Trusted Workforce 2.0 Transition Report

Progress to Personnel Vetting Reforms made during the Biden-Harris Administration

January 2025

Security, Suitability, and Credentialing
PERFORMANCE ACCOUNTABILITY COUNCIL

Championing Reform

Government-wide efforts to improve personnel vetting are consolidated under the Trusted Workforce 2.0 (TW 2.0) initiative. The reforms, which enjoy bipartisan support, aim to improve the speed and effectiveness of processes used by Executive Branch agencies to determine whether their workforces should be considered trustworthy to perform specific jobs. Started in 2018, Phase 1 of the initiative successfully focused on reducing an existing backlog of background investigations and decreasing unreasonably long processing times. It also included consolidating the bulk of background investigations under the Department of Defense. This improved both workforce mobility and the efficiency of vetting processes.

The Biden-Harris Administration assumed responsibility for the initiative as its senior political appointees onboarded in early 2021. After reviewing progress, the leaders of this initiative, known as the "PAC Principals", championed it as a White House priority and included it within the President's Management Agenda. Reforms implemented during the Biden-Harris term primarily focused on Phase 2 of the Trusted Workforce 2.0 initiative, which was completed during 2024, and ensured the overall initiative was positioned for effective ongoing implementation regardless of change in Administration. Leaders also delivered several major achievements during this period that dramatically improved the mission space.

Key Accomplishments

The Biden-Harris Administration drove several major achievements that dramatically improved personnel vetting. High-level accomplishments include:

A) *Finalized Requisite Policies* – Issued the government-wide policies needed to implement more responsive and consistent vetting operations in Phase 3 of Trusted Workforce 2.0. This included setting bold performance standards that if achieved will dramatically improve vetting timelines and issuing a consolidated questionnaire for gathering background investigation information.

B) *Formalized the Reform Strategy* – Enhanced accountability by publishing a formal roadmap for achieving reform with clear milestones and implementation tools. Also directly engaged when issues emerged that hindered progress against that roadmap, including Government Accountability Office recommendations.

C) *Transitioned to Continuous Vetting* – Accomplished complete enrollment of the national security workforce into continuous vetting (CV) and initiated enrollment of the non-sensitive public trust population, which is targeted for completion in FY2025. The shift to CV reduces risk through tighter monitoring of previously vetted personnel and improved information sources for investigations.

D) *Encouraged Agency-Level Implementation* – Championed Trusted Workforce 2.0 reforms through communication and coordination with the broader interagency. Included designating a Senior Implementation Official for each agency and regularly providing implementation guidance.

E) *Addressed Key Administration Priorities* – Incorporated key White House priorities championed by the President such as destigmatizing mental health, setting reasonable rules around marijuana use, and improving customer service.

These achievements put the TW 2.0 initiative in a position to complete the third phase over the next several years, ensuring agencies can more quickly onboard the trusted workers they need to perform their missions.

Confronting Emergent Challenges

Despite significant successes in advancing reform, the Biden-Harris Administration faced setbacks that emerged in late-2023 and 2024. The most important was learning that the enterprise-wide information technology system for personnel vetting could not be completed as planned and needed to be re-baselined. This disappointment meant key capabilities reliant on the system would also be delayed. Another challenge was slower background investigation processing times. By the summer of 2024, these were affecting agency operations. In each instance the senior leaders responsible for reform confronted the challenge directly, meeting more frequently to coordinate and approve recovery plans. These plans were integrated into the *Trusted Workforce 2.0 Implementation Strategy* for execution during Phase 3.

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Background

Executive Branch agencies rely on their workforces—including military, civilian, and contractor personnel—to achieve organizational and cross-organizational goals. Unacceptable conduct by personnel can reduce agency effectiveness, undermine national security, and erode the American people's trust in their government. Consequently, federal agencies evaluate applicants and current personnel to determine whether they should be trusted (or continue to be trusted). The policies and tools used during this assessment process are collectively referred to as "personnel vetting" and are used in coordination with complementary mission areas, such as insider threat and counterintelligence, to foster a trustworthy workforce.

Lengthy delays in vetting personnel spurred the Executive Branch to improve personnel vetting. Reform is led by senior political appointees who are designated as principals with the Security, Suitability, and Credentialing Performance Accountability Council (PAC), an interagency forum chaired by the Deputy Director for Management at the Office of Management and Budget (OMB). The PAC was initially launched in 2008 under the Bush Administration. Since 2018, the group has worked to enhance personnel vetting through the multi-phase Trusted Workforce 2.0 initiative. The primary goals of this effort are to create a personnel vetting system that (1) quickly provides federal organizations with trusted workers, (2) is easier to navigate for Americans wishing to serve their country, and (3) simplifies complying with federal vetting policies for agencies and contractors. The Biden-Harris Administration prioritized the TW 2.0 initiative and pushed agencies to implement reform.

Inherited State of Reform

The 2015 unauthorized breach of a personnel vetting data system led to the exposure of personal data from millions of background investigation records. It caused a significant reduction in investigative capacity for Office of Personnel Management (OPM), the federal government's primary investigative service provider (ISP) at the time. By 2018, OPM's backlogged inventory of approximately 725,000 open cases was driving lengthy processing times across the Executive Branch. The slowdown prevented agencies from quickly onboarding the personnel needed to perform their missions.

The PAC's interagency leadership worked collaboratively to address the issue under Phase 1 of the Trusted Workforce initiative. Changes to policy and processes reduced the inventory to a more sustainable level of under 200,000 cases by the end of Phase 1, improving timeliness for Top Secret clearances (411 days to 141) and Secret clearances (173 days to 74) by early 2021. These improvements brought case processing speeds close to targets set by Congress in the *Intelligence Reform and Terrorism Prevention Act of 2004 (IRTPA)*.
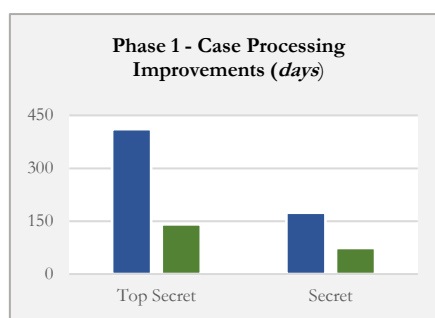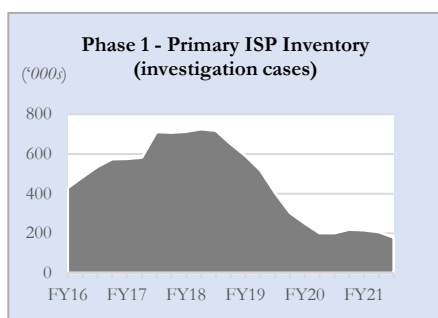
During this initial phase of TW 2.0 the responsibility for conducting most background investigations was transferred from OPM to the Department of Defense (DoD) through Executive Order 13869, which also delegated the necessary authorities. This consolidated background investigations with complementary capabilities like counterintelligence and insider threat monitoring under the new Defense Counterintelligence and Security Agency (DCSA). The change promoted greater economies of scale. DoD took steps to address underlying cybersecurity vulnerabilities to existing personnel vetting data systems while designing a new, enterprise-wide system to replace the legacy platforms. The new system would be critical for providing operational capabilities and performance metrics envisioned under the TW 2.0 initiative.

Key Accomplishments

The PAC is led by senior political appointees called the PAC Principals.[1] The group took meaningful strides in advancing reform through Phase 2 of the TW 2.0 initiative. The primary goals of Phase 2 were to:

(1) Establish an improved framework for personnel vetting. This included publishing an improved set of performance standards with targets that could be used to drive more efficient operations.

(2) Issue the core policies needed to implement the framework consistently across the Executive Branch.

(3) Transition the national security workforce from periodic reinvestigations to continuous vetting.

The PAC completed these goals during 2024 and was able to begin the transition to Phase 3. Several of the most impactful achievements from this period are highlighted below.

A) *Finalized Core Policies*

One of the first steps in Phase 2 was to improve policy alignment and consistency for personnel vetting, while ensuring it was tied to outcomes the PAC wanted to achieve. In February 2022, the PAC released the *Federal Personnel Vetting Guidelines* which established the fundamental design elements for personnel vetting moving forward. This included adopting five defined vetting scenarios, creating a more consistent set of vetting processes across government. It also condensed all investigations into three intuitive risk tiers (Low, Moderate, and High), which simplifies the process of moving previously vetted personnel moving between agencies. Over the subsequent two years the PAC's leadership released the remaining core policies aimed at implementing the broader TW 2.0 vision and improving all elements of personnel vetting. A complete list of the core policies can be found in Appendix A.

One of the most important core policies for driving future improvements is the *Federal Personnel Vetting Performance Management Standards* and associated implementation guidance. This document set aggressive new performance measures for agencies compared to the legacy IRTPA goals. The new metrics, which are being reported as data becomes available, enable leaders to make better data-based decisions. They also provide more relevant information. For example, new metrics focus on how quickly personnel are available to onboard versus only when the final adjudication is made. Additionally, timeliness measures now include all cases—not just the fastest 90% as required in IRTPA—and starts counting when the vetting questionnaire is submitted versus when the investigation is scheduled.
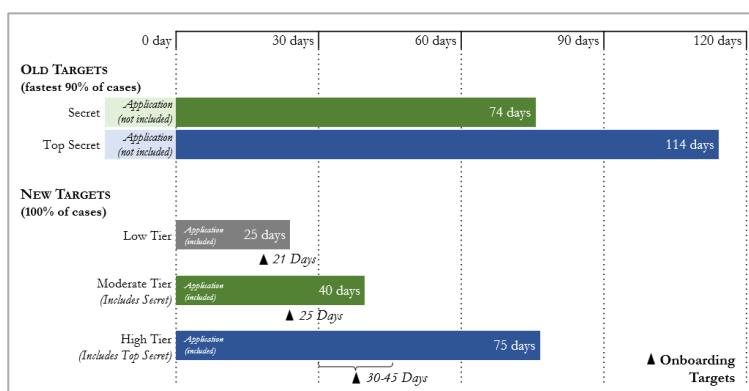
Another key element of delivering on the Trusted Workforce 2.0 vision was the development of a consolidated background investigation questionnaire for covering all three risks levels. Called the Personnel Vetting Questionnaire (PVQ), the new form is simpler to complete, introduces greater efficiency, and reduces the burden on individuals moving between positions. It also better aligns with existing policies on mental health destigmatization and marijuana usage.

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[1] The PAC Principals are designated ex officio under Executive Order 13467 (as amended). They include the Office of Management & Budget (OMB) Deputy Director for Management, the Director of National Intelligence, the OPM Director, and the Under Secretary of Defense for Intelligence & Security.

B) ***Formalized the Reform Strategy***

After defining a new framework, senior leaders worked with the interagency to create a plan for achieving it. The PAC Principals ultimately released the *TW 2.0 Implementation Strategy* in April 2022. It provides agencies with the information they need to incorporate reforms. This includes a suite of supporting tools—such as cost calculators and checklists—for agency leaders to build their own plans. The strategy is updated quarterly through interagency coordination, so it remains current. It includes steps for addressing recommendations from the Government Accountability Office (GAO), which added personnel vetting to its High Risk List in 2018. About 20 recommendations related to personnel vetting were tackled during Phase 2 and the PAC is working to incorporate the remaining open recommendations into its strategy planning.

Since its introduction, the *TW 2.0 Implementation Strategy* has been the backbone of interagency coordination on personnel vetting reform. It provides agencies with guidance for what to expect during the reform process and steps they should take to prepare for it. It also includes the direction that agencies designate a key official as its Senior Implementation Official (SIO) for coordinating reform progress. Coordinating reform through the SIOs fosters greater accountability. Agencies establish internal implementation plans based on the Strategy and its supporting tools. The document also provides a baseline for the status of major TW 2.0 milestones, which are publicly reported.

C) ***Transitioned to Continuous Vetting***

The traditional model of personnel vetting relied on periodic reinvestigations. These required vetted personnel in national security and public trust positions to undergo a new investigation after a set duration, typically every 5 or 10 years depending on the sensitivity of the position. This approach created gaps where vetted personnel could be involved in problematic behavior that an agency might not discover until years later, and each individual periodic reinvestigation could be costly and burdensome.

During Phase 1 the PAC began discussions on identifying improvements to periodic reinvestigations. The concept they ultimately landed on was "continuous vetting". Under this model, vetted personnel would be enrolled into a series of automated record checks. These would allow the government to be notified of activities that might cause an agency to question the trustworthiness of a worker significantly sooner. Continuous vetting combined these automated checks with agency-specific information and event/time-driven checks to substantially decrease the government's risk exposure.
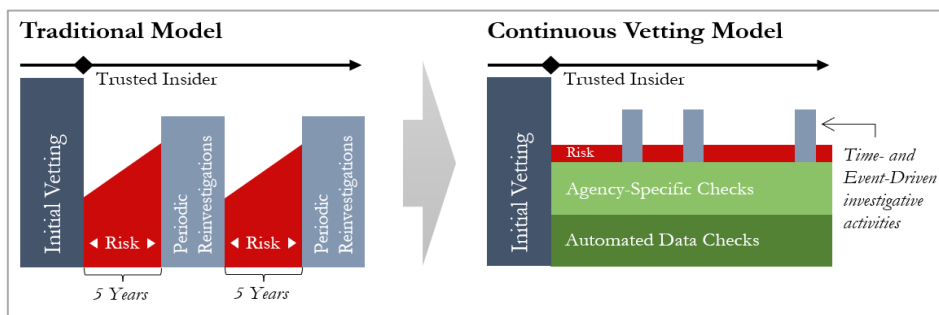
In fiscal year 2020, the PAC began enrolling personnel in national security positions into an initial continuous vetting capability. This capability was enhanced with an expanded list of data sources in 2021 and the entire national security workforce was transitioned by the end of 2022. The results of the transition have been staggering. DoD reported that potentially adverse information is now collected on average three years faster for Top Secret clearance holders and seven years faster for Secret clearance holders when compared to the traditional model, dramatically reducing risk to agencies. In 2024, the PAC authorized and began expanding continuous vetting enrollment so that it would cover the non-sensitive public trust workforce. This transition is expected to be completed around the end of 2025 and will further reduce risks to agencies by alerting them earlier of potentially problematic behavior.

D) **Encouraged Agency-Level Implementation**

While the PAC established a plan for executing Phase 2, the White House took additional steps to ensure interagency participation. The National Security Advisor coordinated a December 2021 memorandum requesting agencies assign SIOs and develop implementation plans. The PAC worked with agencies so that agency-level planning would align with the *TW 2.0 Implementation Strategy*. As a priority effort, OMB also instructed agencies to prioritize funds needed to implement Trusted Workforce 2.0 reforms within its annual budget guidance.

The PAC Principals remained engaged, meeting twice each quarter to resolve issues and push for progress. They also maintained a previously established interagency forum—the Trusted Workforce Advisory Group—to obtain feedback from agencies, communicate progress, and share best practices. This group meets every six weeks and includes representatives from nearly all agencies. In addition to leveraging the TWAG, the PAC began the practice of conducting an annual survey to collect information from SIOs. The PAC Chair would take this information and subsequently issue an annual report summarizing TW 2.0 reform progress. By visibly advocating for reform, the Biden-Harris Administration was effective in keeping agencies engaged throughout Phase 2.

E) **Addressed Key Administration Priorities**

The PAC's leadership worked together to ensure the TW 2.0 initiative aligned with the Biden-Harris Administration's key priorities. There were five priorities that were the most relevant. Progress in advancing each is described below.

- *Championing mental wellness* – The PAC made significant progress destigmatizing mental health issues and treatments. This includes approving the PVQ, which focuses only on the most serious mental illnesses. The PAC leadership agencies also extensively worked to dispel common mental health misperceptions through public interviews, pamphlets, and training.

- *Reasonable rules for marijuana use* – Societal norms surrounding marijuana use have evolved over the last few decades, leading to greater public acceptance. Overly restrictive rules surrounding past marijuana use can unnecessarily prevent agencies from hiring the best talent. In 2021, OPM and ODNI as the Executive Agents for personnel vetting policy issued guidance clarifying that past marijuana use should not necessarily be considered prohibitive during adjudications but be evaluated as part of understating the whole person.

- *Countering domestic violent extremism* – Permitting individuals who are willing to illegally use violence to advance their views—regardless of political affiliation—undermines the American public's trust in its government. During Phase 2, OPM and ODNI drafted the PVQ to more clearly articulate what information needs to be submitted regarding participation in violent extremism. This allows individuals undergoing vetting to better understand what they are required to report.

- *Improved customer experience* – Improving the public's experience was an early goal of the Administration. PAC leaders issued guidelines so agencies would better explain personnel vetting processes to participants and keep them informed of the status of their cases. DCSA was designated as a "High Impact Service Provider", requiring it to publish formal plans for how it will improve the services it offers. The PVQ was drafted using plainer language and less complex questions to make it easier to understand and added requirements for a survey to solicit feedback from users.

- *Identifying and mitigating bias* – Government agencies want to hire the most qualified applicants to help them accomplish their organizational goals. During Phase 2 the PAC sponsored several studies to better understand where bias could influence vetting processes and identify ways to minimize that risk. This will allow the PAC to continue mitigating bias moving forward.

Setbacks & Challenges

Despite making meaningful progress over the last four years, two significant issues have emerged that could undermine those earlier successes. The PAC's leadership has engaged forcefully to ensure that the TW 2.0 initiative is positioned for ongoing implementation success in Phase 3, course correcting on both issues.

A) **Delays to Enterprise Information Technology System**

In late 2023, DoD notified the PAC's leadership that it would not be able to deliver the enterprise-wide information technology platform—called the National Background Investigation Services (NBIS)—as planned. Subsequently, several important reforms reliant on NBIS have been significantly delayed. In 2024, DoD re-baselined its NBIS development plan and development milestones, which were incorporated into the *TW 2.0 Implementation Strategy*. Important stakeholders including relevant congressional committees, the GAO, affected agencies, and industry are all monitoring progress closely to see if the platform can stay on track moving forward.

B) **Increasingly Slower Processing Speeds**

An early success of the TW 2.0 initiative was implementing a series of changes to decrease the end-to-end time it took to process security clearances. Although still significantly faster than the delays experienced in 2019, the average time needed to complete background investigations has increased. Since FY23, Secret and Top Secret cases take 12% and 36% longer, respectively. Both are well above timeliness targets. Early in fiscal year 2025, DCSA began an interagency tiger team to better understand the underlying forces that cause slower processing times and identify solutions. Promising mitigations will be evaluated through the Trusted Workforce 2.0 initiative's governance process and included in the *TW 2.0 Implementation Strategy* moving forward.
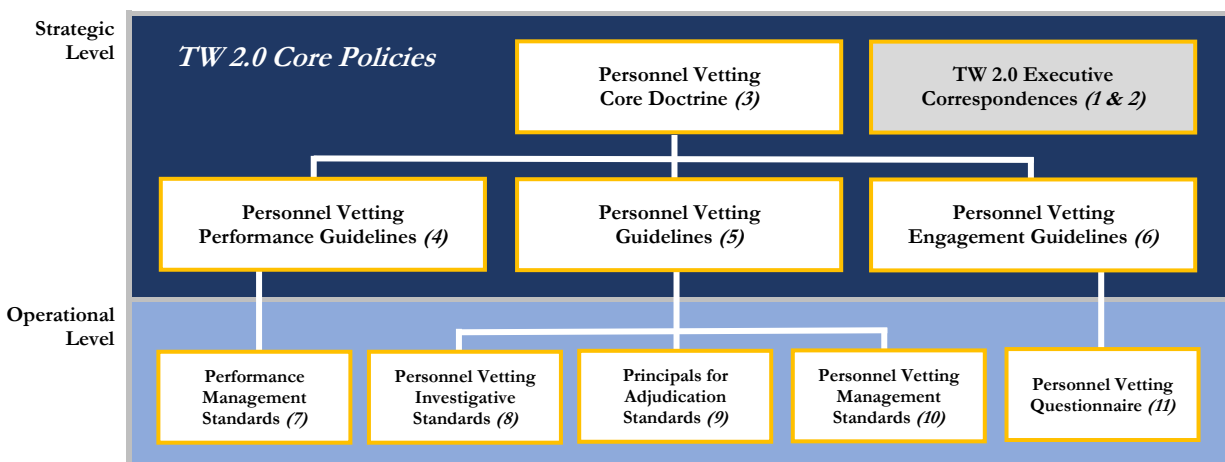
Next Steps

Phase 2 of TW 2.0 was completed during 2024. The PAC's leadership subsequently pivoted to Phase 3, which places even greater emphasis on agency-level implementation, IT development, and expanded metrics reporting. This approach will continue to balance a focus on milestone completion with appropriate cost discipline and operational performance. The priorities for 2025 include:

- *Improve & Expand Continuous Vetting* – Continue the expansion of continuous vetting services to the non-sensitive public trust population, which began in 2024. ISPs will enhance the service's capabilities by further enrolling participants into an FBI data source for flagging arrests and prosecutions called Rap Back.

- *Deploy Shared Services* – A key element of TW 2.0 is consolidating personnel vetting functions and then offering them as services to the broader interagency. Several of these capabilities—known as shared services—are scheduled to advance in 2025. This includes starting the adoption of the Personnel Vetting Questionnaire for collecting information during initial background investigations for the majority of ISPs. Updates to data repositories that house personnel vetting data will streamline workforce mobility.

- *Use Available Tools to Speed Operations* – As a method for reducing the time needed to clear new personnel for onboarding, the PAC leadership is urging agencies to review their operations and identify process improvements. Specifically, agencies are being encouraged to further leverage current capabilities supporting preliminary determinations and eAdjudication that can accelerate onboarding.

Appendix A – Trusted Workforce 2.0 Core Policies

Phase 2 of Trusted Workforce 2.0 was closed upon all core policies being issued. "Core policies" is the PAC's shorthand term for policies that provide a foundation for the federal personnel vetting strategy and its approach to operations. Numerous additional policies supplement the core group by aiding agencies at the implementation level.

A synopsis of the core policies and their relationships is included below. The graphic indicates how strategic-level core policies are related to those at the operational level. The two Executive Correspondence policies shaded in grey are unique in that they were instrumental in preparing for Phase 2 but are tangential to the formal Trusted Workforce 2.0 policy framework.

Strategic Level

Policy	Description
1) Measures to Expedite Reform and Further Reduce the Federal Government's Background Investigation Inventory	(03-Feb-20) Executive Correspondence that directed measures to more quicky reduce the backlog of background investigations, including that enrollment in continuous vetting satisfies periodic reinvestigation requirements, updating criteria that triggers additional investigative activities, and clarifying rules surrounding reciprocity.
2) Continuous Vetting and Other Measures to Expedite Reform and Transition to TW 2.0	(15-Jan-21) Executive Correspondence that defines requirements for the phased transitional states of continuous vetting—TW 1.25 and TW 1.5—as well as the full TW 2.0 capability. Applies to personnel in national security positions and establishes milestones for agency adoption. Also updates performance metrics to include for alert processing timeliness.
3) Personnel Vetting Core Doctrine	(28-Apr-21) Provides an overarching vision for personnel vetting. Includes the principles that serve as a foundation for personnel vetting and criteria used to determine whether the mission space is operating successfully. Also defines policy spheres surrounding priorities, risk management, information management, organizational culture, and information technology.
4) Personnel Vetting Performance Management Guidelines	(10-Feb-22) Explains the framework that will be used to evaluate agency personnel vetting programs by leveraging performance metrics. Defines the outcomes sought through that performance management framework, as well as its chief components. Puts emphasis on measuring efficiency, effectiveness, and risk.
5) Personnel Vetting Guidelines	(10-Feb-22) Describes the high-level outcomes used to judge the overall success of agency personnel vetting programs. Names the key components of personnel vetting, including the three investigation tiers, five vetting scenarios, and twelve activities (elements) that take place during vetting. The document is fundamental in understanding the Trusted Workforce 2.0 model.
6) Personnel Vetting Engagement Guidelines	(10-Feb-22) Provides an overview of how agency personnel vetting programs are to communicate with individuals undergoing vetting processes. This includes setting expectations and regularly providing status updates.

Operational Level

Policy	Description
7) Personnel Vetting Performance Management Standards	(14-Sep-22) Sets minimum performance standards for agencies aimed at measuring efficiency, effectiveness, and risk. Explains the responsibilities of both the ODNI and OPM (as Executive Agents) and agencies to collect, analyze, and report metrics. Includes guidance for measuring quality within the personnel vetting enterprise.
8) Personnel Vetting Investigation Standards	(17-May-22) Establishes the investigative coverage requirements for the three-tier investigation model described in the Personnel Vetting Guidelines, including how they should be applied to each of the five vetting scenarios. Also, the document sets requirements for how ISPs should categorize issue seriousness, what investigative methodologies are to be used, and when additional investigative activities should be triggered.
9) Common Principals for Applying Adjudicative Standards	(19-Jul-22) Aligns the criteria used to make a trust determination across national security, suitability/fitness, and credentialing vetting domains. Establishes policy for how agencies manage their adjudicative operations, as well as describes the framework through which the trust determinations are to be made.
10) Personnel Vetting Management Standards	(23-Jul-24) Establishes requirements on how personnel vetting programs must be administered by agencies, including across all vetting domains (suitability/fitness, national security, and credentialing). Emphasizes using consistent approaches and practices to assess, determine, and manage risk. Covers all five vetting scenarios.
11) Personnel Vetting Questionnaire	(15-Nov-23) Replaces and streamlines multiple legacy forms used to gather information from individuals undergoing personnel vetting. The form uses plain language and simplifies complex questions to make it more clear to the individual what information is being requested. It will be made digitally available in Phase 3.