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September 29, 2025

The Honorable Tom Cotton
Chairman
The Honorable Mark Warner
Vice Chairman
Select Committee on Intelligence
United States Senate

The Honorable Rick Crawford
Chairman
The Honorable Jim Himes
Ranking Member
Permanent Select Committee on Intelligence
House of Representatives

Status of Open GAO Recommendations to the Director of National Intelligence

GAO's mission is to support Congress in meeting its constitutional responsibilities. We make recommendations to improve the accountability, operations, and services of government agencies and to increase the effectiveness of federal spending. In fiscal year 2024, our work yielded about \$67.5 billion in financial benefits—a return of about \$76 for every dollar invested in GAO.¹ We also identified more than 1,220 other benefits that cannot be measured in dollars but that led to program and operational improvements across the government, including at the Office of the Director of National Intelligence (ODNI).

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 included a provision for the Comptroller General to submit an annual list to the Congressional Intelligence Committees and to the Director of National Intelligence (DNI) of all open recommendations made by GAO to the DNI.² The provision also directs the DNI to submit, within 120 days of receiving our annual list and the accompanying letter, a report of actions taken—and actions the DNI intends to take—in response to each open recommendation. As of September 2025, the DNI had not submitted a response to our 2024 letter.³ ODNI officials said they will include any actions taken or planned actions taken for open recommendations from October 2024 to 2025 in a response to this, our 2025 letter.

This letter and its enclosures mark our third submission, which formally transmits and communicates the results of our work. It describes the DNI's (1) progress in implementing

¹GAO, Performance and Accountability Report, Fiscal Year 2024, GAO-25-900570 (Washington, D.C.: November 2024).

²Pub. L. No. 117-263, § 6304 (2022). This provision requires the Comptroller General to submit the annual list no later than September 30, 2023, and each September 30 thereafter through 2028.

³GAO, *Status of Open GAO Recommendations Made to the Director of National Intelligence*, [GAO-24-107671](#) (Washington, D.C.: Sept. 26, 2024) (2024 letter). According to ODNI officials, ODNI will not submit a response to our 2024 letter due to internal delays resulting, in part, from leadership and organizational changes.

recommendations from GAO reports issued from July 2011 through September 15, 2025; (2) initial responses to open recommendations; and (3) progress in implementing priority recommendations.⁴ Enclosure 1 includes a list of the open unclassified recommendations, and enclosures 2 and 3 include a list of the open sensitive and classified recommendations that we have made to the DNI from July 2011 through September 15, 2025.

The scope of this engagement includes all recommendations directed to the DNI in unclassified; sensitive but unclassified (SBU); and classified reports issued from July 2011 through September 15, 2025.⁵ To identify the specific recommendations directed to the DNI, we queried the GAO recommendation follow-up system for unclassified recommendations and reviewed GAO records for SBU and classified recommendations. We identified ODNI's initial response of concurrence, partial concurrence, or non-concurrence to our recommendations from reports where ODNI provided formal written comments on the associated draft reports. We were unable to provide ODNI's position on 37 open recommendations for the reports where ODNI did not provide a formal response to our recommendations in writing.⁶ To determine the status of open recommendations, we contacted ODNI officials to obtain information on ODNI's efforts to implement them.⁷ Where applicable and when available, we ascertained ODNI's rationale for partially implementing or not implementing recommendations, or for closing recommendations that we consider to be open, and determined the implementation status of each recommendation based on our review of the information collected.

We conducted this performance audit from June 2025 to September 2025 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.

Overview of GAO Recommendations

We have made 122 recommendations to the DNI from July 2011 through September 15, 2025. ODNI has implemented 72 of those recommendations, for an implementation rate of 59 percent.⁸ We positively note ODNI's recent focus and progress on closing recommendations; however, its implementation rate still lags behind the government-wide average. For example, in

⁴Priority 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 operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

⁵We plan to issue a report on the reliability of timeliness data that ODNI uses to oversee the personnel security process in the fall of 2025. We will include the four recommendations from this report in the next iteration of this letter.

⁶GAO provides responsible agency officials, when appropriate, with an opportunity to review and provide comments on a draft of a product before it is issued, including the agency's initial position on any recommendations. ODNI has not provided comments on some of our draft reports, and therefore we are unable to include ODNI's response of concurrence, partial concurrence or nonconcurrence to recommendations from those reports.

⁷In addition to outreach to ODNI for recommendation updates, ODNI communicates any recent or planned actions in response to all open GAO recommendations in ODNI's mandated response to GAO's annual submission. ODNI did not submit a response to our 2024 letter prior to the issuance of this, the 2025 letter (see footnote 3). ODNI officials have provided some information on efforts to close open recommendations in the course of routine communication with GAO engagement teams and other GAO officials.

⁸ODNI's 59 percent implementation rate reflects recommendations made to the DNI from July 2011 through September 15, 2025. We closed an additional five recommendations as not implemented, and we closed one recommendation as no longer valid.

November 2024 we reported that on a government-wide basis, agencies have implemented 70 percent of our recommendations made from fiscal year 2020 through fiscal year 2024.⁹ In contrast, ODNI’s implementation rate for that same 4-year period was 54 percent.

As of September 15, 2025, 44 of the 122 recommendations we have made to the DNI since July 2011, or 36 percent of our recommendations, remain open or have been only partially addressed. Table 1 lists the number of recommendations we have made from July 2011 through September 15, 2025, and the status of their implementation as of September 15, 2025.¹⁰

Table 1: Recommendations Made by GAO to the Director of National Intelligence (DNI) and Implementation Status, from July 2011 through September 15, 2025			
Total recommendations	Recommendations open or open–partially addressed ^a	Recommendations closed–not implemented or closed–no longer valid ^b	Recommendations closed–implemented
122	44	6	72

Source: GAO. | GAO-25-108612

^aGAO lists a recommendation as “open–partially addressed” when the agency has completed some action(s) that contribute to the closure of the recommendation as implemented. However, such recommendations remain open until the agency has completed all actions needed to implement the recommendation. As of September 15, 2025, six of the 44 open recommendations remain open–partially addressed.

^bGAO does not close a recommendation because an agency does not concur with it or has said it will not take the action. However, prior to July 2023, we would close a recommendation as “not implemented” when circumstances changed or when, in our professional judgment, sufficient time had passed, and the agency was unlikely to implement the recommendation. As of July 2023, we may close a recommendation as “no longer valid” when a law has been updated or terminated; when a program has been terminated, replaced, or changed; when an office is terminated (and its functions are dissolved); or when the time frame for implementation has passed. We closed one recommendation as no longer valid and closed five recommendations as not implemented.

The enclosures to this letter identify the 44 unclassified, sensitive, and classified recommendations directed to the DNI that remain open. The recommendations relate to areas of intelligence enterprise management, infrastructure and facilities, workforce management, and personnel vetting.¹¹ By fully implementing these recommendations, ODNI could improve its ability to help ensure the intelligence community (IC) best manages its workforce and infrastructure and increases the efficiency and effectiveness of its operations in support of its mission.¹²

GAO provides responsible agency officials with an opportunity to review and provide comments on drafts of products before they are issued and seeks agency comments to ensure products are fair, objective, balanced, and complete. In response to the drafts we provided for their review, ODNI concurred or partially concurred with 64 recommendations (52 percent) and did

⁹GAO, *Performance and Accountability Report, Fiscal Year 2024*, [GAO-25-900570](#) (Washington, D.C.: November 2024).

¹⁰Recommendations remain open until they are designated as “closed–implemented” or “closed–no longer valid.” GAO closes a recommendation as “closed–no longer valid” when GAO determines the circumstances warrant, such as when a law has been updated or terminated; when a program has been terminated, replaced, or changed; when an office is terminated (and its functions are dissolved); or when the time frame for implementation has passed.

¹¹Due to the classified nature of some of the recommendations, additional details on the recommendations in the key areas noted in this report can be found respectively in classified enclosures 2 and 3.

¹²Section 3003 of title 50, United States Code, defines the intelligence community (IC) as consisting of 18 elements, including the ODNI, Central Intelligence Agency, multiple intelligence components of the Department of Defense (DOD), and elements from other agencies that have been designated accordingly by the President, or jointly by the DNI and the head of the department or agency concerned. These organizations independently and collaboratively gather, analyze, and produce the intelligence necessary to conduct foreign relations and national security activities.

not concur with three recommendations (2 percent) of the 122 recommendations we made from July 2011 through September 15, 2025. However, during that period, ODNI did not provide comments on 55 recommendations (45 percent).¹³ Table 2 provides an overview of ODNI's response to the 44 recommendations that remain open as of September 15, 2025.

Table 2: Office of the Director of National Intelligence (ODNI) Responses to Open GAO Recommendations Made from July 2011 through September 15, 2025

Total open recommendations	ODNI concurred	ODNI partially concurred	ODNI did not concur	ODNI did not provide comments
44	7	0	0	37

Source: GAO. | GAO-25-10861241

In 2022, we issued our first annual priority open recommendation letter to the DNI.¹⁴ In that letter, we designated 19 recommendations as priority recommendations. Since then, ODNI has implemented 14 of those priority recommendations, and we have added 10 additional priority recommendations.¹⁵ In our 2025 priority recommendation letter to the DNI, we identified a total of 14 open priority recommendations.¹⁶

We are sending copies of this report to the appropriate congressional committees and DNI. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>. If you or your staff have any questions about this report and accompanying enclosures, please contact me at CzyzA@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report include Jennifer Andreone (Assistant Director), Demetrios Marinides (Analyst in Charge), Hannah Elliott, Lillian Moyano Yob, Michele Fejfar, and Tracy Barnes.

//SIGNED//

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Enclosures – 3

¹³Percentages may not sum to 100 percent due to rounding.

¹⁴GAO, *Priority Open Recommendations: Office of the Director of National Intelligence*, [GAO-22-105852](#) (Washington, D.C.: Sept. 1, 2022).

¹⁵In addition, we closed one priority recommendation as no longer relevant.

¹⁶GAO, *Priority Open Recommendations: Office of the Director of National Intelligence*, [GAO-25-108078](#) (Washington, D.C.: May 1, 2025). In May 2025, we issued the fourth annual priority recommendation letter to the DNI where we designated five priority recommendations in addition to the nine remaining priority recommendations that remained open from the 2024 priority recommendation letter. See, GAO, *Priority Recommendations: Office of the Director of National Intelligence*, [GAO-24-107337](#) (Washington, D.C.: June 17, 2024).

Enclosure 1: Overview of Open Unclassified Recommendations to the Director of National Intelligence Made by GAO from July 2011 through September 15, 2025

Table 3 outlines the unclassified recommendations made to the Director of National Intelligence from July 2011 through September 15, 2025, that remain open.

Table 3: List of Open Unclassified Recommendations Made by GAO to the Director of National Intelligence (DNI) from July 2011 through September 15, 2025

GAO report title and number	Recommendation	Priority recommendation	DNI response
<i>Personnel Security Clearances: Additional Guidance and Oversight Needed at the Department of Homeland Security and Department of Defense to Ensure Consistent Application of Revocation Process</i> , GAO-14-640 (Washington, D.C.: Sept. 8, 2014)	To facilitate department-wide review and assessment of the quality of the personnel security clearance revocation process, the Director of National Intelligence (DNI) should, in consultation with the Secretaries of Defense and Homeland Security, develop performance measures to better enable them to identify and resolve problems, and direct the collection of related revocation and appeals information. (Recommendation 9)	No	Concur
<i>Personnel Security Clearances: Additional Guidance and Oversight Needed at the Department of Homeland Security and Department of Defense to Ensure Consistent Application of Revocation Process</i> , GAO-14-640 (Washington, D.C.: Sept. 8, 2014)	To help ensure that similarly situated individuals are treated consistently, and to facilitate oversight and help ensure the quality of the security clearance revocation process, the DNI should review whether the existing security clearance revocation process is the most efficient and effective approach. In this review, the DNI should consider whether there should be a single personnel security clearance revocation process used across all executive-branch agencies and workforces, with consideration of areas such as the timing of the personal appearance in the revocation process, and the ability to cross-examine witnesses. Further, to the extent that a single process or changes to the existing parallel processes are warranted, the DNI should consider whether there is a need to establish any policies and procedures to facilitate a more consistent process, and recommend as needed any revisions to existing executive orders or other executive-branch guidance. (Recommendation 13)	No	Concur
<i>National Security Space: Actions Needed to Better Use Commercial Satellite Imagery and Analytics</i> , GAO-22-106106 (Washington, D.C.: Sept. 7, 2022) ^a	The DNI, in coordination with the Secretary of Defense, should ensure that the National Geospatial-Intelligence Agency (NGA) and the National Reconnaissance Office develop specific performance goals and measures that would support progress toward the goal of maximizing the use of commercial satellite imagery. (Recommendation 3)	No	No comment

GAO report title and number	Recommendation	Priority recommendation	DNI response
<i>National Security Space: Actions Needed to Better Use Commercial Satellite Imagery and Analytics</i> , GAO-22-106106 (Washington, D.C.: Sept. 7, 2022) ^a	The DNI, in coordination with the Secretary of Defense, should ensure that NGA, in coordination with IC and DOD stakeholders, develops guidance to establish specific roles and responsibilities for commercial analytic services that use remote sensing data. The guidance should note the components responsible for addressing resourcing visibility and for identifying performance goals and measures related to commercial analytic services that use remote sensing data. (Recommendation 4)	No	No comment
<i>Federal Real Property: Improved Data and Access Needed for Employees with Disabilities Using Secure Facilities</i> GAO-24-107117 (Washington, D.C.: Jan. 9, 2024) ^b	The DNI should ensure that the Director of the National Counterintelligence and Security Center, in collaboration with each of the sensitive compartmented information facilities (SCIF) accrediting agencies, develops and implements a plan outlining steps for SCIF accrediting agencies to report data on their inventory of SCIFs in a timely manner in accordance with Intelligence Community Directive 705. (Recommendation 1) ^c	No	No comment
<i>Federal Real Property: Improved Data and Access Needed for Employees with Disabilities Using Secure Facilities</i> GAO-24-107117 (Washington, D.C.: Jan. 9, 2024) ^b	The DNI, in coordination with the IC element heads, should issue updated or new guidance that identifies minimum specifications for common accessibility concerns at entrances and within SCIFs, including automatic door openers, accessible door locks and intrusion detection systems, and tactile signage. (Recommendation 2)	Yes	No comment
<i>Federal Real Property: Improved Data and Access Needed for Employees with Disabilities Using Secure Facilities</i> GAO-24-107117 (Washington, D.C.: Jan. 9, 2024) ^b	The DNI, in coordination with the IC element heads, should issue updated or new guidance that addresses accessibility in the annual SCIF security inspection process. This process could include an accessibility checklist to all federal agencies to identify and address—to the maximum practicable—physical access barriers to and inside SCIFs. (Recommendation 3)	No	No comment
<i>Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations</i> , GAO-24-105669 (Washington, D.C.: Jan. 22, 2024)	The DNI should follow best practices for evaluating the reliability of the data that agencies submit related to security clearance reciprocity. Such best practices include interviewing knowledgeable officials about their data systems, reviewing data system documentation to determine if data entry controls are sufficient, and tracing a sample of data to or from source documents to assess the accuracy and completeness of the data. (Recommendation 1)	Yes	No comment

GAO report title and number	Recommendation	Priority recommendation	DNI response
<i>Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations,</i> GAO-24-105669 (Washington, D.C.: Jan. 22, 2024)	The DNI should develop and implement a plan that addresses agencies' concerns that led them to mistrust some other agencies' security clearance processes. (Recommendation 2)	No	No comment
<i>Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations,</i> GAO-24-105669 (Washington, D.C.: Jan. 22, 2024)	The DNI should facilitate access to secure facilities and systems for agencies to ensure they can make reciprocity determinations. (Recommendation 3)	No	No comment
<i>Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations,</i> GAO-24-105669 (Washington, D.C.: Jan. 22, 2024)	The DNI, in coordination with the Director of the Defense Counterintelligence and Security Agency, should develop and implement a plan to ensure that current and future IT systems used for personnel vetting contain complete and accurate information required to make security clearance reciprocity determinations (Recommendation 4)	Yes	No comment
<i>Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations,</i> GAO-24-105669 (Washington, D.C.: Jan. 22, 2024)	The DNI should issue clarifying guidance, such as by updating Security Executive Agent Directive 7, to address whether communicating with prior agencies is permitted in the security clearance reciprocity process and, if so, under what circumstances. (Recommendation 6)	No	No comment
<i>Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations,</i> GAO-24-105669 (Washington, D.C.: Jan. 22, 2024)	The DNI should develop and implement a plan that accounts for contractor and agency concerns—with consideration of resource and privacy issues—to ensure that contractors are informed about the status of reciprocity determinations when there are delays. (Recommendation 8)	No	No comment

Source: GAO. | GAO-25-108612

Note: From 2011 through 2013, we issued seven reports with 20 recommendations made to DNI. These 20 recommendations are “closed as implemented” and are not reflected in table 3. The information provided under “DNI response” indicates the status of ODNI’s response to our recommendation(s) at the time of the product’s issuance.

^aWe issued a classified version of this report under GAO-22-105072C with the same recommendations. That report is not included in enclosure 2 in order to not double count the recommendations.

^bWe issued a sensitive version of this report under GAO-23-106120SU with the same recommendations. That report is not included in enclosure 2 in order to not double count the recommendations. In its March 2024 response to GAO-23-106120SU, ODNI noted that it concurred with recommendations made in that report.

^cThis recommendation is "open—partially addressed." A recommendation is listed as "open—partially addressed" when the agency has completed action(s) that contribute to the closure of the recommendation as implemented. However, the recommendation remains open until all actions to implement the recommendation have been completed.