D/NCs often have language skills and cultural knowledge that are needed for national security work. However, D/NCs can be deterred from applying for clearances because of uncertainty and even misinformation about the citizenship requirements to obtain a clearance, the complex and sometimes confusing PV process, and perceptions regarding both lengthy processing times and a higher potential for rejection. These issues can prevent departments or agencies and cleared industry contractor organizations from fully using the needed skills and expertise of D/NCs in sensitive positions.

Project Objectives

The Security, Suitability, and Credentialing Performance Accountability Council Program Management Office sponsored this study to examine challenges and potential sources of confusion and misperceptions related to the PV process for D/NCs and to consider how these factors might affect U.S. government (USG) efforts to meet national security workforce needs. Specifically, our study aims were to (1) understand U.S. PV policy and guidance that outlines security considerations and associated mitigating factors that might be especially relevant for D/NCs; (2) identify challenges, perceptions, and issues related to PV practices or policies that might affect the recruitment or retention of D/NCs; and (3) provide recommendations to address relevant aspects of the PV process for D/NCs.

Methodology and Limitations

We used a mixed-methods research approach. To understand the structural context of the PV process as it relates to D/NCs, we analyzed USG laws, statutes, and policies related to citizenship and PV. Our analysis focused on elements that may significantly affect D/NC applicants, such as foreign activities and associations, foreign preference, and allegiance to the United

States. To gain insight into how such elements may affect adjudicative outcomes, we reviewed two small but meaningful subsets of challenges to security clearance denials that were heard by the Defense Office of Hearings and Appeals (DOHA) and the U.S. Department of Energy's Office of Hearings and Appeals (OHA).

To better understand the experiences of D/NCs who are navigating the PV process, we scanned online discussion platforms on security clearances and conducted interviews with subject-matter experts (SMEs) and stakeholders who are familiar with the common challenges that D/NCs are facing during the PV process. The interviewees included USG and industry PV professionals, legal experts specializing in security clearance cases, and D/NCs who had experienced the security clearance process.

We acknowledge several limitations in data availability that affected the comprehensiveness of this research. First, the number of dual citizens whom we interviewed was limited and thus does not fully capture the variety of D/NC experiences with the PV process. Additionally, insights into how often dual or naturalized citizenship influences adjudicative outcomes were limited in scope. We reviewed only a small subset of the PV hearings and issue decisions for federal contractors held by DOHA and OHA. This review excluded cases for government employees and military personnel and adjudicative processes used by other agencies, such as those in the Intelligence Community (IC). Additionally, although we reviewed federal PV policies and relevant laws, our analysis did not extend to internal department and agency instruction manuals, guidelines, or policies.

Finally, as part of the USG's Trusted Workforce 2.0 (TW 2.0) PV reform effort, two critical structural elements of the USG-wide PV system that we reference throughout this report are going to be updated over the next several years. One element is the National Security Adjudicative Guidelines, which underlie the criteria for security clearance decisions; the guidelines were released in 2017, and several of our interviewees confirmed that they expect the guidelines to be updated as part of the TW 2.0 reform effort. The other element is the Standard Form 86 (SF-86) Questionnaire for National Security Positions, which is used to collect information to support PV investigations and national security investigations.[1] The SF-86 is being replaced by the Personnel Vetting Questionnaire (PVQ), and a phased deployment of the PVQ—with the first department or agency use case—began in early 2025. Full implementation of the PVQ across the USG is projected to occur in fiscal year 2027.[2] We reviewed the latest proposed version of the PVQ, and we note in this report some changes that are particularly relevant to D/NC applicants.

[1] U.S. Office of Personnel Management, "Questionnaire for National Security Positions," Standard Form 86, revised November 2016.

[2] Justin Doubleday, "Goodbye SF-86? OMB Approves New 'Personnel Vetting Questionnaire,'" Federal News Network, February 9, 2024; Security, Suitability, and Credentialing Performance Accountability Council, "Trusted Workforce 2.0: Quarterly Progress Report," January 2025.

Structure of This Report

In Chapter 2, we provide an overview of the structural components of the PV process that are relevant to D/NC applicant cases. This overview is based on a review of literature, policy documents, and a subset of challenges to security clearance adjudications. In Chapter 3, we highlight observations and key issues related to how D/NCs experience the PV process, how their applications and cases are handled by workforce professionals (such as recruiters and human resources staff) and PV system professionals (such as investigators and adjudicators), and barriers to the USG and industry hiring D/NCs that stem from the PV process. These insights were drawn from perspectives shared in online discussion platforms on PV issues and from 23 interviews with stakeholders, SMEs, and D/NCs who have pursued security clearances. In Chapter 4, we present our findings and recommendations. Finally, in the appendix, we provide a reference document with key questions and answers for D/NC applicants that was derived from the data and analysis that we conducted. The reference sheet is titled "Addressing Common Questions and Concerns from Dual or Naturalized Citizens Regarding the Security Clearance Process."

CHAPTER 2

Personnel Vetting Structural Elements Related to Dual or Naturalized Citizen Applicant Cases

The PV process is a comprehensive system designed to assess whether individuals are sufficiently suitable, reliable, and trustworthy to hold positions of national security. When a USG department or agency sponsors someone for a security clearance, the PV process begins with the individual providing information on a standardized form. An investigator then verifies the information the individual provided, conducts records and database checks, and interviews references and contacts as required based on the level of clearance requested by the department or agency. Once the investigation is complete, the investigative record is provided to adjudicators in the sponsoring department or agency, who review the information and determine whether the individual is eligible for a security clearance; adjudicators can also request additional information before making the final determination. The PV process is governed by a variety of laws, statutes, and policies. These rules define key aspects of the process, including the eligibility criteria for obtaining a security clearance, the types of information that must be gathered during the vetting process, and the procedures for making adjudicative decisions. Although PV policies aim to ensure fairness and consistency through standardized forms and guidelines, prior reports from RAND researchers have identified areas for improvement and provided recommendations for USG consideration.[1]

To understand the structural context of the PV process as it relates to D/NCs, we analyzed laws, statutes, and policies related to citizenship and PV and focused on elements that may significantly affect D/NC applicants, such as foreign activities and associations, foreign preference, and allegiance to the United States. We also reviewed two small but meaningful subsets of challenges to security clearance denials heard by DOHA and OHA to gain insight into any impacts that might be observable in adjudicative outcomes.

[1] Marek N. Posard, Sina Beaghley, Hamad Al-Ibrahim, and Emily Ellinger, *Assessing Misperceptions Online About the Security Clearance Process*, RAND Corporation, RR-A1690-1, 2023; David Stebbins, Richard S. Girven, and Samantha Ryan, *National Security Employment: Improving the Candidate Experience Journey Through the Personnel Vetting Process*, RAND Corporation, RR-A1990-1, 2023.

Citizenship Laws and Statutes

U.S. Citizenship

As described in U.S. Code, Title 8, U.S. citizenship may be obtained through birthright, through naturalization, or when derived from naturalized or U.S. citizen parents.[2] The USG automatically provides *birthright citizenship* to most children born in the United States; this process is sometimes referred to as *citizenship through residence*.[3] Birthright citizenship applies not only to children who are born in the 50 states and the District of Columbia, it also applies to nearly all individuals who are born in U.S. territories, depending on the territory and the citizenship status of the individuals' parents or grandparents.[4] Birthright citizenship may also apply to individuals who are born outside the United States but, at the time of their birth, have parents or grandparents who were born in the United States or are U.S. citizens; this process is sometimes referred to as *citizenship through blood relationship*.[5] Individuals who have birthright citizenship are *natural born citizens*.[6]

Naturalization is the process by which a non-U.S. citizen can become a U.S. citizen; these individuals are *naturalized citizens*. Applicants for naturalization typically must meet several criteria, such as residing continuously in the United States for at least five years after permanent resident admission prior to filing the naturalization application (or for at least three years if the applicant's legal permanent resident status was a result of marriage to a U.S. citizen).[7] Additionally, applicants must demonstrate "good moral character," pass an "English language and civics test," and take an oath of allegiance to the United States administered by an authorized U.S. official.[8] Naturalized citizens have the same rights and responsibilities as natural born citizens, except that they are not eligible for the U.S. presidency.[9] Children who

---

[2] For more information, see U.S. Code, Title 8, Section 1431, Children Born Outside the United States and Lawfully Admitted for Permanent Residence; Conditions Under Which Citizenship Automatically Acquired.

[3] U.S. Code, Title 8, Chapter 12, Subchapter III, Nationality and Naturalization.

[4] Natives of unincorporated U.S. territories, such as American Samoa, are noncitizen nationals. A *noncitizen national* is someone who is not a U.S. citizen but is granted certain rights and privileges that are similar to those of citizens, including the right to reside and work in the United States without restriction (Travel.State.Gov, "Certificates of Non Citizen Nationality," webpage, U.S. Department of State, undated-a; Vera Institute of Justice, *Are You a United States Citizen?* U.S. Department of Justice, November 2011).

[5] U.S. Code, Title 8, Chapter 12, Subchapter III.

[6] Legal Information Institute, "Natural Born Citizen," Cornell Law School, undated.

[7] Requirements may vary depending on individual circumstances, such as foreign citizens who marry U.S. citizens or children with foreign citizenship who are adopted by U.S. citizens (U.S. Citizenship and Naturalization Services, "Policy Manual, Volume 12—Citizenship and Naturalization," webpage, June 24, 2025; U.S. Code, Title 8, Section 1430, Married Persons and Employees of Certain Nonprofit Organizations).

[8] U.S. Citizenship and Naturalization Services, 2025.

[9] Legal Information Institute, undated.

are born outside the United States to non-U.S. citizens qualify for *derivative citizenship* if one or more parents becomes a naturalized citizen before the child turns 18 years old.

Dual Citizens

Citizenship laws vary by country, and although not all countries permit dual citizenship, U.S. law "does not impede its citizens' acquisition of foreign citizenship whether by birth, descent, naturalization or other form."[10] In the United States, dual citizenship is typically obtained one of three ways: (1) A citizen of another country can apply to become a naturalized U.S. citizen if the applicant's country allows dual citizenship, (2) U.S. citizens can obtain citizenship in another country that recognizes dual citizenship with the United States,[11] or (3) U.S. citizens may be born with dual citizenship, depending on their parents' citizenship status and places of birth.[12]

In some cases, dual citizenship is automatically conferred because of citizenship laws. For example, a child who is born in the United States to a parent from a country that grants citizenship by inheritance may automatically become a citizen of both the United States and the parent's home country. In such cases, if the individual has never exercised the rights and privileges of their foreign citizenship, they may be uncertain about whether they are truly a dual citizen. During this study, we interviewed one individual who was unsure about whether they were a dual citizen but believed that they were "technically" a dual citizen from birth. This interviewee disclosed their uncertainty during their security clearance background investigation to err on the side of caution, despite never having lived in the other country, never having obtained a passport from that country, and never having had any contact with that country's government.[13]

Personnel Vetting Questionnaire Data Requirements

At the outset of this study, the SF-86 was the document that all security clearance applicants were required to complete to begin the PV process; it may be completed on paper or electronically.[14] The form is used to collect information to help assess an individual's eligibility for a security clearance. The form has 21 sections, each with questions pertaining to differ-

[10] Travel.State.Gov, "Dual Nationality," webpage, U.S. Department of State, undated-b; U.S. Citizenship and Immigration Services, "Immigration and Nationality Act," webpage, July 10, 2019.

[11] A U.S. citizen may obtain foreign citizenship by applying for citizenship from another country or, in some cases, they may automatically obtain foreign citizenship because they marry a citizen of a foreign country.

[12] Travel.State.Gov, undated-b; USAGov, "How to Get Dual Citizenship or Nationality," webpage, November 13, 2024.

[13] USG PV SME, interview with the authors, November 7, 2024.

[14] U.S. Office of Personnel Management, 2016.

ent aspects of the applicant's history. For some sections, the responses of D/NC applicants are less likely to differ significantly from those of non-D/NC applicants, such as for sections on education, employment, drug activity, or psychological and emotional health. However, for other sections—particularly those that pertain to foreign connections—D/NCs may have more information to report. These sections include passport and citizenship, foreign contacts, foreign activities, and foreign travel.

As we described in Chapter 1, the SF-86 is being replaced by the PVQ as part of the TW 2.0 PV reform effort, and a phased deployment of the PVQ began in early 2025.[15] In our review of the publicly available PVQ at the time of this study, we found that, although similar to the SF-86 in most informational categories, the PVQ requires D/NC applicants to provide additional detail in certain areas. For example, in the passport and citizenship section, the SF-86 requires applicants to provide their U.S. Citizenship and Immigration Services number, while the PVQ also requires Student and Exchange Visitor Information System and visa numbers, if applicable.

Additionally, questions about foreign connections were added to some sections in the PVQ, which will likely increase the reporting requirements for some D/NC applicants. For example, under employment, applicants are now asked whether they have been employed by a foreign business; under marital or relationship status, applicants are now asked in a separate question whether they or their partner are exposed to foreign persons who may influence their decisions or shared common interests.

Personnel Vetting Investigative and Adjudicative Requirements

The SF-86 is used by investigators as a launching point for the investigative portion of the PV process. Investigations were governed by the Federal Investigative Standards, jointly issued by security and suitability executive agents, until 2022, at which time the standards were replaced by the Federal Personnel Vetting Investigative Standards as part of TW 2.0 implementation.[16] Investigators verify the information provided by the applicant on the SF-86 by collecting records and interviewing references and contacts as required by the level of investigation requested by the sponsoring agency. Investigators also interview the applicant, check databases, and collect information from other sources. If the investigator identifies something that could indicate a potential risk, they may do additional research into the issue. Extensive foreign connections—such as family members, business dealings, or travel—can make investigations more time-consuming because each connection must be researched.

The culmination of the investigation is a case file that is provided to the adjudicators of the sponsoring agency. Adjudications are governed by the National Security Adjudicative

[15] Doubleday, 2024; Security, Suitability, and Credentialing Performance Accountability Council, 2025.

[16] Office of the Director of National Intelligence and U.S. Office of Personnel Management, "Federal Personnel Vetting Investigative Standards," May 17, 2022b.

Guidelines that are outlined in Security Executive Agent Directive (SEAD) 4.[17] The purpose of the adjudicative guidelines is to establish "the single, common adjudicative criteria for all covered individuals who require initial or continued eligibility for access to classified information or eligibility to hold a sensitive position."[18] The adjudicative guidelines explicitly state that D/NCs are not disqualified from holding a security clearance: "*by itself*, the fact that a U.S. citizen is also a citizen of another country is not disqualifying without an objective showing of such a conflict or attempt at concealment."[19]

Adjudicators apply the SEAD 4 National Security Adjudicative Guidelines to the applicant's case file information to assess the individual's character and loyalty to the United States and determine whether the individual is an acceptable security risk. There are guidelines governing 13 types of concerns, each with criteria for evaluating the applicant's conduct and assessing potential risk. Each guideline includes conditions that could raise a security issue and be disqualifying, as well as conditions that could mitigate security concerns. Table 2.1 provides an overview of the concerns that are addressed in the National Security Adjudicative Guidelines.

TABLE 2.1
Security Executive Agent Directive 4 National Security Adjudicative Guidelines

Adjudicative Guideline	Concern
Guideline A: Allegiance to the United States	"The willingness to safeguard classified or sensitive information is in doubt if there is any reason to suspect an individual's allegiance to the United States."
Guideline B: Foreign Influence	"Foreign contacts and interests, including, but not limited to, business, financial, and property interests, are a national security concern if they result in divided allegiance. They may also be a national security concern if they create circumstances in which the individual may be manipulated or induced to help a foreign person, group, organization, or government in a way inconsistent with U.S. interests or otherwise made vulnerable to pressure or coercion by any foreign interest."
Guideline C: Foreign Preference	"When an individual acts in such a way as to indicate a preference for a foreign country over the United States, then he or she may provide information or make decisions that are harmful to the interests of the United States. Foreign involvement raises concerns about an individual's judgment, reliability, and trustworthiness when it is in conflict with U.S. national interests or when the individual acts to conceal it."

[17] Office of the Director of National Intelligence, "National Security Adjudicative Guidelines," Security Executive Agent Directive 4, June 8, 2017a.

[18] Office of the Director of National Intelligence, 2017a, p. 1.

[19] Office of the Director of National Intelligence, 2017a, p. 10.

Table 2.1—Continued

Adjudicative Guideline	Concern
Guideline D: Sexual Behavior	"Sexual behavior that involves a criminal offense; reflects a lack of judgment or discretion; or may subject the individual to undue influence of coercion, exploitation, or duress. These issues, together or individually, may raise questions about an individual's judgment, reliability, trustworthiness, and ability to protect classified or sensitive information."
Guideline E: Personal Conduct	"Conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations can raise questions about an individual's reliability, trustworthiness, and ability to protect classified or sensitive information."
Guideline F: Financial Considerations	"Failure to live within one's means, satisfy debts, and meet financial obligations may indicate poor self-control, lack of judgment, or unwillingness to abide by rules and regulations, all of which can raise questions about an individual's reliability, trustworthiness, and ability to protect classified or sensitive information."
Guideline G: Alcohol Consumption	"Excessive alcohol consumption often leads to the exercise of questionable judgment or the failure to control impulses, and can raise questions about an individual's reliability and trustworthiness."
Guideline H: Drug Involvement and Substance Misuse	"The illegal use of controlled substances, to include the misuse of prescription and non-prescription drugs, and the use of other substances that cause physical or mental impairment or are used in a manner inconsistent with their intended purpose can raise questions about an individual's reliability and trustworthiness, both because such behavior may lead to physical or psychological impairment and because it raises questions about a person's ability or willingness to comply with laws, rules, and regulations."
Guideline I: Psychological Conditions	"Certain emotional, mental, and personality conditions can impair judgment, reliability, or trustworthiness. A formal diagnosis of a disorder is not required for there to be a concern under this guideline."
Guideline J: Criminal Conduct	"Criminal activity creates doubt about a person's judgment, reliability, and trustworthiness. By its very nature, it calls into question a person's ability or willingness to comply with laws, rules, and regulations."
Guideline K: Handling Protected Information	"Deliberate or negligent failure to comply with rules and regulations for handling protected information—which includes classified and other sensitive government information, and proprietary information—raises doubt about an individual's trustworthiness, judgment, reliability, or willingness and ability to safeguard such information."
Guideline L: Outside Activities	"Involvement in certain types of outside employment or activities is of security concern if it poses a conflict of interest with an individual's security responsibilities and could create an increased risk of unauthorized disclosure of classified or sensitive information."
Guideline M: Use of Information Technology Systems	"Failure to comply with rules, procedures, guidelines, or regulations pertaining to information technology systems may raise security concerns about an individual's reliability and trustworthiness, calling into question the willingness or ability to properly protect sensitive systems, networks, and information."

SOURCE: Reproduces information from Office of the Director of National Intelligence, 2017a.

D/NC applicants are unlikely to provide significantly different responses from non-D/NC applicants on their SF-86s that would raise concerns under most National Security Adjudicative Guidelines, such as responses under Personal Conduct (Guideline E), Drug Involvement and Substance Misuse (Guideline H), or Psychological Conditions (Guideline I). However, other guidelines have conditions related to foreign connections that, for D/NCs, may raise more security concerns that would need to be adjudicated and result in a more arduous and lengthy security clearance process. These guidelines include Foreign Influence (Guideline B, concern about whether the applicant's foreign connections may lead to a divided allegiance), Foreign Preference (Guideline C, concern about whether the applicant prefers a foreign country over the United States), and Outside Activities (Guideline L, concern about whether the applicant's involvement with foreign or domestic entities could create an increased risk of unauthorized disclosure of classified or sensitive information).

For each concern identified, the adjudicator must decide whether the concern can be mitigated; to make this determination, the adjudicator will sometimes ask the applicant to submit additional information. For the guidelines that include concerns about foreign connections (and are therefore relevant to D/NCs), the mitigating factors that can offset the potential risk generally fall into one of the following categories:

1. The applicant is unlikely to be *put in a position of having to choose* between the interests of a foreign entity and those of the United States. For foreign contacts, these mitigating factors are based on the applicant's relationship with the foreign citizen, the foreign citizen's position or activities in the country, and the country itself.
2. *The country* where the applicant has foreign connections poses little or no risk of security issues or conflicts of interest.
3. *The concerning issue* is insubstantial because of when it occurred, of its infrequency, it was approved, or it was determined to pose little or no risk of security concern or conflict of interest.
4. *The applicant* properly reported or ended the concerning issue or expressed a willingness to do so.

If the adjudicator determines that a concern cannot be mitigated, the concern can be grounds to deny eligibility for clearance. As stated in the SEAD 4 guidelines, "Any doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security."[20]

[20] Office of the Director of National Intelligence, 2017a, p. 6.

Department- or Agency-Specific Requirements

Although the SEAD 4 National Security Adjudicative Guidelines are applicable to all USG national security clearance determinations, departments and agencies may have additional requirements for applicants to complete as part of their suitability process. For dual citizens in particular, these requirements may include specific measures to demonstrate their loyalty or allegiance to the United States. For example, the U.S. Department of Justice's Drug Enforcement Administration requires dual citizens to provide a written declaration swearing loyalty and allegiance to the United States, and the U.S. Department of Homeland Security's Immigration and Customs Enforcement division requires some dual-citizen applicants to take a loyalty oath.[21]

For more than a decade before the SEAD 4 National Security Adjudicative Guidelines went into effect in June 2017, some departments and agencies—including the U.S. Department of Defense (DoD)—required dual-citizen applicants to destroy or turn in their foreign passports or identity cards and/or renounce their foreign citizenship.[22] The SEAD 4 National Security Adjudicative Guidelines do not require these actions, although a *willingness* to renounce foreign citizenship as a demonstration of loyalty to the United States can be a mitigating factor for Foreign Preference (Guideline C) concerns. After SEAD 4 went into effect, DoD directed industrial security officers in 2021 to return any foreign passports or identity cards they held to the cleared employees.[23]

Reporting Requirements

The requirement to report foreign connections does not end with the SF-86 or the PVQ, once it is fully implemented. USG personnel who have access to classified information or who hold a sensitive position are also required to regularly report foreign connections. These reporting requirements are governed by the National Security Adjudicative Guidelines outlined in

[21] Under federal regulation, *all* federal employees and military personnel are required to take an oath of office affirming that they will "support and defend the Constitution of the United States against all enemies, foreign and domestic" and "bear true faith and allegiance to the same." However, the same requirement does not apply to federal contractors (U.S. Code, Title 5, Section 3331, Oath of Office; Drug Enforcement Administration, U.S. Department of Justice, "Loyalty Oath," July 2008; Immigration and Customs Enforcement interviewee, correspondence with the authors, January 21, 2024).

[22] Executive Order 14347, signed September 5, 2025, authorized the use of Department of War as a secondary name for the Department of Defense. This publication was written before that order was released and thus refers to the secretary and department by their current statutory names under Public Law 81-216, National Security Act Amendments of 1949.

[23] Defense Security Service, "Foreign Passports and SEAD 4 Guidelines," U.S. Department of Defense, ISL 2019-01, January 15, 2019.

SEAD 3.[24] Once TW 2.0 is fully implemented, the Federal Personnel Vetting Management Standards will also have specific reporting requirements pertaining to foreign connections.[25]

The SF-86 and SEAD 3 reporting requirements differ in scope and purpose and reflect their roles in PV. The SF-86 focuses on foreign contacts at a single point in time during the background investigation process. Applicants are required to report individuals with whom they have "close and/or continuing contact" and to whom they or their spouses or partners are "bound of affection, influence, common interests, and/or obligation."[26] The requirement in SEAD 3, which is designed for ongoing reporting after employment, includes similar language in defining the foreign contacts who must be reported: "continuing association with known foreign nationals that involve bonds of affection, personal obligation, or intimate contact."[27] However, SEAD 3 expands the criteria to include any foreign contact that involves the "exchange of personal information," depending on the nature of the relationship.[28] Although casual public contact is excluded, SEAD 3 captures broader interactions to account for evolving foreign connections. The SEAD 3 requirements are intended to ensure that PV professionals remain aware of new relationships, whether personal or professional, that could pose security risks, even if those relationships are not yet close or bound by affection. However, during our interviews, interviewees across all stakeholder groups flagged inconsistent language about foreign contacts and reporting between SEAD 3 and the SF-86 as confusing to navigate both as clearance holders and as security officers responsible for implementing PV policies and processes.

Case Analysis of Security Clearance Appeals

Individuals who have had their security clearance eligibility revoked or denied are able to appeal the decision. Federal government employees can generally appeal such decisions through their department or agency's personnel security board of appeals or a similar entity, such as the Central Intelligence Agency's internal appeals panel.[29] OHA provides a fact-finding hearing for U.S. Department of Energy contractors and civilians prior to any denial or revocation. For most DoD contractors and the contractors for approximately 32 other federal departments and agencies, the opportunity for a fact-finding hearing prior to any denial

[24] Office of the Director of National Intelligence, "Reporting Requirements for Personnel with Access to Classified Information or Who Hold a Sensitive Position," Security Executive Agent Directive 3, June 12, 2017b.

[25] Performance Accountability Council, "Federal Personnel Vetting Management Standards," September 14, 2022, Appendix C.

[26] U.S. Office of Personnel Management, 2016.

[27] Office of the Director of National Intelligence, 2017b, p. 4.

[28] Office of the Director of National Intelligence, 2017b, p. 4.

[29] Central Intelligence Agency, "AR 10-16 (U) Appeal of Personnel Security Decisions," May 19, 2010.

or revocation is provided by DOHA.[30] OHA and DOHA are the only hearings and appeals offices that publish all of their decisions (in redacted form). This transparency provided us with a usable sample of contractor case decisions.

To gain insight into how structural elements of the PV process may affect adjudicative outcomes, we analyzed the publicly available data from a limited number of security clearance cases heard by DOHA and OHA. From DOHA's online case summaries, we analyzed 752 contractor appeals cases from 2023.[31] Although the case files were anonymized, they included information that is relevant to the security clearance process, such as citizenship(s), legal issues, any history of violence, and familial relations. Case files that involved connections to high-risk countries included information about that country or region, such as the presence of an authoritarian regime, human rights violations, or a U.S. Department of State (DoS) advisory against visiting. Case files also included the concern(s) and National Security Adjudicative Guidelines that were the basis for the denial that was appealed.

Of the 752 cases examined, 22 cited the applicant's dual or naturalized citizenship and associated foreign connections as a risk factor in the denial being appealed (3 percent of the cases analyzed). For these cases, the administrative judges consistently noted that there must be significant assurance that any potential conflict of interest between the United States and another relevant country would be resolved in favor of the United States. The denial was upheld in one-half of the cases (11 cases). Dual or naturalized citizenship was not given as a reason for any of the denials. In 10 of the 11 cases in which the denial was upheld, unmitigated concerns about foreign connections were the sole reason or one of the contributing reasons for the decision (approximately 1 percent of the cases analyzed).

We also analyzed 108 OHA security clearance appeals cases from 2023.[32] Of these cases, only two cited unmitigated risk because of foreign connections as a reason for the denial (less than 1 percent of the cases reviewed). In both of those cases, the concern arose from the applicant's behavior and not from the country where the foreign connection was located or the foreign citizenship.

Our analysis of appeals cases was limited to a single year and cases from the only two hearings and appeals offices that publish their decisions. This sample is not representative of all cases across USG employees but is a strong sample of decisions involving contractors. Although the results are not generalizable, they are informative. In cases in which dual citizenship or foreign connections were considered risk factors, they were closely scrutinized. As outlined in the National Security Adjudicative Guidelines, any doubt in such cases was resolved in favor of national security, although that only applied to a very small number of the appeals cases that we analyzed.

[30] DOHA, homepage, U.S. Department of Defense, undated-a.

[31] DOHA, "DOHA Appeal Board Decisions," webpage, U.S. Department of Defense, undated-b.

[32] OHA, "Decision Summaries," webpage, U.S. Department of Energy, undated.

CHAPTER 3

Perspectives on Dual or Naturalized Citizen Applicant Cases and Experiences in the Personnel Vetting Process

To understand the dynamics, challenges, and perspectives of the experiences of D/NC applicants in the PV process, we scanned online discussion platforms on security clearance issues and conducted interviews with stakeholders. The interviewees were USG PV professionals, D/NC applicants who had gone through the security clearance process, attorneys who specialize in helping D/NCs navigate the PV process, and industrial security SMEs. According to the interviewees, the languages and cultural skills of many D/NCs are needed in the national security workforce. However, despite the demand for D/NCs, we identified several challenges D/NCs face when applying for and obtaining security clearances, including

1. confusion about the PV requirements for D/NCs
2. perceptions of inconsistencies and challenges with D/NC application processing
3. hiring barriers created by the PV process
4. D/NCs being deterred by the PV process.

Online Discussion Platform Scan

We searched online discussion platforms for insights into D/NCs' experiences with and perceptions of the security clearance process. We focused on two platforms—Reddit (r/SecurityClearance) and ClearanceJobsBlog.com (Security Clearance Q&A)—because PV professionals and applicants use these platforms to share advice, ask questions, and voice concerns about the PV process. These platforms offer a limited but informative glimpse into the unique questions and concerns of D/NC security clearance applicants, the type of information (or misinformation) that is posted about issues related to citizenship status, and other insights into D/NCs' experiences with the PV process.

The subreddit r/SecurityClearance on Reddit is where users ask questions and share advice, experiences, and grievances about the security clearance process. As of October 2024, the r/SecurityClearance subreddit had approximately 61,000 members. We found 27 discussion threads about dual or naturalized citizenship that were posted since 2020; of these

threads, 26 began with someone asking whether their dual-citizenship status would make them ineligible for a security clearance. Although the majority of this subreddit's members appeared to know that dual or naturalized citizenship is not a disqualifying factor for a security clearance, that knowledge was not universal. For example, one subreddit member inaccurately posted that federal employees cannot have dual citizenship.[1] Misperceptions and misinformation about this and other PV requirements were posted alongside accurate information, with little to distinguish between what was factual and what was not.

A typical thread is summarized in Table 3.1. The initial post was from an individual who wanted to enlist in the U.S. Navy and obtain a security clearance. However, during the preliminary screening of the individual's SF-86, the recruiter told them that the Navy could not accept their application because they had dual U.S./Chinese citizenship and a parent who was a Chinese national residing in China. In the thread, the applicant explained what had happened and asked whether they would ever be able to obtain a security clearance: "I'll be starting college in the fall and was thinking of doing NROTC [Navy Reserve Officers' Training Corps], but would it be pointless? I'm not confident in being able to secure a secret clearance given my family's background."[2]

[1] cptvenezuela, "Relinquishing Dual Citizenship," Reddit post, r/SecurityClearance, August 23, 2021.

[2] Global-Rock-6435, "SCI preliminary denied by Navy for Chinese parent, do I still have a chance at commissioning?" Reddit post, r/SecurityClearance, May 15, 2024.

TABLE 3.1

Summary of Dual or Naturalized Citizen Eligibility Thread from a Post on the Subreddit r/SecurityClearance

Content of Response to Post (number of responses)	Accuracy of Response (correct, incorrect, partially correct, N/A)	Comment
Impossible or unlikely to get a clearance (7)	Incorrect or partially correct	The parent could be considered a risk under the Adjudicative Guidelines. However, if the Navy considers mitigating factors, the individual might be able to obtain a clearance if the adjudicator determines that the risk can be mitigated. They may also be able to obtain a clearance from another sponsoring agency.
Concern that Chinese government would threaten the parent to coerce information from the clearance holder (7)	Correct	These comments reflect the SEAD 4 National Security Adjudicative Guidelines.
Likelihood of a clearance would improve if the parent migrated to the United States (5)	Correct	These comments reflect the SEAD 4 National Security Adjudicative Guidelines.
Likelihood of a clearance would improve if the applicant severed ties (1)	Correct	These comments reflect the SEAD 4 National Security Adjudicative Guidelines.
Likelihood of a clearance would be worse if the parent had worked for the Chinese government (1)	Correct	These comments reflect the SEAD 4 National Security Adjudicative Guidelines.
Likelihood of a clearance would depend on luck of the draw (1)	Incorrect or partially correct	This response illustrates a perception that the National Security Adjudicative Guidelines are not applied consistently. Although this may be accurate in some cases because of the inherent subjectivity of the guidelines and human judgment, this impression may stem from a conflation of USG-wide adjudicative standards and department- or agency-specific security and suitability requirements.
Poster should not listen to advice on the subreddit; referred to SEAD 4 National Security Adjudicative Guidelines (1)	Correct	This response was generated by an artificial intelligence–based discussion monitor. It was the only response that included a link to a valid outside source of information.
Anecdote about someone with Chinese citizenship or family in China receiving a clearance (3)	N/A	—

Table 3.1—Continued

Content of Response to Post (number of responses)	Accuracy of Response (correct, incorrect, partially correct, N/A)	Comment
Debate about whether China recognizes dual citizenship (6)	N/A	—

SOURCE: Adapts information from Global-Rock-6435, 2024 (Reddit post).

NOTE: N/A = not applicable. There were 24 responses total, but some responses touched on multiple issues, so the sum of the responses is greater than 24.

Table 3.1 illustrates several issues with how PV and dual citizenship are discussed in public online discussion platforms. First, misinformation is stated as fact, and sometimes people are explicitly told not to bother applying for a security clearance. Second, there is a perception among some people that the National Security Adjudicative Guidelines are not applied uniformly, which may stem—at least in part—from a conflation of the USG-wide National Security Adjudicative Guidelines and department- or agency-specific security and suitability requirements.

The other online discussion platform we scanned was ClearanceJobsBlog.com. ClearanceJobs.com is a networking website that professes to be "the largest career network for professionals with federal government security clearance."[3] As of May 2025, ClearanceJobs.com claimed to have more than 54,000 job postings from more than 1,900 hiring companies. ClearanceJobs.com operates ClearanceJobsBlog.com, a site that hosts a discussion platform where users can ask questions and share their experiences with the PV process. We identified 35 discussions pertaining to D/NCs that were posted between 2018 and 2024. Although there were fewer D/NC-related posts on ClearanceJobsBlog.com than on Reddit, the posts tended to provide more accurate information, suggesting that ClearanceJobsBlog.com users may have a better understanding of the PV process (in fact, some users self-identified as former investigators and adjudicators). What follows are examples from ClearanceJobsBlog.com that illustrate common user concerns; these user concerns were also observed on Reddit:

- **Uncertainty about security clearance processing times:** When someone asked how long the investigative process would take for a dual U.S./Japanese citizen, multiple respondents said that the length of time is too difficult to determine; one person stated that it would likely be longer than for non-naturalized/non-dual citizens.[4] In a remark illustrating that this is a common question for security clearance applicants, another forum participant said, "This question has been asked a thousand times. No one can tell you how long your process will take. All of us are waiting, and looking for timelines."[5]
- **Uncertainty about renouncing a foreign citizenship and/or destroying a foreign passport:** Someone posted that their security specialist asked them whether they would be willing to renounce their Italian citizenship: "While I am willing to renounce, I am also a little confused because I know plenty of Italian-Americans with TS/SCI [Top Secret/Sensitive Compartmented Information] who work at DoS and DoD."[6] Several responses provided factual information, including that the requirements vary between agencies, how someone obtains foreign citizenship matters, and even though it is standard to

[3] ClearanceJobs.com, homepage, undated.

[4] sx19ctl, "Question about Adjudication Status," ClearanceJobsBlog.com, Security Clearance Q&A, July 2, 2018.

[5] sx19ctl, 2018 (ClearanceJobs.com post).

[6] gmgmgmgm, "Asked if I am willing to renounce Italian citizenship for Secret Clearance," ClearanceJobsBlog.com, Security Clearance Q&A, November 1, 2024.

ask applicants whether they are *willing* to renounce, the USG no longer requires nor in some cases wants applicants to renounce (two different users made this last point, one of whom included a reference to the National Security Adjudicative Guidelines). However, two users responded incorrectly that the poster would likely have to destroy or turn in their passport; one of those users shared this anecdote and advice: "I had a friend with dual-citizenship. They basically had him cut up his passport from the other country. Having a clearance is a big deal and they want to know that you are 100% loyal to the U.S. If you have hesitations about that it is ok, but know that it could discontinue your clearance process and your position."[7]

- **Uncertainty about the applicability of the National Security Adjudicative Standards:** The dual U.S./Italian citizen whose post was mentioned in the previous example also noted, "I assume adjudicators have some form of codified policy to make these determinations, but at the same time it is impossible to . . . account for all the nuances of people's lives and backgrounds."[8] In response, someone posted a detailed and accurate explanation of the applicable requirement and cited the National Security Adjudicative Guidelines. However, this understanding of the National Security Adjudicative Guidelines was not universal. In another discussion thread, someone posted, "Take a look [at] Guidelines B and C within Security Executive Agent Directive 4 (SEAD 4). This should give you more guidance on the dual citizenship issue. Although I'm not sure who's really following this directive, it eases the burden of foreign passports and dual citizenship depending on the circumstances though."[9]

Interviewee Observations

We conducted 23 semi-structured interviews with key stakeholders across multiple populations between November 2024 and March 2025: USG PV SMEs (seven participants), industrial security stakeholders (six participants), attorneys with PV expertise (three participants), and D/NCs (seven participants). Our interviews with USG PV SMEs provided information about how investigators, adjudicators, quality reviewers, and USG hiring departments or agencies interpret and apply the National Security Adjudicative Guidelines and the concerns or issues those SMEs encounter more frequently with D/NC applicants. To better understand the experiences of D/NC security clearance applicants, we interviewed D/NCs who had gone through the PV process and attorneys who specialize in helping D/NCs navigate that process, including appeals of adjudicative decisions. We also interviewed industrial security stakeholders who shared insights into the workforce demand for foreign language and cultural

7 gmgmgmgm, 2024 (ClearanceJobs.com post).

8 gmgmgmgm, 2024 (ClearanceJobs.com post).

9 koshka, "Top Secret Clearance with possible dual citizenship with Russia," ClearanceJobsBlog.com, Security Clearance Q&A, March 9, 2018.

expertise, considerations that are made before hiring D/NCs or bringing them onto projects that require a security clearance, and challenges or obstacles faced by industrial security employers and by D/NCs during the PV process. What follows are summaries of the four major challenges our interviewees identified regarding D/NCs who apply for, obtain, and retain security clearances.

Challenge 1: Confusion About Personnel Vetting Requirements for Dual or Naturalized Citizens

Most interviewees noted that there are widespread misunderstandings and misconceptions about PV requirements for D/NCs. Multiple reasons were provided for the confusion, including

- a lack of clear and specific information or other resources for applicants from employers or official websites regarding specific D/NC-related PV issues
- the proliferation of misinformation and personal anecdotes online
- changes to PV requirements for D/NC applicants over time and perceptions of legacy requirements still being applicable
- inconsistent D/NC application outcomes
- inconsistent language in PV regulations and forms.

Of note, many interviewees pointed out that misunderstandings and misperceptions about PV requirements persist not only among D/NCs but also among workforce professionals (e.g., recruiters and human resources staff) and security clearance personnel (e.g., security officers and background investigators).

Confusion Among Dual or Naturalized Citizens

Many D/NC interviewees reported that they did not receive clear information to help them understand and navigate the vetting process or to adequately answer their questions related to citizenship, foreign connections, and other issues of particular relevance to D/NCs. One D/NC applicant reported, "There was no prompting from [my employer's] side. Basically, [I got] a couple of emails and the SF-86 showed up. They were just like, 'Fill this out.'"[10] Another D/NC who applied to be a commissioned officer in the armed services said, "I wasn't given any instructions from the recruiter, who when you sign up for the military, is probably your only contact."[11]

Several interviewees reported that much of the information that is available to applicants, such as organization-based frequently asked questions (FAQs) and websites, does not

[10] Dual or naturalized citizen, interview with the authors, January 31, 2025.

[11] Dual or naturalized citizen, interview with the authors, February 6, 2025.

address the specific questions and unique concerns of D/NC applicants. For example, one D/NC applicant reported, "[The Defense Counterintelligence and Security Agency] has an FAQ website, which isn't helpful—it has a link to a 52-page document which [provides] way more than is necessary . . . [and] the FAQs are not accurate."[12]

Additionally, the lack of clarity and guidance for the SF-86 can make the form challenging to complete. For D/NCs with many foreign connections, the lack of clarity about who should be reported as a "close and/or continuing" foreign contact was frequently mentioned as confusing and stressful. One USG PV staff member noted, "The 'close and continuing' concept is extremely difficult to explain to people, and the way it's worded is not easy to understand."[13] One legal expert explained it as follows:

> Applicants have no idea about these nuances. I encounter people who claim dual citizenship when they may not have it. . . . The concept of "close or continuing contact" with a foreign national—many people misunderstand this, thinking it requires both "close" and "continuing" contact, whereas the "or" makes a significant difference. This misunderstanding isn't limited to college students or recent graduates applying for their first clearance; even deputy directors of intelligence agencies and senior officials in [PV] have the wrong interpretation, despite overseeing thousands of cleared personnel. Recently, I had a disagreement with a client who insisted it was "and" not "or." Misunderstandings like this arise because terms like "close," "continuing," "affection," "obligation," "influence," and "common interests" are not clearly defined, leading to unfair penalties.[14]

As a result of this confusion and lack of guidance, D/NC candidates sometimes complete the SF-86 incorrectly: They provide too much, too little, or irrelevant detail or preemptively renounce their foreign citizenship. Many of these actions can result in additional time to process their application. As one attorney said, "Sometimes [D/NC candidates] say things the wrong way, but more often, they don't give enough thought to the information they're putting down."[15] One D/NC applicant shared what happened when they listed their parents as foreign contacts because they send money to help with bills: "The [interviewer] said not your parents—it's supporting a foreign entity or a foreign organization."[16] This applicant then explained how they now believe the question should be answered: "It's how it's defined by you. It's a very subjective question—the only one."[17]

Given the lack of clear D/NC-specific resources and guidance, D/NC applicants often resort to other sources of information, such as online discussion platforms, social media,

---

12 Dual or naturalized citizen, interview with the authors, February 6, 2025.

13 USG PV SME, interview with the authors, March 20, 2025.

14 Attorney with PV expertise, interview with the authors, January 9, 2025.

15 Attorney with PV expertise, interview with the authors, November 12, 2024.

16 Dual or naturalized citizen, interview with the authors, February 6, 2025.

17 Dual or naturalized citizen, interview with the authors, February 6, 2025.

friends, and family, to fill the gap. However, these sources can add to the confusion if they provide incorrect information or cite personal anecdotes that may be incorrect or not representative of the PV process. Additionally, applicants often do not understand that there are both USG National Security Adjudicative Guidelines and department- or agency-specific requirements, which may contribute to perceptions that the PV process or review criteria are inconsistent.

Confusion Among Workforce Professionals

Workforce professionals, such as recruiters and human resources staff, often provide D/NC applicants information and guidance for navigating the PV process. However, interviewees reported that these personnel sometimes do not fully understand the PV process, how PV requirements apply to D/NCs, or how risks related to foreign connections are evaluated. Attorneys with PV expertise said that these professionals sometimes misrepresent how PV policies relate to D/NCs. One industrial security SME explained, "Most of the recruiters don't really understand the PV process; they don't necessarily recognize the potential issues that might come up."[18]

Confusion Among Security Clearance Personnel

Security clearance personnel, such as an organization's security officers and background investigators, provide information to applicants, and investigators are responsible for verifying applicants' SF-86 information, compiling their records, verifying their history, and interviewing them and their contacts. However, as one attorney with PV expertise noted, "It's not just the applicants that don't understand. It's literally the security officers."[19] This attorney further explained that security officers sometimes have an outdated understanding of the national security risks that are associated with the countries D/NC applicants come from: "[There are] situations where government officials are unaware of certain issues, particularly with key countries where dual nationals are common. Security officers often lack [an] understanding of these nuances."[20] As a result, some interviewees reported that security officers provide inaccurate or outdated information about eligibility and other D/NC-related questions and concerns. One USG PV interviewee provided a specific example: "One of the myths among security officers is that there is a standard for 'close and continuous contact.' The myth is, 'Would you invite that person to your wedding?'"[21]

Some security clearance personnel acknowledged that it can be challenging to understand the complexities of the PV process as it relates to D/NCs. For example, one PV investigator

[18] Industrial security stakeholder, interview with the authors, November 7, 2024.

[19] Attorney with PV expertise, interview with the authors, January 9, 2025.

[20] Attorney with PV expertise, interview with the authors, January 9, 2025.

[21] USG PV SME, interview with the authors, November 7, 2024.

noted, "When we have questions or need clearer, defined information, it's a struggle to visit multiple sites to gather what we need. If everything related to PV were consolidated in one place, similar to what they did with the [TW] on Max.gov, it would be much more efficient."[22]

When workforce professionals and security clearance professionals do not fully understand the PV requirements or are not precise in explaining those requirements to applicants, they can contribute to the spread of misinformation and misperceptions. One industrial security SME explained, "The military . . . lawyers will always come up with, 'You're a dual citizen, you'll never get a clearance,' and somehow that lives in the mythology of the process. Worse, I think some [security officers] contribute to this. They either don't know what they're talking about, don't understand the regulations, or they're being overprotective or sensitive, and they misinterpret . . . guidance."[23]

Additionally, some interviewees noted that departments and agencies sometimes misinterpret requirements or incorrectly apply their own definitions for certain terms. For example, one attorney who represents D/NC clearance applicants described cases in which individuals faced clearance denials because of the inconsistent application of vetting requirements. D/NC applicants listed foreign nationals they knew under "Foreign Contacts" on their application form, as required. However, during a polygraph or on a supplemental form, the applicants were asked about dual citizens they knew. When they disclosed these dual citizens—who were not required to be listed as foreign nationals on the application—they were denied a clearance under Guideline B (Foreign Influence) for allegedly failing to disclose all the foreign nationals they knew. This happened despite U.S. law recognizing dual citizens as U.S. citizens and not as foreign nationals.[24]

Challenge 2: Perceptions of Inconsistencies in Dual or Naturalized Citizen Applicant Treatment and Processing

Through our interviews and our scan of online discussion platforms, we identified four reasons D/NCs sometimes perceive the PV process as inconsistent or unfair: (1) a conflation of the USG-wide adjudicative requirements and department- or agency-specific security policies, (2) reports of insensitive treatment of D/NC applicants by PV staff, (3) inconsistent handling of D/NC applications, and (4) a lack of transparency during the PV process and about denials.

[22] USG PV SME, interview with the authors, March 20, 2025.

[23] Industrial security stakeholder, interview with the authors, February 19, 2025.

[24] Attorney with PV expertise, interview with the authors, January 9, 2025.

Conflation of U.S. Government–Wide Requirements and Department- or Agency-Specific Policies

Table 2.1 highlighted how applicants and clearance holders sometimes mistakenly attribute clearance denials to USG-wide policies when those denials may actually be due to department- or agency-specific policies. These differing requirements can also create a perception of D/NC applicants being treated unfairly, such as when one applicant who has citizenship from a particular country is told that their foreign citizenship makes them ineligible for a security clearance (because of potential foreign influence factors) while others from the same country successfully obtain security clearances.

Reports of Insensitive Treatment of Dual or Naturalized Citizen Applicants by Some Personnel Vetting Staff

Some of our D/NC interviewees reported experiencing insensitive and, in some cases, offensive questioning during the PV process. These interviewees said that they felt the questions they were asked reflected unfair assumptions about their loyalty because of dual citizenship or demonstrated a lack of understanding of norms in other cultures. Other interviewees reported that interviewers made them feel uncomfortable about their foreign connections when they were interviewed. These interactions left some D/NC interviewees feeling alienated, embarrassed, or even questioning their place in USG service.

Some D/NC interviewees reported that they felt personally attacked by PV staff because of their foreign citizenship (which for some was out of their control). One D/NC interviewee who was working as a linguist described how they and other D/NCs in their office are valued by their program managers for their language skills and professionalism; however, their experience was different with PV staff:

> When it comes to the [human resources] and security vetting and the background investigation and all of that part of the organization, it was a different story. . . . [They assume] what you're bringing to the table is trouble, and [they] have to vet the daylights out of you to make sure that you're not a threat.[25]

Another interviewee shared a coworker's experience during the PV process, recounting how the interviewer remarked, "You're a Cuban citizen; I haven't seen a Cuban for a long time. Our interview is going to be very fun."[26] This comment caused the coworker stress and concern because they feared the interviewer would be especially tough on them.

[25] Dual or naturalized citizen, interview with the authors, November 18, 2024.

[26] Dual or naturalized citizen, interview with the authors, January 31, 2025.

Inconsistent Handling of Dual or Naturalized Citizen Applications

Some D/NC interviewees expressed the concern that their applications are unfairly scrutinized compared with applications from non-D/NCs. However, one USG PV SME explained that this is not the case:

> This is largely a misconception. U.S.-born citizens with foreign contacts or family members who are foreign citizens are vetted similarly to naturalized or dual citizens seeking clearance. The difference lies in the extent of the checks, as naturalized citizens often have more-extensive foreign contacts, resulting in checks on more individuals and family members. However, the checks themselves are the same as those for U.S.-born individuals with foreign connections.[27]

Concerns about inconsistent treatment of D/NC applications may stem from the fact that the National Security Adjudicative Guidelines for risks related to Foreign Influence (Guideline B) and Foreign Preference (Guideline C) can require more-nuanced and more-subjective analyses compared with other guidelines, such as those for Financial Considerations (Guideline F) and Criminal Conduct (Guideline J). The USG PV SME we last quoted went on to note, "For the most part, foreign preference is visible, but foreign influence is not, making it difficult to ascertain the sincerity of someone's claimed level of contact. . . . Foreign influence is one of the most difficult guidelines to address due to its many shades of gray."[28]

Additionally, several USG PV experts noted the challenges of assessing country-specific risks. USG PV interviewees reported that adjudicators use an assortment of resources to inform decisions related to country risk, including DoS country risk reports, open-source data, and their own personal experiences or feelings. Some PV interviewees expressed concern that other PV personnel may rely on outdated perceptions of a country's risk and lack the expertise needed for these investigations and adjudications, leading to inconsistencies that could affect the fairness and effectiveness of the PV process.

Lack of Transparency During the Process and About Denials

The inability of applicants to track their progress during the PV process—although not unique to D/NC applicants—has led to D/NC interviewee concerns about the process and whether their citizenship status is negatively affecting their application. One D/NC applicant described their wait as follows:

> I filed in August of [2023] and for 12 months after that, I heard nothing. Eventually . . . I asked the security office, "What's up?" I don't know what exactly occurred, but within one week, I got a call from someone asking, "Do you still need a clearance?" . . . Then I was granted interim Top Secret, which was very odd, [since] I had initially been told that there

[27] USG PV SME, interview with the authors, March 14, 2025.

[28] USG PV SME, interview with the authors, March 14, 2025.

> wouldn't be an interim. . . . Overall, it's been very confusing, and it's very difficult to know whether being a dual citizen has played any meaningful role in that process.[29]

Some interviewees reported that fairness concerns are particularly troubling because defending or mitigating D/NC cases on appeal is challenging. Because of cited security constraints, the factual basis for denials is often not disclosed beyond the National Security Adjudicative Guidelines citation, creating a lack of transparency that hinders applicants' ability to effectively challenge appeals and leaves some D/NC applicants wondering whether they were treated fairly.[30] One D/NC interviewee described a coworker's situation:

> [My coworker is] TS/SCI eligible and was read in but then [was] read out without explanation. . . . They're telling her that she can't do anything with her clearance again, that she should leave the company because she's not cleared, but she [believes that she's] still cleared and continues to hold TS/SCI eligibility. It could be that her only recourse is FOIAing [making a Freedom of Information Act request for] her record. . . . Are they just discriminating against her [because of the country she is from]? The trouble is, FOIA could take years.[31]

Challenge 3: Hiring and Reciprocity Barriers in the Personnel Vetting Process

Interviewees highlighted that, despite the national security demand for the languages and cultural knowledge possessed by many D/NC applicants, the PV process can directly or indirectly create barriers that hinder hiring efforts. Interviewees from all groups had the perception that investigations and adjudications for D/NCs with extensive foreign connections take longer and have a greater potential of being denied than those of other applicants. These perceptions can make departments, agencies, and government contractors reluctant to sponsor or hire D/NCs for projects that require a security clearance and may deter D/NC applicants. Interviewees also described inconsistent adjudicative decisions between departments and agencies related to foreign connections, which can result in denials of transfers of trust. These denials can prevent cleared members of the workforce from filling positions in departments or agencies other than the one that originally granted the clearance.

---

[29] Dual or naturalized citizen, interview with the authors, January 31, 2025.

[30] Industrial security stakeholder, interview with the authors, November 7, 2024; Attorney with PV expertise, interview with the authors, January 9, 2025; USG PV SME, interview with the authors, February 3, 2025.

[31] FOIA grants the public the right to access records from federal agencies (Dual or naturalized citizen, interview with the authors, February 10, 2025).

Perceptions of Lengthy Investigations and Adjudications and Greater Potential for Denial

Many of our PV and industrial security interviewees pointed out that factors related to being a D/NC can result in applications that are more complex, time-consuming, and labor-intensive to process than those of other applicants. This is particularly true if the applicant has numerous foreign connections because investigators and adjudicators must thoroughly evaluate potential risks related to Foreign Influence (Guideline B) and Foreign Preference (Guideline C). Additionally, obtaining records or documentation from overseas can create additional challenges for investigators, including navigating foreign laws, maintaining secrecy, and dealing with varying standards of documentation. These factors can result in delays or complications during the PV process. However, we did not have access to the PV data of departments or agencies to be able to assess whether D/NC applicants, on average, experience longer application reviews or more-frequent denials than other applicants; this is a topical area that may warrant further study.

Cultural and political nuances also contribute to the complexity of D/NC applications. Interviewees noted that investigators and adjudicators may lack sufficient understanding of cultural norms in other countries, such as naming conventions or mandatory military service requirements, which can lead to unnecessary delays. As one USG PV SME explained, "In the U.S., we recognize common name derivatives (Joe is Joseph). Do people here know that Sasha is Alexander? There should be some sort of cultural training for investigators and adjudicators—things that vary from region to region."[32] The challenges are particularly pronounced for D/NC applicants sponsored by IC agencies, which can be more risk-averse and apply additional requirements and stricter thresholds for security clearances due to the sensitivity of their missions. The lengthiness and uncertainty of the PV process for IC agencies was illustrated in this example shared by an interviewee: "I [have a coworker] who has Russian citizenship. I think he applied for clearance two years ago and has not heard how it was adjudicated yet. It hasn't moved at all—basically, no adjudication at all."[33]

Industry employers also face difficulties onboarding D/NC employees because of the lengthy and complex nature of the security clearance process. One interviewee highlighted a few of these impacts on both industry employers and applicants:

> The problem you have in industry is that . . . many of these [D/NCs] can't draw a paycheck until their clearance is approved. Sometimes [the process] takes too long and the company will pull the person because they can't wait that long. So how many of these [D/NCs] are getting kicked out of the process because their employer can't wait?[34]

[32] USG PV SME, interview with the authors, March 3, 2025.

[33] Dual or naturalized citizen, interview with the authors, January 31, 2025.

[34] Attorney with PV expertise, interview with the authors, December 11, 2024.

Difficulties with Transfers of Trust

The principles of reciprocity and transfer of trust are designed to streamline the security clearance process across departments and agencies and ensure that departments and agencies honor each other's adjudicative decisions.[35] However, some interviewees reported that these principles may not be consistently applied for D/NC applicants, resulting in additional hurdles. For example, one D/NC interviewee shared, "I had to go through everything again. It was as if I had just come in off the street, even though I'd had a whole career in the IC."[36] Although concerns about departments and agencies honoring each other's trust determinations extend beyond the D/NC population, several interviewees suggested that this issue affects D/NCs in particular because their clearances are frequently granted by exception or waiver.

Exceptions or waivers allow applicants to overcome potentially disqualifying concerns about risk by demonstrating mitigating circumstances, providing evidence, and/or adhering to additional reporting requirements. Several interviewees reported that the most common exceptions and waivers were related to foreign affiliation, an issue that is applicable to many D/NCs. When applicants are adjudicated by exception or waiver, departments or agencies are not required to accept those adjudicative decisions; instead, the new department or agency may decide that the applicant is too great a risk and deny the clearance request. An industrial security stakeholder described these decisions as "murky" and added, "Some might use this discretion as a crutch or an excuse not to bring someone in, so you never really know at the end of the day."[37]

Some interviewees also noted that adjudications on transfers of trust with exemptions could be particularly time-consuming. We did not have access to the PV data of departments or agencies to be able to assess whether D/NC applicants, on average, are adjudicated more frequently with exemptions or waivers or whether adjudications that include exemptions or waivers are more time-consuming than those without them; this is a topical area that may warrant further study. However, in the words of one industrial security stakeholder, "It's a problem."[38] This stakeholder described their company's experience with multiple federal agencies as follows:

> I'm looking at a document [for my company] of people who need TS/SCI. . . . There's a section on people who need exceptions to the policy. The most common exception is foreign affiliation. How long do [transfer of trust] adjudications take when they're

[35] Office of the Director of National Intelligence, "Reciprocity of Background Investigations and National Security Adjudications," Security Executive Agent Directive 7, November 9, 2018; Office of the Director of National Intelligence and U.S. Office of Personnel Management, "Federal Personnel Vetting Guidelines," February 10, 2022a.

[36] Dual or naturalized citizen, interview with the authors, November 18, 2024.

[37] Industrial security stakeholder, interview with the authors, February 19, 2025.

[38] Industrial security stakeholder, interview with the authors, November 19, 2024.

> adjudicated by exception? For [one IC agency], it's over one year. These are people [who are] already TS/SCI cleared, who are likely sitting in a military SCIF [sensitive compartmented information facility] and [have had] a full-scope polygraph, and it will take at least a year [for the agency] to decide if they can trust that person. I think [another agency] is six to nine months. . . . [For another agency] it's hard to know [how long it will take because] if you submit someone who's an exception, they'll reject your request and [tell us], "Don't resubmit it until we tell you to." They don't want the requisition sitting with them because then they'd have to count the time to work the case against them. . . . I think they're close to six to nine months. [Another agency], if they have a case with issues [including foreign affiliation], it will likely be two to three years. With [another agency] . . . it's a little different because they sometimes need a specific language skill set and it's very specific to the contract. If . . . the agency needs certain types of people, they'll prioritize those people and everyone else sits in the pile. So, it could be over a year. With [another agency], it may be a couple of months, but you don't know what's going to happen with any individual element.[39]

Several interviewees reported that transfers of trust with exemptions are sometimes denied outright, particularly by IC agencies. One PV SME reported that their agency has a zero-tolerance policy when it comes to adjudications with exemptions: "If there is an exception, regardless of what it is, we will deny the transfer of trust."[40]

Time-Consuming Appeals Processes

The appeals process for some departments or agencies can also be challenging and time-consuming, leaving applicants in limbo for years. An interviewee explained that

> The [intelligence agency] appeals process is not easy to navigate. You have people who shouldn't have been denied a clearance who are stuck in purgatory for two or three years, at the end of which—if they have good representation—they can get the decision reversed. But the damage has been done to their career in the meantime, and sometimes the original agency that sponsored them will drop them because they see that the [intelligence agency] is holding things up; they don't know why, but they're afraid it's a red flag and they don't want to deal with it.[41]

[39] Industrial security stakeholder, interview with the authors, November 19, 2024.

[40] USG PV SME, interview with the authors, February 25, 2025.

[41] Attorney with PV expertise, interview with the authors, December 11, 2024.

Department or Agency and Industry Reluctance to Hire Dual or Naturalized Citizens

Interviewees reported that departments, agencies, and industry contractors are sometimes reluctant to employ D/NCs because of the complexities and perceived risks that are associated with their security clearance processes. This hesitance can lead to exclusionary practices that undermine efforts to leverage the languages and cultural knowledge that D/NCs can bring to the national security workforce. One USG PV expert reported, "There are a lot of employers who do this cynical calculus and only put forward kids from Iowa instead of the person who was a translator in Afghanistan who is now a U.S. citizen . . . but we need [those] skills and knowledge."[42]

Certain agencies, particularly within the IC, were criticized by interviewees for reflexively denying D/NC applicants solely on the basis of their SF-86 forms without seeking clarification or context. One attorney shared the following:

> I was shocked that certain agencies—largely the intelligence agencies—would just deny people solely on [their] SF-86. There was no effort to get clarification or context at all. I'd see clients going through a multiyear application process at, say, [an intelligence agency], and get a letter with a denial, and the person would tell me, "If they'd only asked about it, I could have explained it." And by the time they appeal and go through that process, it's too late, the damage is done. These agencies have advertised that they want "worldly people," people with foreign language skills and experience, so you're going to get people with foreign contacts. But if you're just going to deny them, it's not really fair. I was told that they get so many applicants, they use it as a way to cull the pool, but they don't realize the effect it has on people's careers.[43]

Some industrial security stakeholders noted that onboarding problems can occur when a candidate's D/NC status is discovered during the vetting process, leading to unexpected delays. One industrial security stakeholder noted, "[Because of the hurdles,] there are a lot [of D/NCs] that opt out [of getting a security clearance], but it could also be because their security officer doesn't want to put in the extra work on those applicants."[44]

Some departments or agencies impose restrictions or exclusions on D/NCs for specific contracts or projects, further limiting their employment opportunities.[45] For example, interviewees reported that elements of one department have prohibited D/NCs from work-

[42] USG PV SME, interview with the authors, November 7, 2024.

[43] Attorney with PV expertise, interview with the authors, December 11, 2024.

[44] Industrial security stakeholder, interview with the authors, November 7, 2024.

[45] Industrial security stakeholder, interview with the authors, November 19, 2024; Attorney with PV expertise, interview with the authors, December 11, 2024.

ing on specific contracts.[46] Similarly, the IC and other departments and agencies may have excluded D/NCs from certain controlled access programs, such as special access programs.[47] An industrial security stakeholder reported, "We had [a] contract last year with [a department program,] and they told us they would not accept people on the contract that were dual nationals, even though that condition wasn't included in their contract with us."[48]

The practices affect D/NC applicants in particular, which can limit their opportunities, discourage them from pursuing roles that require security clearances, and reduce the pool of qualified candidates available to departments, agencies, and industry. One interviewee said, "If I could wave a magic wand writ large, it would be the IC doing their homework before they [reflexively] deny people—it has a disproportionate impact on this group in particular."[49]

Challenge 4: Dual or Naturalized Citizens Being Deterred from Going Through the Personnel Vetting Process

The PV process can present multiple challenges that collectively can deter D/NCs with needed skill sets from pursuing security clearances; we described some of these challenges previously, including the significant time commitment and uncertainty, negative perceptions of the PV process, overwhelming requirements, and anxiety about the PV process in general. Additionally, there are common misperceptions about the PV process, such as the belief that dual citizens are not allowed to hold clearances, must renounce their foreign citizenship, or must surrender foreign passports.

These misconceptions continue to deter potential applicants, even though such actions are not generally required by policy: SEAD 4 makes clear that dual citizenship is not a disqualifying factor for holding a security clearance. As one interviewee explained,

> I'm a member of the Hispanic community. We meet a couple of times a year, and people have questions: 'I'm from this foreign country and I want this kind of work,' or 'I'm a U.S. citizen, but my parents are back in another country.' There's definitely a perception that they can't get clearances.[50]

---

[46] Industrial security stakeholder, interview with the authors, November 19, 2024; Industrial security stakeholder, interview with the authors, February 19, 2025; Attorney with PV expertise, interview with the authors, December 11, 2024; Attorney with PV expertise, interview with the authors, January 9, 2025.

[47] Industrial security stakeholder, interview with the authors, November 7, 2024; Industrial security stakeholder, interview with the authors, November 19, 2024; Industrial security stakeholder, interview with the authors, December 16, 2024; Industrial security stakeholder, interview with the authors, February 19, 2025; Attorney with PV expertise, interview with the authors, December 11, 2024; Dual or naturalized citizen, interview with the authors, March 25, 2025.

[48] Industrial security stakeholder, interview with the authors, November 19, 2024.

[49] Attorney with PV expertise, interview with the authors, December 11, 2024.

[50] Industrial security stakeholder, interview with the authors, November 19, 2024.

Other D/NCs are deterred because they believe they will have to renounce their foreign citizenship, even though renunciation is no longer a USG policy requirement. Even if D/NC applicants want to renounce, interviewees pointed out that, in some cases, renunciation could be impossible, depending on the policies of the country, or even dangerous. One interviewee said, "Asking me to do anything with [the country where I have foreign citizenship] would have been a death seal for me."[51]

Numerous PV exerts with whom we spoke emphasized that renunciation of foreign citizenship is no longer a requirement, but individuals may still be asked whether they would be willing to renounce as a genuine demonstration of loyalty to the United States. However, some interviewees explained that applicants often assume that being asked whether they *would be willing* to renounce is a prelude to *being asked* to renounce and that renouncing is the actual requirement. As one attorney with PV expertise explained, "If you ask the question, 'Are you willing?' it's tricky, because . . . some people say [to themselves], 'I'll call the embassy the next day and let them know I'm going to renounce.' [But] the U.S. government doesn't want people to do this because they're tipping countries off that they're getting a clearance."[52] Several USG PV interviewees also pointed out that an applicant informing the country from which they have foreign citizenship that they are renouncing alerts that country to the possibility that the applicant may work in U.S. national security and perhaps be a member of the IC, which would then raise potential operational security and counterintelligence risks. One PV stakeholder put it more bluntly: "We're glad [that requirement has] gone away. It was stupid. You can imagine people going to the embassy and turning in [their passport] and the country figuring out it was because they now have a clearance."[53]

Persistent misperceptions about requirements to destroy foreign passports also remain. As we highlighted earlier, legacy PV policy from 2006 to 2017 required individuals to surrender their passports, but this is no longer the case. One interviewee explained how thinking in the security landscape has changed as follows:

> In the past, it was easy for people to focus on the passport as an objective indicator, treating it like a talisman that supposedly demonstrated a preference for another country. However, this wasn't necessarily true. The existence of a foreign passport often indicated that the individual was simply complying with both U.S. and foreign laws and perhaps trying to maintain a low profile.[54]

---

[51] Judicial Information Center [Centro de Información Judicial], "They Confirm That Nationality Cannot Be Renounced" ["Ratifican que no se puede renunciar a la nacionalidad"], Supreme Court of Justice of the Nation [Corte Suprema de Justicia de la Nación], March 5, 2009; Dual or naturalized citizen, interview with the authors, November 18, 2024.

[52] Attorney with PV expertise, interview with the authors, November 12, 2024.

[53] Industrial security stakeholder, interview with the authors, November 19, 2024.

[54] USG PV SME, interview with the authors, November 7, 2024.

According to interviewees, the past passport surrender requirement continues to create confusion among D/NC applicants, clearance holders, workforce professionals, and security clearance professionals. One D/NC interviewee said that when they mentioned using their foreign passport, "It really triggered [the interviewer]. She asked, 'Why are you using the passport? You have sworn allegiance to the United States. Why do you have two passports?'"[55] One PV SME explained that this confusion is also prevalent among individuals who already have a clearance:

> Although things have changed in the security clearance landscape, the stories [of people having] to turn in their passport have circulated. . . . People may know they could get a passport from another country, but they're not sure how that would affect their clearance or [how it would be affected if they get] dual status for their kids or if they want to travel with their foreign passport.[56]

On the point of traveling on a foreign passport, SEAD 4 makes clear that it is a security clearance concern if an individual fails to use a U.S. passport when entering or exiting the United States.

For D/NC applicants, a negative perception of the PV process and fear about how they may be treated can deter them from applying or lead them to consider leaving public service. D/NC applicants expressed frustration that their loyalty to the United States was being scrutinized despite years of public service. Multiple interviewees reported that they or their employees had interactions with PV staff that left them feeling as though they were not considered "American enough."[57] One explained that "It cuts deep because you literally signed a pledge to serve your country. It feels unfair to be treated differently based solely on your origin or background, leading others to behave or ask questions in a way that seems undeserved."[58]

One D/NC interviewee described a particularly upsetting experience with an interviewer that caused the individual to withdraw their security application:

> The background investigator started asking me very repeatedly about my dad, who had just passed away. I felt that it was because he was not American, and I didn't feel American enough. It was one question after the other until I reached my breaking point, and I started crying and then [the investigator] stopped.[59]

---

55 Dual or naturalized citizen, interview with the authors, January 29, 2025.

56 USG PV SME, interview with the authors, February 3, 2025.

57 Dual or naturalized citizen, interview with the authors, November 18, 2024; Dual or naturalized citizen, interview with the authors, March 4, 2025; Industrial security stakeholder, interview with the authors, February 19, 2025.

58 Dual or naturalized citizen, interview with the authors, November 18, 2024.

59 Dual or naturalized citizen, interview with the authors, November 18, 2024.

The same interviewee went on to describe how an interviewer alienated one of their foreign contacts by implying that the interviewee was not American because of their dual citizenship: "They told me that the investigator asked if I have any 'American friends.' These questions were directed at somebody who looks just like me and was a . . . naturalized U.S. citizen."[60] The interviewee went on to explain how damaging that interaction was to them and how it undermines the USG's reputation in the immigrant community among those who have become naturalized citizens:

> Immigrant communities . . . have a negative narrative about the U.S. government. I have been accused of spying for the government by members of my community. Over the past 19 years, I've tried to talk to anybody [who] would listen, especially young people, to come join the U.S. government. We need them, and we [want the government] to reflect the public. But here comes this background investigator asking my friend, 'Does she have American friends?'"

However, one USG PV interviewee explained that the way risk is assessed can feel like a criticism of the applicant: "It's not a reflection on the applicant, but rather, what's the likelihood that [they] could be put in a position that no one should be put in. It's not personal, even though it can feel deeply personal."[61] Another interviewee said, "There's a disconnect between what adjudicators are looking at and what candidates think they're looking at."[62]

Elements of the PV process, including perceptions that reviews for D/NCs take longer and have a greater potential of being denied, can create hesitation among D/NC applicants who worry that a rejection could harm their career prospects. Additionally, the detailed personal, professional, and financial information that is required for the SF-86 can be overwhelming and deter applicants in general and D/NC applicants in particular. As one D/NC interviewee said, "It was overwhelming, and I had no idea what I was doing."[63] One USG PV SME expressed a similar sentiment: "The process can be overwhelming and intimidating, and the form itself can be daunting, especially with warnings about potential jail time."[64]

The cumulative impact of these issues can create significant anxiety for prospective D/NC applicants, which can serve as a deterrent from pursuing positions that require a security clearance or can cause them to withdraw partway through the process. As one industrial security stakeholder observed, "How many applicants are weeded out of the process because they decide it's not worth it? Are you going to go through this cumbersome process when you think it's not for you?"[65]

---

60 Dual or naturalized citizen, interview with the authors, November 18, 2024.

61 Attorney with PV expertise, interview with the authors, November 12, 2024.

62 USG PV SME, interview with the authors, February 3, 2025.

63 Dual or naturalized citizen, interview with the authors, November 18, 2024.

64 USG PV SME, interview with the authors, February 25, 2025.

65 Industrial security stakeholder, interview with the authors, November 7, 2024.

CHAPTER 4

Conclusion, Findings, and Recommendations

In this report, we aimed to present a better understanding of the policies and guidance that pertain to D/NC applications for security clearances and to identify challenges, perceptions, and issues associated with PV practices or policies that might affect the recruitment or retention of D/NCs. Through a review of USG statutes, regulations, and forms; an exploratory analysis of clearance appeals; scans of online discussion platforms; and interviews with SMEs, PV professionals, and D/NCs, we identified key issues affecting D/NCs in the PV process. We found that D/NCs are considered a valuable part of the national security workforce by the USG and industrial security organizations in part because of the cultural and language skills that D/NCs often possess. However, D/NCs can face significant challenges in the PV process that deter them from applying for security clearances and create obstacles to them joining the national security workforce. We also identified two topical areas that may warrant additional study: (1) whether D/NC applicants, on average, experience longer application reviews or more-frequent denials than other applicants and (2) whether D/NC applicants, on average, are adjudicated more frequently with exemptions or waivers or whether adjudications that include exemptions or waivers are more time-consuming than those without them.

The findings and recommendations provided below address the key issues we identified, including widespread misinformation about how PV requirements apply to D/NCs, leading to confusion among stakeholders. The erroneous belief that dual citizenship is disqualifying, unclear application forms, and opaque adjudicative decisions have fueled negative perceptions of the PV process and may discourage D/NCs from pursuing or maintaining careers in national security. By addressing misinformation about how PV requirements apply to D/NCs and improving the clarity, consistency, and transparency of the PV process, the USG can more effectively recruit and retain the talent needed to address complex global challenges and strengthen the national security workforce.

Finding 1: Vague and inconsistent language about reporting foreign connections on USG PV forms and in policies and guidance contributes to confusion among prospective D/NC applicants and USG and industrial security officers.

Vague and imprecise terminology on USG vetting forms and in policy and guidance contributes to confusion among stakeholders about vetting requirements and how to make risk determinations related to reporting foreign connections (e.g., foreign contacts or other for-

eign ties). As a result, D/NC candidates sometimes complete the SF-86 incorrectly and/or provide too much, too little, or irrelevant detail; these are all actions that can result in additional time to process their applications. Additionally, departments or agencies and industrial security officers sometimes misinterpret requirements or incorrectly apply their own definitions to explain certain terms, which can result in confusion for applicants and potentially affect their case processing times and results.

Recommendation 1: Update regulations, policies, forms, and guidance with consistent and easy-to-understand language to articulate the requirements for reporting foreign connections.

The USG should standardize terminology and use clear, straightforward language across vetting regulations, policies, forms, and guidance. Aligning terminology and providing clear language would help applicants and other PV stakeholders better understand security clearance requirements, reduce errors, and improve the efficiency of the vetting process. For example, the language that describes the foreign contacts that must be reported should be aligned across the SF-86, PVQ, and SEAD 3; a clear explanation of how to interpret the foreign contact reporting requirement should be included in the PVQ; and forms and guidance should be written in layman's terms or plain English, as mandated by federal statute.[1]

Finding 2: Some workforce professionals and security clearance personnel do not consistently convey accurate information about PV policies and requirements for D/NCs, and some PV personnel describe a lack of resources and training to address the specific needs and requirements for handling D/NC applicant cases.

Through our scan of online discussion platforms and our interviews, we found that workforce professionals (e.g., recruiters and human resources staff) and security clearance personnel (e.g., security officers and investigators) have sometimes provided inaccurate information to D/NC applicants. This includes misinformation, such as the false belief that dual citizenship is a disqualifying factor for a security clearance, and misinformed guidance, such as advising D/NC applicants not to apply for positions that require a security clearance. As a result, some D/NC applicants have mistakenly believed that they could not obtain a security clearance or have provided more information than required on the SF-86, resulting in lengthier investigations than may have otherwise been necessary. Additionally, some PV professionals whom we interviewed described a lack of resources and training to address the specific needs and requirements for handling D/NC applicant cases. For example, some investigators may ask abrasive or offensive questions related to foreign citizenship, and some adjudicators lack the necessary country-specific knowledge or resources to evaluate D/NC applicant cases appropriately and consistently.

[1] The Plain Writing Act of 2010 requires departments and agencies to use plain writing in covered documents, which includes documents that are necessary to comply with a requirement the federal government administers (Public Law 111-274, Plain Writing Act of 2010, October 13, 2010).

Recommendation 2: Create and distribute resources for workforce professionals and security clearance personnel that summarize and clarify PV requirements related to D/NC applicants, and provide resources that are tailored to address D/NC applicant cases.

D/NC-specific resources for investigators, adjudicators, and security officers could improve the effectiveness and consistency of the PV process. Resources could include training sessions and workshops that provide clarifications on how PV policies apply to D/NC cases, common concerns of D/NC applicants, and country-specific cultural knowledge that is useful for the investigative and adjudicative processes. It may also be beneficial for agencies that conduct PV investigations (investigative service providers) and adjudicative agencies to manage applications by directing those with significant foreign connections to staff specialists or teams with country or region expertise; one USG department or agency informed us that it is already doing this. Broadening existing training programs to include these elements will better equip security clearance personnel to assess applicants holistically and consistently.

Some of these resources would also be beneficial for recruiters and human resources staff in USG national security hiring organizations and in industry. As the first point of contact for national security applicants, these workforce professionals can play a crucial role in providing accurate information about security clearance requirements. Therefore, it is very important that these professionals have a clear understanding about these requirements and stay informed about current security concerns or at least know where to direct D/NC applicants who have questions.

Finding 3: Widespread misinformation about PV requirements for D/NC applicants can create confusion and may deter potential applicants from seeking national security positions.

Changes to PV requirements over time and conflicting language in policies, on forms, and from security officials have resulted in misinformation and confusion about how PV requirements apply to D/NCs. Sponsoring departments and agencies and industry employers sometimes provide D/NC applicants minimal or inaccurate information, which leads applicants to seek guidance from unofficial and sometimes unreliable sources, such as online discussion platforms and personal networks. The result has been the proliferation of misinformation among stakeholders, including D/NC applicants, department or agency security officers, and industrial security contractors. The box on the next page details common misperceptions that we found in online discussion platforms and heard from our interviewees.

Recommendation 3: Create and distribute resources that provide clarity on the PV requirements that are most relevant to D/NC applicants.

The following strategies could be used to develop and disseminate such resources:

- Develop an official USG website that includes common questions and concerns of D/NC applicants and links to relevant policy documents and forms.

- Create a central USG repository where all PV guidelines, policies, and frequently asked questions are available to all clearance applicants.
- Develop a resource with specific guidance for key sections of the SF-86 or PVQ that may be more subjective (such as foreign contacts) and include such information as the depth and breadth of the information required and the type of additional information that could be provided to mitigate potential concerns.
- Create online resources for completing the SF-86 or PVQ forms, such as videos, workshops, or even dedicated helplines or chat services staffed by knowledgeable personnel who can answer applicant questions.
- Sponsoring departments or agencies provide or direct D/NC applicants to such resources as those listed above or to others that they develop.
- Sponsoring departments or agencies provide D/NC applicants additional information about how their evaluation will be different from the USG standard to meet department- or agency-specific requirements.
- The USG or departments or agencies host informational webinars or outreach initiatives that are targeted to and customized for prospective D/NC applicants.

These resources should directly address the common misperceptions that are identified in the box. To that end, on the basis of the research we conducted for this report, we created a reference sheet with information to help address common D/NC applicant questions and concerns. This reference sheet is provided in the appendix.

Common Misperceptions Related to Dual or Naturalized Citizenship and Security Clearances

Misperception 1: All D/NCs or D/NCs from certain countries are ineligible for security clearances.

U.S. policy allows D/NCs to hold security clearances, regardless of the country from which they have citizenship. However, there is a widespread belief that dual or naturalized citizenship is automatically disqualifying or that citizenship from certain countries—such as those viewed as threatening or on poor terms with the United States—is disqualifying. Several SMEs stated that there is no USG-wide list of countries for which dual citizenship is automatically disqualifying, although it is possible that certain agencies maintain such a list. A related misperception is that citizenship from or connections to friendly countries are never disqualifying.

Misperception 2: Foreign citizenship must be renounced and/or foreign passports surrendered.

U.S. policy does not require dual citizens to renounce their foreign citizenship or forfeit or destroy their foreign passports. In most cases, the USG does not want individuals to

alert foreign governments to the fact that they are applying for a national security position. However, starting almost 25 years ago, some PV policy guidance required individuals to surrender foreign passports. This continued until June 8, 2017, which was the effective date of SEAD 4. Stories of passport surrenders from the past continue to circulate and cause con- fusion among D/NC applicants, clearance holders, workforce professionals, and security clearance professionals.

Misperception 3: D/NCs are denied security clearances for not being American enough.

When applicants are asked about foreign contacts, foreign businesses, and foreign travel, they sometimes report feeling that their loyalty to the United States is being doubted or that they are being held to different standards from other applicants. The USG collects this information from all applicants to evaluate the risk of divided allegiance, conflicts of interest, or vulnerability to coercion and not to assess whether an applicant is American enough to hold a clearance.

Misperception 4: All clearance eligibility decisions are based on identical processes and requirements.

There are two layers of guidelines for evaluating security clearance applications: (1) the USG-wide National Security Adjudicative Guidelines and (2) department- or agency-specific security requirements. The National Security Adjudicative Guidelines establish a consistent baseline for clearance decisions for all applicants. Additionally, the sponsoring department or agency—which makes the final security clearance determination—may have additional security considerations or requirements based on its mission, such as disqualifying individuals with connections to certain countries or requiring a polygraph. Department- or agency-specific requirements can lead to different outcomes for applicants with similar backgrounds, which can be perceived as unfair. These differing outcomes can also deter individuals who mistakenly believe that because one department or agency denied their clearance, all other departments and agencies will deny them a clearance, or that if one person is denied a clearance because of their association with a given country, the USG will not allow anyone from that country to obtain a clearance.

APPENDIX

Reference Sheet: Addressing Common Questions and Concerns from Dual or Naturalized Citizens Regarding the Security Clearance Process

This appendix presents a reference sheet of key questions and answers for D/NC applicants about the security clearance process. We developed this stand-alone document from the data we collected and analysis we conducted for this report.

The following information was developed from research conducted by RAND researchers and reported in *Vetting of Dual Citizens and Naturalized Citizens for Service in the National Security Workforce: Addressing Complexities, Challenges, and Opportunities Related to the Personnel Vetting Process* in 2025.[1] This document is a summary of the common questions and concerns of dual or naturalized citizens regarding the security clearance process that were identified based on publicly available information, expert interviews, and the research team's analysis. If you have questions regarding any aspect of the security clearance process and your specific case, we recommend contacting your organization's security office for guidance.

In no way should the information contained in this document be substituted for the U.S. National Security Adjudicative Guidelines or U.S. government laws and policies, nor should this document be considered any form of legal advice.

---

[1] Stephanie J. Walsh, Sina Beaghley, David Stebbins, Nikolay Maslov, and Theiline Pigott, *Vetting of Dual Citizens and Naturalized Citizens for Service in the National Security Workforce: Addressing Complexities, Challenges, and Opportunities Related to the Personnel Vetting Process*, RAND Corporation, RR-A3461-1, 2025.

Security Clearance and Foreign Connections

Question: Why Does the U.S. Government Care About Foreign Contacts, Foreign Businesses or Activities, and Foreign Travel or Whether I Am a Dual or Naturalized Citizen?

The U.S. government uses standardized criteria outlined in the National Security Adjudicative Guidelines of Security Executive Agent Directive 4 (SEAD 4) to determine whether you are eligible for a security clearance.[2] The key factors include your allegiance to the United States; whether you have conflicting allegiances or divided loyalties; and whether you are vulnerable to pressure, manipulation, or coercion by a foreign government or another foreign entity. Details about foreign contacts, foreign travel, and citizenships help adjudicators (the officials who make clearance decisions) assess whether your activities or relationships could pose a risk to national security. Note that failure to fully report or disclose foreign ties and associations, as required, could disqualify you from eligibility. It is important to provide complete and accurate information in response to all questions in government forms (SEAD 4, Section 2(i), and Guidelines A, B, and C).

Citizenship and Security Clearance

Question: Are Dual Citizens Allowed to Get a Security Clearance? Does the Other Country (or Countries) Where I Have or Had Citizenship Matter?

Yes, dual citizens can get a security clearance. The National Security Adjudicative Guidelines explicitly state that being a dual citizen does not disqualify someone from obtaining a security clearance. This applies regardless of the country or countries where you have (or had) citizenship or where close foreign relatives may live. These guidelines are applicable across all U.S. government agencies (SEAD 4, Guideline C, Section 9).

The department or agency sponsoring your clearance—whether hiring you directly or through a contract—will decide whether to approve you for a clearance; the decisionmaking process is called *adjudication*. Departments and agencies base those decisions on the National Security Adjudicative Guidelines. Factors they evaluate include the U.S. government's relationship with the country of your other citizenship, your connections to that country, and any specific security concerns related to the department or agency's mission. Some departments or agencies—such as those with intelligence or law enforcement missions—may have additional requirements to determine suitability for a position, such as a polygraph examination. As a result, individuals with similar backgrounds may receive different clearance outcomes depending on the agencies sponsoring their clearances.

[2] Office of the Director of National Intelligence, 2017a.

Question: I Was Not Born in the United States, but I Am a Citizen. Is It Possible for Me to Get a Security Clearance?

Yes, it is possible. U.S. citizenship is required to obtain a security clearance, and your eligibility does not depend on your place of birth. As a naturalized U.S. citizen seeking a national security position, you have the same rights and opportunities as any other U.S. citizen.[3]

Question: As a Dual Citizen, Am I Required to Renounce My Foreign Citizenship to Be Granted a Security Clearance?

No, current U.S. policy does not require you to renounce your foreign citizenship to be eligible for a security clearance. However, if asked by an investigator whether you are willing to renounce your foreign citizenship, expressing a genuine willingness can help mitigate security concerns and demonstrate your loyalty to the United States above all other countries (SEAD 4, Guideline C, Section 11(c)).

Additionally, some U.S. departments or agencies may require you to sign a loyalty oath and declaration of allegiance to the United States before approving you for a security clearance. Security clearance decisionmakers want to see clear evidence of your allegiance to the United States through your words and actions.

Question: I Am a U.S. Citizen, but I Have Immediate Family Members Who Are Not. Can I Still Get a Security Clearance?

Yes, having family members who are foreign citizens is not automatically disqualifying. However, the U.S. government will evaluate certain risks when making national security determinations, including your vulnerability to pressure, manipulation, or coercion by a foreign government or another foreign entity.

If contact with foreign family members or other foreign associates could increase these risks, it may raise concerns that result in closer scrutiny of your application. These concerns can be mitigated (reduced) if your relationships are unlikely to be used to pressure or influence you. The National Security Adjudicative Guidelines list mitigating factors that decisionmakers can consider, such as the nature of the relationship with the foreign citizen, the foreign citizen's position or activities in the country, and the country itself (SEAD 4, Section 2(f), and Guideline B).

[3] Executive Order 12968, "Access to Classified Information," Executive Office of the President, August 2, 1995; U.S. Constitution, 14th Amendment.

Question: I Send Money to Family Members in Another Country. Can I Get a Security Clearance?

Yes, sending money to family members in another country is not automatically disqualifying. However, the U.S. government will assess certain risks, including (1) your vulnerability to pressure, manipulation, or coercion by a foreign government or entity and (2) the possibility of conflicts of interest related to your foreign business, financial, or property interests.

If you have substantial foreign business, financial, or property interests, they may raise concerns during the adjudication process. Such concerns can be mitigated if the nature of the relationships or the value and type of the financial transactions are unlikely to result in a conflict of interest and could not be used to pressure or influence you (SEAD 4, Section 2(f), and Guidelines B and C).

Question: If I Have a Security Clearance and Seek Dual Citizenship with Another Country, Will My Clearance Be Revoked?

Not necessarily. The National Security Adjudicative Guidelines explicitly state that a U.S. citizen being a citizen of another country is not automatically disqualifying for clearance eligibility. However, the guidelines also state that applying for and/or acquiring foreign citizenship in another country could raise a security concern and may be disqualifying when an individual's foreign involvement is in conflict with U.S. national interests or when the individual acts to conceal it. This decision is subject to the department or agency's evaluation of the risk of foreign preference, including potential concerns about whether the individual's judgment, reliability, and trustworthiness may be in conflict with U.S. national interests. Obtaining but failing to report a foreign passport or identity card when required could raise additional security concerns (SEAD 4, Guideline C). If you hold a security clearance, it is strongly recommended that you notify your organization's security office before pursuing foreign citizenship and if and when foreign citizenship is obtained. The security office can inform you of any reporting requirements.

Travel and Passports

Question: Do I Have to Destroy My Foreign Passport to Be Eligible for a Security Clearance?

No, U.S. policy does not require that you destroy your foreign passport to be eligible for a security clearance. However, failing to report possession of a foreign passport or other foreign identity documents during the application process could lead to a denial of eligibility because of concerns about foreign preference and personal conduct (SEAD 4, Guideline C, Section 10(b), and Guideline E, Section 15(b)).

Question: Can I Travel with My Foreign Passport If I Have a Security Clearance?

Yes, you may travel with your foreign passport under certain conditions. When entering and leaving the United States, you must use your U.S. passport in all interactions with U.S. Customs and Border Protection officials. Per the National Security Adjudicative Guidelines, failure to do so could raise a security concern and may be disqualifying for your security clearance (SEAD 4, Guideline C, Section 10(c)).

When traveling to the foreign country where you hold citizenship, you may use your foreign passport for personal travel when you enter and leave that country. In fact, like the United States, some countries require you to use that country's passport when entering or leaving that country.

Additionally, once you are a security clearance holder, you must report all personal foreign travel in accordance with the U.S. government reporting requirements outlined in Security Executive Agent Directive 3 (SEAD 3, Section F(1)(b)).[4]

Other Common Concerns

Question: Will the Security Clearance Process Take Longer for Me as a Dual or Naturalized Citizen?

The security clearance process may take longer for dual or naturalized citizens if they have many foreign contacts or financial ties or a history of international travel. This is because additional time would be needed to evaluate those foreign connections, which is standard practice for the evaluation of all security clearance applicants, including those who are not dual or naturalized citizens. However, the length of the process varies based on the specific circumstances of each individual case. Being a dual or naturalized citizen is not a reason to expect the process to take longer or result in an adverse outcome.

Question: As a Dual or Naturalized Citizen, Am I Held to a Different Standard During the Security Clearance Process?

No, all U.S. citizens who are seeking a security clearance are evaluated using the same criteria outlined in the National Security Adjudicative Guidelines. However, the process may take longer for dual or naturalized citizens if they have many foreign contacts or financial ties or a history of international travel. This is because additional time would be needed to evaluate these foreign connections, which is standard practice for the evaluation of all security clearance applicants, including those who are not dual or naturalized citizens. Additionally, some departments or agencies—such as those with intelligence or law enforce-

[4] Office of the Director of National Intelligence, 2017b.

ment missions—may have additional requirements for determining suitability for a position, such as a polygraph examination.

Question: Am I Allowed to Talk to Foreign Family Members If I Obtain a Security Clearance?

Yes, you are allowed to communicate with foreign family members after obtaining a security clearance. These relationships should be reported during your initial security clearance investigation. When making national security determinations, the U.S. government evaluates such risks as your vulnerability to pressure, manipulation, or coercion by a foreign government or entity. If contact with foreign family members increases those risks, it could be disqualifying. These concerns may be mitigated if the nature of the relationships is unlikely to be used to pressure or influence you (SEAD 4, Section (2)(f), and Guideline B).

Completing the Standard Form 86 or Personnel Vetting Questionnaire

Question: How Do I Know Whether a Person Is a Close and/or Continuing Foreign Contact That I Need to Report?

The foreign contacts section of the vetting questionnaire is designed to identify non-U.S. citizens with whom you have relationships so that the potential risk those relationships might pose to national security can be assessed.[5] To determine whom you should list, carefully review the requirements outlined in the questionnaire and consider how those requirements apply to your foreign family members and other foreign contacts. Key questions to ask include the following:

- Has your contact with the individual occurred within the specified time frame?
- Do you have close and/or continuing contact with the person?
- Is the individual a foreign national? A *foreign national* is defined as someone who is not a U.S. citizen or U.S. national. Individuals with dual U.S. and foreign citizenship and naturalized U.S. citizens are not foreign nationals.
- Are you, your spouse, or your partner bound to this person by affection, influence, common interests, and/or obligation?

[5] As of June 2025, the Standard Form 86 (SF-86) is the standard form that must be completed to apply for a security clearance. However, the SF-86 will gradually be replaced by the Personnel Vetting Questionnaire (PVQ). The wording in the PVQ varies from the SF-86 in some key areas, so applicants should carefully review the specific form they are completing and follow its instructions when responding.

Although some elements of the question may be open to interpretation, understanding each requirement clearly can help you decide whether to list someone as a foreign contact. If you are unsure, contact your organization's security office for guidance.

Question: What Should I Do If I Do Not Have All the Information Required on the Form for a Close and/or Continuing Foreign Contact?

If you do not have all of the requested information about a foreign contact, provide the details you do know. Use the comments section on the form to explain the nature of the relationship and add any clarifying context. This can help your investigator better understand the nature of the relationship and may expedite the review process. In most cases, it is recommended that you do not contact the person for the missing information. If you are unsure, contact your organization's security office for guidance.

Question: Who Should I Speak with If I Still Have Questions?

If you have questions regarding any aspect of the security clearance process or your specific case, we recommend that you contact your organization's security office for guidance.

Abbreviations

D/NC	dual or naturalized citizen
DoD	U.S. Department of Defense
DOHA	Defense Office of Hearings and Appeals
DoS	U.S. Department of State
IC	Intelligence Community
OHA	Office of Hearings and Appeals
PAC PMO	Performance Accountability Council Program Management Office
PV	personnel vetting
PVQ	Personnel Vetting Questionnaire
SEAD	Security Executive Agent Directive
SF-86	Standard Form 86
SME	subject-matter expert
TS/SCI	Top Secret/Sensitive Compartmented Information
TW	Trusted Workforce
USG	U.S. government

References

Central Intelligence Agency, "AR 10-16 (U) Appeal of Personnel Security Decisions," May 19, 2010.

ClearanceJobs.com, homepage, undated. As of July 23, 2025:
https://www.clearancejobs.com/

cptvenezuela, "Relinquishing Dual Citizenship," Reddit post, r/SecurityClearance, August 23, 2021.

Defense Office of Hearings and Appeals, homepage, U.S. Department of Defense, undated-a. As of July 23, 2025:
https://doha.ogc.osd.mil/

Defense Office of Hearings and Appeals, "DOHA Appeal Board Decisions," webpage, U.S. Department of Defense, undated-b. As of July 25, 2025:
https://doha.ogc.osd.mil/Industrial-Security-Program/Industrial-Security-Clearance-Decisions/DOHA-Appeal-Board/

Defense Security Service, "Foreign Passports and SEAD 4 Guidelines," U.S. Department of Defense, ISL 2019-01, January 15, 2019. As of April 17, 2025:
https://www.dcsa.mil/Portals/91/Documents/CTP/tools/ISL2019-01_ForeignPassports_SEAD4.pdf

DOHA—*See* Defense Office of Hearings and Appeals.

Doubleday, Justin, "Goodbye SF-86? OMB Approves New 'Personnel Vetting Questionnaire,'" Federal News Network, February 9, 2024.

Drug Enforcement Administration, U.S. Department of Justice, "Loyalty Oath," July 2008.

Executive Order 12968, "Access to Classified Information," Executive Office of the President, August 2, 1995.

Global-Rock-6435, "SCI preliminary denied by Navy for Chinese parent, do I still have a chance at commissioning?" Reddit post, r/SecurityClearance, May 15, 2024.

gmgmgmgm, "Asked if I am willing to renounce Italian citizenship for Secret Clearance," ClearanceJobsBlog.com, Security Clearance Q&A, November 1, 2024.

Judicial Information Center [Centro de Información Judicial], "They Confirm That Nationality Cannot Be Renounced" ["Ratifican que no se puede renunciar a la nacionalidad"], Supreme Court of Justice of the Nation [Corte Suprema de Justicia de la Nación], March 5, 2009. As of May 14, 2025:
https://www.cij.gov.ar/nota-680-Ratifican-que-no-se-puede-renunciar-a-la--nacionalidad.html

koshka, "Top Secret Clearance with possible dual citizenship with Russia," ClearanceJobsBlog.com, Security Clearance Q&A, March 9, 2018.

Legal Information Institute, "Natural Born Citizen," Cornell Law School, undated.

Office of Hearings and Appeals, "Decision Summaries," webpage, U.S. Department of Energy, undated. As of July 25, 2025:
https://www.energy.gov/oha/listings/decision-summaries

Office of the Director of National Intelligence, "National Security Adjudicative Guidelines," Security Executive Agent Directive 4, June 8, 2017a.

Office of the Director of National Intelligence, "Reporting Requirements for Personnel with Access to Classified Information or Who Hold a Sensitive Position," Security Executive Agent Directive 3, June 12, 2017b.

Office of the Director of National Intelligence, "Reciprocity of Background Investigations and National Security Adjudications," Security Executive Agent Directive 7, November 9, 2018.

Office of the Director of National Intelligence and U.S. Office of Personnel Management, "Federal Personnel Vetting Guidelines," February 10, 2022a.

Office of the Director of National Intelligence and U.S. Office of Personnel Management, "Federal Personnel Vetting Investigative Standards," May 17, 2022b.

OHA—*See* Office of Hearings and Appeals.

Performance Accountability Council, "Federal Personnel Vetting Management Standards," September 14, 2022.

Posard, Marek N., Sina Beaghley, Hamad Al-Ibrahim, and Emily Ellinger, *Assessing Misperceptions Online About the Security Clearance Process*, RAND Corporation, RR-A1690-1, 2023. As of July 23, 2025:
https://www.rand.org/pubs/research_reports/RRA1690-1.html

Public Law 111-274, Plain Writing Act of 2010, October 13, 2010.

Security, Suitability, and Credentialing Performance Accountability Council, "Trusted Workforce 2.0: Quarterly Progress Report," January 2025. As of July 23, 2025:
https://assets.performance.gov/files/FY25_Q1_Personnel_Vetting_QPR.pdf

Stebbins, David, Richard S. Girven, and Samantha Ryan, *National Security Employment: Improving the Candidate Experience Journey Through the Personnel Vetting Process*, RAND Corporation, RR-A1990-1, 2023. As of July 23, 2025:
https://www.rand.org/pubs/research_reports/RRA1990-1.html

sx19ctl, "Question about Adjudication Status," ClearanceJobsBlog.com, Security Clearance Q&A, July 2, 2018.

Travel.State.Gov, "Certificates of Non Citizen Nationality," webpage, U.S. Department of State, undated-a. As of April 1, 2025:
https://travel.state.gov/content/travel/en/legal/travel-legal-considerations/us-citizenship/Certificates-Non-Citizen-Nationality.html

Travel.State.Gov, "Dual Nationality," webpage, U.S. Department of State, undated-b. As of July 24, 2025:
https://travel.state.gov/content/travel/en/legal/travel-legal-considerations/Relinquishing-US-Nationality/Dual-Nationality.html

U.S. Citizenship and Immigration Services, "Immigration and Nationality Act," webpage, July 10, 2019. As of July 25, 2025:
https://www.uscis.gov/laws-and-policy/legislation/immigration-and-nationality-act

U.S. Citizenship and Naturalization Services, "Policy Manual, Volume 12—Citizenship and Naturalization," webpage, June 24, 2025. As of July 24, 2025:
https://www.uscis.gov/policy-manual/volume-12

U.S. Code, Title 5, Section 3331, Oath of Office.

U.S. Code, Title 8, Chapter 12, Subchapter III, Nationality and Naturalization.

U.S. Code, Title 8, Section 1430, Married Persons and Employees of Certain Nonprofit Organizations.

NATIONAL DEFENSE RESEARCH INSTITUTE

The authors of this report examine the challenges and complexities that surround the personnel vetting (PV) process for dual or naturalized citizens (D/NCs) who are seeking roles in the national security workforce. Applicants for national security positions must navigate the federal PV process to adjudicate their eligibility for a security clearance. For individuals who are D/NCs, the process may be more complex due to such factors as perceptions about foreign citizenship, perceptions about the possession of a foreign passport, and government concerns about extensive foreign connections.

D/NCs often have language skills and cultural knowledge that are needed for national security work. However, D/NCs can be deterred from even applying for clearances because of uncertainty and even misinformation about the citizenship requirements to obtain a clearance, the complex and sometimes confusing PV process, and perceptions regarding both lengthy processing times and a higher potential for rejection. These issues can prevent departments, agencies, and cleared industry contractor organizations from fully using the needed skills and expertise of D/NCs in sensitive positions. The authors of this report offer insights and recommendations to address relevant aspects of the PV process for D/NCs.

$20.00

ISBN-10 1-9774-1566-0
ISBN-13 978-1-9774-1566-0

www.rand.org

RR-A3461-1