



U.S. DEPARTMENT OF HOMELAND SECURITY **OFFICE OF INSPECTOR GENERAL**

OIG-24-43

August 8, 2024

FINAL REPORT

DHS Has Made Progress in Implementing an Enhanced Personnel Vetting Program





OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

Washington, DC 20528 | www.oig.dhs.gov

August 8, 2024

MEMORANDUM FOR: Richard D. McComb
Chief of Security Officer
Office of the Chief Security Officer

FROM: Joseph V. Cuffari, Ph.D. **JOSEPH V
CUFFARI** Digitally signed by
Inspector General JOSEPH V CUFFARI
Date: 2024.08.08
08:21:22 -04'00'

SUBJECT: *DHS Has Made Progress in Implementing an Enhanced Personnel Vetting Program*

Attached for your information is our final report, *DHS Has Made Progress in Implementing an Enhanced Personnel Vetting Program*. The report identifies DHS' progress toward implementing an enhanced personnel vetting program. Your office chose not to submit management comments to the draft report. The report contains no recommendations.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please contact me with any questions, or your staff may contact Kristen Bernard, Deputy Inspector General for Audits, at (202) 981-6000.

Attachment



DHS OIG HIGHLIGHTS

DHS Has Made Progress in Implementing an Enhanced Personnel Vetting Program

August 8, 2024

Why We Did This Evaluation

According to Title 5 of the United States Code, section 11001, the Director of National Intelligence is required to direct each Federal agency to implement a program to provide enhanced security review of individuals eligible for access to classified information or eligible to hold a sensitive position. We conducted this evaluation to determine the Department of Homeland Security's progress toward implementing an enhanced personnel vetting program.

What We Recommend

This report does not contain recommendations.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at: DHS-OIG.OfficePublicAffairs@oig.dhs.gov.

What We Found

DHS has made progress toward implementing Trusted Workforce 2.0, a government-wide reform that, when fully implemented, would modernize the security clearance process by shifting to continuous vetting of individuals who have access to sensitive information. Trusted Workforce 2.0 is being implemented in phases, with full implementation expected on March 30, 2026.

DHS' Office of the Chief Security Officer (OCSO) leads the Department in implementing Trusted Workforce 2.0. According to OCSO officials, actions they have taken to implement Trusted Workforce 2.0 include enrolling employees into continuous vetting services and tracking performance metrics. Those metrics include, for example, the number of employees and contractors enrolled in continuous vetting services; the number of investigations initiated, pending, discontinued, and completed; and the average time to complete a personnel vetting process. OCSO officials also stated that they have deployed an online portal DHS employees and contractors can use to self-report security-related information (e.g., foreign travel).

OCSO officials cited reliance on other Federal agencies' continuous vetting systems and services, and funding as challenges to full implementation of Trusted Workforce 2.0. OCSO officials stated they are working with the Office of the Director of National Intelligence, National Counterintelligence and Security Center, and the Department on these issues.

DHS Response

OCSO chose not to submit management comments to the draft report.



Background

In December 2015, Title 5 of the United States Code (U.S.C.), section 11001, as amended, required the Director of National Intelligence to direct each agency to implement a program to provide enhanced security review of individuals eligible to access to classified information or hold sensitive positions no later than December 18, 2020.¹ These individuals are either Federal employees or private contractors performing work for the Government. According to the legislation, an agency's enhanced personnel security program must integrate information from various sources, including government, publicly available sources, commercial data sources, consumer reporting agencies, social media, and other sources as determined by the Director of National Intelligence. The legislation required the heads of agencies to conduct automated record checks of information from those sources at least twice every 5 years to ensure covered individuals are still eligible for access to classified information and hold sensitive positions. Lastly, the legislation required the Inspector General of each Federal agency to assess the effectiveness and fairness of the program in accordance with performance measures and standards established by the Director of National Intelligence.

In March 2018, the Office of the Director of National Intelligence (ODNI), the Office of Personnel Management, and other principal Federal agencies launched the Trusted Workforce 2.0 reform to overhaul the personnel vetting process across the Federal Government. According to this group, known as the Security, Suitability, and Credentialing Performance Accountability Council,² Trusted Workforce 2.0 "aims to fundamentally transform how personnel vetting is conducted and ensure the right people have access to the right information by shifting to continuous vetting as well as issuing relevant policies that modernize the process and increase speed and security"³ In April 2022, the Council issued the *Trusted Workforce 2.0 Implementation Strategy*, which established guidance for implementing Trusted Workforce 2.0 in phases.⁴ In September 2023, the Council extended the milestone for full Trusted Workforce 2.0 implementation, originally scheduled for the end of fiscal year 2024, to March 30, 2026. The Council publishes quarterly reports on the Government's progress toward implementing the strategy.

¹ According to 5 U.S.C. § 11001(a), *Enhanced Personnel Security Program*, as amended, the Department of Homeland Security needed to implement the program within 5 years of the enactment of the Intelligence Authorization Act for FY 2016 (Public Law 114-113, Subpart J, Chapter 110, Section 11001), which occurred on December 18, 2015.

² The Security, Suitability, and Credentialing Performance Accountability Council drives government-wide implementation of security, suitability, and credentialing reform. The principal agencies in the Council include ODNI, the Office of Personnel Management, the Office of Management and Budget, and the Department of Defense.

³ See the Security, Suitability, and Credentialing Performance Accountability Council's *Trusted Workforce 2.0 Personnel Vetting Quarterly Progress Report Update, FY22 Q1*.

⁴ Phase 1 was focused on preparing agencies for change by addressing the background investigation inventory and improving the timeliness of investigations. Phase 2 focuses on transforming personnel vetting across the Government and is divided into three sub-phases: Phase 2a established a new personnel vetting framework; Phase 2b implements the transitional states of continuous vetting called Trusted Workforce 1.25 and Trusted Workforce 1.5; and Phase 2c focuses on fully implementing Trusted Workforce 2.0.



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

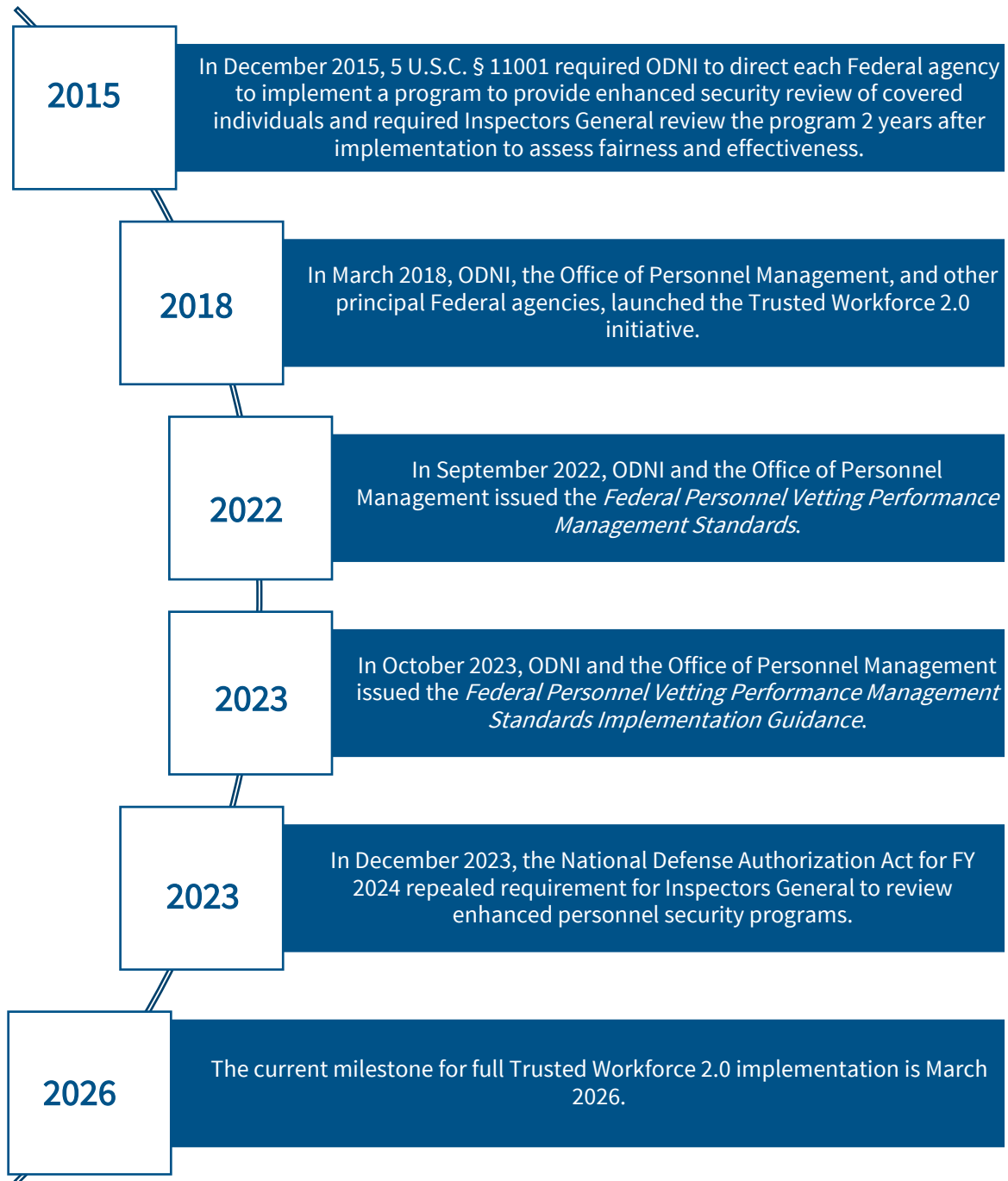
In September 2022, as part of the effort to implement Trusted Workforce 2.0, ODNI and the Office of Personnel Management issued the *Federal Personnel Vetting Performance Management Standards*, which established the minimum performance metrics to assess the success of personnel vetting programs and policies, and the minimum requirements for quality management programs. In October 2023, they issued the *Federal Personnel Vetting Performance Management Standards Implementation Guidance*, which provided additional descriptions, timeframes, and targets for reporting the performance metrics to ODNI; added subordinate metrics; and outlined the requirements and timelines for implementing a quality management program.

In September 2023, we began an inspection to assess the Department's implementation of a fair and effective enhanced personnel security program in accordance with performance measures and standards established by the Director of National Intelligence. However, in December 2023, the National Defense Authorization Act for FY 2024 repealed the requirement for Inspectors General to assess the effectiveness and fairness of their respective agency's enhanced personnel security program. Because DHS has until March 2026 to implement Trusted Workforce 2.0, we determined that an evaluation of DHS' progress toward implementing an enhance personnel vetting program is more appropriate at this time. As a result, we are reporting on DHS' progress toward implementing Trusted Workforce 2.0 as of June 2024.

Figure 1 shows key dates with respect to the enhanced personnel security program.



Figure 1. Timeline of Enhanced Personnel Security Program Implementation



Source: DHS Office of Inspector General analysis of public laws; ODNI and Office of Personnel Management policies and guidance; and Security, Suitability, and Credentialing Performance Accountability Council policies and guidance



Results of Evaluation

DHS Has Made Progress in Implementing Trusted Workforce 2.0

DHS has made progress toward implementing Trusted Workforce 2.0, which according to officials, will exceed the requirements set forth in 5 U.S.C. § 11001 for an enhanced personnel security program. The DHS Secretary designated the Under Secretary for Management as the Senior Implementation Official accountable for implementing Trusted Workforce 2.0. In July 2021, DHS developed the *Trusted Workforce 2.0 Implementation Plan* and assigned the Office of the Chief Security Officer (OCSO)⁵ to lead the Department to achieve the goals set forth in the plan. DHS designed the plan to provide a pathway for the Department to implement continuous vetting (a central goal of the Trusted Workforce 2.0 program) and set goals to assist it in moving toward a fully compliant program. The plan provides supplemental guidance for DHS, including outlining timeframes for implementation completion, stakeholder roles and responsibilities, budgeting, necessary training, and performance measurement deliverables.

What Continuous Vetting Is and How It Works

Continuous vetting is a process that involves regularly reviewing a cleared individual's background to ensure they continue to meet security clearance requirements and can continue to hold positions of trust. Automated record checks pull data from criminal, terrorism, and financial databases, as well as public records, at any time during an individual's period of eligibility. The continuous vetting capability replaces clearance investigations, which traditionally occurred every 5 or 10 years.

Source: Defense Counterintelligence and Security Agency

In addition to developing an implementation plan, OCSO officials also have been tracking and reporting performance metrics to ODNI since FY 2018 through a standardized reporting document designed by ODNI. The *Federal Personnel Vetting Performance Management Standards* identifies 27 performance metrics that agencies should use when assessing the success of their personnel vetting programs and policies. The *Federal Personnel Vetting Performance Management Standards Implementation Guidance* added another 16 subordinate metrics, bringing the total to 43 metrics that, if applicable, agencies

should track. OCSO officials stated that 38 of these performance metrics will be applicable to DHS when Trusted Workforce 2.0 is fully implemented. Of these, OCSO officials are currently tracking 15 and reporting on 9 of them. The nine performance metrics OCSO officials are reporting or partially reporting⁶ to ODNI are:

⁵ OCSO provides enterprise-wide security solutions to protect the Department's people, information, and resources against constant evolving threats and is organizationally located within the Management Directorate of DHS.

⁶ OCSO is not yet reporting 1) the percentage of completed and pending adjudications, and 2) the percentage of adverse (e.g., denial, revocation, debarment, removal) or administrative (e.g., suspension, reinstatement) vetting actions.



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

1. number of investigations [for the purpose of obtaining or maintaining a security clearance] initiated, pending, discontinued, and completed;
2. number of completed and pending adjudications;
3. number of adverse (e.g., denial, revocation, debarment, removal) or administrative (e.g., suspension, reinstatement) vetting actions;
4. number of exceptions;
5. number of trust determinations currently undergoing appeal;
6. average time to complete the end-to-end personnel vetting process;
7. average time to complete the initiation of an investigation for any vetting scenario;
8. average time to make a trust determination based on the completed investigation for any vetting scenario; and
9. population size (the number of employees and contractors eligible and enrolled in continuous vetting).

OCSO officials also stated that they have taken other actions toward implementing Trusted Workforce 2.0. For example, OCSO officials said DHS has:

- Certified to ODNI DHS' compliance with the minimum standards for Trusted Workforce 1.25 by enrolling DHS employees eligible to occupy a national security position⁷ into continuous vetting capabilities with at least three automated record checks in August 2021, ahead of the Trusted Workforce 1.25 deadline of September 2021.
- Certified to ODNI DHS' compliance with the minimum standards for Trusted Workforce 1.5 by enrolling DHS employees eligible to occupy a national security position into continuous vetting capabilities with seven automated record checks in March 2022. In May 2022 ODNI concurred that DHS' continuous vetting program satisfies the minimum required standards for Trusted Workforce 1.5. As of May 1, 2024, DHS has enrolled approximately 198,000 employees into continuous vetting capabilities at the Trusted Workforce 1.5 level.
- As of May 1, 2024, enrolled over 259,000 DHS employees and non-sensitive public trust contractors in the Federal Bureau of Investigation's Rap Back program⁸ (a service that

⁷ "National security eligible" is a determination of eligibility for access to classified information or eligibility to hold a sensitive position, to include access to sensitive or compartmented information, restricted data, and controlled or special access program information. According to OCSO officials, DHS' national security eligible population includes employees and contractors with an active security clearance as well as those in a sensitive position with no access to classified information. DHS relies on the Defense Counterintelligence and Security Agency to enroll DHS contractors on classified national security contracts into continuous vetting.

⁸ DHS relies on the Defense Counterintelligence and Security Agency's systems and services to enroll DHS employees into the Federal Bureau of Investigation's Rap Back program. OCSO officials stated that to fully implement Trusted Workforce 2.0, DHS must enroll all employees and contractors into the Rap Back program.



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

provides notifications of criminal activity). DHS' enrollment accounts for approximately one third of the entire Federal Government's Rap Back enrollment.

- Established methods to monitor and collect DHS components' metrics regarding the performance of their individual personnel security programs.
- Established six working groups including the Trusted Workforce Executive Steering Committee (a committee that tracks Trusted Workforce implementation status across the Department) and the Trusted Workforce Communications Working Group (a group that assists in the development of communications products to inform the DHS workforce about Trusted Workforce, including continuous vetting enrollment).
- Procured and implemented the Continuous Vetting and Analytics Service, an enterprise solution for continuous vetting that uses a subset of artificial intelligence, specifically, robotic process automation to remove repetitive tasks allowing practitioners to process personnel and actions in a more efficient manner.
- Developed, piloted, and deployed an online portal for DHS employees and contractors to self-report security related information, such as foreign travel or criminal activity, and comply with reporting requirements for personnel with access to classified information established by ODNI.

Although they have taken actions to implement Trusted Workforce 2.0, OCSO officials cited reliance on other Federal agencies for information technology (IT) systems as a challenge to full implementation. For example, DHS relies on ODNI's Continuous Evaluation System⁹ to conduct continuous vetting of its employees in the national security eligible population. The Continuous Evaluation System conducts automated record checks of security-relevant information over this population, and according to ODNI, this capability is "the cornerstone of security clearance transformation efforts within the Trusted Workforce 2.0 framework and the move toward government-wide continuous vetting." OCSO officials further added that for DHS to fully implement Trusted Workforce 2.0, they must also enroll employees outside of the national security eligible population into continuous vetting, including those in the "non-sensitive public trust" and "low risk" populations. However, OCSO officials stated that current services are only offered to the national security eligible population. According to the Security, Suitability, and Credentialing Performance Accountability Council, the Defense Counterintelligence and Security Agency¹⁰ was scheduled to offer the capability to enroll non-sensitive public trust positions into continuous vetting in October 2023, but this capability has been delayed until October 2024 to

⁹ The Continuous Evaluation System is an IT system that conducts automated record checks for terrorism, criminal activity, eligibility, foreign travel, financial activity, credit, and public records.

¹⁰ The Defense Counterintelligence and Security Agency is the largest investigative service provider in the Federal Government and conducts background investigations for 95 percent of the Federal Government, including DHS.



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

resolve challenges with data sources and population expansion.¹¹ OCSO officials stated that they are working with ODNI, National Counterintelligence and Security Center, to help resolve these issues for the wider Federal Government.

OCSO officials added that DHS also relies on the Defense Counterintelligence and Security Agency for the National Background Investigation Services¹² mandatory shared services to meet continuous vetting requirements. However, they stated that additional functionalities are not yet fully available within the National Background Investigation Services. The officials emphasized that additional functionalities planned for these systems are fundamental to their ability to fully implement Trusted Workforce 2.0. OCSO officials noted that DHS cannot fully transition to the system as a replacement for DHS' legacy Integrated Security Management System¹³ because National Background Investigation Services does not have equivalent baseline and key functionalities that DHS currently depends on.

OCSO officials also cited funding as another challenge to full implementation of Trusted Workforce 2.0. For example, they stated that funding will be needed to replace the Department's legacy Integrated Security Management System, which will reach the end of its product life cycle in FY 2025. OCSO officials stated they are working with the Department to secure funding for the modernization of the Integrated Security Management System, which is critical to DHS achieving full implementation of Trusted Workforce 2.0.

Because implementation of the Trusted Workforce 2.0 reform is ongoing, we are making no recommendations at this time.

Management Comments and OIG Analysis

OCSO chose not to submit management comments to the draft report. However, OCSO submitted technical comments to the draft report, and we revised the report as appropriate.

¹¹ See the Security, Suitability, and Credentialing Performance Accountability Council's *Trusted Workforce 2.0 Personnel Vetting Quarterly Progress Update, FY 24 Q1*, January 2024; and *Trusted Workforce 2.0 Implementation Strategy*, March 2024.

¹² The National Background Investigation Services is an IT system that, according to the Defense Counterintelligence and Security Agency, will replace a suite of legacy background investigation and case management IT systems.

¹³ The Integrated Security Management System is a web-based case management application designed to support the life cycle of the DHS personnel security, administrative security, and classified visit management programs; the system was implemented in 2008. According to OCSO officials, the system has reached the end of its product life cycle and must be replaced.



Appendix A: Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Pub. L. No. 107-296) by amendment to the *Inspector General Act of 1978*.

Our objective was to determine DHS' progress toward implementing an enhanced personnel vetting program. Our original objective was to determine whether DHS implemented a fair and effective program in accordance with performance measures and standards established by the Director of National Intelligence, a requirement contained in 5 U.S.C. § 11001. However, during the evaluation, we learned that Federal agencies, including DHS, have until 2026 to complete implementation of Trusted Workforce 2.0, a program that meets the requirement for an enhanced personnel security program. Because of this, and because the National Defense Authorization Act for FY 2024 repealed the requirement for Inspectors General to assess the effectiveness and fairness of their respective agency's enhanced personnel security programs, we determined that an evaluation of DHS' progress toward implementing an enhance personnel vetting program is more appropriate at this time.

To answer our objective, we performed the following procedures:

- interviewed officials from DHS' Office of the Chief Security Officer;
- reviewed DHS' Trusted Workforce performance metrics reports to ODNI;
- reviewed applicable Federal laws and regulations;
- reviewed relevant prior reports;
- reviewed applicable policies, procedures, and guidance for enhanced personnel security programs and Trusted Workforce 2.0;
- reviewed meeting minutes for the Trusted Workforce 2.0 Executive Steering Committee for 2022 and 2023;
- identified roles and responsibilities related to the implementation of Trusted Workforce 2.0; and
- reviewed relevant congressional testimony and media articles.

Because DHS' implementation of Trusted Workforce 2.0 is ongoing, officials told us of other actions they took and planned to take to implement the reform. As this report was meant to provide a snapshot of progress DHS made as of June 2024, we did not perform procedures to verify all actions that DHS officials said were completed beyond those included in the bulleted list above. DHS provided sufficient evidence to demonstrate those actions.



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

We conducted this evaluation from September 2023 through June 2024 under the authority of the *Inspector General Act of 1978*, 5 U.S.C. §§ 401–424, and according to the *Quality Standards for Inspections and Evaluations*, issued by the Council of the Inspectors General on Integrity and Efficiency.

DHS OIG’s Access to DHS Information

During this evaluation, DHS provided timely responses to our requests for information and did not delay or deny access to the information we requested.



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

Appendix B: Office of Audits Major Contributors to This Report

Tinh Nguyen, Assistant Inspector General for Audits
Peter Charboneau, Auditor
Katherine McCall, Auditor



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

Appendix C: Report Distribution

Department of Homeland Security

Secretary
Deputy Secretary
Chief of Staff
Deputy Chiefs of Staff
General Counsel
Executive Secretary
Director, Government Accountability Office/OIG Liaison Office
Under Secretary, Office of Strategy, Policy, and Plans
Assistant Secretary for Office of Public Affairs
Assistant Secretary for Office of Legislative Affairs

Office of Management and Budget

Chief, Homeland Security Branch
DHS OIG Budget Examiner

Congress

Congressional Oversight and Appropriations Committees

Additional Information

To view this and any other DHS OIG reports, Please visit our website: www.oig.dhs.gov

For further information or questions, please contact the DHS OIG Office of Public Affairs via email: DHS-OIG.OfficePublicAffairs@oig.dhs.gov



DHS OIG Hotline

To report fraud, waste, abuse, or criminal misconduct involving U.S. Department of Homeland Security programs, personnel, and funds, please visit: www.oig.dhs.gov/hotline

If you cannot access our website, please contact the hotline by phone or mail:

Call: 1-800-323-8603

U.S. Mail:
Department of Homeland Security
Office of Inspector General, Mail Stop 0305
Attention: Hotline
245 Murray Drive SW
Washington, DC 20528-0305