

## 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.