

### ODNI & OPM Executive Correspondence



**Transforming Federal Personnel Vetting: Measures to Expedite Reform and Further Reduce the Federal Government's Background Investigation Inventory** Executive Correspondence (EC) is the fifth in a series of issuances from the Security Executive Agent (ODNI) and the Suitability & Credentialing Executive Agent (OPM).

- This bold overhaul of how the Federal Government establishes and maintains trust in the workforce, through effective and timely vetting, is a national security priority to meet agencies' mission-critical needs. To date, Trusted Workforce (TW) 2.0 has led to mitigation measures and business process improvements resulting in the reduction in the background investigation inventory from a high of 725,000 in April 2018 to a target of approximately 200,000 as of February 2020.
- The EC directs to agencies additional measures developed to facilitate improved risk mitigation, reinforces continuing applicability of previous guidance, and introduces important TW 2.0 reform concepts that will drive early adoption of the improved process. The EC enables agencies to begin the transition away from traditional periodic reinvestigations by providing standards for a continuous vetting model designed to enable agencies to better mitigate security and safety risks.

These measures, taken together with those in prior ECs, are initial components of a comprehensive strategy to reform personnel vetting.

#### **Additional Inventory Reduction Measures for a More Effective and Efficient Process**

The following measures are effective immediately:

- 1. Compliance with periodic reinvestigation requirements through continuous vetting**
  - Individuals in national security positions enrolled in a continuous vetting program that meets interim minimum standards, as outlined in the EC, are deemed to be in compliance with periodic reinvestigation requirements. The continuous standards are designed to surface issues sooner, allowing for earlier intervention.
  - Departments and agencies must demonstrate ability to comply with interim continuous vetting requirements to the EAs by submitting the required documentation outlined in the EC to the Executive Agents.
- 2. Clarifications or revisions to the existing Federal Investigative Standards**
  - Modifications to remove or change the periodicity of certain checks.
  - Revisions to investigative flags for financial delinquencies and traffic fine violations in certain cases.
  - Authorization for investigative service providers to use a broader spectrum of investigative methods for issue resolution.
- 3. Use of annual vetting appraisals to identify concerns earlier in the process**
  - Introduces a forthcoming process for D/As to annually appraise individuals' backgrounds and to identify those who may require additional support or assistance to prevent behavior from presenting a serious, future concern.
  - D/As must obtain approval from the EAs prior to conducting a pilot, creating a similar assessment, and prior to implementation.
- 4. Early Trusted Information Provider program capabilities to reduce duplication of effort**
  - The Trusted Information Provider (TIP) program mandated by the FY20 National Defense Authorization Act, Section 6611, is a program to reduce duplication of effort in vetting Federal and industry clearance holders. New guidelines and standards for the TIP program are under development and will be coordinated as part of the TW 2.0 policy framework.
  - To inform policy development, D/As, industry, and the military services may work with the EAs on aspects of implementing the TIP program.

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### Measures Related to TW 2.0 Implementation

Consistent with Executive Order 13467, as amended, and pursuant to forthcoming guidance, heads of agencies shall prepare for the following:

5. **Transition from periodic reinvestigations to continuous vetting**
  - D/As will prepare for the transition, including budgeting, personnel, policy, process, IT changes, and compliance with all applicable law.
  - D/As must still comply with the continuous evaluation implementation requirement and target population enrollment for 2020.
6. **Additional risk mitigation measures**
  - To reduce risk between PRs where an individual is not yet enrolled in a compliant continuous vetting program, D/As are encouraged to conduct periodic checks of certain data sources and enroll individuals into FBI Rap Back.
7. **Opportunities to gain efficiencies**
  - D/As will work with the Executive Agents to begin streamlining agency personnel vetting programs to better align processes and criteria used for vetting determinations.
8. **Better access to state, local, and tribal law enforcement criminal history record information**
  - D/As and investigative service providers will cooperate with the Executive Agents in their efforts to improve investigative service provider access to state, local, and tribal criminal history record information.
9. **Credentialing Standards**
  - Once new credentialing standards are finalized, D/As will align their other vetting processes with government-wide credentialing standards, guidelines, and procedures designed to reduce risk to Federal personnel, property, and information systems.
10. **Expedited policy coordination**
  - D/As are to ensure that policy and operational personnel participate in the interagency process for developing the new TW 2.0 policy framework.
  - D/As are to facilitate expedited review and comment on the upcoming policy.

### Continuing Applicability of Previous Executive Agent Guidance

D/As are reminded of the continued applicability of prior guidance related to background investigation validity and reciprocity, the deferral of periodic reinvestigations when continuous evaluation capabilities are in place, and the acceptance of active national security determinations by other agencies for the purpose of interagency visits, information exchanges, or other official activities.

### Questions?

Questions should be directed by email regarding:

- national security determinations to SecEA@dni.gov,
- suitability and fitness determinations to SuitEA@opm.gov,
- credentialing determinations to CredEA@opm.gov.

# FACT SHEET

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### What does the EC do?

- Introduces important TW 2.0 reforms, such as the transition away from the traditional model of PRs to a future model that replaces PRs with government-wide continuous vetting. Continuous vetting will enable agencies to better mitigate security and safety risks.
- Directs D/As with investigative authority to adhere to clarifications of and revisions to the existing Federal Investigative Standards.
- Instructs D/As to work with the EAs to begin streamlining their agency personnel vetting programs in anticipation of upcoming policy changes to better align processes and criteria used for vetting determinations.

### When does the EC go into effect?

- Immediately, and it will remain in effect at least until the final TW 2.0 policy is enacted.

### Who does it impact and how?

- Investigative Service Providers – Have a greater ability to select the most optimal method to resolve an investigative issue and will begin providing continuous vetting services to enable agencies to better mitigate risk.
- D/As – Have the ability to enroll Tier 3/5 populations into continuous vetting instead of submitting PRs as long as certain requirements are met.
- Individuals in the workforce – May be a part of early enrollment into a continuous vetting solution rather than a PR.

### Will it make the process faster while protecting safety and security?

- Yes. The policy revisions are specifically designed to improve safety and security through a more effective and efficient process.

### How will changes benefit reform?

- Permits earlier implementation of TW 2.0 concepts to mitigate risk.
- Detects risks earlier for early adopter participants.
- Reduces the influx of PRs submitted into legacy process and allows for modernization of new information technology systems.

### How does it fit into larger reform?

- Informally referred to as “TW 1.5,” the EC creates a transitional state of policy, processes, and capabilities that serves as a bridge between the current state approach and the TW 2.0 future state approach to implement changes sooner and accelerate the transition to the improved future state.

### How does this raise vetting standards?

- The reform changes raise the standard of vetting by introducing minimum standards for continuous vetting process across the Executive Branch. Continuous vetting will enable agencies to better mitigate security and safety risks by surfacing issues sooner, allowing for earlier intervention, and facilitating timely employee assistance.