December 2021

PERSONNEL VETTING

Actions Needed to Implement Reforms, Address Challenges, and Improve Planning

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Why GAO Did This Study

Personnel vetting helps protect the nation's interests by aiming to establish and maintain trust in the federal workforce. High-quality vetting processes can reduce the risk of unauthorized disclosure of classified information. In 2018 GAO placed the government-wide personnel security clearance process on its High-Risk List due to a lack of performance measures and issues with IT systems.

This report evaluates, among other things, the extent to which the PAC Principals have implemented Trusted Workforce 2.0; ODNI has formalized continuous evaluation and assessed program performance; and DOD has planned for the IT and workforce needed to support its personnel vetting mission. To conduct this work, GAO analyzed relevant documentation, interviewed officials from the agencies represented by the four PAC Principals, and collected and reviewed data on continuous evaluation. GAO also assessed information collected against GAO leading practices on performance measures and project schedules, and evaluated DOD's actions against a DOD instruction on workforce planning.

What GAO Recommends

Congress should consider requiring the DNI to develop performance measures for CE. GAO is also making three recommendations, including that DOD revise the NBIS schedule to fully meet the characteristics of a reliable schedule and establish a milestone to complete strategic workforce planning. ODNI did not indicate whether it concurred with GAO's recommendations. DOD concurred with GAO's two recommendations to it.

View GAO-22-104093. For more information, contact Brian M. Mazanec at (202) 512-5130 or mazanecb@gao.gov.

What GAO Found

The Security, Suitability, and Credentialing Performance Accountability Council (PAC) Principals—comprising the Deputy Director for Management of the Office of Management and Budget, the Director of National Intelligence (DNI), the Director of the Office of Personnel Management (OPM), and the Under Secretary of Defense for Intelligence and Security—have made progress in implementing Trusted Workforce 2.0, which is a reform of personnel vetting processes. The PAC Principals reduced a backlog of investigations, have begun to develop a policy framework for a new approach to personnel vetting, and have begun to develop needed information technology (IT) systems.

The Office of the Director of National Intelligence (ODNI) has formalized requirements to enroll the eligible national security population in continuous evaluation (CE), but has not assessed program performance. CE entails enrolling employees in IT systems that conduct automated record checks on a frequent basis. As of March 2021, about three-quarters of the eligible national security population in executive branch agencies were enrolled in a CE system, according to ODNI officials. In 2017 GAO recommended that ODNI develop performance measures to evaluate CE and a plan to address its impact on agency resources. ODNI concurred with GAO's recommendation but has delayed taking actions in response and will not do so until CE is fully implemented, according to ODNI officials. This lack of progress may warrant congressional consideration, as it could limit ODNI's and congressional decision-makers' ability to assess the effectiveness and impact of continuous evaluation.

The Department of Defense (DOD) does not have a reliable schedule to help manage the National Background Investigation Services (NBIS) system. DOD has been developing NBIS since 2016, and DOD plans to replace the IT systems it currently uses to manage the background investigation process with NBIS. GAO assessed the NBIS schedule using GAO best practices and found it did not meet the characteristics of a reliable schedule (see table). By aligning the NBIS schedule with the characteristics of a reliable schedule, DOD could improve the likelihood of completing NBIS on schedule and improve decision-making during the program's development.

Table: Extent to Which NBIS Schedule Meets Best Practices

Characteristics of a reliable schedule	GAO assessment of the characteristic
Comprehensive	Partially met
Controlled	Partially met
Well-constructed	Minimally met
Credible	Minimally met

Source: GAO analysis of information for the National Background Investigation Services (NBIS) system. | GAO-22-104093

Further, DOD has taken limited strategic workforce planning steps for its entire personnel vetting workforce because it has not established a milestone for doing so. By establishing a milestone, DOD would create an accountability mechanism to complete its planning, which would help it determine the right mix of skills and competencies needed to effectively accomplish the personnel vetting mission.

United States Government Accountability Office

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Abbreviations

CE	continuous evaluation
CV	continuous vetting
DCSA	Defense Counterintelligence and Security Agency
DOD	Department of Defense
IT	information technology
NBIB	National Background Investigations Bureau
NBIS	National Background Investigation Services
ODNI	Office of the Director of National Intelligence
OMB	Office of Management and Budget
OPM	Office of Personnel Management
PAC	Performance Accountability Council
SEAD	Security Executive Agent Directive

U.S. GOVERNMENT ACCOUNTABILITY OFFICE
A Century of Non-Partisan Fact-Based Work

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Congressional Addressees

Personnel vetting processes help ensure the trustworthiness of the federal government's workforce, which among other things, helps prevent unauthorized disclosure of classified information to foreign intelligence services or other actors. The vetting processes provide a method to determine whether personnel are and remain over time (1) eligible to access classified information or to hold a sensitive position, (2) suitable or fit for government employment or to serve as contractor employees, or (3) eligible to access agency systems or facilities.[1] High-quality personnel vetting processes are necessary to minimize risks to the nation that stem from personnel not being suitable for government employment, or from the unauthorized disclosure of information that could cause exceptionally grave damage to U.S. national security.[2]

We placed the government-wide personnel security clearance process on GAO's High-Risk List in January 2018 due to factors that included delays in completing the security clearance process, a lack of measures to determine the quality of investigations, and issues with the information technology (IT) systems supporting the process. In our 2021 High-Risk

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[1]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. The term "fitness" is used to refer to similar determinations related to the level of character and conduct necessary for an individual to perform work for or on behalf of a federal agency as an employee in the excepted service (other than a position subject to suitability), as a contractor employee, or as a nonappropriated fund employee.

[2]*See* Exec. Order No. 13,526, § 1.2, 75 Fed. Reg. 707, 707-08 (Dec. 29, 2009) (describing the three levels of classification).

Report, we reported on some improvement in these areas, but also reported that challenges remain.[3]

The Security, Suitability, and Credentialing Performance Accountability Council (PAC) is the government-wide entity responsible for driving the implementation of reforms to the personnel vetting processes. The PAC has four principal members (hereinafter termed the PAC Principals): the Deputy Director for Management of the Office of Management and Budget (OMB); the Director of National Intelligence, who is the Security Executive Agent; the Director of the Office of Personnel Management (OPM), who is the Suitability and Credentialing Executive Agent; and the Under Secretary of Defense for Intelligence and Security.[4]

In March 2018 the PAC Principals initiated Trusted Workforce 2.0, which is an effort to reform and align the current personnel vetting processes. An important goal of this reform is to implement continuous evaluation (CE). This involves enrolling cleared personnel in CE systems that enable frequent automated record checks that generate electronic alerts delivered to agency security officials.[5] In addition, the executive branch transferred the responsibility for the government-wide background

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[3]GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, GAO-21-119SP (Washington, D.C.: Mar. 2, 2021). In 2005, we designated the Department of Defense's (DOD) personnel security clearance program a high-risk area because of delays and backlogs in the personnel security clearance process. We continued that designation in the 2007 and 2009 updates to our High-Risk list because delays continued and we found problems with the quality of OPM-produced investigation reports and DOD adjudication documentation. In our 2011 High-Risk report, we removed DOD's personnel security clearance program from the High-Risk list because DOD had taken actions to improve the timeliness of clearance processing, issued guidance on adjudication standards, and developed and implemented quality assessment tools for background investigations and adjudications.

[4]*See* Exec. Order No. 13,467, § 2.4(b), *as amended through* Exec. Order No. 13,869, 84 Fed. Reg. 18,125 (Apr. 24, 2019). The Executive Order designates the members as the Deputy Director for Management of the Office of Management and Budget (OMB) as the Chair of the PAC, the Director of National Intelligence in their role as the Security Executive Agent, the Director of OPM in their role as the Suitability and Credentialing Executive Agent, and the Under Secretary of Defense for Intelligence.

[5]Executive Order 13,467, 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. Exec. Order No. 13,467, § 1.3(d), (f), *as amended by* Exec. Order No. 13,764, 82 Fed. Reg. 8115, 8119 (Jan. 17, 2017).

investigation mission from OPM to the Department of Defense (DOD) as of October 1, 2019.[6] As a part of this transfer, DOD established the Defense Counterintelligence and Security Agency (DCSA), which now serves as the government's primary investigative service provider and conducts more than 95 percent of the government's background investigations.[7]

In numerous published reports we have highlighted issues related to personnel security clearances.[8] For example, in 2017, we reported on challenges that the Office of the Director of National Intelligence (ODNI) faced in implementing an executive branch-wide CE program and that agencies faced delays in completing periodic reinvestigations.[9] In 2017 we also reported separately on multiple additional challenges, including meeting timeliness objectives for initial security clearances, assessing investigation quality, and conducting strategic planning for the background investigations workforce.[10]

We performed this review under the Comptroller General's authority to conduct evaluations on his own initiative. This report assesses the extent to which (1) the PAC Principals have implemented Trusted Workforce 2.0; (2) ODNI has formalized requirements to implement CE and assessed program performance; (3) ODNI has assessed the quality of the

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[6]In April 2020 GAO reported on a reorganization of executive branch agencies, including the transfer of this function to DOD. GAO, *Federal Management: Selected Reforms Could Be Strengthened by Following Additional Planning, Communication, and Leadership Practices*, GAO-20-322 (Washington, D.C.: Apr. 23, 2020).

[7]While DCSA conducts the majority of background investigations, some executive branch agencies have the authority to conduct all or some of their own investigations. Such agencies are investigative service providers and, according to ODNI, include the Central Intelligence Agency, the Federal Bureau of Investigation, and the State Department. In addition, some DOD components, including the National Security Agency, have the authority to conduct their own investigations, according to ODNI.

[8]A listing of some of these reports is included in the Related GAO Products page at the end of this report.

[9]GAO, *Personnel Security Clearances: Plans Needed to Fully Implement and Oversee Continuous Evaluation of Clearance Holders*, GAO-18-117 (Washington, D.C.: Nov. 21, 2017).

[10]GAO, *Personnel Security Clearances: Additional Actions Needed to Ensure Quality, Address Timeliness, and Reduce Investigation Backlog*, GAO-18-29 (Washington, D.C.: Dec. 12, 2017).

personnel security clearance process; and (4) DOD has planned for the IT and workforce needed to support its personnel vetting mission.

For our first objective, we reviewed documentation related to the implementation of the phase one goal of Trusted Workforce 2.0—to reduce and eliminate DCSA's backlog of background investigations.[11] We also reviewed documentation related to the implementation of the phase two goal of the reform—to establish a new government-wide approach to personnel vetting. For example, we reviewed guidance that the PAC Principals have issued to begin to establish this approach, including the *Federal Personnel Vetting Core Doctrine.*[12] We also interviewed officials from ODNI, OPM, DOD, and the PAC Program Management Office on the implementation of Trusted Workforce 2.0.

For our second objective, we reviewed ODNI policy and guidance for CE, such as Security Executive Agent Directive 6, *Continuous Evaluation* (SEAD 6) and related implementation guidelines, as well as executive branch agencies' personnel enrollment data and documentation on ODNI efforts to develop performance measures to assess the effectiveness of agency CE programs.[13] We also interviewed officials at ODNI, the PAC Program Management Office, DOD, and a non-generalizable sample of five executive branch agencies. We selected agencies for our sample based on their size and authority to conduct background investigations, as identified by ODNI.[14]

We excluded components of a department or agency that did not conduct their own investigations. We also excluded agencies that did not have personnel associated with all three investigation types—initial secret, initial top secret, and periodic reinvestigations. The five departments and agencies we selected are the Department of State, the Central

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[11]We did not assess the inventory of background investigations at the 18 other executive branch agencies that are investigative service providers, such as the National Security Agency or the Federal Bureau of Investigation.

[12]*Federal Personnel Vetting Core Doctrine*, 86 Fed. Reg. 2705 (Jan. 13, 2021).

[13]Office of the Director of National Intelligence, Security Executive Agent Directive 6, *Continuous Evaluation* (Jan. 12, 2018); National Counterintelligence and Security Center, *Security Executive Agent Directive 6: Continuous Evaluation Program Implementation Guidelines* (March 2018).

[14]We also considered the extent to which agencies met established objectives for clearance timeliness according to ODNI documents.

Intelligence Agency, the National Security Agency, the Nuclear Regulatory Commission, and the Peace Corps. We compared the information we collected to criteria for assessing agencies' CE programs in SEAD 6 and the implementation guidelines.

For our third objective, we analyzed documentation on ODNI efforts to develop performance measures to assess quality in the security clearance process. In addition, we assessed the extent to which a performance measure developed by ODNI to assess the quality of investigations demonstrates key attributes for successful performance measures.[15] We also interviewed ODNI officials about performance measures for quality.

For our fourth objective, we analyzed DCSA's master schedule for the National Background Investigation Services (NBIS)—an IT system DCSA is developing for personal vetting—and compared the schedule to GAO's best practices.[16] We interviewed DCSA officials about their efforts to develop the schedule. In addition, we collected information from OPM on the extent to which it has implemented recommendations we previously made to address cybersecurity issues in OPM IT systems—systems that DCSA will continue to use to perform its background investigation mission until NBIS is fully deployed. We also analyzed DCSA actions related to strategic workforce planning and interviewed DCSA officials responsible for this planning. We evaluated DCSA's actions against a DOD instruction on workforce planning.[17]

To assess the reliability of the data sources we used to conduct our analyses, we reviewed information on the backlog of investigations and the enrollment of personnel in CE systems. We reviewed relevant documentation regarding the systems in which these data are stored. We also interviewed officials with knowledge of these data and systems at ODNI, DCSA, and our sample of agencies. We found the data we used to be sufficiently reliable for the purposes of this report. We describe our scope and methodology in more detail in appendix I.

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[15]GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures,* GAO-03-143 (Washington, D.C.: Nov. 22, 2002).

[16]GAO, *Schedule Assessment Guide: Best Practices for Project Schedules*, GAO-16-89G (Washington, D.C.: Dec. 22, 2015).

[17]DOD Instruction 1400.25, vol. 250, *DOD Civilian Personnel Management System: Civilian Strategic Human Capital Planning (SHCP)* (June 7, 2016).

We conducted this performance audit from February 2020 to December 2021 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.

Background

Personnel Vetting Processes

Figure 1: Phases for Vetting Determinations for Personnel Security, Suitability, Fitness, and Credentialing

Initiation	Investigation	Adjudication	Reinvestigation and continuous vetting
The agency requests that the individual filling a position that requires a background investigation submit an application.	Investigation service providers such as the Defense Counterintelligence and Security Agency use the information in the application to investigate the individual's background.	Agencies use the information from the background investigation to determine whether personnel are (1) eligible to access classified information or to hold a sensitive position, (2) suitable for government employment or fit for government employment or to serve as a contractor employee, or (3) eligible for an identity credential permitting access to agency systems or facilities.	Most individuals are subject to periodic reinvestigations after an agency makes an initial favorable determination. Under certain circumstances, agencies may defer or phase out the use of periodic reinvestigations as they adopt continuous vetting—an approach that involves the use of automated record checks, time/event-based checks, and agency data to ensure trustworthiness and ongoing eligibility/access.

Source: GAO analysis of executive branch agency documentation. | GAO-22-104093

Governance Structure for Personnel Vetting Reform

In June 2008 Executive Order 13,467 established the PAC, the specific responsibilities of which currently include working with agencies to implement continuous performance improvement programs, policies, and procedures; establishing annual goals and progress metrics; and

preparing annual reports on results.[18] Further, the PAC is to monitor performance to identify and drive enterprise-level process enhancements, and make recommendations for changes to executive branch-wide guidance and authorities to resolve overlaps or close policy gaps where they may exist. In addition, the PAC is to develop and continuously reevaluate and revise outcome-based metrics that measure the quality, efficiency, and effectiveness of the vetting enterprise.[19] Figure 2 lists the PAC Principals and related responsibilities as outlined in Executive Order 13,467.

Figure 2: The Performance Accountability Council (PAC) Principal Members and Related Responsibilities as Outlined in Executive Order 13,467

Deputy Director for Management of OMB	Director of National Intelligence	Director of OPM	Under Secretary of Defense for Intelligence and Security
Serves as the Chair of the PAC and has authority, direction, and control over its functions.	Serves as the Security Executive Agent and is responsible for, among other things, developing and issuing uniform and consistent policies and procedures to ensure the effective, efficient, timely, and secure completion of investigations, polygraphs, and adjudications related to determinations of eligibility for access to classified information or eligibility to hold a sensitive position.[a] In this role, the Director of National Intelligence is also to direct the oversight of such investigations, reinvestigations, and adjudications.	Serves as the Suitability and Credentialing Executive Agent and is responsible for, among other things, prescribing suitability standards and minimum standards of fitness for employment.[b] In this role, the Director of OPM is also to prescribe position designation requirements and investigative standards, policies, and procedures for suitability or fitness for Federal, contract, or non-appropriated fund employment, and for eligibility for an identity credential.	Executive Order 13,467, as amended, assigns the Department of Defense (DOD) responsibility for designing, developing, operating, defending, and continuously updating and modernizing, as necessary, the information technology systems that support all background investigation processes conducted by DOD. The Executive Order directed the Secretary of Defense to establish the Defense Counterintelligence and Security Agency and designated it as the agency responsible for providing background investigation services to DOD and most executive branch agencies.[c]

OMB   Office of Management and Budget
OPM   Office of Personnel Management

Source: Executive Order 13,467, as amended. | GAO-22-104093

[a]Exec. Order No. 13,467, § 2.5(e), *as amended by* Exec. Order No. 13,764, 82 Fed. Reg. 8115, 8125 (Jan. 17, 2017).

[b]Exec. Order No. 13,467, § 2.5(b)(i*), as amended by* 82 Fed. Reg. at 8123.

[c]Exec. Order No. 13,467, § 2.6(b)(i)-(vii), *as amended by* Exec. Order No. 13,869, 84 Fed. Reg. 18,125, 18,125-27 (Apr. 24, 2019). Prior to the transfer of background investigation functions from

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[18]*See* Exec. Order No. 13,467, § 2.2, 73 Fed. Reg. 38,103, 38,105 (June 30, 2008); Exec. Order No. 13,467, § 2.4(d), *as amended by* Exec. Order No. 13,764, 82 Fed. Reg. 8115, 8122 (Jan. 17, 2017).

[19]*See* Exec. Order No. 13,467, § 2.4, *as amended.*

OPM, DOD was responsible for designing, developing, operating, defending, and continuously updating and modernizing, as necessary, information technology systems that supported all background investigation processes conducted by OPM's National Background Investigations Bureau. The Defense Counterintelligence and Security Agency also provides adjudicative services to DOD and contractor personnel under the National Industrial Security Program at other federal agencies.

In addition, in April 2014 the PAC established the Program Management Office to implement personnel security clearance reforms. This office is staffed with 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.

In April 2019 the President issued Executive Order 13,869, which generally provided for the transfer of background investigation operations from OPM to DOD and made related amendments to Executive Order 13,467.[20] OPM and DOD signed an interagency agreement in June 2019 that set forth expectations for activities necessary for the transfer of functions of the National Background Investigations Bureau and associated employees and resources from OPM to DOD. OPM completed the transfer of the background investigation mission to DOD as of September 30, 2019.

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[20]Exec. Order No. 13,869, *Transferring Responsibility for Background Investigations to the Department of Defense*, 84 Fed. Reg. 18,125 (Apr. 24, 2019) (amending Executive Order 13467). Section 925 of the NDAA for Fiscal Year 2018 generally resulted in the transfer of background investigations from OPM to DOD for DOD personnel. In addition to implementing section 925, Executive Order 13,869 transferred responsibility to DCSA for conducting national security background investigations for most other executive branch agencies. It further facilitated the delegation of responsibility for suitability and fitness background investigations for most non-DOD agencies from OPM to DCSA. See Pub. L. No. 115-91, § 925(a)-(d) (2017); Exec. Order No. 13,869, §§ 1, 2 (amending section 2.6 of Executive Order 13467). GAO discussed this transfer in greater detail in GAO-20-322. While DCSA conducts 95 percent of the government's background investigations, some executive branch agencies have the authority to conduct all or some of their own investigations, according to ODNI. Such agencies include the Central Intelligence Agency, the Federal Bureau of Investigation, and the State Department, as well as some DOD components including the National Security Agency. Under the existing system that the PAC Principals are in the process of replacing with Trusted Workforce 2.0, individuals granted security clearances undergo a periodic reinvestigation—for as long as they remain in a position requiring access to classified information or other sensitive position— to ensure their continued eligibility. ODNI reported that as of October 1, 2018, approximately 4.1 million government and contractor employees, in or supporting executive branch agencies, were eligible to hold a security clearance.

Trusted Workforce 2.0

Trusted Workforce 2.0 is a government-wide initiative to modernize personnel vetting through a series of policy and procedural reforms and the overhaul of the government-wide process to vet the trustworthiness of the federal workforce. According to the former Director of the National Counterintelligence and Security Center within ODNI, Trusted Workforce 2.0 seeks to implement a "one-three-five" framework, as depicted in figure 3.[21]

Figure 3: Trusted Workforce 2.0 Framework

One-three-five framework

One personnel vetting model

The Performance Accountability Council (PAC) plans to align the distinct security, suitability/fitness, and credentialing vetting processes into one model with a simplified policy framework of executive issuances, guidelines, and standards.

Three investigative tiers

The PAC plans to reduce the background investigation tiers from five to three: Tier-1 for low-risk positions, Tier 2 for moderate-risk suitability vetting and secret clearances, and Tier-3 for high-risk suitability vetting and top secret clearances.[a]

Five vetting scenarios

1. Initial vetting: determining whether to trust individuals with no prior background investigation conducted by the federal government;

2. Continuous vetting: replacing periodic reinvestigations and consisting of automated record checks, agency-specific checks, and certain time- or event-driven fieldwork;

3. Upgrades: adjusting the level of vetting commensurate with a move to a position with a higher level of risk;

4. Transfer of trust: moving an individual from one agency to another with the goal of improving the speed of mobility; and

5. Reestablishment of trust: following a break in service, vetting an individual for return to the federal workforce.

Source: ODNI officials. | GAO-22-104093

[a]Under the current system, the 2012 *Federal Investigative Standards* establish requirements for conducting five tiers of background investigations that provide information to enable security, suitability/fitness, and credentialing vetting determinations. The five tiers of investigations are: Tier-1 for positions designated low risk, non-sensitive, and for access to agency systems and facilities; Tier-2 for non-sensitive positions designated as moderate risk public trust; Tier-3 for positions designated as non-critical sensitive, and/or positions that require eligibility for access to information classified at

[21]*Security Clearance Reform: Hearing before the Senate Select Committee on Intelligence*, 116th Cong. (2020) (statement of Mr. William Evanina, Director, National Counterintelligence and Security Center).

the confidential or secret level or "L" access; Tier-4 for non-sensitive positions designated as high risk public trust; and Tier-5 for positions designated as critical sensitive, special sensitive, and/or that require access to information classified at the top secret level or Sensitive Compartmented Information, or for "Q" access.

CE is a key component of Trusted Workforce 2.0 that shortens the time between cleared individuals' background reinvestigations. CE systems conduct automated record checks of cleared personnel daily and monthly, depending on the type of information and database being checked.[22] In contrast, under the current system, personnel have not been subject to periodic reinvestigations more frequently than every 5 years unless initiated as a result of an event-driven need.[23] The types of records checked as part of CE are the same as those checked for other personnel security purposes, such as credit, criminal activity, and foreign travel. The PAC is also moving the reform effort towards CV.[24]

National Background Investigation Services

There have been multiple efforts to replace OPM's systems since the occurrence of a cybersecurity incident in 2015 in which the background investigation records of federal employees and contractors were compromised (see figure 4).

[22]Executive Order 13,467, as amended, defines CE as 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. It states that CE 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. Exec. Order No. 13,467, § 1.3(d), (f), *as amended by* Exec. Order No. 13,764, 82 Fed. Reg. 8115, 8119 (Jan. 17, 2017).

[23]Under the 2012 *Federal Investigative Standards*, individuals occupying Tier 3 and Tier 5 positions must be reinvestigated at least once every 5 years and as a result of an event-driven need. However, implementation of this requirement for the Tier 3 population has been deferred.

[24]OMB officials told us that CE and CV are similar but different concepts. They explained that CV is a concept related to capabilities supporting Trusted Workforce 2.0 while CE is a concept related to risk-management techniques used between periodic reinvestigations.

Figure 4: Timeline of Information Technology (IT) Related Events for Background Investigation Services (2015-2020)

Feb. 2015– Aug. 2017: GAO audits of OPM's information security.

2015

June–July 2015: OPM reports IT data breaches.

2016

June–Sept. 2016: DOD begins the National Background Investigation Services project. Executive Order 13,467 amended to assign DOD the role of developing and securely operating IT systems that support all background investigation processes conducted by National Background Investigations Bureau (NBIB).

2017

2018

Dec. 2017 and April 24, 2019: The National Defense Authorization Act for Fiscal Year 2018 and Executive Order 13,869 establish requirements related to the transfer of OPM's NBIB personnel, resources, and functions to DOD.

2019

Sept. 30, 2019: Transfer of OPM's NBIB background investigation functions to Defense Counterintelligence and Security Agency (DCSA) complete.

2020

Oct. 1, 2020: DCSA assumes control of NBIB legacy IT systems.

Source: : GAO analysis of Office of Personnel Management (OPM) and Department of Defense (DOD) data. | GAO-22-104093

Currently, DCSA is piloting NBIS capabilities while also maintaining the National Background Investigations Bureau's legacy IT systems with OPM network support. In the future, DCSA plans to replace these legacy systems with NBIS, which will perform multiple functions in the personnel vetting process.[25] These will include enabling (1) agencies to validate the clearance level of positions; (2) applicants to enter data to initiate an investigation; (3) investigators to manage and store vetting information they collect; and (4) agencies that are investigative service providers to conduct automated records checks, among other things.

The PAC Principals Have Made Progress in Implementing Trusted Workforce 2.0

The PAC Principals divided the implementation of Trusted Workforce 2.0 into two phases and have made progress in implementing both phases. The goal for phase one of the reform is to reduce and eliminate the

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[25]DOD's Defense Information Systems Agency was initially directed to lead the acquisition of NBIS. On October 1, 2020, the Defense Information Systems Agency's NBIS Program Executive Office transferred to DCSA.

backlog of background investigations conducted by DCSA.[26] DCSA reported that its backlog declined from approximately 725,000 investigations in April 2018 to about 210,000 investigations in March 2021.[27] ODNI officials attributed this progress, in part, to measures designed to reduce the backlog included in executive memorandums issued jointly by ODNI and OPM in June 2018 and February 2020.[28] For example, the February 2020 executive memorandum authorized agencies to treat certain personnel who are enrolled in CV as having met the periodic reinvestigation requirements without a reinvestigation.

The PAC Principals have also made progress in implementing phase two of Trusted Workforce 2.0, which has a goal to establish a new government-wide approach to personnel vetting. Specifically, the PAC Principals have begun to develop a policy framework for the new approach to personnel vetting and to develop needed IT systems, which ODNI officials stated are the key components to implementing the reform.

- **Policy framework.** PAC Principals have made some progress in developing a policy framework for Trusted Workforce 2.0. For example, in January 2021 ODNI and OPM published the *Federal Personnel Vetting Core Doctrine*.[29] These officials told us that the *Doctrine* is a key policy for the reform. The *Doctrine* states that it will guide the development of government-wide and agency policy, and it establishes goals for the reformed personnel vetting processes. In addition, ODNI and OPM officials told us that the PAC Principals are developing additional policy in four areas: (1) defining the requirements for the five vetting scenarios we described earlier, including initial and continuous vetting; (2) measuring the performance

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[26]We plan to continue to examine DCSA's inventory of background investigations and the extent to which executive branch agencies met established timeliness objectives for the personnel security clearance process as part of our follow up on the High-Risk list.

[27]As noted earlier, we focused on DCSA's backlog because the PAC Principals established a goal for Trusted Workforce 2.0 of reducing and eliminating the DCSA backlog. We did not assess the inventory of background investigations at the 18 other investigative service providers.

[28]ODNI and OPM Memorandum, *Transforming Workforce Vetting: Measures to Reduce the Federal Government's Background Investigation Inventory in Fiscal Year 2018* (June 5, 2018); ODNI and OPM Memorandum, *Transforming Federal Personnel Vetting: Measures to Expedite Reform and Further Reduce the Federal Government's Background Investigation Inventory* (Feb. 3, 2020).

[29]*Federal Personnel Vetting Core Doctrine*, 86 Fed. Reg. 2705 (Jan. 13, 2021).

of the vetting process; (3) establishing trust with organizations, such as law enforcement agencies and financial institutions, that provide information used in the vetting process; and (4) engaging with subjects who are being vetted.

For example, ODNI and OPM officials told us that they are revising the *Federal Investigative Standards* and Adjudicative Guidelines.[30] The OPM Director stated that in calendar year 2022 the PAC plans to issue the key Trusted Workforce 2.0 policies, including updated investigative standards and adjudicative guidelines. A PAC Program Management Office official stated that the PAC could issue the policies sooner but did not want to do so before the IT capabilities were in place to enable agencies to comply with the policies.

- **IT Systems.** An official from the PAC Program Management Office told us that the most important factor in implementing Trusted Workforce 2.0 is the executive branch agencies' development of the supporting IT systems, and that the most significant of these IT systems is NBIS. DCSA is developing this system using an Agile approach, which involves developing software incrementally and deploying various NBIS capabilities in multiple sequential releases. It plans to provide federal agencies with access to NBIS in fiscal year 2022, after DOD completes its pilot of NBIS capabilities.[31]

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[30]The 2012 *Federal Investigative Standards* established requirements for conducting background investigations to determine eligibility for logical and physical access, suitability for U.S. Government employment, fitness to perform work for, or on behalf of, the U.S. Government as a contractor employee, and eligibility for access to classified information or to hold a sensitive position. The Adjudicative Guidelines are the single, common criteria used to evaluate individuals who require eligibility for access to classified information or to hold a sensitive position. The guidelines address a variety of areas, including criminal conduct, alcohol consumption, and drug involvement and substance misuse.

[31]Agile is an approach to software development in which the increments of the software developed are continuously evaluated for functionality, quality, and customer satisfaction.

ODNI Formalized Continuous Evaluation Enrollment Requirements but Has Not Assessed Program Performance

ODNI Formalized Requirements to Enroll National Security Populations in a Continuous Evaluation System

ODNI issued a series of documents from 2016 through 2021 formalizing CE program requirements. In late 2016 ODNI issued guidance for phase one of its implementation of CE requiring over 70 executive branch agencies to conduct a credit bureau check and a Federal Bureau of Investigation criminal history check on at least 5 percent of their populations who are eligible to access top secret or sensitive compartmented information.[32] The guidance noted that agencies were to conduct these checks in addition to performing initial investigations or periodic reinvestigations, and this requirement remained in place through fiscal year 2019.

In early 2018 ODNI issued Security Executive Agent Directive 6, *Continuous Evaluation* (SEAD 6), and implementation guidelines. These issuances define ODNI and agency responsibilities for implementing CE, describe future implementation phases beyond fiscal year 2019, and enable agencies to plan for CE.[33] In particular, the CE implementation guidelines outline the seven data categories that are required for CE,

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[32]Office of the Director of National Intelligence Memorandum, *Continuous Evaluation Phased Implementation and Options for Automated Records Checks* (Dec. 22, 2016). Specifically, agencies were to conduct the check on at least 5 percent of their Tier 5 populations, which includes positions designated as critical sensitive, special sensitive, and/or requiring eligibility for access to top secret, sensitive compartmented information, or Q information. ODNI officials reported that they currently track 73 federal agencies with eligible populations for a CE program. There are an additional 33 sub-organizations contained within these agencies.

[33]Office of the Director of National Intelligence, Security Executive Agent Directive 6, *Continuous Evaluation* (Jan. 12, 2018); National Counterintelligence and Security Center, *Security Executive Agent Directive 6: Continuous Evaluation Program Implementation Guidelines* (March 2018).

such as whether an individual has a record of suspicious financial activity.[34]

In February 2020 ODNI and OPM issued additional guidance that established a CE requirement, subsequently referred to as Trusted Workforce 1.5. Trusted Workforce 1.5 was intended to be an interim phase before the final Trusted Workforce 2.0 policy was issued.[35] Its guidance identifies the automated record checks from seven data categories that agencies are required to use under Trusted Workforce 1.5. It also describes the concept of CV as an evolution of the CE concept. CV includes the required CE data checks as well as required agency-specific data checks, such as user activity monitoring, where appropriate. The guidance permits agencies to cease conducting periodic reinvestigations when they have been compliant with the Trusted Workforce 1.5 requirements.

After issuing the Trusted Workforce 1.5 guidance, ODNI officials stated that they recognized not all agencies were able to immediately meet those requirements. Accordingly, in January 2021 ODNI and OPM issued additional guidance for another interim phase—referred to as Trusted Workforce 1.25—that requires agencies to perform three record checks instead of seven.[36] The guidance also requires checks of agency-specific information if available and event-driven investigative activity.[37] Agencies that enroll personnel in a system that meets the Trusted Workforce 1.25 requirements are able to defer periodic reinvestigations for those personnel subject to applicable legal and policy requirements. ODNI also plans to issue final guidance for CV under Trusted Workforce 2.0. Table 1

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[34]The seven data categories for continuous evaluation automated record checks are eligibility, terrorism, foreign travel, suspicious financial activity, criminal activity, credit, and commercial data.

[35]ODNI and OPM Memorandum, *Transforming Federal Personnel Vetting: Measures to Expedite Reform and Further Reduce the Federal Government's Background Investigation Inventory* (Feb. 3, 2020).

[36]ODNI and OPM Memorandum, *Transforming Federal Personnel Vetting: Continuous Vetting and Other Measures to Expedite Reform and Transition to Trusted Workforce 2.0* (Jan. 15, 2021).

[37]The guidance states that agencies must incorporate into their processes relevant information from agency-specific data sources, and it notes that although agency-specific information is not mandatory for Trusted Workforce 1.25, it is a requirement for Trusted Workforce 1.5 and is anticipated to be a requirement for Trusted Workforce 2.0.

summarizes the phase one guidance and subsequent guidance for CE and CV.

Table 1: Trusted Workforce Phased Guidance for Continuous Evaluation and Continuous Vetting, as of January 2021

	Phase One	Trusted Workforce 1.25	Trusted Workforce 1.5[a]	Trusted Workforce 2.0
Date of guidance	December 2016	January 2021	February 2020 and January 2021	No date announced for final policy
Population affected	Certain national security personnel	All national security personnel	All national security personnel	All personnel
Requirement	2 checks: credit bureau and criminal name check	3 ARC checks and other agency information	7 ARC checks[b] and other agency information	Continuous vetting
PR requirement	Checks are in addition to PR	Continuous vetting defers PR	Continuous vetting satisfies PR requirement	Continuous vetting replaces PR requirement
Deadline to enroll personnel	September 30, 2017	September 30, 2021	September 30, 2022	No deadline established yet

Legend:

ARC =Automated Record Check

PR =Periodic Reinvestigation

Source: GAO analysis of executive branch agency information. | GAO-22-104093

[a]According to Office of the Director of National Intelligence (ODNI) officials, not all agencies were immediately able to implement the February 2020 guidance for Trusted Workforce 1.5. In 2020 ODNI worked with the Defense Counterintelligence and Security Agency to develop a Trusted Workforce 1.25 product for those agencies. The January 2021 guidance gave agencies deadlines to enroll their population in either Trusted Workforce capability.

[b]ODNI guidance lists the automated record checks from seven data categories agencies must use to improve early detection of potential security issues under Trusted Workforce 1.5: eligibility, terrorism, foreign travel, suspicious financial activity, criminal activity, credit, and public records. It also lists categories of employment conduct and subject interviews. Trusted Workforce 1.25 checks are for eligibility, terrorism, and criminal activity.

There are currently two major CE systems: ODNI's CE system and DCSA's Mirador. The two systems obtain data from different sources within the required record check categories. According to officials, ODNI's CE system resides on a classified network and includes checks in all seven data categories required for Trusted Workforce 1.5. When a record check results in an alert for an individual, the CE system sends information to agencies to adjudicate.

According to DCSA officials, DCSA has been enrolling the DOD population in its Mirador system, which includes checks in at least three data categories required for Trusted Workforce 1.25, and is also enrolling its population in ODNI's CE system, which includes additional data categories. According to DCSA officials, DOD is also developing the means for the new National Background Investigation Services to interface with the data sources available in both Mirador and ODNI's CE

system to ensure compliance with Trusted Workforce 1.25 and Trusted Workforce 1.5.

According to ODNI and DCSA officials, executive branch agencies had enrolled approximately three-quarters of the total eligible population of 4.1 million federal employees, military personnel, and contractor personnel in a CE system as of March 2021. This entails about 3.3 million individuals from 33 agencies enrolled in ODNI's CE system that meets the Trusted Workforce 1.25 requirements, according to officials. ODNI officials said that only five agencies have met the Trusted Workforce 1.5 requirements, as not all agencies receive all seven categories of checks and they must also implement other requirements, such as insider threat and user activity monitoring. DCSA offers a Trusted Workforce 1.25 service to non-DOD agencies and, as of April 2021, four agencies had begun enrolling their personnel in the service and 22 other agencies were working to meet the requirements.[38]

ODNI Has Not Assessed Continuous Evaluation Program Performance

ODNI has not assessed the performance of agencies' CE programs. In 2017 we recommended that ODNI develop performance measures to evaluate CE and develop a plan to address its impact on agency resources.[39] We stated that assessing CE would ensure that it is effectively meeting its critical purpose of filling the information gap between investigative cycles to identify risks to national security. ODNI concurred with our recommendation and, according to officials, collected CE metrics from some agencies for fiscal years 2017 through 2020. These metrics include the number of issues flagged by the CE systems, the actions resulting from flagged issues, and the resource impacts on

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[38]DCSA's Trusted Workforce 1.25 Service offers a limited set of automated record checks in three data categories—alert management, real-time threat analysis and reporting, and record retention—at $42 annually per individual. *See* DCSA Federal Investigations Notice No. 20-04, *FY 2021 & FY 2022 Investigations Reimbursable Billing Rates* (June 30, 2020). NBIB previously provided agencies a Continuous Evaluation Special Agreement Check of $45 annually per individual. *See* NBIB Federal Investigations Notice No. 17-03, *Continuous Evaluation Special Agreement Check* (Feb. 3, 2017).

[39]GAO, *Personnel Security Clearances: Additional Planning Needed to Fully Implement and Oversee Continuous Evaluation of Clearance Holders*, GAO-18-159SU (Washington, D.C.: Nov. 21, 2017). In GAO-18-159SU, we reported weaknesses in ODNI's planning to monitor continuous evaluation and recommended it develop an implementation plan to assess the potential effects of continuous evaluation on agency resources and develop performance measures that are clear, quantifiable, objective, and linked to measurable goals. We recommended that ODNI make these assessments in order to ensure that continuous evaluation is conducted consistently across the executive branch and identify any needed modifications to the program.

agencies that adjudicate alerts from these systems.[40] For example, one of the metrics that ODNI has collected on the resources expended by agencies on CE is the estimated number of labor hours devoted to validating, investigating, and adjudicating CE alerts. ODNI officials stated that personnel security officers can spend about 20 hours a month sifting through and following up on alerts generated by automated records checks.

ODNI officials told us, however, that they have not analyzed these metrics or developed performance measures linked to specific goals in order to assess the performance of agency CE programs. Rather, they have used the metrics only during site visits to agencies and to determine compliance with implementation requirements. In 2017 ODNI officials said they would be able to evaluate the effects of CE after they had a collected data for a year. Subsequently, in 2019 ODNI officials said that an accurate measure of performance across the government would not be possible until CE was fully implemented. In that year, ODNI had already enrolled over 300,000 individuals from 26 agencies in its own CE system with checks in seven data categories. In March 2021 ODNI officials said they were waiting for data from all agencies with access to all seven checks and did not have a time frame for developing performance measures. However, all agencies across the executive branch are not required to conduct the seven checks that meet Trusted Workforce 1.5 requirements for their entire national security population until September 2022.

As we found in 2017, developing a range of performance measures before the program fully matures could help ODNI identify potential program modifications needed prior to the next phase of implementation, as well as prior to full implementation. While metrics can help to establish a baseline from which a goal for a performance measure can be established, our work has shown that performance measures should also be linked to associated goals so that they can inform whether an agency is meeting those goals.[41] For example, ODNI could establish a target time frame based on an assessment of the amount of effort required to effectively identify and resolve CE alerts by data category. The target

[40]See appendix II for more information about the status of this and other key recommendations we have made in recent reports on the personnel security clearance process.

[41]GAO-18-159SU.

could reveal how effective agency CE programs are at mitigating risk or inform program modifications.[42]

SEAD 6 assigns ODNI's National Counterintelligence and Security Center responsibility for periodic assessments of agencies' CE capabilities, and with conducting research and development to ensure that, among other things, CE capabilities remain efficient and effective.[43] The *Continuous Evaluation Program Implementation Guidelines*, issued by the National Counterintelligence and Security Center, describes metrics and data calls that the Center will undertake, noting that it will compile and analyze metrics to assess the impact of CE investigative leads on the personnel security process, resource impacts due to manning and technical development requirements, and the effectiveness of CE in transforming security clearance investigation processes.[44] Several statutes also require ODNI, as the Security Executive Agent, to provide certain information annually on matters related to CE and CV, including resources expended by each agency.[45]

In the absence of any assessment of CE performance information, we spoke with officials from our sample of five agencies to gather illustrations of their experience in implementing CE and CV. The agencies reported the following:

- Department of State officials said that the department had enrolled about 75 percent of its national security population in ODNI's CE

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[42]A measurable target is one key attribute of a successful performance measure that we have identified in previous work. See GAO, *The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans*, GAO/GGD-10.1.20 (Washington, D.C.: Apr. 1, 1998).

[43]Office of the Director of National Intelligence, Security Executive Agent Directive 6, *Continuous Evaluation*, para. F.1 (Jan. 12, 2018).

[44]National Counterintelligence and Security Center, *Security Executive Agent Directive 6: Continuous Evaluation Program Implementation Guidelines*, para. F (March 2018).

[45]The National Defense Authorization Act (NDAA) for Fiscal Year 2020 required ODNI, in coordination with the PAC, to submit by March 1, 2020, and annually thereafter through 2022, a report to congressional committees on the resources expended by each federal agency in the previous fiscal year for processing security clearance background investigations and continuous vetting programs, including certain costs associated with continuous evaluation initiatives. Pub. L. No. 116-92, § 6613 (2019). Previously, the NDAA for Fiscal Year 2018 required ODNI, in coordination with the other PAC Principals, to report annually through December 31, 2021, on the costs to the executive branch related to continuous evaluation as well as initiations, investigations, adjudications, and revocations. Pub. L. No. 115-91, § 925(k)(1)(E) (2017).

system, but that it would need additional resources to enroll and maintain its entire population in the system. To explain their projection, the officials cited the large number of alerts the department currently receives per person on the portion of its population currently enrolled. They also projected additional needs, assuming a similar number of alerts per person for the portion of the population not currently enrolled in CE, as well as any anticipated fees associated with the CE system.

- Officials at the Central Intelligence Agency said that they were expending significant effort in confirming whether alerts were relevant to their personnel. For example, more than half of their workforce was enrolled in ODNI's CE system, according to ODNI data. However, Central Intelligence Agency officials stated that they had been able to close only about 25 percent of alerts received as of April 2021. They also found that less than one percent of alerts received from a criminal activity data check were relevant for their personnel. Central Intelligence Agency officials said they are also responsible for the CE enrollment and alerts of ODNI personnel. They stated that they were leveraging technology to help resolve this problem, but that it would take time to adopt it while they stayed current with incoming alerts. Meanwhile, officials said they had faced delays in enrolling individuals in ODNI's CE system that have caused data integrity issues.

- Officials from the Nuclear Regulatory Commission and the Peace Corps said in fall 2020 that they had limited engagement with ODNI, and Peace Corps officials said that they wanted more support on CE. Neither agency had been able to access the necessary systems to meet Trusted Workforce 1.5 requirements, though they intended to use DCSA's Trusted Workforce 1.25 service. Officials from both agencies supported the requirements in general, but noted delays between the issuance of these requirements and the ability of smaller agencies to obtain the capability to meet them.

- Officials at the National Security Agency said in fall 2020 that it would be difficult to acquire certain CE data sources and would take time to plan and build the IT systems necessary to enroll their entire population.

By not developing CE performance measures and assessing agency performance using such measures, ODNI may have limited information to work with agencies to address the challenges it may face—such as resource impacts—in implementing CE. It also cannot ensure that the first phases of implementation that have already begun are effective or are achieving similar results at all agencies. Uneven implementation of CE could 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. Developing CE performance measures could also help agencies to identify potential program modifications needed before the next phase of Trusted Workforce 2.0 implementation—an effort that affects more than four million individuals across more than 70 agencies.

ODNI has not taken action to develop performance measures that are clear, quantifiable, objective, and linked to measurable goals, as we recommended in 2017. ODNI generally concurred with our recommendation, but it has not made progress in implementing it and has missed multiple milestones for doing so. This lack of progress may warrant congressional consideration as it could limit ODNI and congressional decision makers' ability to assess the effectiveness and impact of continuous evaluation.

ODNI Has Not Assessed the Quality of All Phases of the Clearance Process, and the Measure It Developed for Investigations Was Not Reliable

ODNI has not assessed the quality of all of the phases of the clearance process. While ODNI had developed a performance measure for the investigation phase, it has not developed performance measures for the initiation and adjudication phases. Additionally, the measure ODNI had developed for the investigation phase was not reliable. Further, in October 2021, in commenting on a draft of this report, ODNI informed us that it no longer plans to use this measure.

We found in 2017 that ODNI and the PAC had taken steps to establish performance measures for the quality of investigations, but neither had set a milestone for their completion.[46] Therefore, we recommended that ODNI establish such a milestone. ODNI did not concur with our conclusions and recommendations, but in 2019 ODNI developed a performance measure to assess the quality of investigations.[47]

The measure ODNI developed for assessing the quality of background investigations was based on a set of guidelines that ODNI and OPM issued in 2015 for assessing the quality of background investigations— the *Quality Assessment Standards*. These standards established a quality assessment model and a method for assessing the extent to which investigations meet the *Federal Investigative Standards*. Generally, an investigative service provider conducts an investigation of a subject and

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[46]GAO-18-29.

[47]ODNI's performance measure was applicable to initial investigations and reinvestigations.

submits a report of its investigation to the subject's agency. Adjudicators in the subject's agency then review the report to make a determination regarding the security clearance and also rate the quality of the investigation.

An investigation meets the *Quality Assessment Standards* if adjudicators rate it as (1) *complete*—the investigation included all required components in the *Federal Investigative Standards* and all issues were resolved; or (2) *justified-incomplete*—the investigation did not include all components required by the *Federal Investigative Standards*, but it included an explanation that the missing information was impossible to obtain or that reasonably exhaustive efforts were made to meet the requirements and the efforts were unsuccessful.[48] The *Quality Assessment Standards* also require executive branch agencies to randomly select and rate 5 percent of investigation reports and to document the ratings in a quality reporting tool that provides the ratings to ODNI. ODNI had combined ratings on investigations rated by adjudicators as *complete* with those rated as *justified-incomplete* and calculated one statistic showing the average number of investigations that conformed to the *Quality Assessment Standards*. That statistic was the investigations performance measure that ODNI had developed.

While ODNI had developed a measure to assess the quality of investigations, its measure was not reliable. We assessed the performance measure using six of 10 key attributes for successful performance measures.[49] See table 2 for a summary of our assessment and appendix III for more details about this assessment.

[48]Adjudicators review reports of investigations that summarize the results of the investigation of an applicant for a personnel security clearance. Adjudicators use the information in these reports to make security clearance determinations. For purposes of clarity in this report, we use the phrase *justified-incomplete* in place of the term *justified* from the *Quality Assessment Standards*. *Justified-incomplete* investigations are those in which component requirements are not met, but either they are impossible to obtain or reasonably exhaustive efforts are made to meet them and the efforts are unsuccessful. The missing component requirements are accompanied by an adequate explanation when required, and any issues present are resolved per the *Quality Assessment Standards*. The other two categories under the *Quality Assessment Standards* are *incomplete* and *insufficient*, in which cases the standards are not met.

[49]We reported these key attributes in GAO-03-143.

Table 2: GAO Assessment of the Alignment between the Performance Measure the Office of the Director of National Intelligence (ODNI) Developed for Investigation Quality and Key Attributes for Performance Measures

Attribute	Definition	GAO Assessment
Core program activities	Measure covers the activities that an entity is expected to perform to support the intent of the program	Not demonstrated
Linkage	Measure is aligned with division and agency-wide goals and mission, and is clearly communicated throughout the organization	Partially demonstrated
Clarity	Measure is clearly stated, and the name and definition are consistent with the methodology used to calculate it	Not demonstrated
Measurable target	Measure has a numerical goal	Demonstrated
Objectivity	Measure is reasonably free from significant bias or manipulation	Not demonstrated
Reliability	Measure produces the same result under similar conditions	Not demonstrated

Source: GAO analysis of information derived from ODNI. | GAO-22-104093

Note: For the key attribute ratings described in table 2, "Demonstrated" means that the ODNI performance measure satisfied the entire criterion. "Partially demonstrated" means that the ODNI performance measure satisfied some of the criterion, but not all of it. "Not demonstrated" means that the ODNI performance measure did not satisfy any of the criterion.

We did not evaluate ODNI's performance measure against three of the key attributes: limited overlap, balance, and government-wide priorities. We did not evaluate ODNI's measure against these attributes because they focus on factors that make a system of multiple performance measures successful, and ODNI had developed just one measure. In addition, we excluded one of the key attributes related to an individual measure—having a baseline and deriving trend data. While this key attribute applies to an individual measure, we determined that it does not apply to the measure that ODNI had developed. ODNI officials stated that they developed the investigations measure in 2019 and had not had sufficient time to accumulate historical data to determine a baseline and associated trends.

ODNI officials acknowledged the need to develop performance measures to enable monitoring of all phases of the clearance process. As we discussed earlier, ODNI and OPM officials stated that they are developing additional policies for Trusted Workforce 2.0, and in one set of policies they plan to establish other performance measures. In addition, a PAC Program Management Office official acknowledged that it would be important align performance measures the PAC develops with leading practices. The official stated that the PAC is using GAO's key attributes criteria to guide efforts to develop the measures, but could not provide documentation of this effort. Developing measures for assessing the quality of all phases of the clearance process that align with the key attributes for successful performance measures would enable ODNI, the PAC Chair, and other PAC Principals to perform their oversight roles more effectively.

Schedule for Developing NBIS System Is Not Reliable, and Workforce Planning for Vetting Personnel Is Incomplete

The NBIS system schedule does not meet the characteristics of a reliable schedule. In addition, legacy IT systems that DCSA now manages may continue to have cybersecurity issues. Further, DOD has not completed strategic workforce planning for its entire personnel vetting workforce.

DCSA Developed a Schedule to Manage the NBIS System, but It Is Not Reliable

DCSA has developed an integrated master schedule to manage the NBIS system, but it does not meet the best practices of a reliable schedule. DCSA officials stated that they are using an integrated master schedule to plan their work on NBIS and to inform Congress and DCSA leadership about the program's progress.[50] We assessed a version of the program's integrated master schedule from June 17, 2020, and found that the schedule was partially comprehensive and controlled, but was minimally well-constructed and credible. As a result, the program's schedule could not be considered reliable.[51]

We assessed the NBIS system schedule against 10 best practices for developing and maintaining reliable program schedules, which are defined in GAO's *Schedule Assessment Guide* and *Agile Assessment Guide*.[52] The NBIS system schedule minimally met or partially met nine of

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[50]An integrated master schedule constitutes a program schedule that includes the entire required scope of effort, including the effort necessary from all government, contractor, and other key parties for a program's successful execution from start to finish. As of spring 2020, there were 15 NBIS application development teams supported by an integrated master schedule that covers the period from June 3, 2019, to May 15, 2024.

[51]We incorporated DCSA officials' feedback to this analysis in December 2020, including some examples of the initiatives adopted by the NBIS team to improve the integrated master schedule. However, this did not impact our assessment of the best practices.

[52]GAO-16-89G. Agile is an approach to software development in which software is developed incrementally and is continuously evaluated for functionality, quality, and customer satisfaction. The process starts with strategy at the governance level, followed by requirements management, and then user stories. Agile can reduce the risks of funding a program that fails or produces outdated technology. See GAO, *Agile Assessment Guide: Best Practices for Agile Adoption and Implementation*, GAO-20-590G (Washington, D.C.: Sept. 28, 2020).

10 scheduling best practices, and it substantially met one.[53] We then grouped these best practices into four characteristics of a reliable schedule: comprehensive, controlled, well-constructed, and credible. See our analysis of the NBIS schedule summarized in figure 5 and described in the narrative below.

Figure 5: Extent to Which NBIS Schedule Met Characteristics of a Reliable Schedule and Followed Best Practices for Each Characteristic (schedule version as of June 17, 2020)

GAO assessment of NBIS schedule in meeting each characteristic	Best practices for each characteristic[a]	GAO assessment of NBIS schedule in meeting best practices for each characteristic[b]
Comprehensive ◓	Capturing all activities	◓
	Assigning resources to all activities	◓
	Establishing the durations of all activities	◑
Controlled ◓	Updating the schedule using actual progress and logic	◓
	Maintaining a baseline schedule[c]	◓
Well-constructed ◔	Sequencing all activities	◓
	Confirming that the critical path[d] is valid	◔
	Ensuring reasonable total float[e]	◔
Credible ◔	Verifying that the schedule can be traced horizontally and vertically[f]	◔
	Conducting a schedule risk analysis	◔

● Fully met
◑ Substantially met
◓ Partially met
◔ Minimally met
○ Not met

Source: GAO analysis of information for the National Background Investigation Services (NBIS) program. | GAO-22-104093

[a]GAO, *Schedule Assessment Guide: Best Practices for Project Schedules*, GAO-16-89G (Washington, D.C.: Dec. 22, 2015).

[b]For the best practice ratings described here, "minimally met" means the program provided evidence that satisfies a small portion of the criterion. "Partially met" means the program provided evidence that satisfies about half of the criterion. "Substantially met" means the program provided evidence that satisfies a large portion of the criterion. "Fully met" means the project team provided complete evidence that satisfies the entire criterion. A schedule is considered reliable if the assessment ratings for each of the four characteristics are substantially or fully met. If any of the characteristic ratings is not met, minimally met, or partially met, then the schedule cannot be considered reliable. We

[53]For the ratings described here, "minimally met" means the program provided evidence that satisfies a small portion of the criterion and "partially met" means the program provided evidence that satisfies about half of the criterion. "Substantially met" means the program provided evidence that satisfies a large portion of the criterion. "Fully met" means the program provided complete evidence that satisfies the entire criterion. A schedule is considered reliable if the assessment ratings for each of the four characteristics are substantially or fully met. If any of the characteristic ratings is not met, minimally met, or partially met, then the schedule cannot be considered reliable.

determined the characteristic assessment rating by assigning each best practice rating a number and taking the average.

[c]A baseline schedule represents the original configuration of the program plan and signifies the consensus of all stakeholders regarding the required sequence of events, resource assignments, and acceptable dates for key deliverables.

[d]The critical path is the longest continuous sequence of activities in a schedule.

[e]Total float is the amount of time an activity can be delayed or extended before delay affects the program's finish date.

[f]A schedule with horizontal and vertical traceability accounts for the interdependence of detailed activities, and activities are traceable among various levels of the schedule.

- *Comprehensive—Partially met.* The schedule appears to reflect all work necessary for the entire program, but it may not sufficiently detail the work necessary to accomplish the program's milestones. Specifically, we found irregularities with the resource assignments in the schedule, such as unrealistically over-allocated resources or improbable assignments. For example, some milestones in the schedule have assigned resources, which is improbable because a milestone denotes the achievement of a key event and is a point in time. Program officials told us that they had not yet analyzed the schedule's resource assignments. Analyzing the schedule for resources would allow insight into the current or programed allocation of resources and would significantly reduce the risk of the program's slipping.

  We found that the duration of activities in the schedule are reasonably short and meaningful and allow for discrete progress measurement. However, activities in the schedule are not mapped to a work breakdown structure, which is a document that defines in detail the work necessary to accomplish a program's objectives. Program officials stated that the program does not have a work breakdown structure or a related dictionary that would define the scope of scheduled activities. Instead of using a formal work breakdown structure, program officials stated that they conduct a breakdown session when they construct the schedule at the beginning of each release that takes into account the requirements and deliverables for every product owner. GAO's *Agile Assessment Guide* states that a work breakdown structure or similar document provides a clear picture of the total scope of work necessary to meet a program's vision and requirements—not just the work for a particular release. According to GAO's *Schedule Assessment Guide*, a well-developed work breakdown structure, along with its associated dictionary, is essential to the success of acquisition programs.

- *Controlled—Partially met.* We found a large number of date anomalies, including 602 activities that were planned to have been started in the past that had no actual start date, and 553 activities that were planned to have been completed in the past with no actual finish date. All unfinished work and activities that have not started should be rescheduled to occur after the status date. If the schedule continues to show unfinished work as performed in the past, then it no longer represents a realistic plan to complete the program.

  Program officials said that they had established a new baseline schedule—the basis for managing the program's scope—for NBIS in early 2020, and that they had started developing the current schedule in May 2020.[54] However, we found that the majority of activities in the schedule had no associated baseline start or finish dates. Also, program officials lacked a schedule basis document that defines the organization of the schedule, describes the logic of the network, describes the basic approach to managing resources, and provides a basis for all parameters used to calculate dates. Thorough documentation is essential for validating and defending a baseline schedule.

- *Well-constructed—Minimally met.* We found that the majority of activities have straightforward logic, which allows the schedule to respond to changes in activity durations or progress. However, we also found a range of problems related to the construction of the NBIS schedule for each of the best practices of this characteristic, including the sequencing of activities, the schedule's critical path, and the reasonableness of the total float available, which is the amount of time that activities can slip before they delay key program milestones.

  In general, every activity within the schedule except for the program start and program finish milestones should have at least one predecessor and one successor activity. However, we found that about 19 percent of remaining activities and milestones in the schedule had either no successor or no predecessor, or neither. We also found that about 36 percent of remaining activities exhibited logic anomalies, such as finish dates that did not drive any successors,

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[54]According to GAO's *Schedule Assessment Guide,* establishing a baseline schedule is essential to effective management. A baseline schedule represents the original configuration of the program plan and signifies the consensus of all stakeholders regarding the required sequence of events, resource assignments, and acceptable dates for key deliverables.

which means that they could be delayed indefinitely with no adverse effect on key milestone dates.

We could not confirm valid critical paths throughout the entire schedule or in the individual releases detailed in the schedule. Without a valid critical path, management cannot focus on activities that will detrimentally affect the key program milestones and deliveries if they slip. We also found that the schedule includes unreasonable amounts of time that activities are allowed to slip due to missing logic and logic anomalies. Reasonable values of total float would allow program managers to identify activities that are permitted to slip so that they can reallocate resources to activities that require more resources to be completed on time.

- *Credible—Minimally met.* The schedule should link products and outcomes associated with other sequenced activities, but we determined that the schedule did not do so. As a result, we found that the schedule showed that activities for certain milestones would need to slip 800 to 900 days to show a delay. The schedule was also not horizontally traceable. We have reported that schedules that are not horizontally traceable may not depict relationships between different program elements and product hand-offs, leading to less effective program management. The schedule should also be vertically traceable—that is, data should be consistent between different levels of a schedule. Based on our analysis, this does not appear to be the case. For example, we found that the finish date for a high-level task does not always correspond to the finish date expected based on its lower-level tasks.

  Program officials stated that the program did not conduct a traditional schedule risk analysis, and instead considered risks separately in a spreadsheet. A schedule risk analysis uses statistical techniques to predict a level of confidence in meeting a program's completion date by focusing on uncertainty and key risks and how they affect the schedule's activity durations. While Agile teams and processes can be viewed as ways to mitigate risk in complex software programs, we have reported that all programs face risk and uncertainty, and the likelihood and consequences of each risk should be examined.[55] Without a schedule risk analysis, calculating the completion date from

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[55]GAO-20-590G.

schedule logic and duration estimates in the schedule may underestimate the overall program critical path duration.

DCSA does not have a reliable schedule to manage NBIS because the scheduling team was not using any best practices when developing the schedule, according to DCSA officials. DCSA officials stated that they have faced challenges in incorporating the program's Agile software development approach into the more traditional approach to scheduling and have had to adapt to several shifts in NBIS development goals since the program's inception in 2016. However, developing and executing a schedule for an Agile program provides a focus on deadlines for specific goals and activities to ensure that all required actions are planned to be completed.

The credibility of decision-making on a program will be negatively affected if the schedule is not reliable. A schedule provides a road map for systematic program execution and the means by which to gauge progress, identify and resolve potential problems, and promote accountability. Agile programs that adhere to GAO's scheduling best practices can develop a schedule that is accountable for delivering high-value outcomes.[56] By fully aligning the NBIS schedule with the characteristics of a reliable schedule, as defined in our schedule guide, and the best practices in our Agile software development guide, DCSA could give DOD and Congress greater confidence in the system's schedule, including the likelihood of on-time completion, and improved decision-making over the remaining years of the development of these IT services for the government-wide personnel vetting process.

DOD and OPM Have Not Completed all Recommended Efforts to Secure Legacy IT Systems

As NBIS is being developed, DOD and OPM have not completed all recommended efforts to secure OPM's legacy IT systems used for the personnel security clearance process. In particular, officials stated that DOD and OPM have not completed all recommended efforts to implement security improvements to OPM's IT environment to ensure that key security controls are in place and operating as intended.

We have previously reported on issues with these systems and issued 80 IT security-related recommendations to OPM. As of November 2021, OPM had implemented 69 of those recommendations. For example, OPM implemented two priority recommendations regarding updating security

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[56]GAO-20-590G.

plans for selected systems and re-evaluating security control assessments to ensure that they comprehensively test controls.

OPM transferred ownership of these legacy IT systems to DCSA in October 2020, and DCSA is maintaining these systems that are hosted on OPM's network. According to DCSA and OPM officials, they have taken some additional steps to mitigate remaining cybersecurity issues.[57] DCSA officials added that security patches and updates are implemented in accordance with DOD cybersecurity best practices.

DOD Has Not Completed Strategic Workforce Planning for Its Personnel Vetting Workforce

DCSA has taken limited steps to conduct strategic workforce planning for its personnel vetting workforce. Strategic workforce planning focuses on developing long-term strategies for acquiring, developing, and retaining an organization's total workforce, including federal staff and contractor personnel, to meet the needs of the future.[58]

Some of the limited steps DCSA has taken to conduct strategic workforce planning include an analysis in the third quarter of 2020 of the demographics (e.g., gender, age) of its current personnel vetting workforce. A demographic analysis is one of the analyses recommended by DOD's workforce planning best practice guide.[59] Furthermore, we reported in April 2020 that OPM had developed a strategic workforce plan in 2019 when it was responsible for the background investigation mission. OPM's plan detailed initiatives to strengthen the training and capacity of its investigative workforce.[60] DCSA officials stated that they had identified information relevant to DCSA's current workforce planning needs from the 2019 OPM plan, and that they would use OPM's plan as a starting point for developing the DCSA strategic workforce plan.

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[57]The DOD Inspector General initiated an audit in January 2020 of the cybersecurity controls related to legacy IT systems and NBIS, but terminated the audit in September 2020 because the COVID-19 pandemic affected its ability to complete the audit. As a result of our initial coordination with the DOD Inspector General, we did not review cybersecurity controls as part of this engagement.

[58]See GAO, *DHS Strategic Workforce Planning: Oversight of Department-wide Efforts Should Be Strengthened*, GAO-13-65 (Washington, D.C.: Dec. 3, 2012).

[59]DOD Defense Civilian Personnel Advisory Service, *Strategic Workforce Planning Guide* (Nov. 23, 2016).

[60]GAO-20-322.

We have previously reported that organizations undergoing transformation stand to benefit from strategic workforce planning.[61] As a new DOD agency that has assumed responsibility for the government-wide background investigation mission from OPM, DCSA is undergoing its own transformation, and wholesale changes inherent to organizational transformation represent a unique opportunity for DCSA to incorporate strategic workforce planning into organization-wide planning processes to influence major decisions.

Under DOD Instruction 1400.25, volume 250, DOD components are responsible for developing, managing, executing, and assessing strategic workforce plans.[62] However, DCSA has not conducted this planning because it has not established a milestone for completing its strategic workforce planning. DCSA officials told us that they had not prioritized conducting this planning, and a July 2020 briefing that listed the agency's priorities did not include strategic workforce planning. DCSA officials acknowledged the importance of strategic workforce planning and in March 2020 stated that they have been focused on other priorities since DCSA was established in 2018. They also stated that they did not plan to focus on workforce planning for their personnel vetting workforce until 2022, after DCSA is more fully established.

However, after we discussed our preliminary observations about the agency's limited planning, DCSA officials told us that they had begun to take some action and had documented an approach to conduct strategic workforce planning. In particular, the background investigation component—one of the four organizational components that comprise the personnel vetting division of DCSA—documented strategic workforce planning steps it plans to take.[63] The approach includes steps such as reviewing national and DOD-level workforce strategies and gathering data on workforce trends. However, the approach does not include a milestone for completing strategic workforce planning or issuing a strategic workforce plan. The approach also does not discuss workforce planning

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[61]GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO-04-39 (Washington, D.C.: Dec. 11, 2003).

[62]DOD Instruction 1400.25, vol. 250, *DOD Civilian Personnel Management System: Civilian Strategic Human Capital Planning (SHCP)*, encl. 2, para. 6.a (June 7, 2016). The instruction makes the heads of DOD components responsible for developing, managing, executing, and assessing each component's strategic workforce plan.

[63]DCSA's personnel vetting division is comprised of four separate mission-teams—background investigations, adjudications, continuous vetting, and insider threats.

for the personnel vetting workforce in the other three organizational components of DCSA.

By establishing a milestone for completing its strategic workforce planning and issuing a strategic workforce plan for its background investigations component and taking similar steps for its entire personnel vetting workforce, DCSA will establish an accountability mechanism to complete its planning. Strategic workforce planning can help DCSA identify human capital gaps that it may need to address as it implements the Trusted Workforce 2.0 reform. For example, we have reported that strategic workforce planning can help agencies determine the right mix of skills and competencies that agencies' workforces need.[64] A strategic workforce plan can also help agencies identify and use hiring authorities and other human capital tools to develop successful strategies for ensuring that they can obtain the workforces they need to achieve their missions.

Further, strategic workforce planning can aid DCSA in planning for its human capital needs to establish and operate continuous vetting capabilities. For example, strategic workforce planning can help DCSA refine its hiring and training strategies to ensure that it continually updates its workforce needs to keep pace with evolving skills and technologies associated with continuous vetting. Finally, as the PAC continues to develop and implement Trusted Workforce 2.0, the workforce needs that are required to support the reformed personnel vetting processes may continue to evolve, which underscores the importance of workforce planning.

Conclusions

Personnel vetting is a critical process to help protect the nation's interests by providing a means to establish and maintain trust in the federal government's workforce. High-quality personnel vetting processes are necessary to minimize risks to the nation. For example, a high-quality personnel security clearance process minimizes the risks of the unauthorized disclosure of classified information that could cause exceptionally grave damage to U.S. national security.

The PAC Principals have made progress in implementing Trusted Workforce 2.0 by substantially reducing DCSA's investigation backlog and taking steps to establish a new government-wide approach to personnel vetting. However, ODNI has not taken action to implement our 2017 recommendation to develop performance measures for CE, has

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[64]GAO-04-39.

missed multiple milestones for doing so, and does not have a time frame for developing these measures. This lack of progress may warrant congressional consideration, because without performance measures, including a performance measure for quality, ODNI has limited information to work with agencies to address the challenges they may face in implementing CE. In addition, the lack of performance measures limits ODNI's and congressional decision makers' ability to assess the effectiveness of CE, which is particularly important as ODNI and the PAC adjust to a CV approach.

While ODNI has not yet developed performance measures to assess CE, it took the positive step of developing a performance measure to assess the quality of background investigations, although it now no longer plans to use this measure. It has also not assessed the quality of other phases of the clearance process, and the measure it had developed for background investigations was not reliable. Developing measures for assessing the quality of all phases of the personnel security clearance process that align with the key attributes for successful measures would provide ODNI, the PAC Chair, and other PAC Principals with reliable information to perform their oversight roles more effectively.

DCSA has also made progress in developing an Integrated Master Schedule to plan for the NBIS system, but until this schedule is aligned with the characteristics of a reliable schedule, DCSA will lack a reliable road map to guide the execution of the system, gauge system progress, identify and resolve potential problems, and promote accountability.

DCSA has taken limited steps to conduct strategic workforce planning for its personnel vetting workforce. A milestone for completing this planning, issuing a strategic workforce plan, and taking similar steps for its entire personnel vetting workforce would enable DCSA to achieve the benefits of strategic workforce planning. Such benefits include ensuring that its workforce has the right mix of skills and competencies to achieve DCSA's mission. Addressing the gaps we identified in all of the aspects of personnel vetting is particularly important because the executive branch is in the midst of a major transformation of the personnel vetting enterprise.

Matter for Congressional Consideration

Congress should consider requiring the Director of National Intelligence to develop continuous evaluation performance measures linked to goals to assess the performance of agencies' continuous evaluation programs, including measures to assess quality and the impact on resources. (Matter for Consideration 1)

Recommendations for Executive Action

We are making a total of three recommendations, including one to the Office of the Director of National Intelligence and two to the Department of Defense:

The Director of National Intelligence, in consultation with the Deputy Director for Management of the Office of Management and Budget, the Director of the Office of Personnel Management, and the Under Secretary of Defense for Intelligence and Security, should ensure that the Director of the National Counterintelligence and Security Center develops performance measures for assessing the quality of all phases of the personnel security clearance process that align with the key attributes of successful performance measures. (Recommendation 1)

The Secretary of Defense should ensure that the Director of the Defense Counterintelligence and Security Agency revises the National Background Investigation Services system schedule to meet all the characteristics of a reliable schedule as defined in GAO's best practice guides for scheduling and Agile software development. (Recommendation 2)

The Secretary of Defense should ensure that the Director of the Defense Counterintelligence and Security Agency establishes a milestone for completing strategic workforce planning and issues a strategic workforce plan for the Defense Counterintelligence and Security Agency's entire personnel vetting workforce. (Recommendation 3)

Agency Comments and Our Evaluation

We provided a draft of this report to ODNI, DOD, OMB, OPM, the Central Intelligence Agency, the Department of State, the National Security Agency, the Nuclear Regulatory Commission, and the Peace Corps for review and comment. Written comments from ODNI and DOD are reprinted in their entirety in appendixes IV and V, respectively. OMB and OPM provided technical comments, which we incorporated in the report as appropriate. The Central Intelligence Agency, the Department of State, the National Security Agency, the Nuclear Regulatory Commission, and the Peace Corps did not provide comments. In its comments, ODNI did not state whether or not it concurred with the recommendations we made to the Director of National Intelligence, but it provided comments on our findings. In its comments, DOD concurred with the recommendations we directed to the Secretary of Defense.

In response to the Matter for Congressional Consideration that Congress consider requiring the Director of National Intelligence to develop CE performance measures, ODNI stated that it has already developed performance measures to assess the efficacy and impact of CE

automated record checks. ODNI stated that the performance measures address the CE process, outputs, and outcomes, and that the measures map to goals such as increasing the frequency of security-relevant checks. We acknowledged in our report that ODNI has collected the CE metrics that it referred to in its letter. However, during our review, ODNI officials told us that they have not analyzed these metrics or used them to develop performance measures to assess agency performance on CE. As we stated in our report, ODNI officials said that developing performance measures would not be possible until CE was fully implemented, they were waiting for data from all agencies, and did not have a time frame for developing CE-related performance measures. Without CE performance measures, ODNI has limited information to work with agencies to address the challenges they may face in implementing CE.

In addition, ODNI included several comments regarding our finding that it has not assessed the quality of all phases of the clearance process and that the investigation measure it developed is not reliable. Specifically, in response to our finding that ODNI has not assessed the quality of all phases of the clearance process, ODNI stated that it uses multiple approaches to oversee personnel security programs including collecting and assessing data on agency timeliness in completing the clearance process, collecting data on the inventory of investigations and adjudications, inspecting agencies' personnel security programs, and collecting data on background investigations through the Quality Assessment Reporting Tool. ODNI acknowledged that quality measures for the initiation and adjudication phases of the clearance process were needed. As we stated in our report, developing measures for assessing the quality of the initiation and adjudication phases that align with the key attributes for successful performance measures would enable ODNI, the PAC Chair, and other PAC Principals to perform their oversight roles more effectively.

In response to our finding that ODNI's performance measure for investigation quality did not align with key attributes of a successful performance measure, ODNI stated that, although it explored using this measure, it ultimately decided not to use it. However, during our review, ODNI officials told us that they used this measure to assess agencies' performance on background investigations and ODNI provided documentation demonstrating how they used the measure. For example, ODNI provided us documentation showing that it compared agency performance data to the measurable target in the performance measure. In addition, we reported in our March 2021 High-Risk report that ODNI

had developed this measure.[65] In its review of a draft of our High-Risk report in December 2020 and over the course of this review, ODNI did not state that it was exploring the viability of the measure or that it had never used it in practice.

Accordingly, we modified the wording of our first recommendation to apply it to all phases of the clearance process instead of just the initiation and adjudication phases. We also removed a recommendation we had included in the draft report we provided to agencies for their comment for ODNI to align the measure it had developed with the key attributes of successful performance measures. ODNI's decision to not use the measure it had developed could impede progress in addressing recommendations we have made on this topic. Nevertheless, it is encouraging that ODNI stated that it will work with OPM to develop new measures for each phase of the security clearance process as a part of Trusted Workforce 2.0.

Further, ODNI responded to our finding that it had not communicated to executive branch agencies that it had developed and was using a performance measure to assess investigation quality. ODNI stated that the *Quality Assessment Standards* and Quality Assessment Reporting Tool were developed through a transparent, community-wide approach. However, we did not comment on the extent that ODNI communicated with other agencies during the development of the *Quality Assessment Standards* or the Quality Assessment Reporting Tool. Rather, our finding focused on, among other things, the extent to which ODNI communicated about the performance measure it had developed. ODNI did not address this finding in its comments. However, it is encouraging that ODNI stated that it will work with OPM to develop a communication strategy to facilitate government-wide understanding of the measures it plans to develop with OPM.

In its comments, DOD concurred with our recommendation that the DCSA Director revise the NBIS system schedule to meet all the characteristics of a reliable schedule as defined in GAO's best practice guides for scheduling and Agile software development. The department stated that the NBIS Executive Program Manager will continue to refine program milestones based on resourcing and evolving policy requirements using Agile software development best practices. This is a positive step and, should DCSA align the NBIS schedule with the characteristics of a

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[65]GAO-21-119SP.

reliable schedule, it will have a more reliable road map to guide the execution of the system, gauge system progress, identify and resolve potential problems, and promote accountability.

DOD also concurred with our recommendation that the DCSA Director establish a milestone for completing strategic workforce planning and issue a strategic workforce plan for the Defense Counterintelligence and Security Agency's entire personnel vetting workforce. The department stated that DCSA has an effort underway to implement our recommendation and that DCSA's strategic workforce plan will encompass its entire civilian workforce. However, the department did not state that it planned to establish a milestone for completing its plan. Establishing a milestone will help ensure the completion of the strategic workforce planning and enable DCSA to realize the benefits of such planning.

We are sending copies of this report to the appropriate congressional committees, the Acting Director of OMB, the Director of National Intelligence, the Director of OPM, the Secretary of Defense, the Secretary of State, the Director of the Central Intelligence Agency, the Chairman of the Nuclear Regulatory Commission, and the Acting Director of the Peace Corps. In addition, the report is available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-5130 or mazanecb@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix VI.

Brian M. Mazanec
Director, Defense Capabilities and Management

List of Addressees

The Honorable Jack Reed
Chairman
The Honorable James M. Inhofe
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Mark Warner
Chairman
The Honorable Marco Rubio
Vice Chairman
Select Committee on Intelligence
United States Senate

The Honorable Adam Schiff
Chairman
The Honorable Devin Nunes
Ranking Member
Permanent Select Committee on Intelligence
House of Representatives

The Honorable Jim R. Langevin
Chairman
The Honorable Jim Banks
Ranking Member
Subcommittee on Cyber, Innovative Technologies, and Information
Systems
Committee on Armed Services
House of Representatives

The Honorable Ruben Gallego
Chairman
The Honorable Trent Kelly
Ranking Member
Subcommittee on Intelligence and Special Operations
Committee on Armed Services
House of Representatives

The Honorable Gerald E. Connolly
Chairman
Subcommittee on Government Operations
Committee on Oversight and Reform
House of Representatives

Appendix I: Scope and Methodology

For our first objective, we reviewed documentation related to the implementation of the phase one goal of Trusted Workforce 2.0—to reduce and eliminate the Defense Counterintelligence and Security Agency's (DCSA) backlog of background investigations. We focused on DCSA's backlog because it was the focus of the goal of phase one of Trusted Workforce 2.0. We did not assess the inventory of background investigations at the 18 other executive branch agencies that are investigative service providers.[1]

In addition, we reviewed documentation related to the implementation of phase two of Trusted Workforce 2.0, which is intended to establish a new government-wide approach to personnel vetting. For example, we reviewed guidance issued by the Security, Suitability, and Credentialing Performance Accountability Council (PAC) Principals such as the *Federal Personnel Vetting Core Doctrine*.[2] Further, we analyzed DCSA's progress in developing the National Background Investigation Services (NBIS) and interviewed officials from the Office of the Director of National Intelligence (ODNI), the Office of Personnel Management (OPM), the Department of Defense (DOD), and the PAC Program Management Office about efforts to implement Trusted Workforce 2.0.

For our second objective, we reviewed the requirements related to continuous evaluation (CE) that ODNI issued in Security Executive Agent Directive 6, *Continuous Evaluation* (SEAD 6), corresponding implementation guidelines, and additional guidance that ODNI and OPM issued in June 2018, February 2020, and January 2021.[3] We analyzed data on the extent to which agencies had enrolled personnel into CE systems and compared this information with ODNI requirements. We also reviewed documentation and interviewed ODNI officials about efforts to develop performance measures to assess the effectiveness of agency CE

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[1]According to ODNI, 18 agencies besides DOD—including the Central Intelligence Agency, the Federal Bureau of Investigation, the National Security Agency, and the U.S. Agency for International Development—have the authority to conduct their own background investigations.

[2]*Federal Personnel Vetting Core Doctrine*, 86 Fed. Reg. 2705 (Jan. 13, 2021).

[3]ODNI and OPM Memorandum, *Transforming Workforce Vetting: Measures to Reduce the Federal Government's Background Investigation Inventory in Fiscal Year 2018* (June 5, 2018); ODNI and OPM Memorandum, *Transforming Federal Personnel Vetting: Measures to Expedite Reform and Further Reduce the Federal Government's Background Investigation Inventory* (Feb. 3, 2020); ODNI and OPM Memorandum, *Transforming Federal Personnel Vetting: Continuous Vetting and Other Measures to Expedite Reform and Transition to Trusted Workforce 2.0* (Jan. 15, 2021).

programs. We compared this information to criteria for assessing agencies' CE programs in SEAD 6 and the implementation guidelines. We also interviewed officials at the PAC Program Management Office, DOD, and a sample of five executive branch agencies to obtain their perspectives about meeting CE enrollment requirements.

We selected agencies with small, medium, and large-sized workforces for our sample, and those with authority to conduct background investigations, according to ODNI. We excluded subcomponents of a department or agency, as we focused our analysis on identifying any agency-wide issues and excluded agencies that did not report data to ODNI on all three investigation types—initial secret, initial top secret, and periodic reinvestigations—because we focused our analysis on agencies that could provide perspectives about all three types. We also considered some additional factors when selecting our sample.[4] For example, we selected the Central Intelligence Agency because a senior ODNI official told us the agency had thought through how to use CE information. In addition to the Central Intelligence Agency, we selected the Department of State, the National Security Agency, the Nuclear Regulatory Commission, and the Peace Corps. We selected these five agencies for our sample to include diverse perspectives, but they are not representative of all executive branch agencies that have personnel with security clearances, and therefore our findings should not be generalized to agencies outside of this sample.

For our third objective, we analyzed documentation and interviewed officials on ODNI efforts to develop and implement performance measures to assess quality in the clearance process. We compared information on ODNI efforts to develop and implement performance measures to assess quality with GAO's key attributes for successful performance measures.[5] To perform this analysis, two analysts independently reviewed the documentation on the performance measure and the methods ODNI uses to collect data to assess agency performance in meeting the measure. The analysts compared that information to each of six of the attributes that were applicable to the

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[4]We considered the extent to which agencies met established objectives for clearance timeliness according to ODNI documents.

[5]GAO-03-143.

analysis.[6] The analysts assigned a rating of demonstrated, partially demonstrated, or not demonstrated for each of the applicable attributes. When the analysts disagreed about an assessment of one of the key attributes, they met and discussed their analysis to resolve their differences and agreed on an assessment.

For our fourth objective, we analyzed the June 17, 2020, version of DCSA's Integrated Master Schedule for NBIS, which was the most recent schedule at the time of our review. We compared it with GAO best practices for project schedules.[7] We also interviewed DCSA officials about their efforts to develop the schedule. In addition, we collected information from OPM on the extent to which it has implemented recommendations we previously made to address cybersecurity issues in OPM information technology (IT) systems—systems that DCSA will continue to use to perform its background investigation mission until NBIS is fully deployed. We also coordinated with the DOD Office of Inspector General on an audit of the cybersecurity controls related to legacy IT systems and NBIS. The DOD Office of Inspector General initiated the audit in January 2020 but terminated it in September 2020 because the COVID-19 pandemic affected the Office's ability to complete the review. As a result, we did not review cybersecurity controls as part of this engagement.

We also analyzed DCSA actions related to strategic workforce planning, including documentation of some steps it has taken. We interviewed DCSA officials responsible for strategic workforce planning. We evaluated DCSA's actions against a DOD instruction on workforce planning.[8]

To assess the reliability of the data sources we used to conduct our analyses, we reviewed information on the backlog of investigations and

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[6]We did not evaluate ODNI's performance measure against three of the key attributes: limited overlap, balance, and government-wide priorities. These attributes focus on factors that make a system of multiple performance measures successful, and ODNI has developed just one measure. In addition, we excluded one of the key attributes related to an individual measure—having a baseline and deriving trend data. While this key attribute applies to an individual measure, we determined that it did not apply to our analysis of ODNI's measure at the time we conducted the analysis. ODNI officials stated that ODNI developed the investigations measure in 2019 and did not have sufficient time yet to accumulate historical data to determine a baseline and associated trends.

[7]GAO-16-89G.

[8]DOD Instruction 1400.25, vol. 250, *DOD Civilian Personnel Management System: Civilian Strategic Human Capital Planning (SHCP)* (June 7, 2016).

the enrollment of personnel in CE systems. We reviewed relevant documentation regarding the systems in which these data are stored and the processes to ensure that the data are complete and consistent. We also interviewed officials with knowledge of these data and systems at ODNI, DCSA, and our sample of agencies. We found the data we used to be sufficiently reliable for the purposes of this report.

For appendix II, we focused on recommendations that we determined were key to addressing our high-risk designation of the government-wide personnel security clearance process. We collected and analyzed information from ODNI, DCSA, OPM, and the PAC Program Management Office on actions they took as of spring 2021 to implement these key recommendations. For example, we reviewed ODNI documentation on CE metrics in response to a recommendation we made in 2017.

We conducted this performance audit from February 2020 to December 2021 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.

Appendix II: Status of Key GAO Personnel Security Clearance Process Recommendations to Executive Branch Agencies as of June 2021

We have made 27 recommendations from 2011 through 2017 that are key to addressing our high-risk designation of the government-wide personnel security clearance process. As of June 2021, the Office of Management and Budget (OMB), the Office of the Director of National Intelligence (ODNI), the Office of Personnel Management (OPM), and the Department of Defense (DOD) had taken actions to fully implement 15 of these recommendations. For example, in November 2017 we recommended that the Director of National Intelligence issue a Security Executive Agent Directive on continuous evaluation (CE) to formalize the program.[1] In January 2018 the Director of National Intelligence issued Security Executive Agent Directive 6, *Continuous Evaluation* (SEAD 6).[2]

However, OMB, ODNI, OPM, and DOD have not yet taken actions to implement 10 of these key recommendations, and with this report we add four recommendations that are also central to addressing our high-risk designation.[3] In our December 2017 report we found that the number of executive branch agencies that met established timeliness objectives for initial security clearances decreased from fiscal years 2012 through 2016.[4] To address this finding, we made two recommendations to the Director of National Intelligence.[5] While ODNI did not concur with our conclusions and recommendations, it has taken actions in response. See the recommendations and ODNI's actions summarized in table 3, below.[6]

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[1]GAO-18-117.

[2]Office of the Director of National Intelligence, Security Executive Agent Directive 6, *Continuous Evaluation* (Jan. 12, 2018).

[3]GAO closed two additional recommendations as not implemented. See footnotes 6 and 11.

[4]GAO-18-29.

[5]We also made four recommendations related to other findings to ODNI and OPM in GAO-18-29. As noted above, ODNI did not concur with our report's conclusions and recommendations. In contrast, OPM concurred with each of the three recommendations we made to it and has taken actions to fully implement each.

[6]In 2017, we recommended that the Director of National Intelligence establish a milestone for the completion of government-wide performance measures for the quality of investigations. In 2019, ODNI developed a performance measure to assess the quality of investigations. In May 2021, we decided to close this recommendation as not implemented because ODNI provided documentation demonstrating that it had developed and used the measure, but ODNI officials also told us that they had not established a milestone before completing the measure. However, as discussed earlier and in appendix III, ODNI stated in its response to our draft report that although it explored using this measure, it ultimately decided not to use it.

Table 3: Actions Taken by the Office of the Director of National Intelligence (ODNI) to Address Key Recommendations in GAO-18-29 (as of May 2021)

Recommendation	Actions taken
Conduct an evidence-based review of the investigation and adjudication timeliness objectives for completing the fastest 90 percent of initial secret and initial top secret security clearances.	In 2018 the Performance Accountability Council (PAC) Program Management Office began a review of the timeliness objectives, according to ODNI and PAC Program Management Office officials. These officials told us that when the PAC agrees on the specific steps that will be included in the revised personnel vetting processes under the Trusted Workforce 2.0 reform, the PAC Program Management Office will finalize its analysis of those steps to determine the time needed to complete them. Using that analysis, the PAC will establish a revised set of timeliness objectives. ODNI officials told us that they intend to include the revised timeliness objectives in Trusted Workforce 2.0 guidance, and that the revised objectives will be achievable with the reformed vetting processes. To fully implement this recommendation, the PAC needs to issue Trusted Workforce 2.0 guidance that contains the revised timeliness objectives.
Develop a government-wide plan, including goals and interim milestones, to meet those timeliness objectives for initial personnel security clearance investigations and adjudications.	As noted above, ODNI officials told us that they intend to revise timeliness objectives based on an analysis that the PAC Program Management Office is conducting. Officials told us that these revised objectives will be included in Trusted Workforce 2.0 guidance. Officials also told us that the government-wide plan to meet the revised objectives is the reformed personnel security clearance process in Trusted Workforce 2.0. To fully implement this recommendation, the PAC needs to issue Trusted Workforce 2.0 guidance that contains the revised timeliness objectives.

Source: GAO analysis of ODNI information. | GAO-22-104093

In addition, ODNI has not yet taken actions to implement three key recommendations that we made in a November 2017 report.[7] In particular, we found that ODNI lacked a plan to monitor and measure the performance of CE programs. We also reported that executive branch agencies meeting established timeliness goals for completing periodic reinvestigations decreased from fiscal years 2012 through 2016, and that the potential effects of CE, including on reinvestigations and resources, were unknown. To address these findings, we made three recommendations to the Director of National Intelligence.[8] ODNI generally concurred with our recommendations and has taken actions in response. See these recommendations and ODNI's actions summarized in table 4, below.

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[7]GAO-18-117.

[8]We also made three additional recommendations to ODNI in GAO-18-117. ODNI concurred with and implemented each of those recommendations.

Table 4: Actions Taken by the Office of the Director of National Intelligence (ODNI) to Address Key Recommendations in GAO-18-117 (as of May 2021)

Recommendation	Actions taken
Determine a process and schedule for agencies to regularly report to ODNI on performance measures for continuous evaluation programs. At a minimum, these performance measures should be clear, quantifiable, objective, and linked to measurable goals.	ODNI has developed and collected continuous evaluation metrics from some agencies. While metrics can help to establish a baseline and inform aspects of a program's status, performance measures are linked to a goal and inform how well agencies are doing against that goal. To fully implement this recommendation, ODNI needs to develop a set of measures that are linked to measurable goals to assess the performance of continuous evaluation programs and determine a process and schedule for agencies to regularly report to ODNI on these performance measures.
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.	In 2018 the Performance Accountability Council (PAC) Program Management Office began a review of the timeliness objectives, according to ODNI and PAC Program Management Office officials. These officials told us that when the PAC agrees on the specific steps that will be included in the revised personnel vetting processes under the Trusted Workforce 2.0 reform, the Office will finalize its analysis of those steps to determine the time needed to complete them. Using that analysis, the PAC will establish a revised set of timeliness objectives. ODNI officials told us that they intend to include the revised timeliness objectives in Trusted Workforce 2.0 guidance, and that the revised objectives will be achievable with the reformed vetting processes. To fully implement this recommendation, the PAC needs to issue Trusted Workforce 2.0 guidance that contains the revised timeliness objectives.
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.	ODNI has collected metrics and held working group discussions with some agencies about the resource impact of continuous evaluation, but has not assessed that impact or developed a plan to address potential effects across all implementing agencies. To fully implement this recommendation, ODNI needs to assess the effects of continuous evaluation on agency resources and develop a plan, in consultation with implementing agencies, to address those effects.

Source: GAO analysis of ODNI information. | GAO-22-104093

Further, we made three key recommendations in two reports we issued in 2017 and 2016 that OPM has not yet taken actions to implement. Following the 2015 data breaches, which included a compromise of OPM's systems and files related to background investigations for 21.5 million individuals, we issued the 2017 and 2016 reports on steps OPM took to improve the security of these systems. In particular, in 2017 we reported that the United States Computer Emergency Readiness Team (US-CERT) made 19 recommendations to OPM to improve its security posture following the 2015 data breach, but OPM had not validated actions taken to address the recommendations in a timely manner.[9] We also reported that OPM had not issued role-based training requirements for certain individuals to ensure that these individuals are properly using

[9]GAO, *Information Security: OPM Has Improved Controls, but Further Efforts Are Needed*, GAO-17-614 (Washington, D.C.: Aug. 3, 2017).

tools to monitor the security of the agency's information systems. Additionally, in 2016 we reported that OPM did not always ensure that individuals with significant security responsibilities received specialized training.[10]

To address these issues, we made three recommendations to OPM. OPM generally concurred with our recommendations and has taken actions in response to each. See the recommendations and OPM actions summarized in table 5, below.

Table 5: Actions Taken by the Office of Personnel Management (OPM) to Address Key Recommendations in GAO-17-614 and GAO-16-501 (as of May 2021)

Recommendation (report)	Actions taken
Improve the timeliness of validating evidence associated with actions taken to address the United States Computer Emergency Readiness Team recommendations. (GAO-17-614)	In March 2021 OPM stated that it is tracking the remaining two United States Computer Emergency Readiness Team recommendations in its remedial action management system. However, OPM does not expect that it will be able to complete, and to validate evidence associated with, the required actions to fully implement those recommendations in the near term. To fully implement the recommendation, OPM needs to promptly validate the effectiveness of the actions taken to implement the United States Computer Emergency Readiness Team recommendations.
Develop and implement role-based training requirements for staff using Continuous Diagnostics and Mitigation tools. (GAO-17-614)	In March 2021 OPM stated that it has corrective actions planned as part of its forthcoming cyber training initiative. The agency plans to pilot the initiative and use the results to identify additional training opportunities, including role-based security training. The agency also stated that additional actions are needed, such as coordinating across OPM programs to develop further system requirements and capabilities for providing and tracking specialized training for staff using Continuous Diagnostics and Mitigation tools. OPM expects full implementation in one or two years. To fully implement the recommendation, OPM needs to issue role-based training requirements for individuals who configure and maintain the deployed Continuous Diagnostics and Mitigation tools.
Provide and track specialized training for all individuals, including contractors, who have significant security responsibilities. (GAO-16-501)	In March 2021 OPM stated that corrective actions are planned as part of a forthcoming cyber training initiative. The agency plans to pilot the initiative and use the results to identify additional training opportunities for federal employees. OPM expects full implementation in one or two years. For contractors, the agency stated that the tracking of specialized training is best addressed through contractual requirements and oversight. To fully implement the recommendation, OPM needs to complete its efforts to provide and track training for federal employees with significant security responsibilities. The agency also needs to demonstrate that it has addressed the tracking of specialized training for contractors through contractual requirements and oversight.

Source: GAO analysis of OPM information. | GAO-22-104093

[10]GAO, *Information Security: Agencies Need to Improve Controls over Selected High-Impact Systems*, GAO-16-501 (Washington, D.C.: May 18, 2016).

Finally, we made two key recommendations in April 2015 that ODNI has not yet taken actions to implement.[11] We reported that the executive branch had not fully developed, implemented, or reported on government-wide results-oriented metrics for measuring the quality of background investigations. We also reported that executive branch agencies were not able to share information about investigations that contained derogatory information when an applicant withdrew the application before the investigation was adjudicated. In this scenario, agencies did not have a means to record any information about the investigation, and we reported that the applicant could subsequently submit an application to another agency that might not be aware of the prior investigation that had not been adjudicated. To address these issues, we made two recommendations to ODNI. While ODNI did not state whether it concurred with our recommendations, it has taken actions in response to each. See the recommendations and ODNI actions taken summarized in table 6, below.

Table 6: Executive Branch Agencies' Actions Taken to Address Key Recommendations in GAO-15-179SU (as of May 2021)

Agency	Recommendation	Actions taken
Office of the Director of National Intelligence (ODNI)	Develop, implement, and report to Congress on government-wide, results-oriented performance metrics to measure security clearance background investigation quality.	ODNI developed a performance measure to assess the extent to which investigation reports are complete and implemented it in fiscal year 2019. However, ODNI has not reported on the results of this measure to Congress. To fully implement this recommendation, ODNI needs to report to Congress on the results of its assessments of personnel security clearance background investigation quality.

[11]GAO decided to close an additional recommendation from this report as not implemented due to developments that made the recommendation obsolete. We recommended that the Deputy Director for Management of the Office of Management and Budget (OMB) develop long-term funding estimates for changes to the federal government's investigation practices resulting from the implementation of the 2012 *Federal Investigative Standards*. We decided to close this recommendation as not implemented because OMB did not take action to implement it and, according to PAC officials, the PAC was planning to revise those Federal Investigative Standards for the Trusted Workforce 2.0 reform—the effort to reform the personnel vetting processes.

Agency	Recommendation	Actions taken
ODNI	Develop procedures to require information-sharing between executive-branch agencies concerning incomplete investigations or adjudications that may affect the eligibility of an individual for a security clearance.	In November 2018 ODNI issued Security Executive Agent Directive 7, Reciprocity of Background Investigations and National Security Adjudications. This directive requires executive branch departments and agencies to ensure that unresolved issues and reciprocity denials related to clearance determinations are identified through the appropriate databases. However, the directive does not address a key gap we identified in our 2015 report. In particular, we found that when vetting a job applicant with a clearance granted by another agency, agencies are not able to share new derogatory information if the applicant withdraws the application before the investigation is adjudicated. In this scenario, agencies do not have a means to record information about the incomplete investigation and the applicant may subsequently submit an application to another agency that may not be aware of the prior unadjudicated investigation. To fully implement this recommendation, ODNI needs to require and develop the procedures for executive-branch agencies to share information about investigations that are partially completed but withdrawn by the applicant.

Source: GAO analysis of ODNI information. | GAO-22-104093

Appendix III: GAO Assessment of the Investigations Performance Measure Developed by the Office of the Director of National Intelligence (ODNI)

We assessed the performance measure that ODNI had developed for the quality of investigations against six of 10 key attributes for successful performance measures.[1] We did not evaluate the performance measure against three of the key attributes because those attributes focus on factors that make a system of multiple performance measures successful, and ODNI has developed just one measure.[2] In addition, we excluded one key attribute related to individual performance measures—having a baseline and deriving trend data. While the key attribute applies to individual measures, we determined that it did not apply to the measure ODNI developed. Over the course of our review, ODNI officials stated that they developed the investigations measure in 2019 and had not had sufficient time to accumulate historical data to determine a baseline and associated trends. However, in its comments on our draft report, ODNI informed us that it no longer plans to use the measure.

Nevertheless, as discussed earlier in this report, our assessment of the measure that ODNI had in place found that it demonstrated one key attribute, partially demonstrated a second key attribute, and did not demonstrate the remaining four key attributes.

- *Core program activities—Not demonstrated.* Performance measures should be scoped to evaluate all of the core activities of a program.[3] The performance measure ODNI developed covered only the investigation and reinvestigation phases of the clearance process, which limited its ability to carry out its oversight role to ensure the quality of the entire clearance process. Developing performance measures that focus on all core program activities will provide managers the information they need to manage performance and achieve the goals of the measures.

- *Linkage—Partially demonstrated.* Performance measures should align with an agency's goals; linkage is most effective when clearly communicated to all staff.[4] The performance measure was aligned with a government-wide goal to improve the investigative quality across the executive branch. However, ODNI officials stated that it did

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[1]GAO-03-143.

[2]The three key attributes that focus on factors that make a system of multiple performance measures successful that we excluded from our review are limited overlap, balance, and government-wide priorities.

[3]GAO-03-143.

[4]GAO-03-143.

not communicate that its measure existed to any of the executive branch agencies. ODNI officials told us the performance measure was an internal tool and communicating that the measure existed was not warranted. They also stated that knowledge of the measure could have incentivized agencies to artificially inflate their agencies' ratings by including investigations in their sample that were more likely to meet the *Quality Assessment Standards*. Communicating about performance measures helps agency personnel understand what the organization is trying to achieve.

- *Clarity—Not demonstrated.* A measure has clarity when it is clearly stated and the name and definition are consistent with the methodology used for calculating it.[5] ODNI did not clearly state how it defined the performance measure. In particular, ODNI provided GAO with three definitions for the measure. First, in a written description of the measure, ODNI stated that its performance measure was designed to assess the rate of investigations that conform to the *Quality Assessment Standards*, which encompass investigations that are *complete* or *justified-incomplete*. However, another section of the written description provided a second definition, stating that the measure called for 95 percent of investigations to be complete, but this definition did not account for *justified-incomplete* ratings. ODNI officials provided a third definition for the measure, stating that agencies were required to submit accurate and complete investigative documents with less than a 5 percent error rate. When measures are not clearly stated, users, such as the PAC, could misinterpret the results.

- *Measurable target—Demonstrated.* Performance measures should have measurable targets.[6] ODNI established a numerical goal for the measure. Our review of data provided by ODNI shows that ODNI included a measurable target in the performance measure. The data we reviewed show that ODNI used this measurable target by comparing agencies' performance against the target. Such targets enable agencies to compare actual performance to expectations and to assess whether the agency achieved the goals associated with the measure.

- *Objectivity—Not demonstrated.* Objective performance measures should be reasonably free of significant bias or manipulation that

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[5]GAO-03-143.

[6]GAO-03-143.

**Appendix III: GAO Assessment of the
Investigations Performance Measure
Developed by the Office of the Director of
National Intelligence (ODNI)**

would distort the accurate assessment of performance.[7] ODNI's method that it used for measuring performance may have introduced bias in the statistics it calculated using the data it collected for the measure. Combining data from investigations rated as *complete* with data from investigations rated as *justified-incomplete* may have led users of the data to overestimate the degree to which investigations met the *Federal Investigative Standards.* ODNI officials said that they combined these data because missing information *in justified-incomplete* investigations are not due to deficiencies in the quality of an investigator's work. However, users of the one statistic that ODNI calculated using the data it collects were not able to determine the percentage of investigations that fully met the *Federal Investigative Standards* and the percentage that were *justified-incomplete.* This bias limited the utility of the measure's results for decision-making. Objectivity is important because it adds credibility to the performance goals and measures by ensuring that significant bias or manipulation will not distort the measure.

- *Reliability—Not demonstrated.* Reliable measures are amenable to applying standard procedures for collecting data or calculating results so that they would be likely to produce the same results if applied repeatedly to the same situation.[8] The measure used unreliable data because guidance for agencies on sampling investigations lacks key details needed to ensure that the samples are selected in a reliable manner. Specifically, ODNI and OPM require agencies to select investigations randomly to assess using the *Quality Assessment Standards.* ODNI officials told us that the goal of the sample was to calculate statistics that are a representative measure of the quality of all completed investigations. To gather data that allow ODNI to meet its goal, the agencies need to select statistically random samples. However, the *Quality Assessment Standards* do not clarify that agencies must randomly select their sample from the total population of completed investigations so that every completed investigation has an opportunity to be selected in the sample consistent with ODNI's goal.[9]

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[7]GAO-03-143.

[8]GAO-03-143.

[9]A random and generalizable sample requires selecting cases with a known probability of selection and requires use of a tool to generate a random number, such as statistics programs. Without using such random selection processes, the results are not generalizable to the population of cases.

**Appendix III: GAO Assessment of the
Investigations Performance Measure
Developed by the Office of the Director of
National Intelligence (ODNI)**

In addition, the guidance calls for agencies to select and assess a sample of 5 percent of investigations and to document the results in a quality assessment tool, which ODNI would then access to obtain the data for its performance measure. ODNI did not base its decision to collect a 5 percent sample on a statistical analysis of the number of investigations needed per agency to create a representative sample, which is ODNI's goal. This type of analysis would take into account factors such as the number of investigations typically completed by an agency and an estimated error rate. As a result, some agencies with fewer cases likely do not report on enough cases, while agencies with a larger number of cases may report an unnecessarily high number of cases, leading to inefficiencies. Using unreliable data can lead to errors in collecting, maintaining, processing, and reporting data. Significant errors would affect conclusions about the extent to which performance goals have been achieved.

Appendix IV: Comments from the Office of the Director of National Intelligence

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE
WASHINGTON, DC

Mr. Brian M. Mazanec
Director
Defense Capabilities and Management   OCT 26 2021
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Mr. Mazanec:

We appreciate the opportunity to review and respond to the Government Accountability Office (GAO) draft report, Personnel Vetting: Actions Needed to Implement Reforms, Address Challenges, and Improve Planning (GAO-21-104093SU).

We welcome GAO's recognition that progress has been made to implement the Trusted Workforce (TW) 2.0 initiative, specifically with respect to reducing and eliminating the backlog of background investigations and developing a policy framework and needed IT systems to implement TW 2.0 reforms. We also appreciate GAO's finding that the Office of the Director of National Intelligence (ODNI) has now formalized Continuous Evaluation (CE) enrollment requirements through guidance documents and other issuances which will help ensure that federal agencies are enrolling their national security populations into a CE system.

With respect to GAO's proposed "Matter for Congressional Consideration," we would note that the ODNI has already developed performance measures to assess the efficacy and impact of CE automated record checks. These measures address the CE process (e.g. the conduct of a full suite of checks), outputs (e.g. total number of alerts and flags), and outcomes (e.g. number of actions as the result of alert/flags). Each performance measure maps to goals that include bridging information gaps between investigation cycles, increasing the frequency of security-relevant checks, and measuring the impact of CE on personnel security business processes and resources. Currently, the ODNI is using fiscal year (FY) 2020 metrics as the baseline for performance measure development and implementation, as the volume and frequency of CE checks did not fully reflect new investigative business processes until FY 2020.

Additional comments on more specific findings and recommendations in GAO's draft report are contained in the enclosure.

We also appreciate the opportunity to conduct a sensitivity review of the draft GAO report, the results of which have been orally communicated to your office through our Special Security Directorate in the National Counterintelligence and Security Center, in coordination with the Department of Defense, as requested.

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Mr. Brian M. Mazanec

    If you have any questions, you may contact Legislative Affairs at (703) 275-2474.

Sincerely,
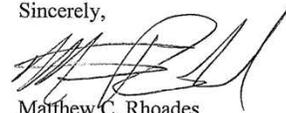
Matthew C. Rhoades
Assistant Director for
Legislative Affairs

Enclosure:
ODNI Response to Draft GAO-21-104093SU, Personnel Vetting: Actions Needed to Implement
Reforms, Address Challenges, and Improve Planning (U)

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ODNI Response to Draft GAO-21-104093SU, *Personnel Vetting: Actions Needed to
Implement Reforms, Address Challenges, and Improve Planning*

Page 21: "ODNI has not assessed the quality of all phases of the clearance process and its
investigations measure is not reliable."

Response: The ODNI oversight of personnel security programs embraces a multi-dimensional
approach that involves reviews and assessments of an agency's performance pursuant to
established requirements, of which the Quality Assessment Reporting Tool (QART) is but one
component. For instance, ODNI collects and assesses metrics on program timeliness pursuant to
the Intelligence Reform and Terrorism Prevention Act (IRTPA) that includes timeliness data on
the initiation, investigative and adjudicative phases of the process, and key indicators of an
agency's performance in the personnel security realm. Agency performance data is also
collected to document clearance volumes and the inventory of investigations and adjudications.
Finally, in complement to these performance measures, the ODNI as Security Executive Agent
(SecEA) conducts direct assessments of agencies' personnel security programs through the
SecEA National Assessment Program (SNAP). SNAP inspects agency personnel security
programs to review program performance from end to end (initiation-investigation-adjudication),
to include investigator and adjudicator training, adherence to reporting requirements,
adjudicative quality reviews, and the proper documentation of all vetting phases.

ODNI, through QART, has instituted a significant mechanism to facilitate comprehensive
performance evaluations of background investigations. As noted by GAO, quality assessment
standards are applied and implemented through QART to document the Investigative Service
Provider (ISP) performance in a number of its background investigations. ODNI will continue to
explore how to best leverage the data collected in QART to facilitate high-impact analysis and
better inform policy makers. One step that ODNI is taking to enhance QART performance is to
move the system to a cloud platform. This new iteration of QART, known as QART 2.0, will
enable easier access to more information by agencies and facilitate insightful analysis and
document trends of ISP performance. QART 2.0 capabilities will align with and better
implement additional quality measures that are under development in Trusted Workforce (TW)
2.0 reform, which embraces a commitment to quality assurance in personnel security vetting.

Page 22-23: "Investigations meet the quality standards if adjudicators rate them as (1) *complete*-
the investigation included all required components in the Federal Investigative Standards and all
issues resolved or (2) *justified-incomplete-the* investigation did not include all components
required by the Federal Investigative Standards, but also includes an explanation that the missing
information is impossible to obtain or reasonably exhaustive efforts were made to meet the
requirements, but the efforts were unsuccessful. The *Quality Assessment Standards* also require
executive branch agencies to randomly select and rate five percent of investigation reports and to
document the ratings in a quality reporting tool that provides the ratings to ODNI. ODNI
combines ratings on investigations that adjudicators rate as complete with those rated as
justified-incomplete and calculates one statistic showing the average number of investigations
that conform to the *Quality Assessment Standards*--that statistic is ODNI's investigations
performance measure."

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Response: The performance measure described by GAO is a fair representation of a calculus ODNI was considering for the use of the QART data. In exploring how to maximize the utility of QART data, ODNI evaluated the viability of combining complete ratings on investigations with those rated as *justified-incomplete* to derive performance evaluations. However, ODNI ultimately chose not to use the measure in practice. ODNI is committed to continuing these efforts to facilitate QART analysis that will provide actionable feedback to assessors, ISPs, and the ODNI. In the meantime, ODNI and OPM are implementing IRTPA to evaluate and report on agencies' timeliness performances in the different phases of the investigation and adjudication processes. Beyond the timeliness metric, ODNI and OPM will continue to develop new performance measures that will expand and enhance evaluations of the efficiency, timeliness, and integrity of each phase of the security clearance process under the TW 2.0 reform effort.

Page 23: "While ODNI has developed a measure to assess quality of investigations, its measure is not reliable…ODNI officials stated that they developed the investigations measure in 2019 and did not have sufficient time yet to accumulate historical data to determine a baseline and associated trends."

Response: As indicated above, ODNI did not actually employ the proposed investigations performance formula. ODNI had begun to explore options to develop better uses of investigations performance measures beginning in 2019, but did not implement them due to challenges in identifying and gathering the necessary metrics. For example, it was difficult to determine from the adjudicative case management systems (from the agencies that had them) how investigations deemed incomplete were handled in the final adjudicative process. Through TW 2.0, ODNI will work with OPM to examine the Quality Assessment Standards data in the QART tool to develop comprehensive performance measures that will render robust analysis.

Page 24: "Core program activities-not demonstrated. As discussed above, we found that ODNI's performance measure for assessing quality in background investigations only covers the investigation and reinvestigation phases of the clearance process. Without developing measures to evaluate the initiation and adjudication phases, ODNI cannot assess the quality of the entire clearance process. In addition, without such measures, it will have insufficient information to carry out its oversight role to ensure the quality of the entire clearance process."

Response: ODNI agrees to the objective of developing new quality measures to evaluate the initiation and adjudication phases of the security clearance process. As noted above, ODNI and OPM will continue to work on developing new performance measures that will accurately evaluate the end-to-end initiation-investigation-adjudication process in the TW 2.0 effort.

Page 24-25: "*Linkage-partially demonstrated.* We found that ODNI's performance measure is aligned with a government-wide goal to improve the investigative quality across the executive branch. However, ODNI officials stated that it has not communicated that its measure exists to any of the executive branch agencies, including investigative service providers that conduct investigations, despite assessing their performance using the measure. Further, ODNI has not communicated that its measure exists to agencies that rate the quality of investigations. ODNI

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officials told us the performance measure is an internal tool and these steps are not warranted. They also stated that knowledge of the measure could incentivize agencies to artificially inflate their agencies' ratings by including investigations in their sample that are more likely to meet the Quality Assessment Standards. Without communicating that the measure exists, personnel in investigative service providers and adjudicating agencies would not know how their day-to-day activities contribute to attaining the government-wide goal to improve the investigative quality across the Executive Branch."

Response: The Quality Assessment Standards and QART were both developed through a transparent, community-wide approach to assess the quality of background investigations and maintain an assessment tool that would obtain quality metrics across the Executive Branch. Moreover, through the multiple in-person and virtual QART training sessions hosted by ODNI, departments and agencies are reminded of the requirements to randomly select 5 percent of closed cases to provide quality assessments for ISP internal improvements. As ODNI and OPM work to develop additional investigative quality measures beyond those captured in the QART data as part of TW 2.0 reform, a communication strategy will be also designed to facilitate government-wide understanding of the newly crafted measures and to help agencies implement them effectively in practice.

Page 25: "*Clarity-not demonstrated*. We found that ODNI has not clearly stated how it defines its performance measure. In particular ODNI provided GAO with three definitions for the measure. First, in a written description of the measure, ODNI states that its performance measure is designed to assess the rate of investigations that conform to the Quality Assessment Standards, which encompass investigations that are complete or *justified-incomplete*. However, another section of the written description provides a second definition, stating that the measure is that 95 percent of investigations should be complete, but this definition did not account for justified-incomplete ratings. ODNI officials provided a third definition for the measure, stating that agencies are required to submit accurate and complete investigative documents with less than a five percent error rate. When measures are not clearly stated, users such as the PAC could misinterpret the results."

Response: As stated above, ODNI established QART to institute and begin performance measures of background investigations. In seminal efforts to leverage and optimize data collected in QART, ODNI looked at different potential formulas. The definitions mentioned above were exploratory in nature in this effort and were never implemented.

Page 26: "*Objectivity-not demonstrated*. We found that ODNI's method for measuring performance may introduce bias in the statistics it calculates using the data it collects for the measure. Combining data from investigations rated as complete with investigations rated as *justified-incomplete* may lead users of the results of the data to overestimate the degree to which investigations have met the *Federal Investigative Standards*. ODNI officials said that they combined these data because missing information in *justified-incomplete* investigations are not due to deficiencies in the quality of an investigator's work. However, users of the one statistic that ODNI calculates using the data it collects are not able to determine the percent of

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investigations that fully met the Federal Investigative Standards and the percent that were
justified-incomplete. This bias limits the utility of the measure's results for decision-making."

Response: While there is no qualitative difference between investigations that were able to
acquire all the information per the Federal Investigative Standards and those investigations that
were not able to acquire all the information for justifiable reasons (i.e., justified-incomplete),
ODNI concurs that combining the data on complete investigations with justified-incomplete
investigations provides an inexact measure. ODNI currently maintains data on these two
performance measures separately, and will continue to keep them distinct for purposes of
developing future investigations performance measures.

Page 26: "*Reliability-not demonstrated*. We found that guidance on sampling investigations
lacks key details needed to ensure the samples are selected in a reliable manner across all
agencies. Thus, the statistics ODNI calculates using data from the sample may be inaccurate,
impairing ODNI's ability to adequately monitor the investigations completed by Executive
Branch agencies.

ODNI and OPM require agencies to select cases randomly in an attempt to collect performance
measure data on the quality of investigations. ODNI officials told us that the goal of the sample
is to calculate statistics that are a representative measure of the quality of all completed
investigations. To gather data that allows ODNI to meet its goal, the agencies need to select
statistically random samples. However, the Quality Assessment Standards do not clarify that
agencies must randomly select their sample from the total population of completed investigations
so that every completed investigation has an opportunity to be selected in the sample. Without
requiring statistically random selection in the guidance provided to agencies, ODNI lacks
assurances that the data it receives are representative of the full population of clearance
investigations, which is ODNI's goal."

Response: ODNI will work with OPM to update guidance that has been provided to departments
and agencies regarding the random selection of five percent of their investigations for quality
assessment (per the Quality Assessment Standards). Depending on the technical capabilities,
guidance could recommend that agencies with case management systems automate the random
selection of cases. Through this capability, agencies with case management systems could better
trace and account for case selection history.

Page 27: "In addition, the guidance also calls for agencies to select and assess a sample of five
percent of investigations and document the results in a quality assessment tool, which ODNI then
accesses for its performance measure. ODNI did not base its decision to collect a five percent
sample on a statistical analysis of the number of investigations needed per agency to create a
representative sample, which is ODNI's goal. This type of analysis would take into account
factors such as the number of investigations typically completed by an agency and an estimated
error rate. As a result, some agencies with fewer cases likely do not report on enough cases
while agencies with larger number of cases may report an unnecessarily high number of cases,
leading to inefficiencies. Without a formal statistical analysis to determine the number of cases

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to sample per agency, it is unlikely that agency samples are sized appropriately to efficiently produce results that are representative of all investigations."

Response: ODNI agrees and will work with OPM to evaluate whether a five percent sample is statistically significant or adequately demonstrative to be used as a representative sample and revise, as appropriate.

Page 27: "ODNI officials acknowledged the need to develop additional performance measures to enable monitoring of all phases of the clearance process. As we discussed earlier, ODNI and OPM officials stated that they are developing additional policies for Trusted Workforce 2.0 and in one set of policies they plan to establish other performance measures. In addition, a PAC Performance Management Office official acknowledged that it would be important to align any additional performance measures the PAC develops with leading practices. The official stated that the PAC is using GAO's key attributes criteria to guide efforts to develop the measures, but did not have documentation of this effort.

Developing measures for assessing the quality of the initiation and adjudication phases that align with the key attributes for successful measures, would enable ODNI, the PAC Chair, and other PAC Principals to perform their oversight roles more effectively. In addition, aligning the investigations performance measure with key attributes of successful performance measures would provide these decision makers with more reliable information on the quality of investigations."

Response: The Executive Branch agencies who have oversight authority (ODNI and OPM) will work with the Performance Accountability Council, Program Management Office (PAC PMO) and its principals to develop additional performance measures that QART 2.0 can help implement. This effort to facilitate the analysis of metrics on background investigations will help identify trends and areas in need of attention to inform assessors and ISPs, as well as policy makers as they continually develop TW 2.0 to strengthen and modernize personnel security vetting.

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Appendix V: Comments from the Department of Defense

OFFICE OF THE UNDER SECRETARY OF DEFENSE
5000 DEFENSE PENTAGON
WASHINGTON, DC 20301-5000

**INTELLIGENCE
AND SECURITY**

September 15, 2021

Mr. Brian Mazanec
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Mazanec:

This is the Department of Defense response to the GAO Draft Report, GAO-21-104093SU, "PERSONNEL VETTING: Actions Needed to Implement Reforms, Address Challenges, and Improve Planning," dated August 13, 2021 (GAO Code 104093). The Department's response to the subject report is attached. My point of contact is Mr. Roger Smith, who can be reached at roger.a.smith127.civ@mail.mil or (703) 697-8065.

Sincerely,

REID.GARRY.PAUL.1072277860
Digitally signed by
REID.GARRY.PAUL.1072277860
Date: 2021.09.15 15:13:35 -04'00'

Garry P. Reid
Director for Defense Intelligence
  Counterintelligence, Law Enforcement,
  & Security

Attachment:
As stated

**GAO DRAFT REPORT DATED AUGUST 13, 2021
GAO-21-104093SU (GAO CODE 104093)**

**"PERSONNEL VETTING: ACTIONS NEEDED TO IMPLEMENT REFORMS,
ADDRESS CHALLENGES, AND IMPROVE PLANNING"**

**DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATIONS**

RECOMMENDATION 3: The Secretary of Defense should ensure that the DCSA Director
revises the NBIS system schedule to meet all the characteristics of a reliable schedule as defined
in GAO's best practice guides for scheduling and Agile software development.

DoD RESPONSE: Concur. In March 2020, the incoming DCSA Director conducted a full
assessment of NBIS and established a revised program schedule. On October 1, 2020, NBIS
resources and personnel were realigned from the Defense Information Systems Agency (DISA)
to DCSA under an Executive Program Manager. DCSA subsequently re-baselined the NBIS
plan of action and milestones, and further aligned program milestones with new vetting
requirements dictated at the Federal level.   Moreover, the Executive Program Manager was
aligned as a direct report to the DCSA Director to reflect the importance of the new deployment
schedule.

　　　Since being realigned to DCSA on October 1, 2020, the NBIS program has achieved six
quarterly milestones on or ahead of schedule. The NBIS Executive Program Manager will
continue to refine program milestones based on resourcing and evolving policy requirements
using Agile software development best practices.

RECOMMENDATION 4: The Secretary of Defense should ensure that the DCSA Director
establishes a milestone for completing strategic workforce planning and issues a strategic
workforce plan for DCSA's entire personnel vetting workforce.

　　　DoD RESPONSE: Concur. This effort is under way in concert with a broader strategic
plan for DCSA. It has been less than a year since DCSA finalized additional mission transfers
from DISA, the Defense Manpower Data Center, the Defense Intelligence Agency, and the
Office of Personnel Management (OPM), bringing almost 1,000 new government employees and
contractor personnel into the DCSA workforce. This was in addition to the previous transfer in
October 2019 of more than 14,000 government employees and contractor personnel from OPM's
National Background Investigations Bureau and the DoD Consolidated Adjudications Facility.
These mission realignments occurred during a dynamic operational and policy environment —
not just with personnel vetting (PV) and Trusted Workforce, but also within the other DCSA
mission areas.

　　　To ensure the long-term success of workforce planning, DCSA's strategic workforce plan
will encompass the entire civilian workforce — including personnel vetting — and will be
aligned with the Agency's strategic plan.

Appendix VI: GAO Contact and Staff Acknowledgments

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Staff Acknowledgments	In addition to the contact named above, Kimberly Seay (Assistant Director), James P. Klein (Analyst-in-Charge), Carolyn Demaree, Emile Ettedgui, Suzanne Kaasa, Jeffrey Knott, Jason Lee, Alberto Leff, Amie Lesser, Parke Nicholson, Mike Shaughnessy, and Cheryl Weissman made key contributions to this report.

Related GAO Products

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