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Comptroller General
of the United States

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June 17, 2024

The Honorable Avril Haines
Director of National Intelligence
Office of the Director of National Intelligence
Washington, D.C. 20511

Priority Open Recommendations: Office of the Director of National Intelligence

Dear Director Haines:

The purpose of this letter is to provide an update on the overall status of the Office of the Director of National Intelligence’s (ODNI) implementation of GAO’s recommendations and to call your continued personal attention to areas in which GAO’s open recommendations should be given high priority.¹ Our work on Intelligence Community (IC) oversight has generated numerous recommendations to help enhance the efficiency and effectiveness of the IC. We positively note ODNI’s recent focus and progress on closing recommendations; however, its implementation rate still lags significantly behind the government-wide average. Specifically, in November 2023, we reported that on a government-wide basis, 75 percent of our recommendations made 4 years ago were implemented.² ODNI had a four-year implementation rate of 42 percent.³

As of May 2024, ODNI had 46 open recommendations.⁴ Fully implementing these open recommendations could significantly improve agency operations.

Since our May 2023 letter, ODNI has implemented eight of the 19 open priority recommendations, and we closed one priority recommendation as no longer relevant.

¹Priority open recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operation, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

²GAO, *Performance and Accountability Report: Fiscal Year 2023*, [GAO-24-900483](#), (Washington, D.C.: Nov. 15, 2023).

³As of May 2024, ODNI’s rate of implementation for all the recommendations we have made since 2011 was 52 percent.

⁴In September 2023, we reported that ODNI had 63 open recommendations, for an implementation rate of 31 percent of all recommendations we have made since 2011. Since we reported on the status of these open recommendations, ODNI has taken steps to implement 17 additional recommendations. GAO, *Status of Open GAO Recommendations Made to the Director of National Intelligence*, [GAO-23-106892](#) (Washington, DC: Sept. 29, 2023).

- ODNI provided evidence of guidance on (1) enhancing oversight of IC facilities and (2) capital investment decision-making for IC facilities in response to two recommendations in our 2016 report.⁵
- ODNI developed an inventory of IC business systems consistent with our 2018 recommendation.⁶
- In response to our two recommendations in 2019, ODNI developed results-oriented goals and milestones for the program designed to increase the pool of culturally and ethnically diverse eligible job applicants for the IC; it also developed roles and responsibilities for IC element participation in this program.⁷
- ODNI provided documentation of the steps taken to prioritize automating the office's hiring process consistent with our recommendation.⁸
- ODNI, in coordination with the Office of Personnel Management (OPM), issued the Federal Personnel Vetting Performance Management Standards Implementation Guidance. This new guidance is consistent with two recommendations we made in 2017 and 2021 that (1) ODNI develop performance measures for continuous vetting and (2) develop guidance that includes multiple measures to assess the quality of all phases of the personnel security clearance process. This guidance includes three quantifiable measures related to continuous vetting and multiple measures to assess the quality of all phases.⁹
- We determined that one recommendation on timeliness of periodic reinvestigations for security clearances was no longer relevant. As a part of the Trusted Workforce 2.0—an effort to reform the federal government's personnel vetting system—ODNI and OPM issued policies that state enrollment in a continuous vetting capability satisfies the requirement of a periodic reinvestigation, rendering our recommendation no longer relevant.¹⁰

We ask that you direct your continued attention to the remaining 10 priority recommendations identified in last year's letter. Additionally, we are adding five new recommendations related to

⁵GAO, *Intelligence Community: Actions Needed to Enhance Oversight for Capital Decision Making for Facilities*, GAO-16-69C (Washington, DC: Mar. 29, 2016).

⁶GAO, *Intelligence Community: Actions Needed to Enhance Oversight of Business Functions and Systems*, GAO-18-584SU (Washington, DC: Sept. 21, 2018).

⁷GAO, *Intelligence Community: Actions Needed to Improve Planning and Oversight of the Centers for Academic Excellence Program*, GAO-19-529 (Washington, D.C.: Aug. 1, 2019).

⁸GAO, *Intelligence Community: Additional Guidance, Collaboration, and Automation Would Help Enhance the Hiring Process*, GAO-20-14SU (Washington, D.C.: Oct. 2, 2019).

⁹GAO, *Personnel Security Clearances: Plans Needed to Fully Implement and Oversee Continuous Evaluation of Clearance Holders*, GAO-18-117 (Washington, DC: Nov. 21, 2017); *Personnel Vetting: Actions Needed to Implement Reforms, Address Challenges, and Improve Planning*, GAO-22-104093 (Washington, D.C.: Dec. 9, 2021).

¹⁰GAO-18-117.

intelligence enterprise management, infrastructure and facilities, and personnel vetting, bringing the total number of priority recommendations to 15.

The classified enclosure to this letter identifies the 15 priority recommendations, of which several are classified, that directly address challenges in IC management and have an effect on the IC's ability to accomplish its mission.¹¹ By fully implementing these recommendations, ODNI could improve its ability to help ensure that the IC best manages its workforce and infrastructure and improve the IC's ability to efficiently and effectively perform mission activities. We ask for your continued attention to these 15 priority recommendations, which fall into the following four areas:

- **Intelligence Enterprise Management.** We have six priority recommendations related to IC enterprise business functions, systems, and organizations.
- **Infrastructure and Facilities.** We have one priority recommendation related to planning and management of IC infrastructure and facility projects.
- **Workforce Management.** We have four priority recommendations related to IC human capital and talent management.
- **Personnel Vetting.** We have four priority recommendations related to the personnel vetting and security clearance process.

In April 2023, we issued our biennial update to our [High-Risk List](#). This list identified government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement.¹² It also identified the need for transformation to address economy, efficiency, or effectiveness challenges.¹³

ODNI has key responsibilities related to one of our high-risk areas—the [government-wide personnel security clearance process](#). While we have identified some progress in addressing this high-risk issue, we currently have four priority recommendations directed to ODNI regarding personnel vetting. These recommendations are focused on reciprocity of security clearances and ensuring the timely completion of investigations and adjudications.

Several other government-wide high-risk areas also have direct implications for ODNI and its operations. These include (1) [improving the management of IT acquisitions and operations](#), (2)

¹¹Due to the classified nature of some of the recommendations, additional details on the priority recommendations in the four key areas noted in the letter, including a complete list of all the priority recommendations, report details, and contact information, are in the classified enclosure to this letter.

¹²GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to Be Maintained and Expanded to Fully Address All Areas*, [GAO-23-106203](#) (Washington, D.C.: Apr. 20, 2023).

¹³In January 2018, we added the government-wide personnel security clearance process to our High-Risk List. In our most recent High-Risk report issued in April 2023, we reported that the agencies responsible for reforming the personnel security clearance process have made considerable progress in implementing Trusted Workforce 2.0. Trusted Workforce 2.0 is designed to transform and align the three personnel vetting processes that determine: eligibility to access classified information or to hold a sensitive position (personnel security clearance process), suitability for government employment or fitness to work on behalf of the government (suitability/fitness process), and eligibility to access agency systems or facilities (personnel credentialing process). See [GAO-23-106203](#).

improving strategic human capital management, (3) managing federal real property, and (4) ensuring the cybersecurity of the nation.¹⁴

We urge your attention to the ODNI-specific and government-wide high-risk issues. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget, and the leadership and staff in agencies, including within ODNI. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.¹⁵

In addition to your attention on these issues, we recognize Congress plays a key role in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 included a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.¹⁶

Congress can use various strategies to address our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on ODNI's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress could follow up during the appropriations process and request periodic updates.

Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress could pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

Copies of this letter are being sent to the Director of the Office of Management and Budget and appropriate congressional committees. In addition, the letter will be available on the GAO website at [Priority Open Recommendation Letters | U.S. GAO](#).

I appreciate ODNI's continued commitment to these important issues, especially as the United States faces an increasingly complex and interconnected global security environment marked by the growing specter of strategic competition and conflict. If you have any questions or would like to discuss any of the issues outlined in the letter, please do not hesitate to contact me or Cathleen A. Berrick, Managing Director, Defense Capabilities and Management, at berrickc@gao.gov or 202-512-3404. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Our teams will continue to

¹⁴With regard to cybersecurity, we also urge you to use foundational information and communications technology supply chain risk management practices set forth in our December 2020 report, *GAO, Information Technology: Federal Agencies Need to Take Urgent Action to Manage Supply Chain Risks*, [GAO-21-171](#) (Washington, D.C.: Dec. 15, 2020).

¹⁵GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

¹⁶James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2).

coordinate with your staff on the 46 open recommendations as well as those additional recommendations in the high-risk areas for which ODNI has a role. Thank you for your office's attention to these matters.

Sincerely,

A handwritten signature in black ink that reads "Gene L. Dodaro". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Gene L. Dodaro
Comptroller General of the United States

Enclosure

cc: The Honorable Shalanda Young, Director, Office of Management and Budget