



DEPARTMENT OF DEFENSE  
DEFENSE OFFICE OF HEARINGS AND APPEALS



In the matter of: )  
 )  
 REDACTED ) ISCR Case No. 19-02793  
 )  
 Applicant for Security Clearance )

**Appearances**

For Government: Tovah Minster, Esq., Department Counsel  
For Applicant: *Pro se*

03/02/2020

**Decision**

MATCHINSKI, Elizabeth M., Administrative Judge:

Applicant defaulted on some \$40,766 in delinquent debt on eight accounts, including a \$3,066 student loan. In late October 2019, he entered into a debt-management plan (DMP) to address seven unsecured consumer-credit debts totaling \$35,577, requiring monthly payments of \$835. As of February 2020, he had paid \$7,747 toward his delinquent debts, including \$3,806 under the DMP. Clearance is granted on the condition that he continue to make timely payments toward his delinquencies.

**Statement of the Case**

On November 8, 2019, the Department of Defense Consolidated Adjudications Facility (DOD CAF) issued a Statement of Reasons (SOR) to Applicant, detailing security concerns under Guideline F, financial considerations. The SOR explained why the DOD CAF was unable to find it clearly consistent with the national interest to grant or continue security clearance eligibility for him. The DOD CAF took the action under Executive Order (EO) 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended; DOD Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the *National Security Adjudicative*

*Guidelines for Determining Eligibility for Access to Classified Information or Eligibility to Hold a Sensitive Position (AG) effective within the DOD on June 8, 2017.*

On November 22, 2019, Applicant answered the SOR allegations and requested a decision on the written record without a hearing. On December 31, 2019, the Government submitted a File of Relevant Material (FORM), including documents identified as Items 1 through 6. The Defense Office of Hearings and Appeals (DOHA) forwarded a copy of the FORM to Applicant on January 2, 2020, and informed him that any response was due within 30 days of receipt. Applicant received the FORM on January 13, 2020, and responded to the FORM on February 12, 2020. On February 13, 2020, Department Counsel indicated that the Government had no objection to Applicant's response to the FORM. On February 18, 2020, the case was assigned to me to determine whether it is clearly consistent with the interests of national security to grant or continue a security clearance for Applicant. I received the case file on February 21, 2020.

### **Evidentiary Rulings**

Department Counsel submitted, as Item 4, a summary report of a personal subject interview (PSI) of Applicant conducted on April 23, 2019. The summary report was part of the DOD Report of Investigation (ROI) in Applicant's case. Under ¶ E3.1.20 of the Directive, a DOD personal background ROI may be received in evidence and considered with an authenticating witness, provided it is otherwise admissible under the Federal Rules of Evidence. The summary report did not bear the authentication required for admissibility under ¶ E3.1.20.

In ISCR Case No. 16-03126 decided on January 24, 2018, the DOHA Appeal Board held that it was not error for an administrative judge to admit and consider a summary of personal subject interview where the applicant was placed on notice of his or her opportunity to object to consideration of the summary; the applicant filed no objection to it; and there is no indication that the summary contained inaccurate information. In this case, Applicant was provided a copy of the FORM and advised of his opportunity to submit objections or material that he wanted the administrative judge to consider. In the FORM, Applicant was advised as follows:

**IMPORTANT NOTICE TO APPLICANT:** The attached summary of your Personal Subject Interview (PSI) (Item 4) is being provided to the Administrative Judge for consideration as part of the record evidence in this case. In your response to the [FORM], you can comment on whether [the] PSI summary accurately reflects the information you provided to the authorized OPM investigator(s) and you may make any corrections, additions, deletions, and updates necessary to make the summary clear and accurate. Alternatively, you may object on the ground that the report is unauthenticated by a Government witness and the document may not be considered as evidence. If no objections are raised in your response to this FORM, or if you do not respond to this FORM, the Administrative Judge may

determine that you have waived any objections to the admissibility of the summary and may consider the summary as evidence in your case.

Applicant did not mention the PSI in his response to the FORM. Concerning whether Applicant understood the meaning of authentication or the legal consequences of waiver, Applicant's *pro se* status does not confer any due process rights or protections beyond those afforded him if he was represented by legal counsel. He was advised in ¶ E3.1.4 of the Directive that he may request a hearing. In ¶ E3.1.15, he was advised that he is responsible for presenting evidence to rebut, explain, or mitigate facts admitted by him or proven by Department Counsel and that he has the ultimate burden of persuasion as to obtaining a favorable clearance decision. While the Directive does not specifically provide for a waiver of the authentication requirement, Applicant was placed on sufficient notice of his opportunity to object to the admissibility of the PSI, to comment on the PSI, and to make any corrections, deletions, or updates to the information in the PSI. Applicant is deemed to have waived any objections to the PSI.

Accordingly, Items 1 through 6 were accepted into the record as exhibits for the Government. Applicant's response to the FORM was admitted as Applicant exhibit (AE) A.

### **Findings of Fact**

The SOR alleges under Guideline F that, as of November 8, 2019, Applicant owes charged-off debts of \$18,145 (SOR ¶ 1.a); \$6,699 (SOR ¶ 1.b); and \$2,168 (SOR ¶ 1.d); and collection debts of \$3,066 (SOR ¶ 1.c); \$895 (SOR ¶ 1.e); \$4,763 (SOR ¶ 1.f); \$4,593 (SOR ¶ 1.g); and \$437 (SOR ¶ 1.h). (Item 1.) When Applicant answered the SOR, he admitted the debts and asserted he was making a good-faith effort to address the debts in SOR ¶¶ 1.a, 1.d, 1.e, and 1.h through a DMP. He stated that he had entered into agreements with the creditors in SOR ¶¶ 1.b, 1.f, and 1.g to make monthly payments on those debts and was adhering to those agreements. He related that he was pursuing refinancing options to repay his student-loan debt (SOR ¶ 1.c). (Item 2.)

After considering Items 1 through 6, which includes Applicant's response to the SOR (Item 2), and Applicant's response to the FORM (AE A), I make the following findings of fact:

Applicant is 39 years old and a native of the Philippines. He came to the United States as a child and became a naturalized U.S. citizen on his own application in July 2008. He earned a bachelor's degree in May 2004 and a master's degree in May 2014. Applicant has worked for a succession of defense contractors since July 2014, and he was granted a DOD secret clearance in September 2014. (Item 3.)

Applicant was married from January 2012 to December 2015. He lived with his parents from May 2014 to January 2016, when he began a cohabitant relationship with his current girlfriend, so he and his ex-wife may have separated in May 2014. In October 2018, Applicant began renting an apartment near his girlfriend, and he was spending about 30%

of his time in that apartment. Applicant has two daughters, age 8 years and age 11 months, respectively. They live with him and his cohabitant girlfriend. (Items 3-4.)

After graduating from college, Applicant worked as a computer-aided design technician for an engineering company until April 2005. He then worked as a service manager until October 2013, when he was laid off. He was unemployed from November 2013 to July 2014. He collected unemployment benefits and was a stay-at-home father while his ex-wife worked. In July 2014, Applicant began working as an analyst in the defense industry. He began his current employment in July 2018. (Item 3.) Applicant did not provide any details about his income when he was employed or his unemployment compensation.

As part of the DOD Continuous Evaluation Program, Applicant's credit was checked on November 7, 2018. Seven delinquent accounts totaling \$37,729 were on his credit report. (Item 6.) On March 11, 2019, Applicant completed and certified to the accuracy of a Questionnaire for National Security Positions (SF 86). In response to financial inquiries into delinquency involving routine accounts, Applicant indicated that he lost a home to foreclosure in December 2016 after being unable to pay his mortgage due to limited income. (Item 3.) Available credit information shows that he obtained a \$137,040 mortgage loan in October 2008, to be repaid at \$1,095 monthly. He was current on his mortgage payments during his marriage, but he defaulted on the payments after his divorce. The loan balance was paid by insurance. (Item 5.) Applicant also listed on his SF 86 collection debts of \$4,763 (SOR ¶ 1.f); \$5,030 (SOR ¶ 1.g); and \$310 (not alleged in SOR). He indicated that he had an established repayment plan for the \$4,763 that will conclude in August 2020; was awaiting a repayment plan for the \$5,030 debt; and had paid the medical debt in February 2019. (Item 3.)

As of March 23, 2019, Applicant's credit report showed the following delinquencies on his credit record:

- A credit-card account opened in September 2005 was charged off for \$18,145 in May 2017 due to inactivity since September 2016 (SOR ¶ 1.a). As of March 2019, the debt was unpaid.
- An \$8,000 line-of-credit account opened in May 2006 was charged off for \$6,699 in December 2017 for failure to make the \$169 monthly payment since June 2017 (SOR ¶ 1.b). As of February 2019, the debt was unpaid.
- A student loan obtained in August 1999 for \$6,060 was in collection for \$3,066 for failure to make the \$64 monthly payment since February 2016 (SOR ¶ 1.c). As of March 2019, the debt was unpaid.
- A credit-card account opened in February 2005 was charged off for \$2,168 in August 2017 for nonpayment since December 2016. As of March 2019, the account balance was \$2,162 (SOR ¶ 1.d).

- A retail charge account opened in February 2008 with a \$700 credit limit was in collection for \$895 due to nonpayment since October 2016 (SOR ¶ 1.e). As of March 2019, the debt was unpaid.
- A \$4,763 charge-account delinquency from February 2017 was acquired by a collection entity in June 2018 (SOR ¶ 1.f). As of March 2019, the debt was unpaid.
- A \$4,593 credit-card balance from January 2017 was placed for collection in August 2017 (SOR ¶ 1.g). As of March 2019, the debt was unpaid.
- A \$437 credit-card balance from December 2016 was placed for collection in November 2017 (SOR ¶ 1.h). As of March 2019, the debt was unpaid.

As of February 2019, Applicant was making timely payments on a credit card with a \$1,200 balance. He owed federal student-loan debts of \$100,239 and \$22,066, which were rated as current. (Item 5.) Apparently, they were in a hardship deferment as Applicant was making no payments on his student loans. (AE A.)

On April 23, 2019, Applicant was interviewed by an authorized investigator for the Office of Personnel Management (OPM). Applicant attributed his financial delinquencies to his lack of income and divorce proceedings, although he did not provide any details of his income or the cost of his divorce. He indicated that he has been repaying the debt in SOR ¶ 1.f at \$247 per month, and that he was still trying to negotiate repayment plans for the credit-card debts in SOR ¶¶ 1.g and 1.h. Applicant denied that he had any accounts in collection or more than 120 days past due. Then confronted about the \$895 delinquency (SOR ¶ 1.e), Applicant indicated that he thought he had paid it off, and he indicated that he would provide proof of satisfaction within five days. Applicant denied that he had any other delinquent accounts. When then confronted with the \$3,066 student loan (SOR ¶ 1.c), Applicant admitted that he had not resolved the debt. When confronted about the charged-off credit-card debts for \$18,145 (SOR ¶ 1.a) and \$2,168 (SOR ¶ 1.d), and the charged-off personal loan for \$6,699 (SOR ¶ 1.b), Applicant expressed his belief that the debts never went to collections, and because the debts had been charged off, he did not have to report them on his SF 86 or take any action to resolve them. He stated that he was willing to pay the debts, but that they had been charged off. Applicant had not had any financial counseling, but admitted that he had been irresponsible in relying too heavily on consumer credit cards. He expressed an intention to avoid incurring delinquent debts in the future, and indicated that his financial situation was improving. (Item 5.)

Payment records indicate that, on March 18, 2019, Applicant made the first of \$264 monthly payments toward debt in SOR ¶ 1.f. As of his February 4, 2020 payment, he had made 12 payments totaling \$3,175 toward the debt. On October 18, 2019, Applicant made a \$356 payment toward the collection entity holding the debts in SOR ¶¶ 1.g and 1.h. After that payment, he made \$136 monthly payments from November 2019 through January 2020. (AE A.) Those payments were apparently being allocated to the debt in SOR ¶ 1.g. (Item 2.)

On October 25, 2019, Applicant entered into a DMP in which he listed \$35,577 in unsecured debt (SOR ¶ 1.a, \$18,145; SOR ¶ 1.b, \$6,699; SOR ¶ 1.d, \$2,162; SOR ¶ 1.e, \$895; SOR ¶ 1.f, \$2,646; SOR 1.g, \$4,593; and SOR ¶ 1.h, \$437). Under the DMP, he agreed to make \$835 monthly payments starting November 1, 2019, with \$763 of his monthly payment to be paid out to his creditors. Under the DMP, his debts would be liquidated over the next 52 months. Applicant continued to make separate payments to the creditors in SOR ¶¶ 1.f-1.h while also making payments under the DMP. Following an initial \$50 payment to enter the DMP, Applicant made DMP payments of \$985 in November 2019 and December 2019, and of \$893 in January 2020 and February 2020. As of his response to the FORM, he had paid a total of \$3,806 to the DMP. (AE A.)

As of October 2019, Applicant was paying \$315 a month on a vehicle loan, \$800 a month in utility expenses, \$2,099 for housing, \$15 a month toward a credit card, and \$1,043 in miscellaneous household expenses. He was setting \$25 a month aside as required by an unspecified “hardship program.” He reported net income of \$5,150 per month. (AE A.)

On November 8, 2019, the DOD CAF issued an SOR to Applicant because of his defaulted student loan and the consumer-credit delinquencies included in his DMP. When Applicant responded to the SOR, he indicated that he was making payments toward the debts in SOR ¶¶ 1.a-1.b, 1.d-1.e, and 1.h through the DMP, and toward the debts in SOR ¶¶ 1.f and 1.g under separate agreements with those creditors. (Item 2.) He provided documentation showing his payments in response to the FORM in February 2020. (AE A.)

## **Policies**

The U.S. Supreme Court has recognized the substantial discretion the Executive Branch has in regulating access to information pertaining to national security, emphasizing that “no one has a ‘right’ to a security clearance.” *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988). When evaluating an applicant’s suitability for a security clearance, the administrative judge must consider the adjudicative guidelines. In addition to brief introductory explanations for each guideline, the adjudicative guidelines list potentially disqualifying conditions and mitigating conditions, which are required to be considered in evaluating an applicant’s eligibility for access to classified information. These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied in conjunction with the factors listed in the adjudicative process. The administrative judge’s overall adjudicative goal is a fair, impartial, and commonsense decision. According to AG ¶ 2(a), the entire process is a conscientious scrutiny of a number of variables known as the “whole-person concept.” The administrative judge must consider all available, reliable information about the person, past and present, favorable and unfavorable, in making a decision.

The protection of the national security is the paramount consideration. AG ¶ 2(b) requires that “[a]ny doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security.” In reaching this decision, I have drawn only those conclusions that are reasonable, logical, and based on the evidence

contained in the record. Under Directive ¶ E3.1.14, the Government must present evidence to establish controverted facts alleged in the SOR. Under Directive ¶ E3.1.15, the applicant is responsible for presenting “witnesses and other evidence to rebut, explain, extenuate, or mitigate facts admitted by applicant or proven by Department Counsel. . . .” The applicant has the ultimate burden of persuasion to obtain a favorable security decision.

A person who seeks access to classified information enters into a fiduciary relationship with the Government predicated upon trust and confidence. This relationship transcends normal duty hours and endures throughout off-duty hours. The Government reposes a high degree of trust and confidence in individuals to whom it grants access to classified information. Decisions include, by necessity, consideration of the possible risk that the applicant may deliberately or inadvertently fail to safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation about potential, rather than actual, risk of compromise of classified information. Section 7 of EO 10865 provides that decisions shall be “in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.” See *also* EO 12968, Section 3.1(b) (listing multiple prerequisites for access to classified or sensitive information).

## **Analysis**

### **Guideline F: Financial Considerations**

The security concerns about financial considerations are articulated in AG ¶ 18:

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. Financial distress can also be caused or exacerbated by, and thus can be a possible indicator of, other issues of personnel security concern such as excessive gambling, mental health conditions, substance misuse, or alcohol abuse or dependence. An individual who is financially overextended is at greater risk of having to engage in illegal or otherwise questionable acts to generate funds. . . .

An applicant is not required to be debt free, but is required to manage his finances in a way as to exhibit sound judgment and responsibility. The Appeal Board explained the scope and rationale for the financial considerations security concern in ISCR Case No. 11-05365 at 3 (App. Bd. May 1, 2012) (citation omitted) as follows:

This concern is broader than the possibility that an applicant might knowingly compromise classified information in order to raise money in satisfaction of his or her debts. Rather, it requires a Judge to examine the totality of an applicant’s financial history and circumstances. The Judge must consider pertinent evidence regarding the applicant’s self-control, judgment, and other qualities essential to protecting the national secrets as well as the

vulnerabilities inherent in the circumstances. The Directive presumes a nexus between proven conduct under any of the Guidelines and an applicant's security eligibility.

Guideline F security concerns are established when an individual fails to pay financial obligations according to terms. Over the two years following his December 2015 divorce, Applicant defaulted on a student loan and on seven consumer credit accounts. As of March 2019, he owed \$40,766 in delinquent debts. Under AG ¶ 19, disqualifying conditions 19(a), "inability to satisfy debts," and 19(c), "a history of not meeting financial obligations," apply.

The burden is on Applicant to mitigate the negative implications for his financial judgment raised by his delinquent debts. Application of the aforesaid disqualifying conditions triggers consideration of the potentially mitigating conditions under AG ¶ 20. One or more of the following conditions may apply in whole or in part:

(a) the behavior happened so long ago, was so infrequent, or occurred under such circumstances that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;

(b) the conditions that resulted in the financial problem were largely beyond the person's control (e.g., loss of employment, a business downturn, unexpected medical emergency, a death, divorce or separation, clear victimization by predatory lending practices, or identity theft), and the individual acted responsibly under the circumstances;

(c) the person has received or is receiving counseling for the problem from a legitimate and credible source, such as a non-profit credit counseling service, and there are clear indications that the problem is being resolved or is under control; and

(d) the individual initiated and is adhering to a good-faith effort to repay overdue creditors or otherwise resolve debts.

Regarding AG ¶ 20(a), the debts have been delinquent for some time, and although he started repaying the debt in SOR ¶ 1.f in March 2019, none of the debts have been fully resolved. Applicant's debts are considered recent because "an applicant's ongoing, unpaid debts evidence a continuing course of conduct and, therefore, can be viewed as recent for purposes of the Guideline F mitigating conditions." ISCR Case No. 15-06532 at 3 (App. Bd. Feb. 16, 2017) (citing ISCR Case No. 15-01690 at 2 (App. Bd. Sept. 13, 2016)). AG ¶ 20(a) does not apply.

Applicant attributes his financial problems to lack of income and his divorce, which are circumstances that could mitigate financial issues under AG ¶ 20(b). However, Applicant did not provide any information about his income or expenses between 2015 and 2017 that could mitigate his disregard of several financial obligations around that time. He



may have had expenses of caring for his then four-year-old daughter, but he provided no details. He moved in with his girlfriend in January 2016, but it is unclear to what extent he and his girlfriend shared expenses.

Even assuming that factors outside of his control contributed to or caused his financial problems, I have to consider whether Applicant acted in a responsible manner when dealing with his financial difficulties. See ISCR Case No. 05-11366 at 4, n.9 (App. Bd. Jan. 12, 2007) (citing ISCR Case No. 99-0462 at 4 (App. Bd. May 25, 2000); ISCR Case No. 99-0012 at 4 (App. Bd. Dec. 1, 1999); ISCR Case No. 03-13096 at 4 (App. Bd. Nov. 29, 2005)). He failed to act responsibly in several respects. There is no evidence that Applicant attempted to contact his creditors about his debts before they came to the attention of the DOD in November 2018. He had some income to make payments as he had been consistently employed in the defense industry since July 2014. As his delinquencies went unpaid, he began renting a separate apartment in October 2018. While it may have been a refuge for him when he needed some time away from his girlfriend, it is evident that his past-due debts were not a priority for him. Even if he thought he could do nothing about debts that had been charged off, he had other accounts in collections.

The timing of resolution of financial problems is an important consideration in evaluating mitigation. Applicant began taking efforts to resolve the debts in SOR ¶¶ 1.f and 1.g shortly before he completed his March 2019 SF 86. In ISCR Case No. 17-03229 at 6 (App. Bd. June 7, 2019), the Appeal Board stated that “an applicant who takes action to resolve his financial problems only after being placed on notice that his or her clearance is in jeopardy may lack the judgment, and self discipline to follow rules and regulations over time or when there is no immediate threat to his or her own interests.” Nonetheless, Applicant is credited with following through on the repayment plans for those two debts. By the time the SOR was issued in November 2018, Applicant had made nine months of payments on the debt in SOR ¶ 1.f and two payments on the debt in SOR ¶ 1.g. He had entered into the DMP to repay his consumer-credit delinquencies and made a first payment of \$985, which was in excess of the \$835 required under the DMP. Applicant is credited with some mitigation under AG ¶ 20(c) and AG ¶ 20(d) because of these payments. However, he has not had any financial counseling, which is required under AG ¶ 20(c). Even after debt payments totaling \$7,747 as of early February 2020, he still owes approximately \$30,000 in past-due debt and has no repayment plan in place for the \$3,066 defaulted student loan.

Applicant is not required, as a matter of law, to establish that he has satisfied each debt in the SOR. See, e.g., ISCR Case No. 02-25499 at 2 (App. Bd. June 5, 2006). However, he is required under Appeal Board precedent to demonstrate not only that he has a plan to resolve his financial problems, but that he has taken significant actions to implement that plan. See, e.g., ISCR Case No. 04-09684 at 2 (App. Bd. July 6, 2006.) Applicant’s repayment arrangements, and his consistent monthly payments, including for the past 12 months toward the debt in SOR ¶ 1.f, demonstrate a willingness to resolve his debts provided he has the income to do so.

## Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant's eligibility for a security clearance by considering the totality of his conduct and all relevant circumstances in light of the nine adjudicative process factors in AG ¶ 2(d):

(1) the nature, extent, and seriousness of the conduct; (2) the circumstances surrounding the conduct, to include knowledgeable participation; (3) the frequency and recency of the conduct; (4) the individual's age and maturity at the time of the conduct; (5) the extent to which participation is voluntary; (6) the presence or absence of rehabilitation and other permanent behavioral changes; (7) the motivation for the conduct; (8) the potential for pressure, coercion, exploitation, or duress; and (9) the likelihood of continuation or recurrence.

Because Applicant requested a decision on the written record, much remains unknown about his current expenses. Yet, he has made the payments as required under his established repayment plans with no evidence of any new delinquency. The security clearance adjudication involves an evaluation of an applicant's judgment, reliability, and trustworthiness in light of the security guidelines in the Directive. See ISCR Case No. 09-02160 (App. Bd. Jun. 21, 2010). Even though Applicant's delay in addressing his delinquent obligations is not condoned, the security clearance adjudication is not intended as a debt collection process or designed to punish applicants for past mistakes or shortcomings.

In exceptional cases, an administrative judge may grant initial or continued eligibility for a security clearance, despite the presence of an issue(s) that can be partially but not completely mitigated. Appendix C of Security Executive Agent Directive (SEAD) 4 grants DOHA administrative judges the discretionary authority to grant initial or continued eligibility for a security clearance *despite the presence of an issue(s) that can be partially but not completely mitigated* with the provision of additional security measures. See also Memorandum, Director for Defense Intelligence (Intelligence and Security), dated January 12, 2018 ("Appendix C identifies authorized exceptions that are to be utilized when making adjudicative decisions to grant initial or continued eligibility for access to classified information or to hold a sensitive position . . . Effective immediately, authority to grant clearance eligibility with one of the exceptions enumerated in Appendix C is granted to any adjudicative, hearing, or appeal official or entity now authorized to grant clearance eligibility when they have jurisdiction to render the eligibility determination.")

Currently, DOHA administrative judges do not have the authority to compel a third party, such as an employer, to monitor a person's compliance with conditions. However, a facility security officer has an independent obligation to report to the Government any information raising a security concern, including a cleared employee's failure to make his debt payments. Applicant's record of debt repayment starting in March 2019 favors granting a conditional clearance in this case. In exercising this discretionary authority, I have carefully considered and weighed the financial considerations security concerns and decided Applicant earned an opportunity to show that he can be counted on to rehabilitate

