

# Insider Threats: Practical Guidance to Operationalize Continuous Evaluation & Vetting

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# Agenda

**01** | Make the Case

**02** | Build the Framework

**03** | Establish Governance

**04** | Mature, Evolve, Expand

# DIB + IntH Compliance with DITMAC

- Must have insider threat system that proactively identifies risk to ALL 13 adjudicative guidelines
- Financial and Criminal misconduct overwhelming reasons clearances not approved nor renewed
- Financial and Criminal misconduct have highest impact on contract revenue and performance
- DIB incentive to proactively detect and mitigate risk before the government discovers and impacts contracts

**34%**

Financial  
Considerations

**20%**

Personal  
Conduct

**11%**

Criminal  
Conduct

**9%**

Drug  
Involvement

**8%**

Alcohol-  
Related

Adjudicative Guideline	Human Capital Signals	Email & Network Signals
Allegiance to the United States		X
Foreign Influence	X	X
Foreign Preference		X
Sexual Behavior	X	
Personal Conduct	X	X
Financial Considerations	X	
Alcohol Consumption	X	
Drug Involvement	X	
Psychological Conditions	X	X
Criminal Conduct	X	
Handling Protected Information		X
Outside Activities	X	
Misuse of Information Technology		X

**200% Increase in incident reporting to DITMAC from 2023 to 2024**

# Financial Stress is Pervasive / Getting Worse

## Paycheck to Paycheck

78% of Employees  
1 in 10 Employees Making \$100K+



## Financial Debt

71% of Employees  
56% Feel They Will Always be in Debt

## Financial Stress

30M US Workers  
1 in 4 Regardless of Salary



## Financial Stability

38% Do Not Participate in 401K  
68% Do Not Manage to a Budget  
56% Save \$100 or Less a Month

## Return to Work is Ongoing Issue

36M Remote Workers  
12% Increase in Dual Employed



## Psychological Impacts

#1 Reason Clearances are Revoked  
20% of Active Shooters had Financial Strain

### PERSONAL FINANCE: DEBT

**U.S. credit card defaults  
soar; total debt hits 12-year  
high**

BY ALICIA ADAMCZYK  
January 23, 2025 at 5:38 PM EST



### TRENDS

**Housing Affordability Hits 'Even the Middle Class' as  
Fewer Starter Homes Are Built, ex-HUD Secretary Says**

By Joy Dumandan  
Jan 25, 2025



### ECONOMY

**A record number of consumers are  
making minimum credit cards  
payments as delinquencies also rise**

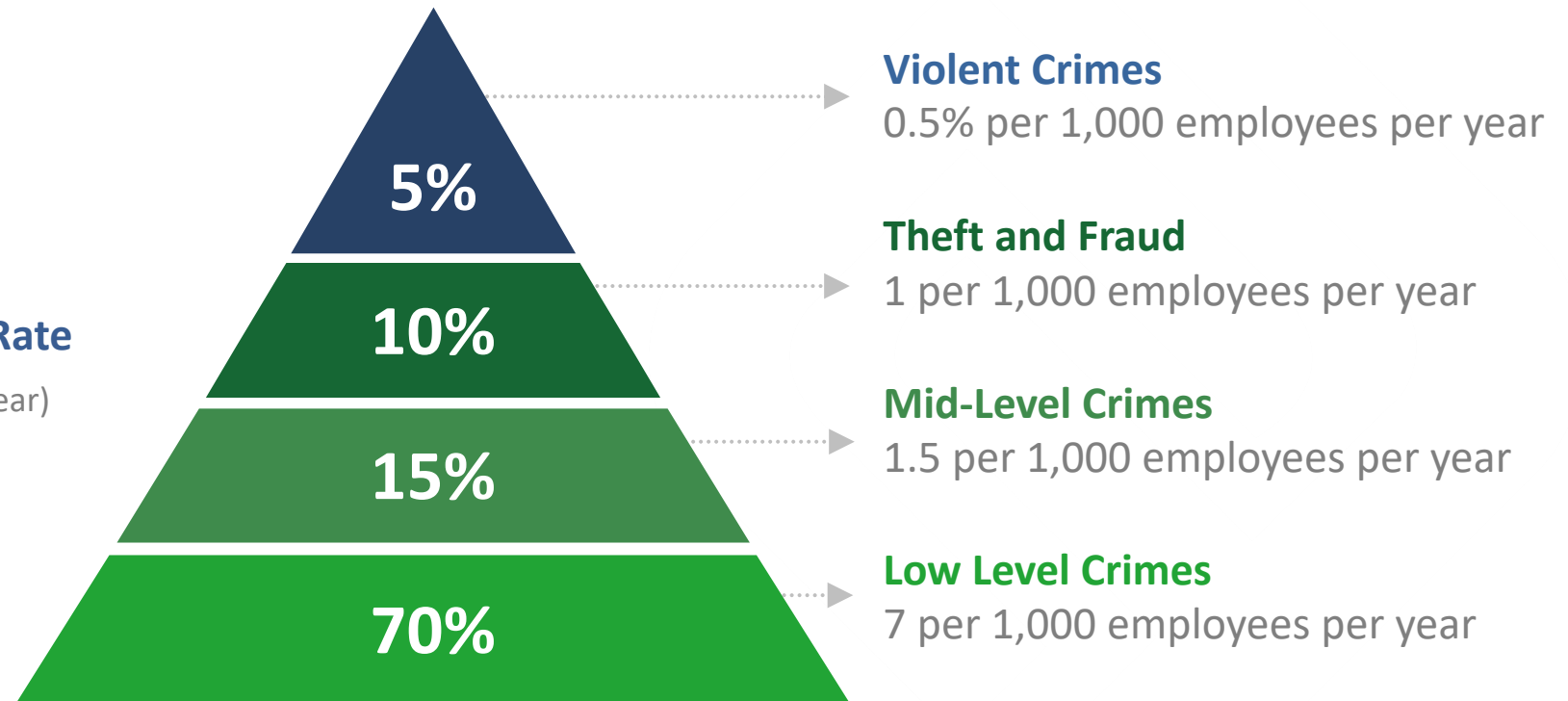
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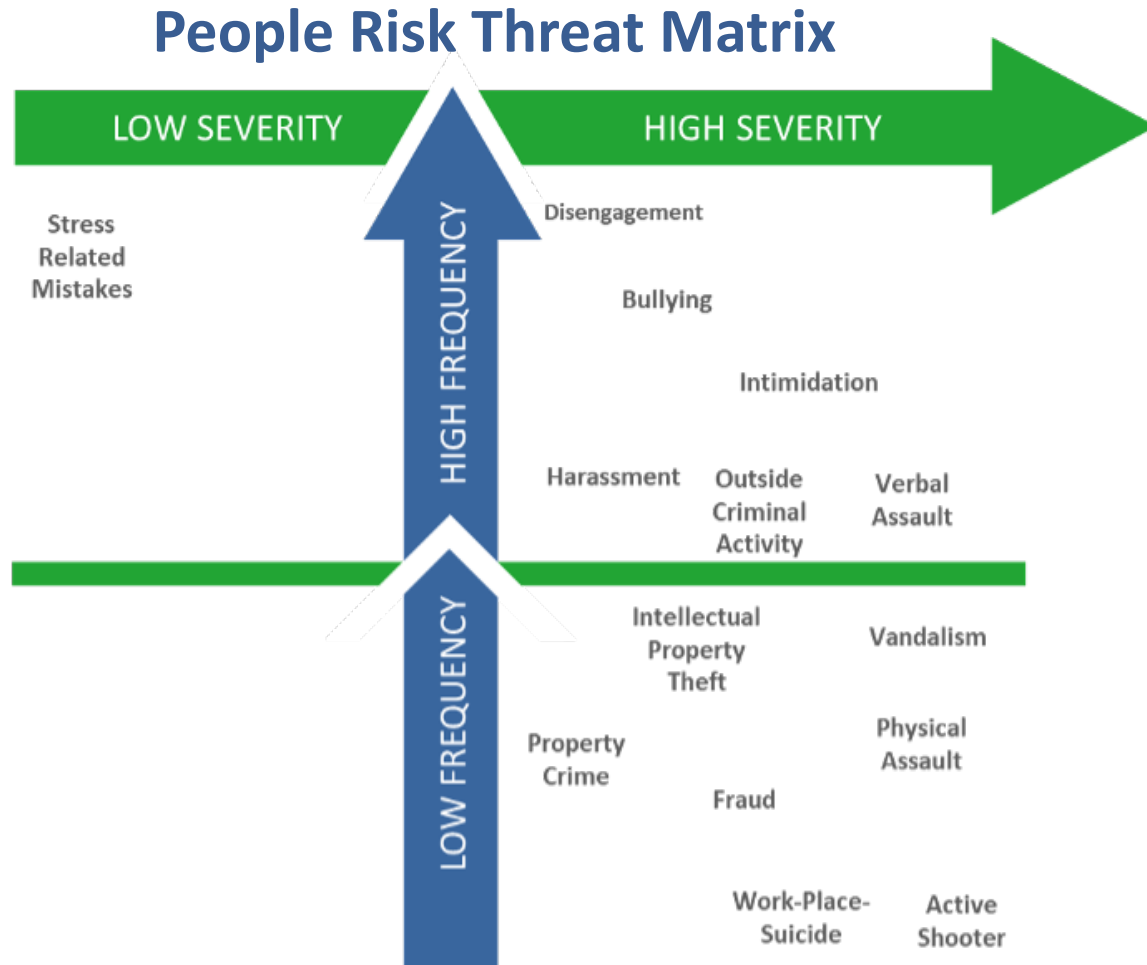
# Lower-Level Crimes Common & Under-Reported

**1%-2%**  
**Market Average Criminal Arrest Rate**  
(10-20 crimes per 1,000 employees per year)



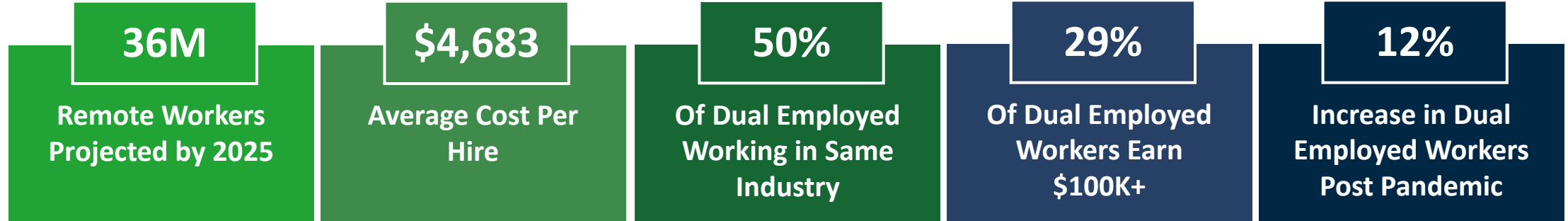
**21% of incidents reported to DITMAC came from Contractors – 67% were criminal**

# Signs of Distress Escalate to Workplace Violence



- 1%-2% arrested each year
- 63% aware of bullying
- 48% experience workplace violence
- 15% workplace deaths intentional
- 656 mass shootings in 2023

## Dual Employment Implications

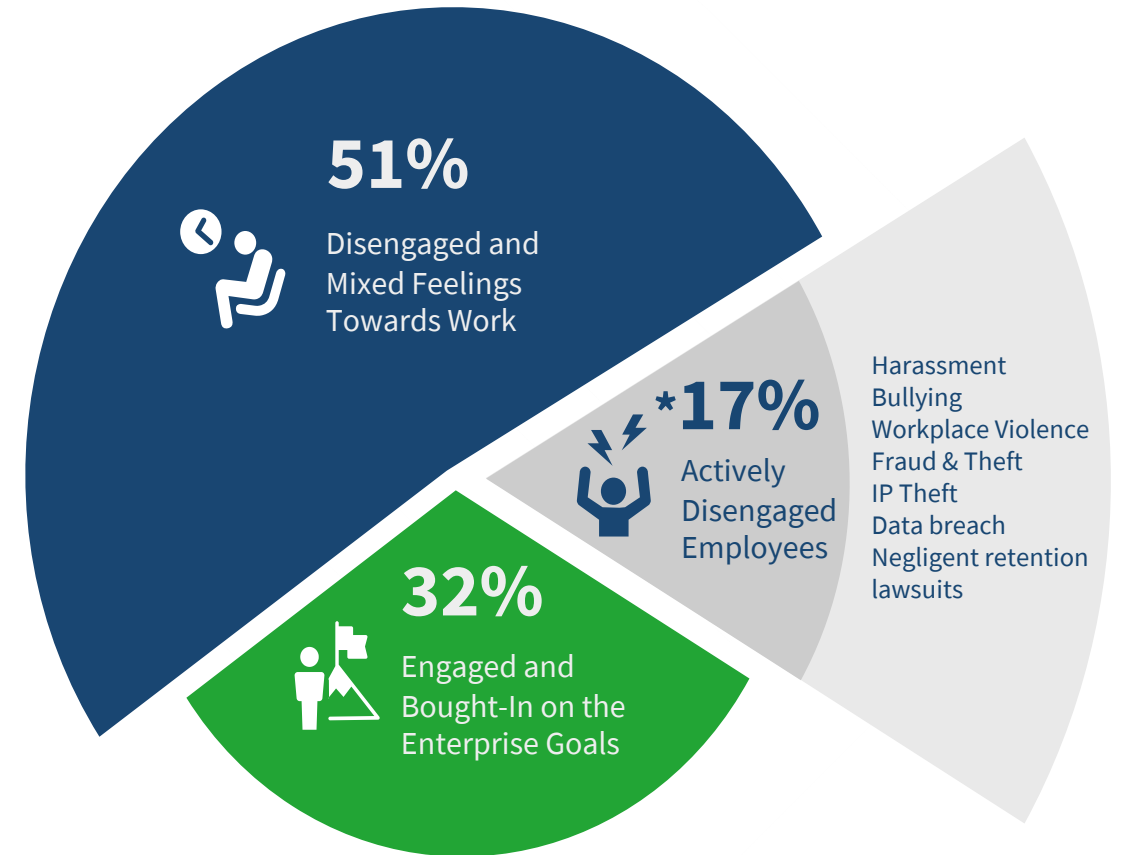


- **Conflicts of Interest (COI):** Violation of COI policies or employment agreements
- **Data Leakage:** Risk of accidental or intentional leakage of confidential & proprietary information
- **Insider Data Breaches:** Use of data from one employer to benefit another for personal gain
- **Regulatory Compliance Issues:** Non-compliance with regulatory requirements
- **Intellectual Property (IP) Theft:** Inadvertently or deliberately share intellectual property
- **Competitive Intelligence:** Sharing of insider competitive intelligence with other firms
- **Exploitation by External Parties:** Employees may be manipulated / coerced into sharing info
- **Unreliable Performance:** Divided attention leads to errors, project delays, and performance issues

# Importance of Employee Health and Wellness

Insider threats, poor productivity & sabotage come from the disengaged workforce:

- Disengaged workers feel their needs are not being met, creating resentment
- **68% OF US PAYROLL** goes to employees disengaged or actively putting organizations at risk
- “Actively Disengaged” represents greatest risk and makes up **17% of workforce**
- Many occupy roles leaders / positions of trust
- Early discovery & remediation improves safety





# Internal Conduct Policy & External Laws

## Criminal Self Reporting (Broad vs. Specific)

- Require ANY arrest or court case activity to be self reported
- Specific arrests/court record charges limit flexibility when charge are not specifically mapped to a policy
- Clear policy on sex offender registry

## Financial Reporting

- Financial policies which require additional level of monitoring or investigation. Risk indicator based on role. (examples: lien, judgment, charge-offs, bankruptcy, etc.)
- EAP program or financial assistance
- Role change with access to financial accounts or cards

## Workplace Violence Laws

- California's Workplace Violence Prevention Plan Law, SB 553, in effect July 1, 2024
- Must implement workplace violence prevention plans, assess and resolve workplace violence hazards, train all employees, and implement investigation and recordkeeping processes
- 23 states have recently passed or legislating similar laws

# Human Capital Signals in Behavioral Data



*All human behavior  
risk signals ideally  
correlate back to an  
Internal Conduct Policy*

# FCRA FACT ACT

## Fair Credit Reporting Act (FCRA) Fair and Accurate Transactions Act (FACTA)

- 2023 FACTA supports investigations of employee misconduct or **non-compliance with written policies**.
- Limits FCRA definition of “consumer report” -- does **NOT** apply if:  

Communication is made to an employer in connection with an investigation of suspected misconduct relating to employment, compliance with laws, rules of a self-regulatory organization, or any preexisting written policies.
- **Employers should update codes of conduct or self-reporting policies** to enhance legal framework for safety and security.

# Steering Committee Composition

Organizations typically include at least three stakeholders from:

## Executive Leadership

- Aligns program with strategic objectives
- Ensures resource allocation
- Facilitates cross-departmental cooperation

## Human Resources

- Monitors employee behavior / performance
- Enforces policies and disciplinary actions

## Information Security/Cyber

- Protects digital assets
- Monitors / responds to cyber threats
- Ensures technical robustness of program

## Physical Security/Risk

- Safeguards physical assets and personnel
- Identifies & mitigates physical access vulnerabilities

## Legal

- Ensures program compliance with laws and regulations
- Navigates legal complexities of monitoring & investigations

## Compliance

- Adherence to industry standards & regulatory requirements
- Guides best practices for insider threat management
- Defines & manages internal policies

# Consent & Authorization

## Evergreen Consent

- SF86 includes captures consent for cleared positions
- Update to normal background check consent – that enables ongoing evaluation
- Captured at onboarding, annual HR or Security update, or on promotion
- Experience shows 95%+ captures on existing non-cleared employees
- Transparent communication helps

## Serial Notification Reminders

- Annual communication
- Reminders ensure employees don't "forget" about the program or their consent
- Serves as deterrence and reminder of strong security posture

# Transparent Employee Communication

- “In support of and to align with these ongoing vetting efforts, we have taken a proactive approach and include all employees in an ongoing company-level monitoring program whereby various local county court and public records are automatically screened for alerts related to criminal activity. “
- “Alerts are anonymous and to date, there have been very few alerts resulting from these monitoring activities. “
- “This initiative supports the strong assurance we have in the company workforce but nevertheless the program has been implemented to support ongoing company management efforts to preserve the safe and secure workplace environment we deserve.”

# Mature – Evolve – Expand

## Public Trust / Non – Cleared Employees

Movement to “Trusted Workforce 2.0”



## High Risk Safety

Recent Termination, Public Customer  
Threats, Executive Threats



## FOCI Mitigation / Supply Chain

Parent Company, B2B Contractors, Supply  
Chain Reps, 1099 Contractors, KYS



## Nation State Actors

Accessing Employment via Synthetic ID,  
Gray Zone Warfare



# Appendix