



November 2017

# PERSONNEL SECURITY CLEARANCES

## Plans Needed to Fully Implement and Oversee Continuous Evaluation of Clearance Holders

## Why GAO Did This Study

Continuous evaluation is a key executive branch initiative to more frequently identify and assess security-relevant information, such as criminal activity. Implementing a continuous evaluation program has been a long-standing goal, with implementation milestones as early as 2010 and DOD pilots dating back to the early 2000's.

GAO was asked to review efforts to implement continuous evaluation. This report assesses the extent to which (1) ODNI has implemented an executive branch-wide program and developed plans to monitor and measure its performance; (2) DOD and other agencies have designed, piloted, and evaluated continuous evaluation and (3) agencies completed timely periodic reinvestigations from fiscal years 2012-2016, and the potential effects of continuous evaluation on reinvestigations. GAO reviewed documentation, analyzed timeliness data, and interviewed officials from ODNI and other agencies. This is a public version of a sensitive report that is being issued concurrently. Information that ODNI and State deemed sensitive has been omitted.

## What GAO Recommends

GAO is making six recommendations, including that ODNI formalize its policy on continuous evaluation, develop an implementation plan as well as a plan to monitor and measure program performance, and assess the potential effects of continuous evaluation on agency resources. ODNI concurred with the recommendations, but disagreed with aspects of GAO's conclusions. GAO continues to believe the conclusions are valid, as discussed in the report.

View [GAO-18-117](#). For more information, contact Brenda S. Farrell at (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov)

# PERSONNEL SECURITY CLEARANCES

## Plans Needed to Fully Implement and Oversee Continuous Evaluation of Clearance Holders

## What GAO Found

In October 2016, the Office of the Director of National Intelligence (ODNI) took an initial step to implement continuous evaluation—a process to review the background of clearance holders and individuals in sensitive positions at any time during the eligibility period—across the executive branch, but it has not yet determined key aspects of the program, and it lacks plans for implementing, monitoring, and measuring program performance. For the first phase, agencies are to conduct certain continuous evaluation record checks against a portion of their national security population by the end of fiscal year 2017. However, ODNI has not formalized its policy on what continuous evaluation encompasses, determined what the future phases will entail or when they will occur, or developed an implementation plan. According to all seven agencies GAO interviewed, this uncertainty has affected their ability to plan for the program and estimate its costs. Without a continuous evaluation policy and a fully developed plan, full implementation—which has been delayed since 2010—may be further delayed. Moreover, ODNI lacks a plan to monitor and measure program performance, including for the first phase, which is underway. Without developing such a plan, ODNI cannot ensure that the program is being implemented consistently across the executive branch or that it is effectively identifying risks to national security.

The Department of Defense (DOD) and the Department of State (State) have designed, piloted, and evaluated continuous evaluation. Their approaches have varied in scope, size, and duration, as they pre-date ODNI's efforts to implement continuous evaluation executive branch-wide. DOD's pilot involves the most record checks and the largest population. DOD had 500,000 employees enrolled in December 2016, and it plans to enroll 1 million by the end of calendar year 2017 and all clearance holders by the end of fiscal year 2021.

Executive branch agencies meeting established timeliness goals for completing periodic reinvestigations decreased from fiscal years 2012 through 2016, and the potential effects of continuous evaluation, including on reinvestigations and resources, are unknown. While 84 percent of the executive branch agencies reviewed by GAO reported meeting the executive branch's 195-day timeliness goal for at least three of four quarters in fiscal year 2012, only 22 percent did so in fiscal year 2016. Also, a 2008 report outlined a plan to replace reinvestigations with continuous evaluation, but ODNI documentation indicates that this is no longer the intent. While agencies expressed varying views about changes to reinvestigations—such as modifying their scope—officials from five agencies stated that the continuous evaluation program will increase their workloads and costs if no other changes are made to the requirements. DOD officials said they cannot afford to conduct both continuous evaluation and reinvestigations, as DOD estimates that more frequent reinvestigations for certain clearance holders will cost \$1.8 billion for fiscal years 2018 through 2022. Although agencies have identified increased resources as a risk of the program, ODNI has not assessed the program's potential effects on agency resources. Without assessing the potential effects once ODNI has further defined the program, implementing continuous evaluation could lead to further delays and backlogs in reinvestigations, and could increase agency costs.

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# Contents

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|                      |   |    |
|----------------------|---|----|
| Letter               |   | 1  |
|                      | Background  | 5  |
|                      | ODNI Has Taken an Initial Step to Implement Continuous Evaluation across the Executive Branch but Has Not Determined Key Program Aspects or How it Will Monitor and Measure Performance | 12 |
|                      | DOD and State Have Designed, Piloted, and Evaluated Continuous Evaluation to Varying Extents  | 24 |
|                      | Number of Agencies Meeting Periodic Reinvestigation Timeliness Goals Decreased from Fiscal Years 2012-2016, and Potential Continuous Evaluation Effects Are Unknown                     | 29 |
|                      | Conclusions   | 37 |
|                      | Recommendations for Executive Action  | 38 |
|                      | Agency Comments and Our Evaluation  | 40 |
| Appendix I           | Comments from the Office of the Director of National Intelligence   | 46 |
| Appendix II          | GAO Contact and Staff Acknowledgments   | 49 |
| Related GAO Products |   | 50 |
| Figures              |   |    |
|                      | Figure 1: Milestones for the Issuance of Continuous Evaluation Policy and Implementation of the Program   | 18 |
|                      | Figure 2: Overview of the Department of Defense's (DOD) Continuous Evaluation Process   | 27 |

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### Abbreviations

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| DOD      | Department of Defense   |
| NBIB     | National Background Investigations Bureau                                     |
| ODNI     | Office of the Director of National Intelligence                               |
| OMB      | Office of Management and Budget   |
| OPM      | Office of Personnel Management  |
| PAC      | Security, Suitability and Credentialing Performance<br>Accountability Council |
| PERSEREC | Defense Personnel and Security Research Center                                |
| State    | Department of State   |

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November 21, 2017

### Congressional Requesters

Continuous evaluation—a process to review the background of an individual who has been determined to be eligible for access to classified information or to hold a sensitive position at any time during the period of eligibility—is a key executive branch initiative to more frequently identify and assess security-relevant information between periodic reinvestigations.<sup>1</sup> Implementing a continuous evaluation program has been a long-standing goal of security clearance reform efforts, with implementation milestones set by the government-wide reform effort dating back to the 4th quarter of fiscal year 2010 and Department of Defense (DOD) pilot studies dating back to the early 2000's. Specifically, since 2001, DOD's Defense Personnel and Security Research Center (PERSEREC) has conducted a number of studies related to continuous evaluation, such as the usefulness of various data sources, the technical capability to conduct automated record checks, and the value and utility of such checks.

Following the September 2013 shooting at the Washington Navy Yard, the Office of Management and Budget (OMB) conducted a 120-day review of the government's security clearance procedures. OMB's February 2014 *Suitability and Security Processes Review Report to the President*, resulting from that review, highlighted 37 recommendations to improve, among other things, the federal government's processes for granting security clearances, including the acceleration of the implementation of continuous evaluation across all agencies and security levels. The report also included a milestone for the Office of the Director of National Intelligence (ODNI) to develop an initial continuous evaluation capability for certain clearance holders by September 2014. However, in April 2015, we found, among other things, that the milestone for implementing continuous evaluation had been adjusted to December 2016, and that executive branch agencies faced challenges in

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<sup>1</sup>As part of the security clearance process, individuals granted security clearances are investigated periodically—for as long as they remain in a position requiring access to classified information—to ensure their continued eligibility.

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establishing a continuous evaluation policy and implementing the process.<sup>2</sup>

You asked us to review executive branch efforts to implement a continuous evaluation program for personnel security clearances. Our objectives were to assess the extent to which: (1) ODNI has implemented an executive branch-wide continuous evaluation program and developed plans for monitoring and measuring the performance of the program; (2) DOD and other executive branch agencies, if any, have designed, piloted, and evaluated continuous evaluation; and (3) executive branch agencies completed periodic reinvestigations in accordance with established timeliness goals from fiscal year 2012 through fiscal year 2016, and the potential effects of continuous evaluation on periodic reinvestigations. This report is a public version of a sensitive report that we issued in November 2017.<sup>3</sup> ODNI and State deemed some of the information in our November report to be sensitive, which must be protected from public disclosure. Therefore, this report omits sensitive information about ODNI's continuous evaluation program and State's pilot. Although the information provided in this report is more limited, the report addresses the same objectives as the sensitive report and uses the same methodology.

For our first objective, we reviewed relevant Executive Orders identifying ODNI's responsibilities for developing a continuous evaluation program.<sup>4</sup>

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<sup>2</sup>We recommended that the Office of Management and Budget (OMB) develop long-term funding estimates for changes to investigation practices, including continuous evaluation, resulting from the implementation of the 2012 Federal Investigative Standards. OMB concurred with our recommendation. We also recommended that the Director of National Intelligence take three actions: (1) develop, implement, and report to Congress on investigation quality measures; (2) develop procedures to require information sharing between executive branch agencies concerning incomplete investigations or adjudications; and (3) develop government-wide baseline data on required reciprocity determinations. The Office of the Director of National Intelligence did not state whether it concurred with these recommendations, and all four recommendations remained open as of May 2017. GAO, *Personnel Security Clearances: Funding Estimates and Government-Wide Metrics Are Needed to Implement Long-Standing Reform Efforts*, [GAO-15-179SU](#) (Washington, D.C.: Apr. 23, 2015).

<sup>3</sup>GAO, *Personnel Security Clearances: Additional Planning Needed to Implement and Oversee Continuous Evaluation of Clearance Holders*, [GAO-18-159SU](#) (Washington, D.C.: Nov. 21, 2017).

<sup>4</sup>See Exec. Order No. 12,968, § 3.5, *amended by* Exec. Order No. 13,764, 82 Fed. Reg. 8115, 8128 (Jan. 17, 2017). Prior to 2017, continuous evaluation responsibilities were in section 3.5 of Executive Order 12968 as amended by Executive Order 13467, 73 Fed. Reg. 38,103, 38,107 (June 30, 2008).

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We also analyzed ODNI memorandums and other documents describing continuous evaluation and conducted interviews with ODNI officials managing the program about the status of the program and any plans to monitor and measure its performance.<sup>5</sup> We compared the status of the continuous evaluation program against recommendations resulting from the February 2014 120-day review. We also conducted interviews with officials from DOD, the Department of State (State), the Department of Homeland Security, U.S. Customs and Border Protection, the Department of Justice, the U.S. Bureau of Alcohol, Tobacco, Firearms, and Explosives, and the Federal Bureau of Investigation to determine the extent to which those agencies have developed plans to implement continuous evaluation and determined potential costs. We selected these seven agencies based on their management of the data sources to be checked as part of continuous evaluation and because they are among those subject to ODNI's continuous evaluation requirements. We compared ODNI program documentation against relevant program management criteria for developing project management plans,<sup>6</sup> key attributes of successful performance measures identified in our prior work, and Standards for Internal Control in the Federal Government related to communication with external partners and monitoring activities.<sup>7</sup>

For our second objective, we reviewed pilots underway at DOD and State—the two agencies that have piloted continuous evaluation in advance of its implementation across the executive branch. Specifically, we analyzed DOD documentation related to its continuous evaluation process and reviewed PERSEREC reports on DOD's continuous evaluation pilots, including lessons learned. We also interviewed officials

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<sup>5</sup>Office of the Director of National Intelligence Memorandum, *Implementation of Continuous Evaluation* (June 30, 2015); and Office of the Director of National Intelligence Memorandum, *Continuous Evaluation Phased Implementation and Options for Automated Records Checks* (Dec. 22, 2016).

<sup>6</sup> Project Management Institute, Inc. *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Fifth Edition, 2013. PMBOK is a trademark of Project Management Institute, Inc.

<sup>7</sup>We selected these program management criteria based on their applicability to implementing new programs and our prior work. GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002); and GAO, *Defense Health Care Reform: Additional Implementation Details Would Increase Transparency of DOD's Plans and Enhance Accountability*, [GAO-14-49](#) (Washington, D.C.: Nov. 6, 2013). These two reports identify key attributes of performance measures. GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

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who developed those reports and analyzed available metrics to determine how DOD has evaluated and tracked the results of its pilots. In addition, we conducted interviews with DOD officials from the Defense Security Service, the Defense Manpower and Data Center, the Consolidated Adjudications Facility, and the Office of the Under Secretary of Defense for Intelligence, which all have roles in the department's continuous evaluation program. We also reviewed metrics and lessons learned from State's pilot and conducted interviews with officials conducting the pilots at State's Bureau of Diplomatic Security. Finally, we observed a demonstration of the information technology (IT) system that DOD is developing for use in conducting continuous evaluation.

For our third objective, we obtained data from ODNI on the timeliness of periodic reinvestigations at specific executive branch agencies from fiscal year 2012 through fiscal year 2016, by quarter.<sup>8</sup> The number of agencies included in our review was omitted because the information was sensitive. We excluded the data reported by State to ODNI from our analysis due to a July 2017 report by the State Office of Inspector General, which identified a number of errors in the department's security clearance timeliness data.<sup>9</sup> As such, we report on the timeliness of the remaining executive branch agencies for which ODNI provided data. To assess the reliability of the data for the remaining executive branch agencies, we reviewed relevant documentation and interviewed officials about data quality control procedures. Based on these steps, we determined that the data were sufficiently reliable for the purposes of this report. For that reason, we did not independently test the accuracy of the agencies' databases. We selected the fiscal year 2012 to 2016 timeframe for our analysis because the executive branch has not publicly reported on the timeliness of individual executive branch agencies since fiscal year 2011. We analyzed the timeliness data to determine the extent to which agencies are meeting OMB-established timeliness goals for completing the fastest 90 percent of periodic reinvestigations within 195 days.

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<sup>8</sup>These data are not inclusive of all executive branch agencies with employees who hold security clearances. As the Security Executive Agent, ODNI collects clearance timeliness data from executive branch agencies on a quarterly basis. ODNI provided data for the executive branch agencies that have responded to ODNI's requests for clearance timeliness data from fiscal years 2012 through 2016. ODNI officials stated that some agencies do not report timeliness data to ODNI because those agencies stated it would be a manual and intensive process.

<sup>9</sup>Office of Inspector General, U.S. Department of State, *Evaluation of the Department of State's Security Clearance Process*, July 2017.



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We also conducted interviews with officials from DOD; State; ODNI; the Security, Suitability, and Credentialing Performance Accountability Council (PAC) Program Management Office; and the National Background Investigations Bureau (NBIB) regarding the potential risks and effects of continuous evaluation on periodic reinvestigation timeliness and plans to offset anticipated workload increases.<sup>10</sup> We compared this information against relevant program management criteria for performing a quantitative risk analysis and *Standards for Internal Control in the Federal Government* related to defining objectives and risk tolerances.<sup>11</sup>

We conducted this performance audit from July 2016 to November 2017 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### Overview of Personnel Security Clearance Process

ODNI estimates that, as of October 1, 2015, approximately 4.2 million government and contractor employees were eligible to hold a security clearance. Personnel security clearances are required for access to certain national security information. National security information may be classified at one of three levels: confidential, secret, or top secret.<sup>12</sup> The level of classification denotes the degree of protection required for

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<sup>10</sup>The Council was previously named the Suitability and Security Clearance Performance Accountability Council. The name was changed by Executive Order 13764, 82 Fed. Reg. 8115 (Jan. 17, 2017).

<sup>11</sup>Project Management Institute, Inc. *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Fifth Edition, 2013. [GAO-14-704G](#).

<sup>12</sup>A top secret clearance is generally required for approval to access sensitive compartmented information; a secret or top secret clearance is generally required for approval to access special access programs. Sensitive compartmented information is classified intelligence information concerning or derived from intelligence sources, methods, or analytical processes that is required to be protected within formal access-control systems established and overseen by the Director of National Intelligence. A special access program is a program established for a specific class of classified information that imposes safeguarding and access requirements that exceed those normally required for information at the same classification level.

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information and the amount of damage that unauthorized disclosure could reasonably be expected to cause to national security. Specifically, unauthorized disclosure could reasonably be expected to cause (1) “damage,” in the case of confidential information; (2) “serious damage,” in the case of secret information; and (3) “exceptionally grave damage,” in the case of top secret information.<sup>13</sup> According to the Office of Personnel Management (OPM) Federal Investigations Notice 16-02, tier 3 investigations are required for eligibility for access to secret and confidential information, or for noncritical sensitive positions, or “L” access.<sup>14</sup> OPM Federal Investigations Notice 16-07 indicates that tier 5 investigations are required for eligibility for access to top secret or sensitive compartmented information, or for critical sensitive or special sensitive positions, or “Q” access.<sup>15</sup>

Once an executive branch agency determines that a position requires a certain level of access to classified information, the employee in that position completes a questionnaire for national security positions, which the requesting agency sends to an investigative service provider. NBIB—the bureau within OPM with responsibility for conducting personnel background investigations—conducts background investigations for most of the federal government; however, some agencies have authority

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<sup>13</sup>See Exec. Order No. 13,526, § 1.2, 75 Fed. Reg. 707, 707-08 (Dec. 29, 2009).

<sup>14</sup>OPM, Federal Investigations Notice No. 16-02, *Federal Investigative Standards for Tier 3 and Tier 3 Reinvestigation* (Oct. 6, 2015).

<sup>15</sup>OPM, Federal Investigations Notice No. 16-07, *Implementation of Federal Investigative Standards for Tier 4, Tier 4 Reinvestigation, Tier 5, and Tier 5 Reinvestigation* (Sept. 26, 2016). OPM Federal Investigations Notice 15-03 states that tier 1 investigations are for positions designated as low-risk and non-sensitive, and are the minimum level of investigation for a final credentialing determination for physical and logical access. It also states that tier 2 investigations are for non-sensitive positions designated as moderate risk public trust positions. OPM, Federal Investigations Notice No. 15-03, *Implementation of Federal Investigative Standards for Tier 1 and Tier 2 Investigations* (Nov. 4, 2014). OPM Federal Investigations Notice 16-07 states that tier 4 investigations are required for positions solely designated as high risk public trust. The Department of Energy uses “L” access to describe a clearance level similar to secret access and “Q” access for a clearance level similar to top-secret access.

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delegated to them to conduct their own investigations.<sup>16</sup> The investigative service provider then conducts a background investigation and submits an investigative report to the requesting agency. Adjudicators from the requesting agency use the information from the investigative report to determine whether to grant or deny the employee eligibility for a security clearance by considering guidelines in 13 specific areas that address (1) conduct that could raise security concerns and (2) factors that could allay those security concerns and permit granting a clearance. Individuals granted security clearances are investigated periodically—for as long as they remain in a position requiring access to classified information—to ensure their continued eligibility. The 2012 Federal Investigative Standards changed the frequency of periodic reinvestigations for certain clearance holders.<sup>17</sup>

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<sup>16</sup>The National Background Investigations Bureau was established by Executive Order 13741 of September 29, 2016, 81 Fed. Reg. 68,289, and absorbed the Federal Investigative Services, the entity within the Office of Personnel Management that previously conducted background investigations for most of the federal government. ODNI can designate an agency as an “authorized investigative agency” pursuant to 50 U.S.C. § 3341(b)(3), as implemented through Executive Order 13467. Alternatively, under 5 U.S.C. § 1104(a)(2), OPM can redelegate any of its investigative functions subject to performance standards and a system of oversight prescribed by OPM under 5 U.S.C. § 1104(b). Agencies without delegated authority rely on NBIB to conduct their background investigations, while agencies with delegated authority have been authorized to conduct their own background investigations.

<sup>17</sup>We have developed an extensive body of work related to the personnel security clearance process. A listing of these reports is included in the Related GAO Products page at the end of this report.

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## Continuous Evaluation Is Intended to Supplement the Personnel Security Clearance Process

According to Executive Order 13467, as amended, continuous evaluation is a vetting process to review the background of an individual who has been determined to be eligible for access to classified information or to hold a sensitive position at any time during the period of eligibility.<sup>18</sup> Continuous evaluation is intended to fill the gap that exists between periodic reinvestigations in which issues relevant to an individual's continued eligibility for a security clearance may go unreported or unknown. For example, while the Federal Investigative Standards have allowed for periodic reinvestigations to be conducted at any time following the completion of the previous investigation or reinvestigation, agencies have not been required to conduct them more frequently than every 5 years, at most, depending on the clearance level and investigative standards in effect. Like periodic reinvestigations, the purpose of continuous evaluation is to assist agencies in evaluating an individual's continued eligibility for access to classified information.

Continuous evaluation involves automated record checks conducted on a more frequent basis, whereas periodic reinvestigations are conducted less frequently and may include, among other things, subject and reference interviews. The types of records checked as part of continuous evaluation are the same as those checked for other personnel security purposes. Security-relevant information discovered in the course of continuous evaluation is to be investigated and adjudicated under the existing standards. According to ODNI, implementation of continuous evaluation will not alter clearance holders' existing rights or responsibilities and it will incorporate protections for privacy and civil liberties.

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<sup>18</sup>Exec. Order No. 13,467, § 1.3(d), as amended by Exec. Order No. 13,764, 82 Fed. Reg. 8115, 8119 (Jan. 17, 2017). Executive Order 13467, as amended, states that continuous evaluation leverages a set of automated record checks and business rules to assist in the ongoing assessment of an individual's continued eligibility, and is intended to complement continuous vetting efforts. The order defines continuous vetting as reviewing the background of a covered individual at any time to determine whether that individual continues to meet applicable requirements. A covered individual is a person who performs, or who seeks to perform, work for or on behalf of the executive branch, such as a federal employee, military member, or contractor, or otherwise interacts with the executive branch such that they must undergo vetting. Certain individuals are excluded from the definition of "covered individual," including the President and Vice President, certain of their employees, and the governors of states or territories. Exec. Order No. 13,467, § 1.3(d), (f), (h) (as amended).

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Continuous Evaluation Is a Key Initiative of the Personnel Security Clearance Reform Effort

The enactment of the Intelligence Reform and Terrorism Prevention Act of 2004 initiated a reform effort including goals and requirements for improving the personnel security clearance process government-wide.<sup>19</sup> In June 2008, Executive Order 13467 established the PAC as the government-wide governance structure responsible for driving the implementation of and overseeing security and suitability reform efforts.<sup>20</sup> The PAC presently has four principal members: the Deputy Director for Management of OMB; the Director of National Intelligence, who is the Security Executive Agent; the Director of OPM, who is the Suitability Executive Agent; and the Under Secretary of Defense for Intelligence.<sup>21</sup> The Executive Order also designated the Deputy Director for Management of OMB as the chair of the PAC. Among other things, the PAC is to work with agencies to implement continuous performance improvement programs, policies, and procedures; establish annual goals and progress metrics; and prepare annual reports on results. It is also to develop and continuously reevaluate and revise outcome-based metrics that measure the quality, efficiency, and effectiveness of the vetting enterprise.<sup>22</sup> In April 2014, the PAC established the Program Management Office to implement security clearance reforms. This office includes subject-matter experts with knowledge of personnel security clearances and suitability determinations from OMB, ODNI, OPM, DOD, the Department of Homeland Security, the Department of Justice, the Department of the Treasury, and the Federal Bureau of Investigation.

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<sup>19</sup>Pub. L. No. 108-458, § 3001 (2004) (codified in relevant part at 50 U.S.C. § 3341). While IRTPA was a far-reaching act with many broad implications, our references to it throughout this report pertain solely to section 3001, unless otherwise specified.

<sup>20</sup>See Exec. Order No. 13,467, § 2.2, 73 Fed. Reg. 38,103, 38,105 (June 30, 2008). Suitability refers to determinations that the executive branch uses to ensure that individuals are suitable, based on character and conduct, for federal employment in their agency or position. DOD and ODNI formed the Joint Security and Suitability Reform Team in 2007 to improve the security clearance process government-wide, prior to the establishment of the Security, Suitability, and Credentialing Performance Accountability Council.

<sup>21</sup>The Director of OPM is the Suitability Executive Agent, responsible for developing standards and procedures relating to determinations of suitability, among other things. The Under Secretary of Defense for Intelligence became the fourth principal member of the PAC in 2016 with the issuance of Executive Order 13741, 81 Fed. Reg. 68,289 (Sept. 29, 2016) (amending Executive Order 13467).

<sup>22</sup>Exec. Order No. 13,467, § 2.4(d)(iv), (xii), *as amended through* Exec. Order No. 13,764, 82 Fed. Reg. at 8122-23.

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In March 2014, OMB established Insider Threat and Security Clearance Reform as a government-wide, cross-agency priority goal to improve interagency coordination and implementation within the area of personnel security clearances.<sup>23</sup> Through this goal, the PAC and executive-branch agencies are to work to improve oversight to ensure that investigations and adjudications meet government-wide quality standards. Included among the goal's key milestones are implementing a continuous evaluation policy for the executive branch that regularly assesses trusted insiders who have been granted, or are eligible for, access to classified national security information, and overseeing the establishment of continuous evaluation capabilities. ODNI is identified as the lead agency for achieving both of these milestones. In addition, continuous evaluation is identified as a key initiative in the PAC's strategic framework for fiscal years 2017 through 2021 as part of an effort to modernize the vetting process.<sup>24</sup>

While the PAC is responsible for driving the implementation of and overseeing the overall government-wide reform effort, individual agencies are responsible for various aspects of the effort. For example, as the Security Executive Agent, ODNI is responsible for developing and issuing uniform and consistent policies and procedures to ensure the effective, efficient, timely, and secure completion of investigations, polygraphs, and adjudications relating to determinations of eligibility for access to classified information or eligibility to hold a sensitive position.<sup>25</sup> In addition, Executive Order 12968, as amended, indicates that ODNI is responsible for setting the standards for continuous evaluation of those

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<sup>23</sup>The GPRA Modernization Act of 2010 requires OMB to report through a website—[www.performance.gov](http://www.performance.gov)—on long-term cross-agency priority goals to improve the performance and management of the federal government, one of which is Insider Threat and Security Clearance Reform. See Pub. L. No. 111-352, § 5 (2011) (codified at 31 U.S.C. § 1120). The performance planning and reporting framework originally put into place by the Government Performance and Results Act of 1993, Pub. L. No. 103-62 (1993), was updated by the GPRA Modernization Act of 2010. There were 16 of these goals as of June 2017.

<sup>24</sup>Security, Suitability, and Credentialing Performance Accountability Council, *Strategic Intent Fiscal Years 2017-2021* (July 2016); Security, Suitability, and Credentialing Performance Accountability Council, *Enterprise Information Technology Strategy Fiscal Years 2017-2021* (October 2016); and Security, Suitability, and Credentialing Performance Accountability Council, *Strategic Intent and Enterprise IT Strategy Implementation Plan Fiscal Years 2017-2021*.

<sup>25</sup>Exec. Order No. 13,467, § 2.5(e)(iii), as amended by 82 Fed. Reg. at 8125.

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individuals who have access to classified information.<sup>26</sup> According to ODNI, under these Executive Orders, it has responsibility for and oversight of continuous evaluation, as it is an investigative activity that supports eligibility determinations. As such, ODNI established a program office within the National Counterintelligence and Security Center to, among other things, establish policy, guidance, and standards for the implementation of continuous evaluation across the executive branch.

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### DOD Has Conducted Research on Continuous Evaluation for More Than a Decade

DOD has been piloting aspects of continuous evaluation for more than a decade—with pilot tests of automated record checks conducted as early as 2002. Specifically, PERSEREC has conducted several studies dating back to 2001 that have informed and evaluated DOD's continuous evaluation pilots, including the utility of and costs associated with various data sources. These studies have focused on the technical capability to conduct automated record checks from over 40 government and commercial databases, the value and utility of automated record checks in tier 5 investigations, and investigative alternatives to the traditional periodic reinvestigation, among other things. The studies have also included recommendations to further improve DOD's continuous evaluation program, as well as areas for future research. PERSEREC noted that it undertook these studies to identify ways to make the personnel security system more efficient, fair, and effective. According to PERSEREC, starting in 2004 with the formation of the government-wide security clearance reform effort, it began to plan for a broader application of its research beyond the department.

Using this body of knowledge, DOD has incrementally improved its automated record check capabilities and therefore its ability to implement a continuous evaluation program, which it did in 2014 at the recommendation of the Secretary of Defense. Specifically, following the September 2013 shooting at the Washington Navy Yard, the Secretary of Defense directed concurrent internal and independent reviews to identify and recommend actions to address any gaps or deficiencies in DOD programs, policies, and procedures regarding, among other things, the

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<sup>26</sup>Specifically, as amended, Executive Order 12968 provides that an individual who has been determined to be eligible for or who currently has access to classified information shall be subject to continuous evaluation as further defined by and under standards (including, but not limited to, the frequency of such evaluation) as determined by the Director of National Intelligence. See Exec. Order No. 12,968, § 3.5, as amended by Exec. Order No. 13,764, 82 Fed. Reg. at 8128.

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granting and renewing of security clearances for department and contractor personnel. In March 2014, the Secretary of Defense identified four key recommendations based on the findings and recommendations from those reviews. One of those recommendations was to implement continuous evaluation to provide automated record checks of personnel with access to DOD facilities or classified information.<sup>27</sup> In addition, DOD Instruction 5200.02, which was also issued in March 2014, states that all personnel in national security positions shall be subject to continuous evaluation.<sup>28</sup> Consistent with the recommendation and the DOD Instruction, the department implemented a continuous evaluation pilot in October 2014, the details of which are discussed later in the report.

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## ODNI Has Taken an Initial Step to Implement Continuous Evaluation across the Executive Branch but Has Not Determined Key Program Aspects or How it Will Monitor and Measure Performance

In October 2016, ODNI took an initial step to implement continuous evaluation across the executive branch in a phased approach, but as of May 2017, it had not yet formalized the program in policy. The seven agencies we spoke with have been limited in their abilities to plan for the implementation of continuous evaluation, including developing estimated costs, in accordance with ODNI's phased approach. This is due, in part, to the fact that ODNI has not yet determined key aspects of the program, such as when the future phases of implementation will occur or what they will entail, and none of the agencies has completed implementation plans. Further, ODNI lacks plans for monitoring and measuring the performance of continuous evaluation across the executive branch.

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<sup>27</sup>The three other recommendations did not involve continuous evaluation and were more broadly focused on insider threat management and DOD's personnel security program.

<sup>28</sup>Department of Defense Instruction 5200.02, *DOD Personnel Security Program (PSP)*, encl. 3, para. 6 (Mar. 21, 2014) (incorporating change 1, effective Sept. 9, 2014).



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## ODNI Has Taken an Initial Step to Implement Continuous Evaluation across Executive Branch Agencies, but Has Not Yet Formalized the Program in Policy

ODNI has taken an initial step to implement continuous evaluation across all executive branch agencies in a phased approach, but it has not yet formalized the program in policy. Specifically, in October 2016, ODNI initiated the first phase of continuous evaluation and outlined requirements for this phase in interim guidance distributed to implementing agencies in December 2016.<sup>29</sup> For the first phase of implementation, executive branch agencies are to conduct certain continuous evaluation record checks against a portion of their national security population. Specific details of the requirements were omitted from this report because the information is sensitive. According to OPM Federal Investigations Notice 17-03, the first phase of continuous evaluation is to be implemented by the end of fiscal year 2017.<sup>30</sup> These checks are conducted in addition to any initial investigations or periodic reinvestigations occurring in fiscal year 2017. ODNI provided agencies with prioritization guidance to help them select individuals for continuous evaluation. Nearly 80 executive branch agencies are subject to the requirements for this first phase of implementation.

ODNI has taken steps to establish the executive branch-wide continuous evaluation program in coordination with key stakeholders. For example, in June 2013, ODNI established a Continuous Evaluation Working Group—consisting of 12 core voting member agencies—as a mechanism to effectively coordinate continuous evaluation implementation among executive branch departments and agencies.<sup>31</sup> According to the group’s charter, it meets on at least a quarterly basis and is responsible for coordinating the development of continuous evaluation standards, policies, and procedures, among other things. Since January 2015, ODNI has also issued interim guidance to executive branch agencies that are subject to its continuous evaluation requirements informing them about the purpose of continuous evaluation and providing them with some details of the program. Further, to inform the establishment of the

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<sup>29</sup>Office of the Director of National Intelligence Memorandum, *Continuous Evaluation Phased Implementation and Options for Automated Records Checks* (Dec. 22, 2016).

<sup>30</sup>NBIB, Federal Investigations Notice No. 17-03, *Continuous Evaluation Special Agreement Check* (Feb. 3, 2017).

<sup>31</sup>The 12 core voting member agencies of the Continuous Evaluation Working Group are as follows: Office of the Director of National Intelligence, Central Intelligence Agency, Defense Intelligence Agency, Department of Energy, Department of Homeland Security, Department of State, Federal Bureau of Investigation, National Geospatial-Intelligence Agency, National Reconnaissance Office, National Security Agency, Office of the Under Secretary of Defense for Intelligence, and Office of Personnel Management.

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executive branch-wide program, ODNI itself began a 1-year continuous evaluation pilot in September 2016, according to ODNI officials. Specific details of ODNI's pilot were omitted from this report because the information is sensitive.

In addition to developing standards for continuous evaluation and its oversight role, ODNI is also developing a system that agencies can use to conduct continuous evaluation. According to ODNI, its system is under development and will be available to all executive branch agencies with a full suite of continuous evaluation data sources. Agencies may opt to: (1) use ODNI's system, (2) develop their own technical solution, (3) partner with another agency to fulfill their continuous evaluation requirements, or (4) some combination of the above options.<sup>32</sup> ODNI asked agencies in December 2016 to provide a preliminary determination as to how they will satisfy future automated records checks requirements to allow ODNI's continuous evaluation program to adequately plan for system enrollee volume and data usage. Specific details regarding the response of executive branch agencies to this request were omitted from this report because the information is sensitive. Some executive branch agencies stated the following:

- Department of Justice and State officials stated that they plan to use ODNI's system once its development is complete;
- DOD officials stated that they plan to use their own internal system that they are developing to conduct continuous evaluation, but that they may use ODNI's system to conduct certain checks; and
- Department of Homeland Security officials noted that they plan to use a combination of existing internal agency systems and ODNI's system.

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<sup>32</sup>As an investigative service provider, NBIB issued a Federal Investigations Notice in February 2017 offering to conduct continuous evaluation checks for agencies (the third option ODNI presented to agencies) to satisfy ODNI's requirements for the first phase of continuous evaluation for a fee of \$45. NBIB, Federal Investigations Notice No. 17-03, *Continuous Evaluation Special Agreement Check* (Feb. 3, 2017). NBIB officials stated that the service also includes a financial activity record check, which is in addition to ODNI's requirements for the first phase, and that as of June 2017, a few agencies had elected to use the service. According to the Notice, agencies are responsible for adjudicating the results of the completed checks, and NBIB officials stated that if an agency determines that additional investigative work is required to adjudicate the results, NBIB will charge agencies an additional fee.

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*Standards for Internal Control in the Federal Government* states that management should externally communicate the necessary information to achieve an entity's objectives.<sup>33</sup> Effective information and communication are vital for enabling an entity to achieve its objectives, which can be accomplished through written guidance.

While ODNI has provided some details of the program to implementing executive branch agencies through interim guidance, it has not yet formalized the continuous evaluation program through a Security Executive Agent Directive. Specifically, in May 2017, ODNI officials stated that ODNI had not yet issued a Security Executive Agent Directive for continuous evaluation, but that a draft directive was undergoing interagency coordination.<sup>34</sup> ODNI officials stated that the directive will contain a definition of continuous evaluation that is consistent with, but expands upon, the definition contained in the relevant Executive Order.<sup>35</sup> These officials stated that the expanded definition will help to clarify continuous evaluation and ensure that agencies have a common understanding of the program. In addition, ODNI officials stated that they have developed draft implementation guidelines, which they plan to issue after the directive is finalized. ODNI officials stated that the interim guidance will remain in effect until the Security Executive Agent Directive or follow-on interim guidance is issued.

DOD's continuous evaluation program—which it began in October 2014, in advance of implementation of continuous evaluation executive branch-wide by ODNI—identified, in a requirements document for its continuous evaluation IT system, that the most important gap in the development of the department's program was the lack of a national or DOD-level policy. Specifically, the requirements document notes the lack of a policy that fully describes the continuous evaluation process or purpose, or the end uses of data. The requirements document further notes that there are multiple definitions of continuous evaluation and, due to the lack of policy,

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<sup>33</sup>[GAO-14-704G](#).

<sup>34</sup>According to ODNI, the Security Executive Agent Directive for continuous evaluation completed informal agency coordination and received endorsement from the former Director of National Intelligence in December 2016. Due to the change in presidential administrations, ODNI was unable to begin the formal interagency coordination process until April 2017. As of August 2017, the directive was still undergoing interagency coordination.

<sup>35</sup>As noted above, continuous evaluation is defined in Executive Order 13467, as amended.

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there is not a common lexicon of terms used in the continuous evaluation program, thereby creating an additional gap.

While ODNI reports that the policy is under review, it has not prioritized the implementation of continuous evaluation and, as a result, has missed numerous milestones in issuing the policy since 2014. Specifically, the original Insider Threat and Security Clearance Reform cross-agency priority goal milestone for ODNI to issue a continuous evaluation policy was July 2014. This milestone was not attained, and it was adjusted to September 2016, a milestone that was also missed. The current milestone for issuing the policy is October 2017. Additionally, ODNI has missed other milestones for implementing a continuous evaluation program, as discussed later in the report.

Furthermore, ODNI has initiated the first phase of continuous evaluation without a government-wide issued policy or an expanded definition of continuous evaluation. As a result, agencies may develop inconsistent approaches to implementing continuous evaluation. For example, DOD officials stated that DOD has developed its own path for continuous evaluation from ODNI's limited guidance and that in the absence of a government-wide policy, DOD is developing its own internal guidance. As a result, the approach to continuous evaluation taken by DOD—the executive branch agency with the majority of security clearance holders—may differ from that of other executive branch agencies once fully implemented. Ultimately, such inconsistent approaches to continuous evaluation could affect reciprocity among agencies—another key objective of government-wide security clearance reform efforts.<sup>36</sup> Without issuing a Security Executive Agent Directive in advance of the next phase of implementation—the timeframe for which ODNI has not yet determined—that includes, among other things, an expanded definition of continuous evaluation, agencies may develop inconsistent approaches to continuous evaluation, resulting in an uneven and perhaps ineffective implementation across the federal government.

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<sup>36</sup>Generally, personnel security clearance reciprocity refers to the decision of an agency to accept a background investigation or clearance determination completed by another authorized investigative or adjudicative agency.

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ODNI Has Not Yet Determined Key Aspects of the Continuous Evaluation Program, and Executive Branch Agencies Have Been Limited in Their Ability to Plan for Implementation

ODNI has not yet determined key aspects of its continuous evaluation program, which has limited the ability of executive branch agencies to plan for implementation in accordance with ODNI's phased approach. For example, while ODNI has initiated the first phase of continuous evaluation in coordination with implementing executive branch agencies, it has not yet determined what the future phases of implementation will entail, or when they will occur. Specifically, ODNI officials stated that they have not set any further timeframes for implementing continuous evaluation or determined agency requirements for future phases.

Moreover, the timeframes for the implementation of continuous evaluation across the executive branch have been extended over time. For example, the original milestone set by the government-wide reform effort for implementing continuous evaluation was the 4th quarter of fiscal year 2010, and it was not attained. The PAC subsequently set an Insider Threat and Security Clearance Reform cross-agency priority goal milestone for developing an initial continuous evaluation capability for the most sensitive top secret clearance holders by September 2014—which was extended to December 2014—and a milestone for implementing the capability for additional clearance holders by December 2016. These milestones were also missed. As of May 2017, continuous evaluation had not yet been fully implemented, and ODNI had not set a milestone for when it would occur.

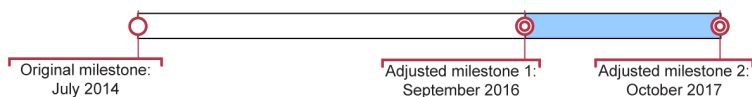
Although ODNI is one of the goal leaders for the Insider Threat and Security Clearance Reform cross-agency priority goal, a senior ODNI official stated that the milestones were arbitrarily set, and that implementing continuous evaluation has proven to be challenging as a result of several technical and legal issues that need to be resolved. Further, ODNI officials highlighted the complexities associated with developing a whole-of-government continuous evaluation program and noted that a number of challenges have come to light as they have been developing the program, which have contributed to missed milestones. However, ODNI has not prioritized the setting of internal milestones for the future phases of implementation that it considers to be reasonable. ODNI officials stated that because continuous evaluation is a new initiative, no realistic timeline for full implementation will be set until the initial results of implementation are analyzed and technical capabilities have matured. Further, they stated that although they are unable to develop a timeline for full implementation at this time, they are actively working to implement the program. In addition, as previously discussed, ODNI's milestone for issuing a continuous evaluation policy has also been adjusted over time. Figure 1 shows the adjusted executive branch

milestones for issuing a continuous evaluation policy and implementing a continuous evaluation program, including developing a technical capability.

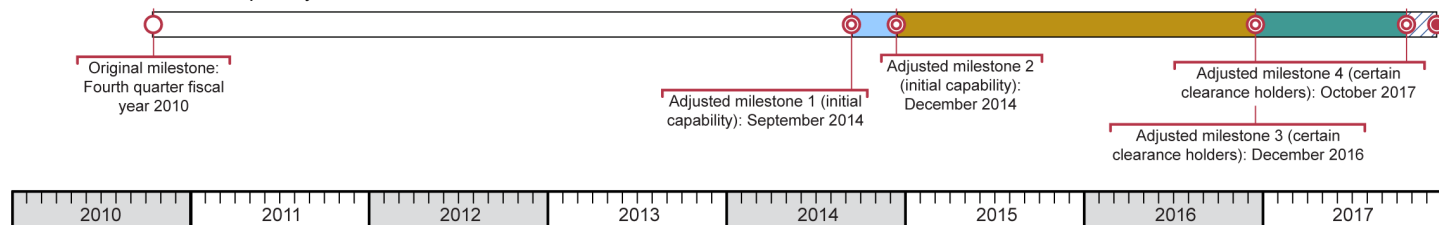
**Figure 1: Milestones for the Issuance of Continuous Evaluation Policy and Implementation of the Program**

**Action**

Issuance of continuous evaluation policy



Continuous evaluation capability for certain clearance holders



● Full implementation: No milestone reported for full implementation

Source: GAO analysis of Office of the Director of National Intelligence and Office of Management and Budget data. | GAO-18-117

The uncertainty regarding the requirements and timeframes for the future phases of the program has affected the ability of executive branch agencies to plan to implement continuous evaluation and estimate the associated costs. First, although OPM Federal Investigations Notice 17-03 notes that the first phase of continuous evaluation is to be implemented by the end of fiscal year 2017, none of the seven executive branch agencies we spoke with has completed an agency-specific implementation plan.<sup>37</sup> While some agencies, such as DOD and State—both of which have established continuous evaluation programs in advance of implementation across the executive branch—have developed concepts of operations or standard operating procedures for continuous evaluation, all seven agencies we spoke with stated that they are waiting for additional information from ODNI before completing their implementation plans. Department of Homeland Security officials stated

<sup>37</sup>NBIB, Federal Investigations Notice No. 17-03, *Continuous Evaluation Special Agreement Check* (Feb. 3, 2017).

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that they are waiting for ODNI to define and schedule the future phases of implementation and to finish developing its continuous evaluation IT system, because there could be unknown policy implications that would affect the Department's planning efforts. In August 2017, ODNI officials described plans to distribute information to executive branch agencies regarding continuous evaluation requirements for fiscal year 2018. Specific details of these plans were omitted from this report because the information is sensitive.

Second, six of the seven agencies we spoke with noted challenges associated with estimating the costs of implementation. For example, while the Federal Bureau of Investigation has developed some cost estimates for implementing continuous evaluation, officials noted that it is challenging to estimate the full costs of the program until they receive additional information from ODNI, such as the requirements for future phases of implementation, as well as information about record check, technology, and personnel requirements. DOD officials stated that the number of individuals enrolled in continuous evaluation directly relates to the amount of agency resources required, for example, to validate, respond to, and adjudicate alerts. Two agencies we spoke with stated that they had not yet taken any steps to estimate costs because they are waiting for additional information from ODNI. In August 2017, ODNI officials stated that they plan to leverage an upcoming OMB budget data request, administered through the PAC, to obtain agency funding estimates for expenses related to conducting continuous evaluation from fiscal years 2017 through 2019.

We have previously identified weaknesses associated with estimating the costs of personnel security clearance reform. Specifically, in April 2015 we found, among other things, that long-term costs of implementing the 2012 Federal Investigative Standards—including the implementation of continuous evaluation—were not addressed in personnel security clearance background investigation reform planning documentation. Further, we found that OMB did not have current and detailed cost-estimate information from executive-branch agencies, because it did not begin to solicit the information from the agencies until almost 2 years after the updated standards were approved. As such, we recommended in April 2015, among other things, that the Deputy Director for Management of OMB, in the capacity as Chair of the PAC, develop long-term funding estimates for changes to the federal government's investigation practices resulting from the implementation of the standards, including but not limited to costs related to: (1) information technology adjustments to enable government-wide data sharing; (2) implementation of continuous

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evaluation of clearance holders; and (3) additional personnel resources for twice-as-frequent reinvestigations. OMB concurred with the recommendation. However, as of October 2017, this recommendation remained open.<sup>38</sup> We continue to believe that this recommendation is valid and should be implemented.

In addition, the seven executive branch agencies we spoke with identified other areas related to agency expectations for which they need information from ODNI. For example, officials from the Department of Justice; the Bureau of Alcohol, Tobacco, Firearms, and Explosives; and the Federal Bureau of Investigation stated that while they would like to use ODNI's IT system to conduct all or at least some of the record checks that will be required, they will need to develop an interface with ODNI's system to do so. However, these officials stated that they were unaware of ODNI's technical requirements for that interface. These officials further stated that without information related to the technical requirements, they are unable to sufficiently plan or budget for continuous evaluation. ODNI officials stated that although ODNI's IT system remains under development, information on technical interface requirements is available to all stakeholders and that they meet with agencies to discuss agency-specific IT requirements. According to ODNI, several executive branch agencies have expressed an interest in using ODNI's IT system to conduct at least some, if not all, of the checks that will be required once continuous evaluation is fully implemented. ODNI officials acknowledged that agencies will need to develop an interface to use the system, and that agencies will be responsible for the associated costs.

The Project Management Institute's *Guide to the Project Management Body of Knowledge (PMBOK® Guide)* provides guidelines for managing individual projects, including developing a project management plan—in advance of executing the project—that describes how the project will be executed, monitored, and controlled. The plan should include, among other things, project schedules and stakeholder roles and responsibilities. The guide notes that updates may be made to the project management plan as changes may occur as the project progresses.<sup>39</sup>

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<sup>38</sup>GAO-15-179SU.

<sup>39</sup>*PMBOK* is a trademark of Project Management Institute, Inc. Project Management Institute, Inc. *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Fifth Edition, 2013.



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ODNI officials managing the continuous evaluation program stated that they have not developed a project management plan for the implementation of continuous evaluation, to include an implementation schedule, because they are still in the planning stage. However, ODNI has already started to implement the program. Without a plan that, among other things, identifies reasonable milestones for the future phases of implementation, ODNI does not have a schedule against which it can track its progress or to which it is accountable. Further, without a plan for implementing continuous evaluation executive branch-wide that includes a schedule and agency requirements for future implementation phases, full implementation—which has been delayed for almost 7 years—may be further delayed.

While a phased approach to implementation provides agencies time to adapt their personnel security clearance programs to changing requirements, without an implementation plan outlining ODNI's expectations of agencies' roles and responsibilities, agencies are unable to sufficiently plan for the implementation of continuous evaluation, including identifying required resources and estimating potential costs. Further, without clearly defining expectations for agencies—including information such as the planned requirements for future phases of implementation—continuous evaluation may not be fully implemented across the executive branch. Incomplete implementation could potentially prevent the federal government from identifying security-relevant information in a timely manner, thereby exposing it to further national security risks, such as unauthorized disclosures of classified information. Limited planning, both by ODNI and at the agency level, ultimately puts the success of the continuous evaluation program—a key aspect of the security clearance reform effort—at risk.

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### ODNI Lacks Plans for Monitoring and Measuring Continuous Evaluation Program Performance

ODNI lacks a plan to monitor and measure the performance of continuous evaluation across executive branch agencies. Specifically, ODNI officials stated that ODNI has not developed a plan to monitor or assess the performance of continuous evaluation across the executive branch, including for the first phase of implementation, which is underway. ODNI officials stated that, ideally, agencies will report that they have met the fiscal year 2017 requirements for the first phase of implementation, and that ODNI will follow up with agencies that do not report. The officials added that, in the long term, ODNI would like to incorporate continuous evaluation into its Security Executive Agent National Assessment Program, through which it conducts oversight of the security clearance process at executive branch agencies, but that continuous evaluation is

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not currently included in the oversight program. As previously discussed, according to Executive Order 13467, ODNI, as the Security Executive Agent, is to direct the oversight of investigations, reinvestigations, adjudications, and, as applicable, polygraphs for individuals' eligibility for access to classified information, or eligibility to hold a sensitive position made by any agency.<sup>40</sup> Similarly, Executive Order 12968, as amended, indicates that ODNI is responsible for determining standards for continuous evaluation.<sup>41</sup> According to ODNI, its authorities under the Executive Orders include responsibility for and oversight of continuous evaluation as it is an investigative activity that supports eligibility determinations.

*Standards for Internal Control in the Federal Government* emphasizes the importance of assessing performance over time, noting that ongoing monitoring should be built into operations, performed continually, and responsive to change.<sup>42</sup> The *PMBOK® Guide* also states that project management includes monitoring and controlling work to meet performance objectives.<sup>43</sup>

Without developing a plan to monitor continuous evaluation—including assessing continuous evaluation at various phases of implementation—ODNI cannot ensure that continuous evaluation is being conducted consistently across the executive branch, and it may experience challenges in identifying any needed modifications to the program. Further, ODNI cannot ensure that continuous evaluation is effectively meeting its critical purpose of filling the information gap between investigative cycles to identify risks to national security.

Additionally, we reported in 2012 that federal agencies engaging in large projects can use performance measures to determine how well they are

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<sup>40</sup>Exec. Order No. 13,467, § 2.5(e)(i), as amended by Exec. Order No. 13,764, 82 Fed. Reg. 8115, 8125 (Jan. 17, 2017).

<sup>41</sup>See Exec. Order No. 12,968, § 3.5, as amended by Exec. Order No. 13,764, 82 Fed. Reg. at 8128.

<sup>42</sup>[GAO-14-704G](#).

<sup>43</sup>Project Management Institute, Inc. *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Fifth Edition, 2013.

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achieving their goals and to identify any areas for improvement.<sup>44</sup> Reporting on these measures can help key decision makers within agencies, as well as stakeholders, to obtain feedback for improving both policy and operational effectiveness. Moreover, performance measures need to provide managers and other stakeholders with timely, action-oriented information in a format that helps them make decisions that improve program performance. Throughout our body of work on leading performance management practices we have identified several attributes of successful performance measures, which include, among other things, measures that are clear, quantifiable, and objective, and that are linked to measurable goals.<sup>45</sup>

However, ODNI has not developed and distributed to executive branch agencies performance measures to assess the effectiveness of continuous evaluation once it is implemented executive branch-wide. ODNI officials stated that they would like to collect metrics in order to determine the potential effects of continuous evaluation, in particular on agency resources. Although these officials stated that they have had some discussions with DOD about the types of metrics it might want to collect, such as the number of false positives and the resources required to address the workload, ODNI has not prioritized the development of performance measures. In February 2017, ODNI officials stated that they had not developed—or distributed to DOD or other agencies conducting continuous evaluation—any performance measures for continuous evaluation. These officials stated that once continuous evaluation has matured, ODNI plans to identify appropriate measures and determine a mechanism to collect and analyze them. In August 2017, ODNI officials stated that they had developed a draft list of metrics for fiscal year 2017.

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<sup>44</sup>GAO, *Streamlining Government: Questions to Consider When Evaluating Proposals to Consolidate Physical Infrastructure and Management Functions*, [GAO-12-542](#) (Washington, D.C.: May 23, 2012).

<sup>45</sup>[GAO-03-143](#). In this review, we identified attributes of performance measures from various sources, such as earlier GAO work, Office of Management and Budget Circular No. A-11, the Government Performance and Results Act of 1993, and the IRS's handbook on Managing Statistics in a Balanced Measures System. In addition, we drew on previous GAO work, including: GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#), (Washington, D.C.: June 1996); and GAO, *The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans*, [GAO/GGD-10.1.20](#) (Washington, D.C.: April 1998). Further, we identified important key attributes of performance measures in GAO, *Defense Health Care Reform: Additional Implementation Details Would Increase Transparency of DOD's Plans and Enhance Accountability*, [GAO-14-49](#) (Washington, D.C.: Nov. 6, 2013).

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Once the metrics are finalized, these officials stated that they would issue guidance to agencies requesting them to report these metrics to ODNI.

However, since ODNI initiated the first phase of continuous evaluation in October 2016, without developing and distributing performance measures to executive branch agencies, it is unclear whether agencies are positioned to collect and report the information to ODNI for fiscal year 2017. Developing performance measures before the program fully matures could help it to identify potential program modifications needed prior to the next phase of implementation, as well as prior to full implementation. Further, without developing clear, quantifiable, and objective performance measures that are linked to measurable goals for agencies to track, and without determining a process and schedule for agencies to regularly report those measures, ODNI cannot ensure that the first phase of the program it has already initiated is effective or achieving similar results at all agencies, which could ultimately affect reciprocity.

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## DOD and State Have Designed, Piloted, and Evaluated Continuous Evaluation to Varying Extents

DOD and State have designed, piloted, and evaluated continuous evaluation, although their respective approaches have varied in scope, size, and duration—with DOD’s pilot involving the most record checks, the largest population, and the longest duration. As previously discussed, DOD’s efforts to design, pilot, and evaluate continuous evaluation have been ongoing for more than a decade, and they pre-date efforts at ODNI to develop and implement an executive branch-wide continuous evaluation program. According to ODNI officials, as of February 2017, DOD and State were the only agencies, other than ODNI, that had piloted continuous evaluation. ODNI officials stated that DOD and State’s pilots were conducted at the discretion of those agencies, and that while ODNI did not oversee them, the results of the pilots have helped inform ODNI’s development of an executive branch-wide program. These pilots were ongoing prior to ODNI’s December 2016 interim guidance outlining the fiscal year 2017 continuous evaluation requirements for executive branch agencies, and as a result, both DOD and State have taken different approaches to developing their programs.

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## DOD’s Continuous Evaluation Pilot

In October 2014, consistent with the Secretary of Defense’s March 2014 recommendation to implement continuous evaluation and DOD Instruction 5200.02, DOD initiated a continuous evaluation pilot that included approximately 100,000 military, civilian, and contractor clearance holders, using a limited set of trusted commercial and government data

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sources. DOD has conducted this pilot in a phased approach, increasing the number of cleared individuals enrolled over time, in accordance with enrollment milestones set as part of the Insider Threat and Security Clearance Reform cross-agency priority goal. Specifically, the department expanded enrollment to 225,000 DOD clearance holders in December 2015 and 500,000 in December 2016, and it plans to increase the enrolled population to 1 million by the end of calendar year 2017.<sup>46</sup> The department has also set an internal goal to enroll all clearance holders department-wide by the end of fiscal year 2021.

DOD has developed its own continuous evaluation IT system—which is called Mirador, and is separate from the IT system that ODNI is developing—to conduct automated record checks of commercial and government data sources on the enrolled population, with the goal of near real-time identification of adverse information to be considered in the evaluation of an individual’s continued eligibility for access to classified information. DOD officials developing the system stated that while they are currently using Mirador to conduct automated record checks for continuous evaluation, the system remains under development, and they are integrating additional data sources and user requirements as those are identified. As of February 2017, the department had implemented seven data sources in Mirador, which provide information about suspicious financial and criminal activity, among other things. Another nine sources were undergoing testing or were otherwise in progress. The department expects Mirador to reach initial operating capacity in fiscal year 2018. DOD officials stated that aspects of Mirador are still manual, such as enrolling individuals, but that they plan to take steps to automate them.

DOD officials stated that, depending on the data source, they run record checks on enrolled individuals daily, monthly, quarterly, or annually. According to DOD officials, if a record check results in an alert, such as for criminal activity, Mirador forwards the alert to DOD’s continuous evaluation validation cell—within the Defense Security Service, which manages the department’s continuous evaluation program—to ensure that: (1) the alert applies to the correct individual; (2) the issue was not previously known; and (3) the issue is adjudicatively relevant. DOD officials stated that if an analyst determines that an alert is valid—

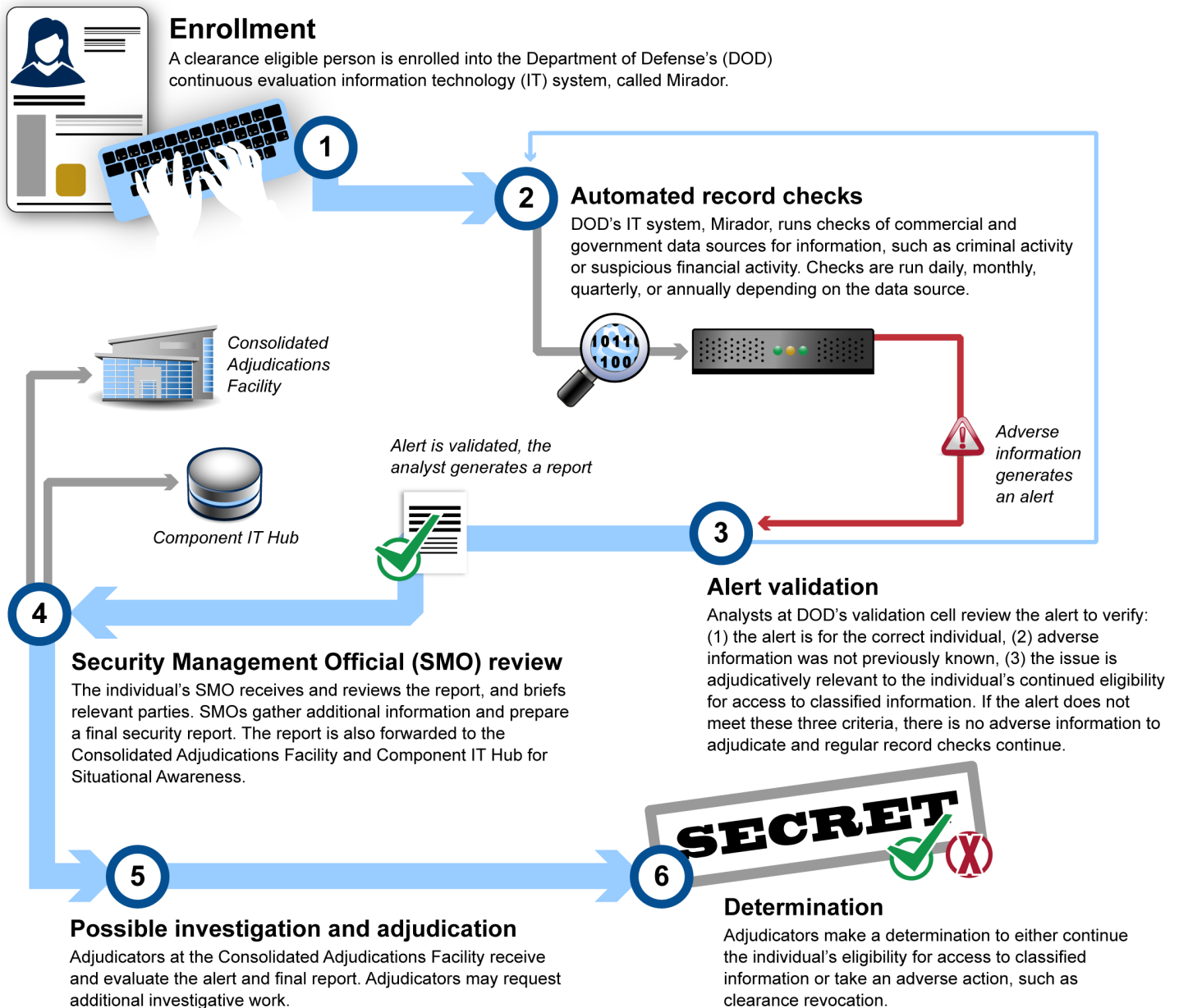
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<sup>46</sup>DOD officials stated that General Officers and Senior Executive Service employees were not part of the pilot population, but that they will be included when DOD increases its enrollment to 1 million by the end of calendar year 2017.

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meaning that all three of the above statements are believed to be true—then the analyst generates a report and forwards it to the individual’s designated security manager. Alerts are prioritized for analyst review according to business rules designed around the severity of the alert, and according to DOD officials, all alerts are reviewed by a supervisor following an analyst’s initial determination. The officials stated that currently, if additional investigative work is required based on the alert, the results of that investigation are forwarded to an adjudicator to make a determination as to whether the alert affects the individual’s continued eligibility for a security clearance. The officials added that the due process safeguards in place for periodic reinvestigations are also in place for continuous evaluation. Figure 2 provides an overview of DOD’s continuous evaluation process.

**Figure 2: Overview of the Department of Defense's (DOD) Continuous Evaluation Process**



Source: GAO analysis of Department of Defense information. | GAO-18-117

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DOD has collected and analyzed metrics on the results of its current pilot. For example, according to DOD data, as of February 2017, continuous evaluation had identified 12,400 alerts. Of those alerts, 2,064—pertaining to 1,816 individuals—were determined to be valid, meaning that they were adjudicatively relevant and not previously known. According to DOD, action has been completed on 1,307 of those cases. Specifically, 859 cases were closed with a favorable decision, but context was added to the individuals' records; in 375 cases the subject separated and/or no longer needed access; and 62 cases involved a clearance revocation, condition, or warning. For DOD's secret-eligible population, continuous evaluation helped to identify risk, on average, 6 years 7 months sooner than the traditional 10-year periodic reinvestigation model, and 1 year 5 months earlier for the top secret-eligible population, which is to be reinvestigated every 5 years. DOD officials stated that these metrics are presently tracked manually by the Consolidated Adjudications Facility, and they identified a need to automate the process, going forward.

In addition, DOD officials stated that they have shared the results of the pilot and lessons learned with ODNI through the Continuous Evaluation Working Group. For example, DOD identified lessons learned related to identifying the right data sources, eliminating duplicate alerts, the frequency of record checks, methods for achieving identity resolution, and the need for operational access to reporting data. Most recently, DOD issued Department of Defense Manual 5200.02 in April 2017, which includes continuous evaluation among the responsibilities and procedures of the DOD Personnel Security Program.<sup>47</sup>

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## State's Continuous Evaluation Pilot

State began its continuous evaluation pilot in January 2015 to evaluate the coverage and reliability of public records information, using a public records service provider. Specifically, it compared information received from public record checks, such as criminal and financial activity, against information contained in personnel security files for approximately 8,600 personnel. State found, among other things, that while public records can provide coverage beyond the traditional scope of investigations, the quality of the information varies, and not all jurisdictions participate. State continued its pilot in 2016 and expanded the enrolled population to include its entire tier 5 population. Additionally, the focus of the pilot

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<sup>47</sup> See Department of Defense Manual 5200.02, *Procedures for the DOD Personnel Security Program (PSP)*, § 11 (Apr. 3, 2017); see also *id.* paras. 2.1.q, 2.10.n, 7.6.b(1).



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shifted from evaluating the usefulness of public records information to evaluating the alerts received. State officials stated that the results of the public record checks are reviewed by the department's continuous evaluation team, which determines whether the information is new, accurate, and relevant, and if so, whether it needs further review and investigation. These officials stated that because State has authority to conduct its own investigations, it is easy to conduct investigative follow-up. According to officials, minor issues, such as traffic violations, are added to personnel files for consideration during the individual's next periodic reinvestigation.

According to State officials, as of March 2017, they had not revoked any clearances as a result of the identification of derogatory information through continuous evaluation. As of April 2017, State had invested approximately \$2.4 million in its continuous evaluation pilot for contract costs and personnel to administer the program, and, according to State officials, ODNI provided approximately one-third of that funding. State officials stated that because ODNI provided funding, State has voluntarily shared some lessons learned with ODNI, although it was not tasked to do so. Some details of State's pilot were omitted because the information is sensitive.

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**Number of Agencies Meeting Periodic Reinvestigation Timeliness Goals Decreased from Fiscal Years 2012-2016, and Potential Continuous Evaluation Effects Are Unknown**

The number of executive branch agencies meeting established timeliness goals for completing periodic reinvestigations decreased from fiscal years 2012 through 2016. Additionally, while executive branch agencies have already initiated the first phase of continuous evaluation, the potential effects of continuous evaluation on periodic reinvestigations and agency resources are unknown, as they have not been assessed.

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## Executive Branch Agencies Meeting Established Timeliness Goals for Completing Periodic Reinvestigations Decreased from Fiscal Years 2012 through 2016

Our analysis of timeliness data for specific executive branch agencies showed that the percent of agencies meeting timeliness goals decreased from fiscal year 2012 through 2016. As part of the Insider Threat and Security Clearance Reform cross-agency priority goal, since the second quarter of fiscal year 2014, the PAC has reported quarterly on agency timeliness. Among other things, the PAC reports on the average number of days taken, for the executive branch as a whole, to complete the end-to-end process for periodic reinvestigations, as compared with the following goals for the fastest 90 percent of periodic reinvestigations: 15 days to initiate a case, 150 days to conduct the investigation, and 30 days to adjudicate—totaling 195 days to complete the end-to-end processing of the periodic reinvestigation.

For fiscal year 2016, the PAC reported that the executive branch as a whole:

- did not meet the goal of conducting the investigative portion of periodic reinvestigations within 150 days for the fastest 90 percent of cases for any quarter. The average number of days ranged from 175 days to 192 days.
- did not meet the goal of completing periodic reinvestigations—the end-to-end goal—within 195 days for any quarter of fiscal year 2016. The average ranged from 209 days to 227 days.

Our analysis of timeliness data for specific executive branch agencies showed that the percent of agencies that reported meeting timeliness goals decreased from fiscal year 2012 through 2016. Specifically,

- while 84 percent of the executive branch agencies met the 150-day investigative goal for at least three of four quarters for the fastest 90 percent of periodic reinvestigations in fiscal year 2012, only 18 percent of the agencies met the investigative goal in fiscal year 2016.<sup>48</sup>
- while 84 percent of the executive branch agencies met the end-to-end processing goal of 195 days for at least three of four quarters for the fastest 90 percent of periodic reinvestigations in fiscal year 2012, only 22 percent of the agencies completed their fastest 90 percent of

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<sup>48</sup>Agencies without delegated authority rely on OPM to conduct their background investigations, while agencies with delegated authority have been authorized to conduct their own background investigations. As such, timeliness data for agencies without delegated authority is a reflection of OPM's timeliness.

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periodic reinvestigations within 195 days for at least three of four quarters in fiscal year 2016.

Of the agencies we reviewed, we found that agencies which use NBIB as their investigative service provider and agencies with delegated authority to conduct their own investigations both experienced challenges in meeting established timeliness goals for periodic reinvestigations in fiscal years 2015 and 2016.<sup>49</sup> For example, 50 percent of the agencies with delegated authority completed investigations for at least three of four quarters for the fastest 90 percent of periodic reinvestigations within 150 days in fiscal year 2015, and 44 percent of agencies with delegated authority met the timeliness goal in fiscal year 2016. Of the executive branch agencies for which we obtained timeliness data from ODNI and which use NBIB as their investigative service provider, NBIB completed the investigative portion within 150 days for 0 percent of the agencies in fiscal year 2015, and completed it within that timeframe for 6 percent of the agencies in fiscal year 2016 for at least three of four quarters for the fastest 90 percent of reinvestigations. Of the executive branch agencies we reviewed, 67 percent met the adjudication timeliness goal of 30 days in fiscal year 2016 for at least three of four quarters for the fastest 90 percent of reinvestigations. Specific details on the timeliness of individual executive branch agencies' periodic reinvestigations were omitted from this report because the information is sensitive.

According to NBIB officials, as of June 2017, NBIB's investigation backlog totaled approximately 673,000 cases—about 183,000 of which were periodic reinvestigations for both tier 3 and tier 5 clearances.<sup>50</sup> NBIB cited the September 2014 decision to not exercise the option of one of its investigative fieldwork contracts—which led to a loss in capacity and an increase in the program's contract costs—and difficulties attracting and retaining investigative resources as two main challenges to timeliness. NBIB officials stated that they are taking steps to address the backlog for background investigations, including periodic reinvestigations. These steps include hiring additional federal and contract investigators, implementing a number of workload management initiatives, and conducting a business process reengineering review to identify potential process efficiencies. Additionally, executive branch agencies noted the increased requirements stemming from the 2012 Federal Investigative

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<sup>49</sup>The data provided by ODNI identified the agencies with delegated authority to conduct their own investigations.

<sup>50</sup>NBIB officials stated that these figures include a baseline inventory of 6 weeks of work.

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Standards, such as continuous evaluation and more frequent periodic reinvestigations for certain clearance holders, as additional challenges to meeting timeliness goals.<sup>51</sup>

In 2008, the Joint Security and Suitability Reform Team issued *Security and Suitability Process Reform*, a report to the President that, among other things, includes OMB-issued interim government-wide processing goals for security clearances for calendar year 2008.<sup>52</sup> The calendar year 2008 government-wide goal for the fastest 90 percent of periodic reinvestigations is the same as the goal currently in place: 195 days to complete the end-to-end processing of the periodic reinvestigation.<sup>53</sup> The report states that OMB issued the interim goal to assist agencies in projecting workload and resource requirements.

However, the timeliness goals on which the PAC currently reports for periodic reinvestigations are the same as those identified by OMB as interim goals for calendar year 2008. Unlike initial investigations, for which timeliness objectives are established by statute, the 195-day goal for the end-to-end timeliness of periodic reinvestigations was an interim goal set by OMB for calendar year 2008.<sup>54</sup> The 2008 report to the President does not detail how the goals were developed or what data, if any, were used to establish them. ODNI officials initially stated that they did not know how the 195-day goal was developed or where it was documented, and did not know whether subsequent, finalized goals were ever established, but they later provided a copy of the 2008 report. A senior NBIB official stated that OMB's interim calendar year 2008 timeliness goals were developed based on the average timeliness of the

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<sup>51</sup>We discuss actions that the executive branch is taking to improve timeliness in a report on overall security clearance reform efforts that will be issued later this year.

<sup>52</sup>The Joint Security and Suitability Reform Team, *Security and Suitability Process Reform*, December 2008.

<sup>53</sup>The report also included an interim goal for 2008 for the fastest 90 percent of initial investigations: 15 days to initiate, 65 days to conduct the investigation, and 25 days to adjudicate, totaling 105 days to complete the end-to-end processing of the initial investigation.

<sup>54</sup>The Intelligence Reform and Terrorism Prevention Act of 2004 established an objective for each authorized adjudicative agency to make a determination on at least 90 percent of all applications for a personnel security clearance within an average of 60 days after the date of receipt of the completed application—40 days to investigate, and 20 days to adjudicate. See Pub. L. No. 108-458, § 3001 (2004) (codified in relevant part at 50 U.S.C. § 3341).

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fastest 90 percent of periodic reinvestigations at that time. Since the establishment of OMB's interim goals, the executive branch has measured periodic reinvestigation timeliness against those goals, and it has not conducted an evidence-based review to ensure that 195 days—and the associated goals of the different phases of periodic reinvestigations—are realistic goals for periodic reinvestigations.

*Standards for Internal Control in the Federal Government* states that management evaluates and, if necessary, revises defined objectives so that they are consistent with requirements and expectations.<sup>55</sup> Without conducting an evidence-based review of the goals, the executive branch will continue to compare the timeliness of its periodic reinvestigations against goals that it established almost a decade ago and that may no longer be appropriate. Further, without ensuring that 195 days, along with the associated goals of the different phases of periodic reinvestigations, are appropriate goals, agencies may not be adequately planning for the amount of time and resources actually required to conduct periodic reinvestigations, and, as a result, they may experience further timeliness delays. Moreover, if an agency does not plan for sufficient time to conduct periodic reinvestigations, it may allow individuals to retain access to sensitive documents when it has not yet confirmed those individuals' continued eligibility, which could have potential repercussions for national security.

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### Potential Effects of Continuous Evaluation on Periodic Reinvestigations Are Unknown

The potential effects of continuous evaluation on periodic reinvestigations, such as possible changes to their frequency or scope, remain unknown. In addition, the executive branch's plans for replacing periodic reinvestigations with continuous evaluation have evolved over time. For example, the 2008 *Security and Suitability Process Reform* report to the President outlined plans to replace the periodic reinvestigation model with continuous evaluation, conducting continuous evaluation annually or at least once every 5 years, depending on an individual's security clearance level.<sup>56</sup> The report identified a June 2009 milestone to develop an implementation plan to transition from periodic

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<sup>55</sup>[GAO-14-704G](#).

<sup>56</sup>The 2008 report described continuous evaluation as including an electronic review of scheduled updates of a subject's application information, automated record checks, and an electronic assessment of the information acquired, as compared with more continuous automated record checks. The Joint Security and Suitability Reform Team, *Security and Suitability Process Reform*, December 2008.

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reinvestigations to continuous evaluation, and as previously discussed, an estimated operational date of the fourth quarter of fiscal year 2010 (see figure 1). The purpose of the change was to reveal security-relevant information earlier and to provide increased scrutiny on populations that could potentially represent risk to the government because they already have access to classified information. However, ODNI documentation states that continuous evaluation supplements and enhances, but does not replace, established personnel security processes.

Executive branch agencies have expressed varying views about potential changes to the periodic reinvestigation model. For example, DOD officials stated that with workload and funding issues, they see no alternative but to replace periodic reinvestigations for certain clearance holders with continuous evaluation, as the record checks conducted are the same for both processes. In addition, DOD officials stated that they believe continuous evaluation will not only result in the more timely identification of security-relevant information, but will also help to change individuals' behaviors—for example, that individuals will be more likely to self-report such information once they are enrolled in the program. DOD officials also noted that if changes are not made to the periodic reinvestigation process, the investigation backlog will persist, because continuous evaluation alerts will continue to add to the investigative workload.

In addition, in September 2016, PERSEREC issued a report on a study it conducted on the effectiveness, timeliness, and cost of various automated record checks-based investigative strategies as compared with traditional periodic reinvestigations. The analysis found that some of the automated record checks strategies were effective, improved the timeliness of issue detection, and lowered costs. However, DOD officials noted that because ODNI is the Security Executive Agent, it must approve the change to the investigative process. These officials stated that they hope to influence this change by demonstrating the effectiveness of continuous evaluation at DOD. Additionally, NBIB officials stated that continuous evaluation will increase their workload and costs, since it is an additional layer to the personnel security clearance process. Accordingly, they hope that ODNI will identify efficiencies that can be made to the process. Further, PAC Program Management Office officials stated that there may be changes to the periodic reinvestigation model in the future, but that any changes to the model will be determined by data and will be made under the authority of ODNI and OPM as the Security Executive Agent and the Suitability Executive Agent, respectively.

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Other agencies, such as State, do not share DOD's view. For example, State officials stated that although a reduction in costs would result from replacing periodic reinvestigations with continuous evaluation, they have concerns that relevant information, such as state and local law enforcement records that are not yet automated, would be missed if they did not conduct periodic reinvestigations. Similarly, officials from the Department of Justice and the Department of Homeland Security stated that they do not intend to replace periodic reinvestigations, and that continuous evaluation is to be a supplement to the personnel security clearance process. However, officials from all three of these agencies stated that it may be possible to change the frequency or scope of periodic reinvestigations at some point in the future. ODNI officials stated that, at this time, they have no intention of replacing periodic reinvestigations with continuous evaluation, and that the Security Executive Agent Directive for continuous evaluation, once issued, will clarify that continuous evaluation is intended to supplement and not replace periodic reinvestigations.

In May 2017, ODNI officials stated that ODNI is not opposed to further improving the security clearance process, and that once continuous evaluation is operational, it plans to determine the efficiencies and mitigation of risks associated with the approach. Specifically, these officials stated that once continuous evaluation is further implemented and ODNI has gathered sufficient data—which they estimated would take about a year from May 2017—they can perform analysis and research to determine whether any changes are needed to the periodic reinvestigation model.<sup>57</sup>

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<sup>57</sup>The Intelligence Authorization Act for Fiscal Year 2014 required a related analysis. Specifically, section 505 required the Director of National Intelligence, in consultation with the Secretary of Defense and the Director of OPM, to develop a plan for updating the process for periodic reinvestigations consistent with a continuous evaluation program. Among other things, the plan was to include an analysis of the costs and benefits associated with conducting periodic reinvestigations and associated with replacing some or all periodic reinvestigations with a program of continuous evaluation. Pub. L. No. 113-126, § 505 (2014). ODNI's October 2016 report, *Strategic Plan for Improving the Periodic Reinvestigation Process Consistent with Continuous Evaluation*, states that many of the planned continuous evaluation record checks align with periodic reinvestigation requirements and that after assessing the cost and effectiveness of continuous evaluation the requirements for certain clearance holders could potentially be modified. Similarly, the Intelligence Authorization Act for Fiscal Year 2016 required ODNI to develop and implement a plan to eliminate the backlog of overdue periodic reinvestigations, including the use of random automated record checks of covered individuals. Pub. L. No. 114-113, § 306(b) (2015).

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While executive branch agencies have different views about potential changes to the periodic reinvestigation process, officials from five of the seven executive branch agencies we spoke with identified the potential expenditure of increased resources, such as workload and costs, as a risk associated with the implementation of continuous evaluation. Specifically, all five agencies stated that continuous evaluation will increase their workloads—and therefore costs—if no other changes are made to the personnel security process. For example, DOD officials noted that adjudicator workloads will increase as new investigative leads—identified through continuous evaluation—require adjudication. Senior DOD officials stated that DOD cannot afford to conduct both continuous evaluation and periodic reinvestigations. Specifically, DOD estimates that implementing the 2012 Federal Investigative Standards requirement to conduct more frequent periodic reinvestigations for certain clearance holders will cost approximately \$1.8 billion for fiscal years 2018 through 2022. In addition, State officials stated that they anticipate that continuous evaluation will increase their personnel security workload because alerts will have to be validated, and potentially investigated, and then adjudicated.

*Standards for Internal Control in the Federal Government* states that management should identify, analyze, and respond to risks related to achieving defined objectives. Risk assessment is the identification and analysis of risks related to achieving defined objectives to form a basis for designing risk responses.<sup>58</sup> In addition, the PMBOK® Guide states that entities should perform a quantitative risk analysis to numerically analyze the effect of identified risks on overall project objectives. The key benefit of this process is that it produces quantitative risk information to support decision-making in order to reduce project uncertainty.<sup>59</sup>

Although executive branch agencies have identified increased resources as a risk associated with implementing continuous evaluation, and ODNI has acknowledged that risk, ODNI, in coordination with the PAC, has not assessed the potential effects of continuous evaluation on an agency's resources. Further, ODNI has not developed a plan, in consultation with implementing agencies, to address such effects, to include modifying the scope or frequency of periodic reinvestigations or replacing periodic

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<sup>58</sup>GAO-14-704G.

<sup>59</sup>Project Management Institute, Inc. *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Fifth Edition, 2013.



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reinvestigations for certain clearance holders. While ODNI is implementing continuous evaluation in a phased approach, having a plan in place to address the increased workload once continuous evaluation is fully implemented is critical to ensuring the sustainability and effectiveness of executive branch agencies' personnel security programs. Further, without assessing the potential impacts on agency resources and developing a plan to address them—once ODNI has further defined the program—implementing continuous evaluation could further increase the periodic reinvestigation backlog and agency costs. With delays in determining continued eligibility, executive branch agencies are assuming greater risk, which runs counter to the purpose of continuous evaluation.

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## Conclusions

Continuous evaluation has been a key and long-standing initiative of security clearance reform efforts, intended to assist agencies in the timely identification of security-relevant information that may affect an individual's continued eligibility for access to classified information. However, ODNI has not demonstrated the leadership necessary to make continuous evaluation a priority. Accordingly, the program's implementation has been delayed for almost 7 years. Although ODNI has taken an initial step to implement it in a phased approach, it has not yet formalized the program in policy or provided an expanded definition of continuous evaluation to implementing agencies. In addition, ODNI has not yet determined key aspects of the program, including future phases of implementation and agency requirements. Key executive branch agencies have deemed information about the future phases necessary to plan for the implementation of continuous evaluation and to estimate potential costs. The absence of this information has limited their ability to prepare for the next phases of implementation. This could further delay the full implementation of continuous evaluation executive branch-wide and result in inconsistencies among agencies' approaches. Specifically, in the absence of ODNI policy and comprehensive guidance, DOD and State continue to develop their current continuous evaluation programs. The ultimate effects of such inconsistencies could negatively affect reciprocity—another key government-wide security clearance reform effort.

Although ODNI is to have oversight of continuous evaluation, it has not incorporated it into its oversight program or developed a plan to ensure that agencies implement it. Without a Security Executive Agent Directive for continuous evaluation that provides an expanded definition of continuous evaluation and relevant terms to help ensure consistent use; a plan for implementing continuous evaluation across the executive branch,

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that includes future phases of implementation and expectations for agencies; and a plan for monitoring program performance throughout the implementation process, as well as performance measures by which to track and report progress, ODNI is not well-positioned to ensure the success and effectiveness of the continuous evaluation initiative. Further, ODNI does not know whether it is meeting the critical purpose of filling the information gap between investigative cycles to identify risks to national security.

Executive branch timeliness in completing periodic reinvestigations has declined over the past five years. Further, the executive branch does not know whether the timeliness goals—set nearly a decade ago—are still relevant and appropriate, given changes to the personnel security clearance process. Without conducting an evidence-based review to ensure that goals for the timely completion of periodic reinvestigations are appropriate, executive branch agencies may not be planning sufficient time and resources to complete periodic reinvestigations and therefore may be challenged to ensure the continued eligibility of the entire national security workforce. Finally, executive branch agencies have identified increased resources, such as workload and costs, as a challenge to implementing continuous evaluation. However, the executive branch has not determined the potential expected effects of continuous evaluation on periodic reinvestigations, and agencies have varying views about what, if any, additional changes should be made to the personnel security clearance process. Without an assessment of the potential effects of continuous evaluation and a plan to address those effects—once ODNI has further defined the program—agencies may not be able to effectively integrate continuous evaluation into their personnel security clearance programs, which in turn could lead to further delays in the clearance process.

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## Recommendations for Executive Action

We are making the following six recommendations to ODNI:

- The Director of National Intelligence should issue a Security Executive Agent Directive for continuous evaluation to formalize the program, which includes, among other things, an expanded definition of continuous evaluation in advance of the next phase of implementation. (Recommendation 1)
- The Director of National Intelligence should, in coordination with the Continuous Evaluation Working Group, develop an implementation plan for continuous evaluation across the executive branch that

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includes a schedule with timeframes and expectations for agencies, such as the requirements (e.g., the size of the enrolled population in continuous evaluation) for future phases of implementation. (Recommendation 2)

- The Director of National Intelligence should develop a plan for monitoring continuous evaluation performance, to include assessing continuous evaluation at various phases of implementation. (Recommendation 3)
- The Director of National Intelligence should develop performance measures for continuous evaluation that agencies must track and determine a process and schedule for agencies to regularly report those measures to ODNI. At minimum, these performance measures should be clear, quantifiable, objective, and linked to measurable goals. (Recommendation 4)
- The Director of National Intelligence should, in coordination with the Deputy Director for Management of the Office of Management and Budget in the capacity as Chair of the Security, Suitability, and Credentialing Performance Accountability Council, conduct an evidence-based review of the timeliness goal of 195 days for completing the fastest 90 percent of periodic reinvestigations and the associated goals for the different phases of periodic reinvestigations, and adjust the goal if appropriate, taking into consideration available resources, the additional workload of continuous evaluation, and the risks associated with individuals retaining access to classified information without determining their continued eligibility. (Recommendation 5)
- The Director of National Intelligence should, once ODNI has further defined the continuous evaluation program, to include issuing a Security Executive Agent Directive and developing an implementation plan, in coordination with the Deputy Director for Management of the Office of Management and Budget in the capacity as Chair of the Security, Suitability, and Credentialing Performance Accountability Council, assess the potential effects of continuous evaluation on agency resources and develop a plan, in consultation with implementing agencies, to address those effects, such as modifying the scope of periodic reinvestigations, changing the frequency of periodic reinvestigations, or replacing periodic reinvestigations for certain clearance holders. (Recommendation 6)

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## Agency Comments and Our Evaluation

We provided a draft of this report to ODNI, DOD, OMB, State, NBIB, the Department of Justice, and the Department of Homeland Security for review and comment. Written comments from ODNI are reprinted in their entirety in appendix I. DOD, OMB, NBIB, and the Department of Homeland Security did not provide comments. ODNI, State, and the Department of Justice provided technical comments, which we incorporated in the report as appropriate.

In its written comments, ODNI stated that it generally concurred, with comments, with our six recommendations. However, ODNI stated that it did not concur with aspects of our overall conclusions and provided observations in four specific areas. We continue to believe that our conclusions are valid, as discussed below.

First, ODNI disagreed with our conclusion that it has not demonstrated the leadership necessary to make continuous evaluation a priority. ODNI noted that it has taken recent actions to better prioritize the implementation of continuous evaluation. While these recent steps are positive and may help position ODNI for success, historically ODNI has not demonstrated the leadership necessary to make the implementation of a continuous evaluation program a priority. Specifically, while ODNI refers to continuous evaluation as a new initiative, the original milestone for implementing the program was the fourth quarter of fiscal year 2010, which was not attained. Since then, as discussed in the report, a number of revised milestones for implementing the program have been missed. For example, the PAC, of which ODNI is a principal member, subsequently set a milestone for developing an initial continuous evaluation capability for other clearance holders by September 2014—which was extended to December 2014—and a milestone for implementing the capability for other clearance holders by December 2016. These milestones were also missed. As of August 2017, continuous evaluation has not yet been fully implemented, and ODNI has not set a milestone for when full implementation would occur. As such, we recommended specific actions that are needed to better position ODNI for success, including issuing a Security Executive Agent Directive for continuous evaluation, developing plans for implementing the program and monitoring its performance, and developing performance measures.

Second, ODNI disagreed with our conclusion that it has not yet determined key aspects of the continuous evaluation program, including future phases of implementation and agency requirements. ODNI stated that the Security Executive Agent Directive for continuous evaluation is undergoing interagency coordination and that it has provided executive

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branch agencies with interim guidance until that process is completed, which we acknowledge in the report. While ODNI has provided interim guidance for continuous evaluation, it only details the requirements for fiscal year 2017 and not for the future phases of implementation. In August 2017, after receiving a draft of our report, ODNI officials stated that they planned to provide additional guidance to agencies clarifying that the requirements for fiscal year 2018 will be the same as those for fiscal year 2017. While this correspondence, once issued, will help agencies with their immediate program planning, ODNI officials stated that they have not yet determined the requirements for fiscal year 2019 or beyond, which limits agencies' abilities to plan beyond the next fiscal year for the future phases of implementation.

Additionally, ODNI stated that the technical development milestones of the Continuous Evaluation System it is developing are well-established, tracked, and shared with stakeholders. As discussed in the report, according to ODNI officials, they have established technical milestones for the development of ODNI's Continuous Evaluation System. While this is an important step in implementing the program, ODNI has not developed similar programmatic milestones for the overall implementation of the program, such as when future phases of implementation will occur, to include full implementation. As discussed in the report, this has limited the ability of executive branch agencies to plan for implementation in accordance with ODNI's phased approach. As a result, full implementation—which has been delayed for almost 7 years—may be further delayed.

Third, ODNI did not agree with our conclusion that although it is to have oversight of continuous evaluation, it has not incorporated it into its oversight program or developed a plan to ensure agencies implement it. In its response, ODNI identified its intention to take certain actions and future mechanisms that could position it to monitor continuous evaluation. Specifically, ODNI stated that continuous evaluation metrics will be collected and analyzed when the initial phase of continuous evaluation implementation ends on September 30, 2017. Additionally, ODNI stated that it will leverage a pending OMB budget data request and that its Security Executive Agent National Assessments Program will be responsible for analysis and oversight of agency implementation and operation of continuous evaluation.

However, as we note in the report, ODNI has not developed and distributed plans to monitor or assess the performance of continuous evaluation across the executive branch, including for the first phase of

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implementation. As we note in our report, ODNI officials stated that ODNI did not oversee the pilots that were conducted by DOD and State, as they were performed at the discretion of those agencies. State officials noted that while they have shared lessons learned on their continuous evaluation pilot, they were not tasked to do so. While ODNI stated in its written comments that it has specific expertise in researching, measuring, analyzing, and monitoring personnel security performance across the executive branch, it has not yet demonstrated these actions with regard to continuous evaluation. For example, DOD—the executive branch agency with the majority of security clearance holders—has conducted research on continuous evaluation since 2001, piloted its program since October 2014, and plans to increase the number of personnel enrolled in the program to 1 million by the end of calendar year 2017. However, ODNI, in the capacity as the Security Executive Agent, has not overseen DOD’s pilot.

Moreover, as discussed in the report, as of August 2017—10 months into fiscal year 2017—ODNI has not yet developed and distributed to executive branch agencies continuous evaluation performance measures. At the end of our review, in August 2017, ODNI officials stated that they have developed a draft list of metrics for continuous evaluation for fiscal year 2017 and that once the metrics are finalized, they will issue guidance to executive branch agencies requesting them to report these metrics to ODNI. While metrics can help to establish a baseline and inform aspects of a program’s status—and ODNI’s development of draft metrics is a positive step—performance measures are linked to a goal and inform how well an agency is doing against that goal. As ODNI has not developed and distributed performance measures that are clear, quantifiable, and objective, and that are linked to measurable goals prior to initiating, or earlier in the first phase of implementation, executive branch agencies may not be positioned to collect and report these metrics at the end of the fiscal year. Additionally, as discussed in the report, according to ODNI officials, while they would like to incorporate continuous evaluation into their Security Executive Agent National Assessments Program, it is not currently part of the program. While ODNI has identified steps that could position it to monitor continuous evaluation in the future, it has not yet implemented mechanisms to monitor and measure program performance.

Fourth, ODNI did not agree with our conclusions that it is not well-positioned to ensure the success and effectiveness of the continuous evaluation initiative, and that it does not know if it is meeting the critical purpose of filling the information gap between investigative cycles to identify risks to national security. However, in its written comments, ODNI

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stated that successful implementation of continuous evaluation across the executive branch requires formal Security Executive Agent policy guidance, implementation and technical guidance and milestones, performance measures, and a monitoring program, which we recommended in the report. ODNI states that it is well-postured to achieve these goals, and refers to its intention to apply Security Executive Agent National Assessments Program best practices as a mechanism to use to monitor and ensure compliance. Although this action could be a step in better positioning ODNI as continuous evaluation implementation further proceeds, as noted above and in our report, ODNI has not yet finalized, distributed, and implemented these and other actions to ensure that it is currently positioned to ensure success, even while it has initiated the first phase of continuous evaluation implementation.

As noted in our report, although ODNI has taken steps to implement continuous evaluation in a phased approach, executive branch efforts to implement continuous evaluation have been a long-standing component of overall security clearance reform. The actions ODNI intends to take as it further implements continuous evaluation, as well as the mechanisms it identified, may better position it and the implementing agencies for success. However, given the challenges that the executive branch has faced in implementing continuous evaluation thus far and the continued delays it has faced, without a fully defined program in place, we believe that our conclusions remain valid.

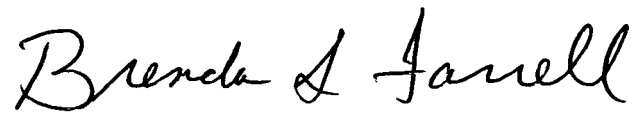
Finally, in its written comments, ODNI suggested a revision to our sixth recommendation. Specifically, ODNI suggested adding an explicit timeframe for completing the action. We believe that ODNI is best positioned to set an appropriate timeframe for completion based on its familiarity with the progress of the program and, as such, did not incorporate this change in our report. We agree with ODNI that establishing such a timeframe is a positive step.

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We are sending copies of this report to the appropriate congressional committees, the Director of National Intelligence, the Secretary of Defense, the Director of OMB, the Secretary of State, the Secretary of Homeland Security, the Director of OPM, the Director of NBIB, the Attorney General, the Director of the Federal Bureau of Intelligence, and the Director of the Bureau of Alcohol, Tobacco, Firearms, and Explosives. In addition, this report will also be available at no charge on the GAO website at <http://www.gao.gov>.

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If you or your members of your staff have any questions regarding this report, please contact me at (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov). GAO staff who made significant contributions to this report are listed in appendix II.

A handwritten signature in black ink that reads "Brenda S. Farrell". The signature is written in a cursive style with a large initial "B".

Brenda S. Farrell  
Director, Defense Capabilities and Management



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*List of Requesters*

The Honorable Mark R. Warner  
Vice Chairman  
Select Committee on Intelligence  
United States Senate

The Honorable Bennie G. Thompson  
Ranking Member  
Committee on Homeland Security  
United States House of Representatives

The Honorable Devin Nunes  
Chairman  
Permanent Select Committee on Intelligence  
United States House of Representatives

The Honorable Adam Schiff  
Ranking Member  
Permanent Select Committee on Intelligence  
United States House of Representatives

The Honorable Peter T. King  
Chairman  
Subcommittee on Counterterrorism and Intelligence  
Committee on Homeland Security  
United States House of Representatives

# Appendix I: Comments from the Office of the Director of National Intelligence

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE  
DIRECTOR OF LEGISLATIVE AFFAIRS  
WASHINGTON, DC 20511

NOV 08 2017

Ms. Brenda S. Farrell  
Director, Defense Capabilities and Management  
United States Government Accountability Office  
Washington, D.C. 20548

Dear Ms. Farrell:

We appreciate the opportunity to review and respond to the Government Accountability Office (GAO) draft report entitled "Personnel Security Clearances: Plans Needed to Fully Implement and Oversee Continuous Evaluation of Clearance Holders" (GAO-17-617). The Office of the Director of National Intelligence (ODNI) generally concurs, with comments, with the recommendations provided in the report. The ODNI does not concur, however, with the overall conclusions.

As was discussed during the 2 November 2016, 8 February 2017, 31 May 2017, 13 July 2017 (during engagement 100970), and 7 August 2017 GAO engagements with the DNI/National Counterintelligence and Security Center (NCSC), the Continuous Evaluation (CE) program like many new and complex interagency initiatives has matured significantly since its inception. However, the conclusions of the GAO report appear to focus on the growing pains from the inception of the program rather than portraying the significant progress achieved in coordination with executive branch CE stakeholders since these engagements began in November 2016. Specific areas of disagreement with GAO's conclusions are addressed below.

**Conclusion 1: ODNI has not demonstrated the leadership necessary to make continuous evaluation a priority.**

The CE capability represents a transformational government-wide advancement in personnel security, and ODNI is fully committed to the success of this national program. Interagency concerns relating to ODNI legal authorities, privacy/civil liberties practices, acquisition of data sources, and CE information technology system security impacted progress and required adjudication. ODNI/NCSC senior leadership continues to closely monitor CE program progress, requirements, risks, and technical development via formal quarterly Program Management Reviews (PMRs). Formal engagement with interagency stakeholders is conducted through the Security Executive Agent (SecEA) Advisory Council, Performance Accountability Council (PAC)/Program Management Office, Federal Investigative Standards Implementation Working Group, CE program/technical working groups, and one-on-one engagements. These actions reflect ODNI's commitment to the CE initiative and its leadership within the intelligence and federal partner communities.

**Conclusion 2: ODNI has not yet determined key aspects of the program, including future phases of implementation and agency requirements.**

Key aspects of the CE program have been promulgated through official Director of National Intelligence (DNI) correspondence issued on 30 June 2015 and 22 December 2016, and copies provided to GAO. Pending the finalization of a formal CE policy, the DNI issued the 22 December 2016 executive memorandum to serve as interim guidance until the Office of Management and Budget (OMB), Office of Information and Records Administration (OIRA) clears Security

Executive Agent Directive 6 (SEAD 6), Continuous Evaluation. As SEAD 6 undergoes the formal OMB/OIRA interagency coordination process, the DNI correspondence provides requirements and instructions for implementing CE, and will be in effect until SEAD 6 or follow-on memoranda are issued.

With regard to future requirements, ODNI intends to collect and analyze metrics obtained from initial Fiscal Year (FY) 2017 CE implementation before additional requirements are levied on stakeholders. This phased implementation of CE is also dependent on the availability of security-relevant data sources and the technical integration of these data within the ODNI CE System.

The CE technical development milestones are well-established, are tracked during formal PMRs, and have been shared with CE stakeholders. Agency unique implementation plans will be developed by ODNI, in conjunction with each agency, based on the agency's CE technical options and existing technical capabilities.

**Conclusion 3: *Although ODNI is to have oversight of continuous evaluation, it has not incorporated it into its oversight program or developed a plan to ensure agencies implement it.***

The ODNI has specific expertise in researching, measuring, analyzing, and monitoring personnel security performance and compliance across the executive branch. CE metrics, developed with interagency CE Working Group input, will be collected and analyzed when the initial phase of CE implementation ends on 30 September 2017. ODNI is also leveraging the OMB August 2017 Budget Data Request, administered through the PAC Security, Suitability, and Credentialing Line of Business, to obtain agency FY17-FY19 funding estimates for CE related costs, another key aspect of CE implementation. Implementation compliance will be assessed and documented by the SecEA metrics program, and the SecEA National Assessments Program (SNAP) will be responsible for analysis and oversight of agency implementation and operation of CE.

**Conclusion 4: *ODNI is not well-positioned to ensure the success and effectiveness of the continuous evaluation initiative. Further, ODNI does not know if it is meeting the critical purpose of filling the information gap between investigative cycles to identify risks to national security.***

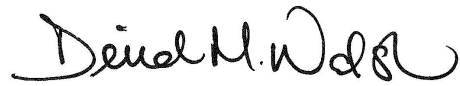
As stated in the report, successful implementation of CE across the executive branch requires formal SecEA policy guidance, implementation/technical guidance and milestones, performance measures, and a compliance assessment/monitoring program. ODNI is well postured to achieve these goals. As noted in the response to Conclusion 3, SNAP best practices will apply to CE monitoring and compliance, just as those practices currently apply to all personnel security activities under SecEA purview.

Additionally, a determination that the increased frequency of CE automated records checks can effectively fill periodic reinvestigation information gaps across the executive branch cannot be made until a statistically significant sample has been collected once CE has been fully implemented.

We believe report Recommendation 6, suggesting that the potential effects of CE should be assessed after CE is further defined, should read "Once CE is implemented and there is a statistically significant data sample (projected to be one year of metrics), in coordination with the Deputy Director for Management of the Office of Management and Budget...". The edit clarifies the timeframe and conditions for an assessment of CE effectiveness.

If you have any questions regarding this matter, please contact the Office of Legislative Affairs at (703) 275-2474.

Sincerely,

A handwritten signature in black ink that reads "Deirdre M. Walsh". The signature is written in a cursive, flowing style.

Deirdre M. Walsh

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# Appendix II: GAO Contact and Staff Acknowledgments

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## GAO Contact

Brenda S. Farrell, (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Kimberly C. Seay (Assistant Director), Chris Businsky, Molly Callaghan, Jenny Chanley, Dawn Godfrey, Saida Hussain, James Krustapentus, Michael Shaughnessy, Rachel R. Stoiko, John Van Schaik, Cheryl Weissman, and Jina Yu made significant contributions to this report.

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# Related GAO Products

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*Personnel Security Clearances: Actions Needed to Ensure Quality of Background Investigations and Resulting Decisions.* [GAO-14-138T](#). Washington, D.C.: February 11, 2014.

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