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May 9, 2025

Congressional Committees

Federal Workforce: Observations on the Implementation of the Trusted Workforce 2.0 Personnel Vetting Reform Initiative

Personnel vetting processes help ensure the trustworthiness of the federal government's workforce which, among other things, helps prevent unauthorized disclosure of classified information to foreign intelligence services or other actors. Personnel vetting processes provide a method to determine whether personnel are and remain over time (1) eligible to access classified information or to hold a sensitive position; (2) suitable or fit for government employment or to serve as contractor employees; or (3) eligible to access agency systems or facilities.

In 2018, the Security, Suitability, and Credentialing Performance Accountability Council (PAC) launched the Trusted Workforce 2.0 (TW 2.0) reform initiative.¹ Officials designed TW 2.0's suite of reforms to streamline government-wide personnel vetting and address problems, such as lengthy background investigations, persistent backlogs, inconsistent practices across agencies, and information security concerns. Compounded, these delays and other problems within the personnel vetting process can negatively affect the ability of federal agencies and contractors to onboard new personnel, manage risk, and achieve their objectives.

The National Defense Authorization Act for Fiscal Year 2024 includes a provision for us to survey a sample of federal agencies, federal contractors, and other persons that require security clearances to access classified information to assess the strengths and weaknesses of the implementation of TW 2.0 and the effectiveness of vetting federal personnel while managing risk during the onboarding of new personnel.² In addition, the act includes a provision that we conduct such surveys once every 2 years through 2029. This report describes (1) the status of federal agencies' implementation of TW 2.0 to vet personnel and contractors for suitability, fitness, credentialing, and eligibility to access classified information; (2) the experiences of federal agencies with implementing TW 2.0, including any benefits, challenges, and effects on managing risk while onboarding personnel; and (3) the experiences of federal contractors with implementing TW 2.0, including any benefits, challenges, and effects on managing risk while onboarding personnel. On December 11, 2024, we briefed members of your staff on the

¹The Security, Suitability, and Credentialing Performance Accountability Council is the government-wide entity responsible for driving the implementation of reforms to the personnel vetting processes. The PAC has four principal members: the Deputy Director for Management of the Office of Management and Budget; the Director of National Intelligence, who is the Security Executive Agent; the Director of the Office of Personnel Management, who is the Suitability and Credentialing Executive Agent; and the Under Secretary of Defense for Intelligence and Security. See Exec. Order No. 13,467, *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information*, § 2.4(b), as amended through Exec. Order No. 13,869, 84 Fed. Reg. 18,125 (Apr. 24, 2019).

²Pub. L. No. 118-31, Div. G, § 7704 (2023).

preliminary results of our review. This report formally transmits the briefing slides along with further analysis (see encs. 1 through 5).³

To assess the implementation status of TW 2.0, we reviewed policies, implementation strategies, and progress updates from the Office of Personnel Management (OPM), the Office of the Director of National Intelligence (ODNI), and the PAC. We also interviewed cognizant officials from OPM, ODNI, the Office of Management and Budget, the PAC program management office, and the Defense Counterintelligence and Security Agency (DCSA) on overall implementation progress. We used the information we collected to inform the design of the surveys developed for federal agencies and contractors we used for our other objectives.

To describe the benefits, challenges, and effects on risk management experienced by federal agencies and contractors, we administered two electronic surveys. First, we selected and surveyed a nongeneralizable sample of 45 federal departments and agencies (hereinafter agencies) that collectively employ about 80 percent of all federal personnel. A full list of the agencies we selected to survey can be found in enclosure 1. Our survey questions focused on the efficiency, timeliness, quality of information, and ability to manage risk more generally across the personnel vetting enterprise.

We also selected and surveyed a generalizable sample of 626 federal contractors, including small businesses and large government contractors. While contractors and agencies interact differently with the personnel vetting system, our contractor survey questions focused on the same aspects of personnel vetting as our agency survey questions. Both surveys included open-ended and closed-ended questions. We used content analysis to assess the open-ended questions and quantitative analysis for the closed-ended questions. Enclosures 1 through 5 provide further details on our scope and methodology and analysis of the data we collected in the surveys.

We conducted this performance audit from January 2024 to May 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.

In summary, we found the following:

TW 2.0 implementation is ongoing. The Executive Agents released the final updated core policy related to TW 2.0 implementation in July 2024 and, as of January 2025, were working with the PAC program management office and federal agencies to focus on agency-level implementation.⁴ Most other TW 2.0 reform initiatives have been partially implemented. Initiatives that remain in progress include the transition from five to three investigative tiers and

³Since delivering our briefing to committee staff, we made changes in the background material to incorporate technical comments from the Office of the Director of National Intelligence and the Office of Personnel Management. These changes do not affect the data we collected or our analysis.

⁴PAC, *Trusted Workforce 2.0 Transition Report: Progress to Personnel Vetting Reforms made during the Biden-Harris Administration* (Jan. 2025).

the implementation of government-wide continuous vetting (CV).⁵ According to the PAC, all national security personnel have been enrolled in CV, and the PAC reported in January 2025 that enrollment of the entire non-sensitive public trust population was on track to be completed by October 2025.⁶ However, delays associated with the National Background Investigation Services (NBIS) IT system have slowed further progress. NBIS, which the Department of Defense is developing to support all phases of personnel vetting and replace legacy systems, is critical to the successful implementation of the TW 2.0 reform effort. In September 2024, DCSA completed a new 36-month “roadmap” for NBIS that projects product development milestones through fiscal year 2027.

Federal agencies experienced benefits and challenges, and about half reported improved risk management from TW 2.0 implementation, as of September 2024:

- *Benefits.* Agencies reported that the primary benefit of TW 2.0 implementation has been the ability to access real-time information on personnel, primarily through CV. For example, one agency told us that CV allowed them “to mitigate risk across the enterprise for continued trust of current individuals as well as new hires [from other agencies who] are being accepted as a trusted individual.”
- *Challenges.* Agencies also reported multiple challenges with implementing TW 2.0, with the most challenging related to technology and resources. For example, 42 of 43 agencies, or about 98 percent of those for which the question was applicable, reported that adapting their agency personnel vetting IT systems to the requirements of TW 2.0 has been at least somewhat challenging. One agency noted that its own case adjudication system is antiquated and that it had used resources to support a new case adjudication system planned for NBIS. After months of establishing workflows and partnering with DCSA, which is developing NBIS, they were informed that the new adjudication system would be cancelled. The agency further reported that without a new case adjudication system, it will be unable to adhere to the new TW 2.0 reporting metrics.
- *Risk management.* About 51 percent of the agencies we surveyed reported that their ability to manage risk while onboarding new personnel had at least somewhat improved under the implementation of TW 2.0 thus far. About 27 percent reported that there had been no change; about 9 percent reported a somewhat reduced ability to manage risk; and about 13 percent reported they had no basis to judge.

⁵Background investigations are grouped into five tiers under the current model that is being phased out as part of TW 2.0 implementation. The five tiers correspond to the sensitivity level of the trust determination needed for the employee. For example, Tier 1 investigations are for low-risk, non-sensitive public trust positions, and for physical or logical access, while Tier 5 investigations are for positions designated as critical sensitive or special sensitive, or that require eligibility for Q access or access to Top Secret or sensitive compartmented information. Under TW 2.0’s streamlined model, Low Tier covers low-risk non-sensitive positions and physical or logical access or credentialing determinations; Moderate Tier covers moderate-risk public trust and noncritical sensitive positions and granting eligibility and access to classified information at the Confidential or Secret level, or L access; and High Tier covers high-risk public trust and critical or special sensitive positions and granting eligibility and access to classified information at the Top Secret level, access to sensitive compartmented information, or Q access. Under TW 2.0, continuous vetting replaces periodic reinvestigations and consists of ongoing automated record checks of public and government data, agency-specific data, and certain time- or event-driven investigative activities. When these automated checks generate an alert, such as for criminal activity, the alert prompts further investigation.

⁶PAC, *Trusted Workforce 2.0 Quarterly Progress Report* (Jan. 2025).

Federal contractors experienced benefits and challenges, and nearly one quarter reported improved risk management from TW 2.0 implementation:⁷

- **Benefits.** Contractors reported improvements in the efficiency and timeliness of certain personnel vetting processes. For example, an estimated 40 percent of contractors reported at least some improvement in the efficiency of the process for requesting a security clearance. An estimated 45 percent of contractors reported improvement in the time it takes to receive a preliminary determination, or interim clearance. In related narrative responses, one contractor said timelier preliminary determinations allow contractors to assign personnel to jobs more quickly.
- **Challenges.** Contractors reported challenges obtaining information about ongoing background investigations and CV alerts. For example, an estimated 52 percent of contractors said obtaining information about ongoing background investigations was at least somewhat challenging, and an estimated 35 percent of contractors experienced at least some challenges obtaining information about investigations related to CV alerts. In narrative responses, contractors also said system inefficiencies—especially those related to NBIS—increased their workloads. For example, one contractor said that the delayed migration from previous systems to NBIS forced contractor security officials to “put information into two [IT] systems,” a challenge that is “very time consuming.”
- **Risk management.** Nearly half of all contractors—an estimated 45 percent—said the implementation of TW 2.0 had not changed their ability to manage risk when onboarding new personnel, while an estimated 22 percent said their ability to manage risk had improved. An estimated 8 percent said their ability to manage risk had been somewhat reduced, while an estimated 25 percent had no basis to judge.

Further information on agencies’ and contractors’ survey responses can be found in enclosures 1 through 5.

Agency Comments

We provided a draft of this report to ODNI, OPM, the Department of Defense, and the Office of Management and Budget for review and comments. ODNI, OPM, and the Department of Defense provided technical comments that we incorporated as appropriate. The Office of Management and Budget did not provide comments.

⁷The contractor survey results have margins of error at the 95 percent confidence level of plus or minus 13 percentage points or fewer.

Should you or your staff have any questions concerning this report, 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. Key contributors to this report were Kimberly Seay (Assistant Director), Erik Wilkins-McKee (Analyst-in-Charge), Nicole Ashby, Suellen Foth, Christopher Gezon, Abinash Mohanty, Terry Richardson, Carter Stevens, and Raymond Weyandt.

//SIGNED//

Alissa H. Czyz
Director, Defense Capabilities and Management
Enclosures – 5

List of Committees

The Honorable Roger Wicker
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The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Tom Cotton
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The Honorable Mark Warner
Vice Chairman
Select Committee on Intelligence
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The Honorable Rick Crawford
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The Honorable Jim Himes
Ranking Member
Permanent Select Committee on Intelligence
House of Representatives

Federal Workforce: Observations on the Implementation of the Trusted Workforce 2.0 Personnel Vetting Reform Initiative

Briefing for Staff Members of the Senate and House Intelligence and Armed Services Committees

December 11, 2024

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Introduction

We placed the government-wide personnel security clearance process on our High-Risk List in January 2018. As of April 2018, there was a backlog of about 725,000 cases, including investigations to determine an individual's eligibility to access classified information or to hold a sensitive position. To reduce this backlog and, among other things, align the government's various personnel vetting processes to improve their efficiency and effectiveness, the Security, Suitability, and Credentialing Performance Accountability Council (PAC) launched the Trusted Workforce 2.0 (TW 2.0) initiative in 2018.

In our 2023 High-Risk update, we noted there had been considerable progress in implementing TW 2.0, but the government-wide personnel security clearance process still faced challenges regarding the timely processing of clearances, measuring the quality of all stages of the clearance process, and issues with associated IT systems.

Source of Work and Objectives

The National Defense Authorization Act for Fiscal Year 2024 includes a provision for us to conduct a survey on the implementation of TW 2.0. The Act also includes a provision that we conduct surveys once every 2 years through 2029.⁸

This briefing provides our assessment, which serves as the baseline for future surveys, of the following:

1. The status of federal agencies' implementation of TW 2.0 to vet personnel and contractors for suitability/fitness/credentialing and eligibility to access classified information;
2. The experiences of federal agencies with implementing TW 2.0, including any benefits, challenges, and effects on managing risk while onboarding personnel; and
3. The experiences of federal contractors with implementing TW 2.0, including any benefits, challenges, and effects on managing risk while onboarding personnel.

⁸Pub. L. No. 118-31, Div. G, § 7704 (2023). Throughout this briefing, we use the term "agencies" to refer to both executive branch departments and agencies, unless otherwise indicated. We also use the phrase "eligibility to access classified information" to refer to individuals eligible to hold a sensitive position or to access classified information.

Background

TW 2.0 Goals and Initiatives

TW 2.0 is a government-wide initiative to modernize personnel vetting through a series of policy and procedural reforms and the overhaul of the government-wide process to vet the trustworthiness of the federal workforce. The initiative aims to better support agencies' missions by, among other things,

- reducing the time required to bring new hires on board;
- enabling mobility of the federal workforce; and
- improving insight into workforce behaviors.

TW 2.0, which is not fully implemented, introduces several reforms, including the following:

- Streamlining and aligning the government's various personnel vetting processes through new guidance and policy that applies general principles to all of them.
- Introducing continuous vetting (CV) government-wide. CV replaces periodic reinvestigations and consists of ongoing automated record checks of public and government data, agency-specific data, and certain time- or event-driven investigative activities. When these automated checks generate an alert, such as for criminal activity, the alert prompts further investigation.
- Reducing the number of background investigation tiers from five to three.
- Focusing on five key vetting scenarios for (1) establishing trust when onboarding new employees; (2) maintaining trust through ongoing vetting of current employees; (3) facilitating instances when individuals change position or assume new duties within their organization and a higher tier of investigation is required; (4) facilitating the mobility of trusted employees across federal agencies; and (5) facilitating the return of previously vetted individuals after a break in service.

Summary of Observations

Objective 1: Implementation Status of TW 2.0

- Key reform initiatives are partially implemented, including the transition from five to three investigative tiers, revised vetting scenarios, and government-wide CV.
- Delays related to the National Background Investigation Services (NBIS) system have delayed progress toward full implementation of TW 2.0.

Objective 2: Experiences of Federal Agencies with Implementing TW 2.0

- Benefits: Access to timely information on personnel.
- Challenges: Technology, resources, and shifting milestones.
- Risk management: Most agencies reported some improvement.

Objective 3: Experiences of Federal Contractors with Implementing TW 2.0

- Benefits: Efficiency of clearance requests, timeliness of preliminary determinations.
- Challenges: Obtaining information about investigations and CV alerts.
- Risk management: Some contractors reported improvement.

Objective 1: Implementation Status of TW 2.0 – Initiatives

The PAC has identified initiatives that are required to fully implement TW 2.0 and has made varying degrees of progress toward meeting them. See figure 1 for further details.

Figure 1. Implementation Status of Key Trusted Workforce 2.0 Reform Initiatives

	Status	Key accomplishments	Remaining work
Issue new policy and guidance to streamline and align personnel vetting processes	Fully implemented	Executive Agents released full suite of policies, including investigative, adjudicative, and management standards; personnel vetting and performance management guidelines; and related forms.	None
Reduce number of investigative tiers from five to three	Partially implemented	Revised investigative framework was codified in the May 2022 <i>Federal Personnel Vetting Investigative Standards</i> . ^a	Update repositories; develop plan to address agency concerns; and implement vetting scenarios.
Implement the upgrades, transfer of trust, and re-establishment of trust vetting scenarios	Partially implemented	Executive Agents released operational level guidance to agencies.	Resolve National Background Investigation Services (NBIS) system delays and implement new tier model.
Introduce continuous vetting (CV) government-wide	Partially implemented	National security population enrolled in CV; some non-sensitive public trust population enrolled in CV.	Enrollment of the non-sensitive public trust population is ongoing. ^b NBIS delays have slowed progress.

Source: GAO analysis of agency documentation and Office of Personnel Management and Performance Accountability Council program management office officials. | GAO-25-107325

^aDirector of National Intelligence and Director of the Office of Personnel Management, *Federal Personnel Vetting Investigative Standards* (May 17, 2022).

^bAccording to officials from the Office of Personnel Management, more than 53,700 personnel in non-sensitive public trust positions were enrolled in CV as of March 2025. According to PAC documentation, the goal is to enroll all such personnel by the end of fiscal year 2025. However, the Director of the Defense Counterintelligence and Security Agency confirmed that not all enrolled personnel are being continuously vetted.

Objective 1: Implementation Status of TW 2.0 – NBIS

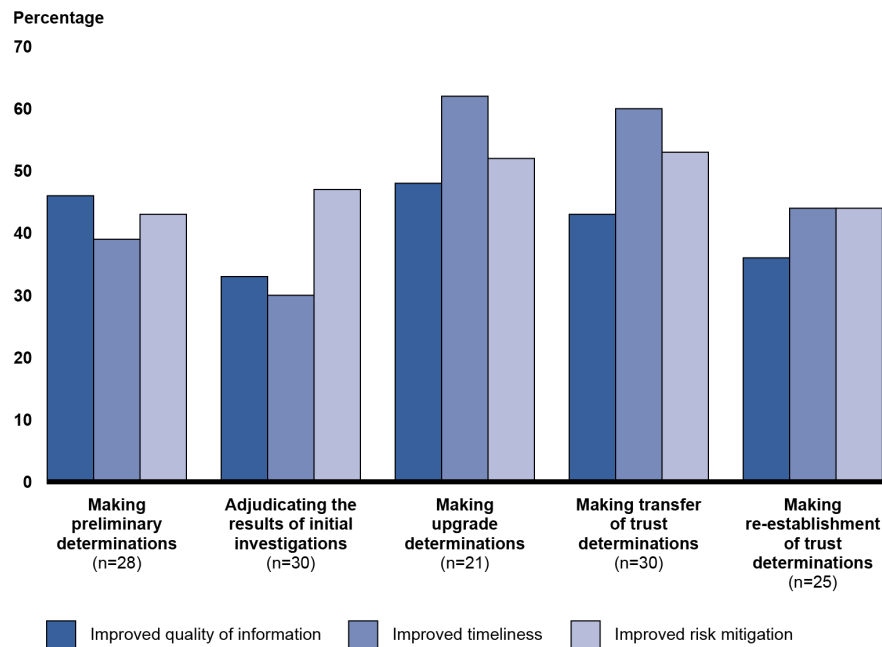
- Most recently, the PAC reported that the Defense Counterintelligence and Security Agency (DCSA) is working to address substantial delays, cost overruns, and technical issues associated with the NBIS system.
- Officials with the Office of Management and Budget (OMB) and the PAC program management office (PMO) told us that delays with NBIS are also delaying full TW 2.0 implementation—a point echoed by agency officials we surveyed. Among the actions delayed were the
 - transition from five to three investigative tiers;
 - full enrollment of non-sensitive public trust personnel in CV; and
 - implementation of a revised personnel vetting questionnaire to be used in the vetting application process that relies on completion of NBIS revisions to the eApplication capability.⁹
- In September 2024, DCSA completed a 36-month “roadmap” for NBIS that projects product development milestones through fiscal year 2027.

⁹See PAC, *Trusted Workforce 2.0 Quarterly Progress Report* (Oct. 2024). The PAC reported in January 2025 that these actions were on track to meet the revised timelines in the October 2024 report. See PAC, *Trusted Workforce 2.0 Quarterly Progress Report* (Jan. 2025).

Objective 2: Experiences of Federal Agencies with Implementing TW 2.0 – Benefits

Agencies reported that the primary benefit of TW 2.0 implementation to date has been the ability to access real-time information on personnel, primarily through CV and enrollment in the Federal Bureau of Investigation’s criminal database, Rap Back.

Figure 2. Percentage of Federal Agencies Reporting Improved Personnel Vetting Activities in GAO’s Trusted Workforce 2.0 Survey



Source: GAO analysis of executive branch agency survey responses. | GAO-25-107325

Note: We surveyed 45 agencies. However, not all agencies were using elements of Trusted Workforce 2.0 in these processes, so the related questions did not apply to all agencies. Also, the percentage of agencies reporting that there had been no change to the quality of information, timeliness, and risk mitigation of the processes in this figure varied but in many cases was comparable to those reporting improvement. For example, of the 21 agencies that reported using elements of Trusted Workforce 2.0 to make upgrade determinations, 10 respondents (~48 percent) stated they had seen improvements in the quality of information available, 8 (~38 percent) stated there had been no change, 1 (~5 percent) reported a reduction in performance, and 2 (~9 percent) stated they had no basis to judge.

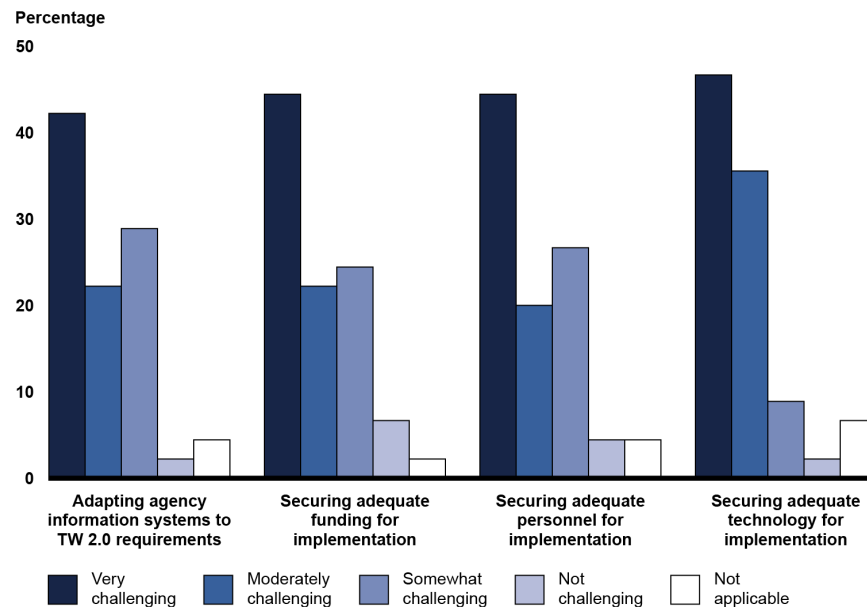
In responses to survey questions, at least 31 of 45 agencies specifically stated the enrollment of their national security personnel in continuous vetting, Rap Back, or the Office of the Director of National Intelligence’s automated record checks helped to mitigate risk, save costs, increase efficiency, or provide other benefits. Examples of agency responses include:

- “The implementation of [continuous vetting] has allowed [our agency] to mitigate risk across the enterprise for continued trust of current individuals as well as new hires that are a transfer of trust and are being accepted as a trusted individual.”
- “[Trusted Workforce] 2.0’s ability to provide ‘real-time’ data has enabled us to swiftly assess and mitigate potential risks.”
- “The greatest benefits to [our agency] from implementing the elements of [Trusted Workforce] 2.0 include [that] ...transfer of trust timeliness has improved due to enrollment in continuous vetting.”

Objective 2: Experiences of Federal Agencies with Implementing TW 2.0 – Challenges

Agencies reported multiple challenges with implementing TW 2.0 to date, with the most challenging related to technology and resources. In survey responses, agencies also cited shifting milestones and implementation delays often related to NBIS. Forty-two of 43 agencies for which the question was applicable reported that adapting their agency personnel vetting information systems to the requirements of TW 2.0 has been at least somewhat challenging. Forty-one agencies for which it was applicable reported that securing adequate resources to support TW 2.0 implementation has been at least somewhat challenging.

Figure 3. Percentage of Federal Agencies Reporting Trusted Workforce 2.0 (TW 2.0) Implementation Challenges in GAO's Survey



Source: GAO analysis of executive branch agency survey responses. | GAO-25-107325

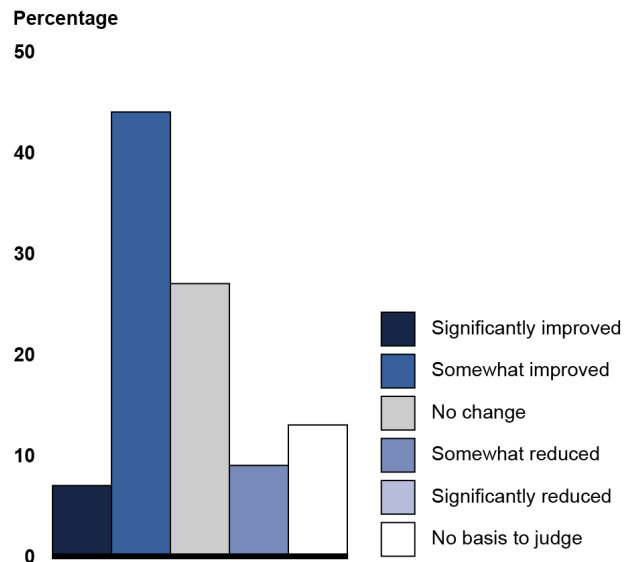
In responses to survey questions, agencies also reported other challenges such as:

- *Fifteen agencies reported that National Background Investigation Services system delays or limitations in its technical capabilities were challenging to Trusted Workforce 2.0 (TW 2.0) implementation.*
- *Eight agencies reported that delays in enrolling certain populations in continuous vetting was a challenge to TW 2.0 implementation. There is currently a program for enrolling the non-sensitive public trust population in continuous vetting.*
- *Seven agencies reported that shifting milestones had made it difficult to implement TW 2.0.*

Objective 2: Experiences of Federal Agencies with Implementing TW 2.0 – Managing Risk While Onboarding Personnel

Twenty-three of the 45 **agencies** (~51 percent) we surveyed reported that their ability to manage risk while onboarding new personnel had at least somewhat improved under the implementation of TW 2.0 to date, while 4 (~9 percent) reported that their ability to manage risk had been somewhat reduced. An additional 12 agencies (~27 percent) reported that there had been no change in their ability to manage risk, while the remaining 6 agencies (~13 percent) reported that they had no basis to judge.

Figure 4: Percentage of Federal Agencies Reporting Effects on Managing Risk While Onboarding Personnel in GAO's Trusted Workforce 2.0 Survey



Source: GAO analysis of executive branch agency survey responses. | GAO-25-107325

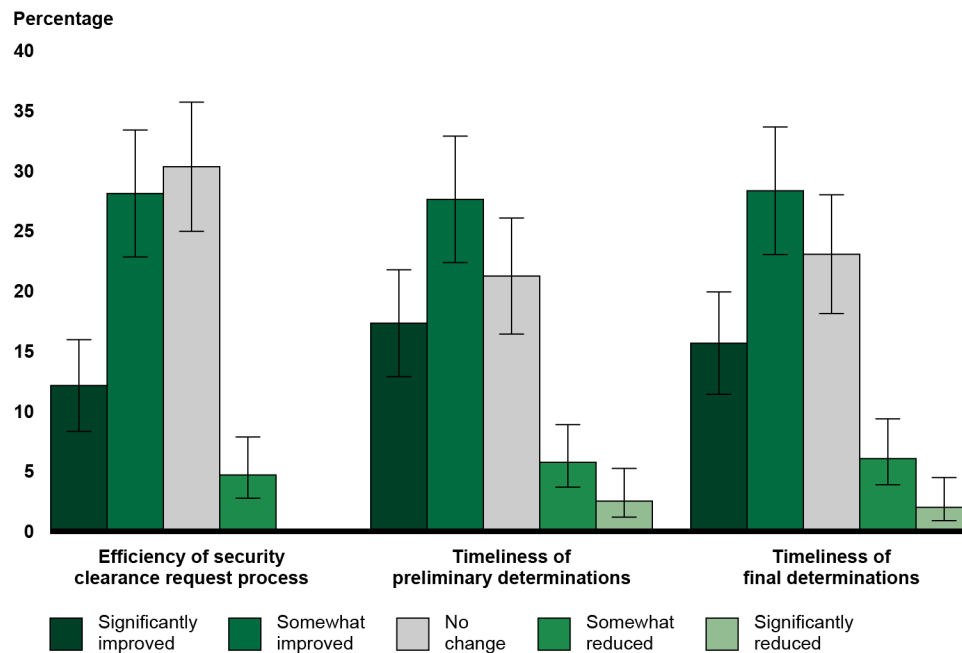
In written comments, agencies cited both positive and negative factors that affected risk management while onboarding personnel.

- Some agencies cited access to information through continuous vetting as improving the management of risk when onboarding personnel under transfer of trust circumstances.
 - *“Knowing once a person is enrolled in the Trusted Workforce program [and] the same continuous vetting checks are conducted (as required), helps reduce the risk to the agency and helps fill positions quickly.”*
- Other agencies stated that policy changes had a positive effect on risk management.
 - *“[Trusted Workforce] 2.0 has required [our agency] to take steps to integrate security and suitability decision points. This effort has led to the identification of potential risks as personnel join the [agency] as new hires or when moving within [the agency].”*
- By contrast, continued reliance on multiple IT systems was cited as affecting the management of risk negatively.
 - *“The lack of a single system for personnel vetting increases ... the risk of inaccurate information.”*

Objective 3: Experiences of Federal Contractors with Implementing TW 2.0 – Benefits

Some contractors reported improvements in the efficiency of the security clearance application process, the timeliness of preliminary determinations, and the timeliness of final determinations with TW 2.0 implementation to date.

Figure 5. Estimated Percentage of Federal Contractors Reporting Improved Personnel Vetting Processes in GAO’s Trusted Workforce 2.0 Survey



Source: GAO analysis of federal contractor survey responses. | GAO-25-107325

Note: Survey estimates are based on our generalizable survey of contractors. To accurately portray the survey findings, we include error bars in the figure above. These error bars depict the variability of our survey results. The estimates in this figure have a margin of error of plus or minus 5 percent or less at the 95 percent confidence level.

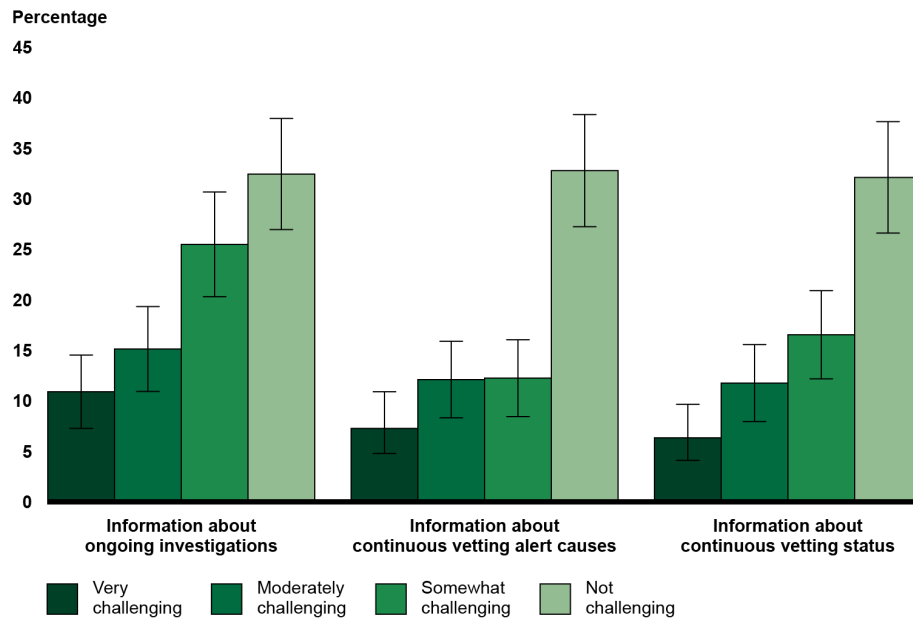
In responses to survey questions, contractors said a simplified application process and faster preliminary determinations had improved their timelines for hiring and assigning new workers. Examples of contractor responses include:

- “It seems like it is taking less time to get a [preliminary determination] and therefore we can start new employees much faster.”
- “The time between sending an investigation request to the [investigative service provider] and the individual receiving a [preliminary determination] has decreased, leading to the individual being assigned to the classified contract sooner.”
- “Requesting a clearance has gotten easier.”
- “More efficient clearing process. Faster [preliminary] determination.”

Objective 3: Experiences of Federal Contractors with Implementing TW 2.0 – Challenges

Contractors reported two key challenges with TW 2.0 implementation to date: increased workloads and difficulty obtaining information about ongoing background investigations and CV alerts. Contractors said increased workloads were caused by training needs, systems inefficiencies, and delays.

Figure 6. Estimated Percentage of Federal Contractors Reporting Challenges Accessing Information about Background Investigations and Continuous Vetting Alerts in GAO’s Trusted Workforce 2.0 Survey



Source: GAO analysis of federal contractor survey responses. | GAO-25-107325

Note: Survey estimates are based on our generalizable survey of contractors. To accurately portray the survey findings, we include error bars in the figure above. These error bars depict the variability of our survey results. The estimates in this figure have a margin of error of plus or minus 6 percent or less at the 95 percent confidence level.

In responses to survey questions, contractors noted that technological issues and government support have also created challenges. Some examples of responses include:

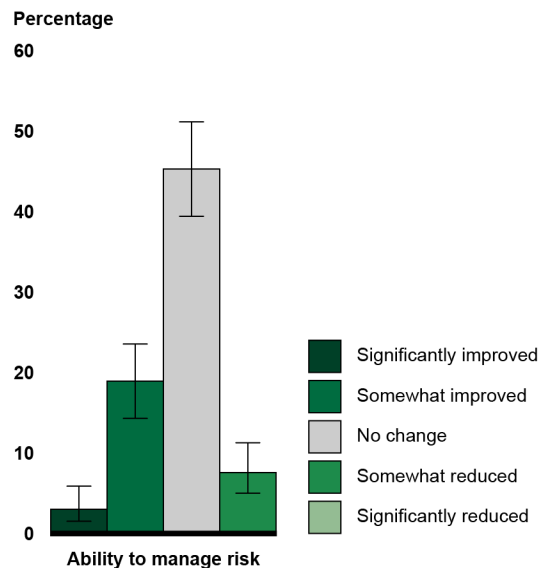
- “Sometimes [it’s] hard to receive help [from investigative service providers] on answers to our questions, either by email or phone.”
- “We now have to put information into two [IT] systems, DISS and [National Background Investigation Services (NBIS)]. It is very time consuming considering we use DISS for 95 percent of the security information we need.
- “Migrating from DISS to NBIS, then continuing with having to use both systems because full integration from DISS to NBIS has been delayed.”
- “The benefits of continuous vetting have been somewhat overshadowed by the difficulties associated with the transition to NBIS. The IT system’s shortcomings have introduced significant inefficiencies....”

Note: DISS is the Defense Information System for Security, an IT system used to manage personnel vetting and operated by the Defense Counterintelligence and Security Agency.

Objective 3: Experiences of Federal Contractors with Implementing TW 2.0 – Managing Risk While Onboarding Personnel

An estimated 45 percent of **contractors** reported no change in their facility's ability to manage risk when vetting new personnel. An estimated 22 percent of respondents reported at least some improvement—while an estimated 8 percent reported at least some reduction—in their ability to manage risk. Contractors' written comments indicated varied experience with risk management.

Figure 7. Estimated Percentage of Contractors Reporting Effects on Managing Risk While Onboarding Personnel in GAO's Trusted Workforce 2.0 Survey



Source: GAO analysis of federal contractor survey responses. | GAO-25-107325

Note: Survey estimates are based on our generalizable survey of contractors. To accurately portray the survey findings, we include error bars in the figure above. These error bars depict the variability of our survey results. The estimates in this figure have a margin of error of plus or minus 6 percent or less at the 95 percent confidence level. In this figure, we have removed the bar representing "Significantly reduced" as there were too few responses in this category to report the statistic.

In responses to survey questions, contractors said the implementation of Trusted Workforce 2.0 had a minimal effect on risk management. Examples of comments included:

- *"The speed in which the applicant receives their [preliminary determination] allows us to make better decisions for the company and our customers."*
- *"[Trusted Workforce] 2.0 has reduced the backlog of clearance investigations, allowing for faster onboarding of new hires."*

However, contractors also said system issues increased risk in the hiring process.

- *"The primary factor affecting our ability to manage risk during the onboarding of new personnel has been the challenges associated with the National Background Investigation Services system."*
- *"[Continuous vetting] is not implemented consistently across DOD and [the intelligence community]. This adds risk in my hiring process, because I can't tell if people will be approved for [higher clearances] by examining the DISS database."*

Scope and Methodology

For our first objective, we

- reviewed relevant documents from the PAC about the status of TW 2.0, including quarterly progress and implementation strategy updates and related policy and guidance.
- interviewed officials from the PAC principal agencies (OMB, Office of Personnel Management [OPM], Office of the Director of National Intelligence [ODNI], and Department of Defense [DOD]); the PAC program management office; DCSA, the government's primary investigative service provider; and a federal contractor industry organization.

We used the information we collected and reviewed to inform our methodology for the remaining objectives.

For our second and third objectives, we conducted two surveys:

- **Agencies:** a nongeneralizable sample of 45 federal departments and agencies, including all cabinet departments, the military departments, six intelligence agencies, 10 medium and large independent agencies, and other agencies with the authority to conduct background investigations that did not fall within these groups. Although the findings are not generalizable to all federal departments and agencies, these 45 departments and agencies employ about 80 percent of all federal personnel, including those subject to at least one of the personnel vetting processes. We achieved a 100 percent response rate for our agency survey.
- **Contractors:** a generalizable sample of 626 federal contractors, including small businesses and a selection of large government contractors. We achieved a 48 percent response rate for our contractor survey.

Scope and Methodology (continued)

We designed both surveys to collect data on the effects of TW 2.0 implementation on the efficiency, quality of information, timeliness, and risk management of the federal government's personnel vetting enterprise. The surveys included both closed-ended and open-ended questions, for which we conducted quantitative and qualitative analyses of responses, respectively.

We requested technical comments on this briefing from OMB, OPM, ODNI, and the Office of the Under Secretary of Defense for Intelligence and Security. We incorporated the comments as appropriate.

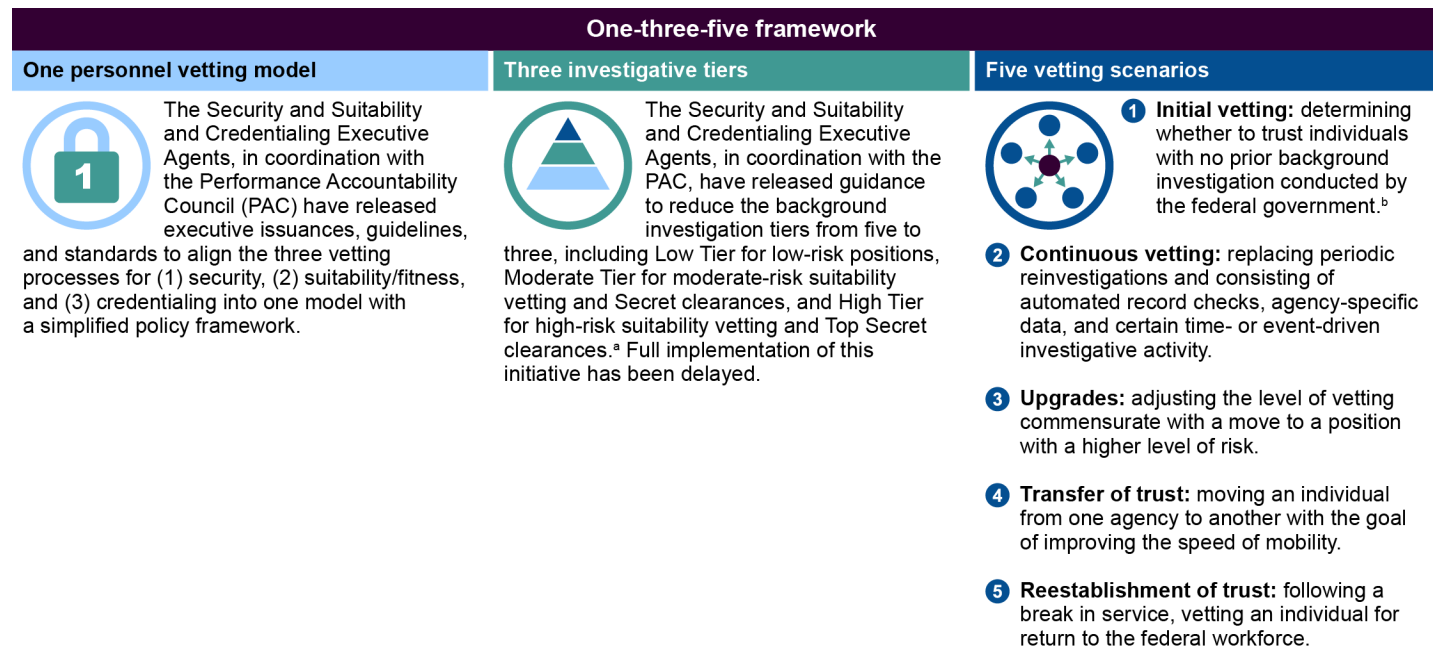
Additional Background Information

Background

TW 2.0 Goals and Initiatives

The TW 2.0 initiative includes reforms of personnel vetting guidelines, investigative tiers, and vetting scenarios. See figure 8 for details.

Figure 8: Trusted Workforce 2.0 Framework



Source: PAC documentation; Office of the Director of National Intelligence officials; and GAO (icons). | GAO-25-107325

^aLow Tier covers low-risk non-sensitive positions and physical or logical access or credentialing determinations; Moderate Tier covers moderate-risk public trust and noncritical sensitive positions and granting eligibility and access to classified information at the Confidential or Secret level, or L access; and High Tier covers high-risk public trust and critical or special sensitive positions and granting eligibility and access to classified information at the Top Secret level, access to sensitive compartmented information, or Q access. See Director of National Intelligence and Director of the Office of Personnel Management, *Federal Personnel Vetting Investigative Standards* (May 17, 2022).

^bAccording to Office of the Director of National Intelligence officials, under Trusted Workforce 2.0, an initial vetting determination also is done for previously vetted individuals who have been away from the government for more than 5 years.

Background

Roles and Responsibilities

In June 2008, Executive Order 13,467 established the PAC as the government-wide entity responsible for implementing reforms of the federal government's personnel vetting processes. There are four PAC principals:¹⁰

- **Deputy Director for Management of the Office of Management and Budget** chairs the PAC and sets overall personnel vetting reform direction. The Deputy Director leads accountability of reform.
- **Director of National Intelligence** serves as the Security Executive Agent, responsible for setting and overseeing personnel vetting policy for national security sensitive determinations.
- **Director of the Office of Personnel Management** serves as the Suitability and Credentialing Executive Agent, responsible for setting and overseeing personnel vetting policy for suitability, fitness, and credentialing determinations.
- **Under Secretary of Defense for Intelligence and Security** hosts and oversees DCSA, which conducts the majority of the federal government's background investigations. The Under Secretary is also responsible for carrying out all DOD personnel vetting reforms.¹¹

¹⁰Exec. Order No. 13,467, *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information*, § 2.4, as amended through Exec. Order No. 13,869, *Transferring Responsibility for Background Investigations to the Department of Defense*, 84 Fed. Reg. 18,125 (Apr. 24, 2019).

¹¹E.g., PAC, *Personnel Vetting Quarterly Progress Update, FY24 Q3* (July 2024).

Other PAC member agencies include the following:

- **Defense Counterintelligence and Security Agency (DCSA)** serves as the primary federal entity for conducting background investigations for the federal government.¹² DCSA also provides the PAC with information regarding matters of performance, including timeliness and continuous improvement, capacity, IT modernization, and other relevant aspects of its operations.¹³
- **Department of Homeland Security, Department of State, Federal Bureau of Investigation,** and other departments and agencies also have ongoing representation on the PAC.

Other officials with responsibilities under TW 2.0 include:

- a **Senior Implementation Official** in each department and agency who is responsible for ensuring that agency implementation of TW 2.0 is consistent with the principles of the *Federal Personnel Vetting Core Doctrine*, implementation guidance issued by the Executive Agents, and the *Trusted Workforce 2.0 Implementation Strategy*.¹⁴

¹²DOD Directive 5105.42, *Defense Counterintelligence and Security Agency* (Jan. 16, 2025).

¹³Exec. Order No. 13,467, as amended.

¹⁴PAC, *Trusted Workforce 2.0 Implementation Strategy* (Apr. 2022).

Background

Personnel Vetting Process

Agencies and contractors have different levels of interaction with the personnel vetting process. See figure 9 for details.

Figure 9: Federal Agency and Contractor Roles in Personnel Vetting Processes

	Initiation	Investigation	Adjudication	Continuous vetting ^a	Reinvestigation
Agency role	The agency requests that the individual submit an application to initiate a background investigation.	Investigative service providers, such as the Defense Counter-intelligence and Security Agency and the Federal Bureau of Investigation, use the information in the application to investigate the individual's background.	Agencies use the information from the background investigation to determine whether the individual is eligible to access classified information or hold a sensitive position; suitable/fit to be a government employee or contractor employee; or eligible for credentials to access agency systems or facilities.	Agencies use automated record checks, time/event-based checks, and agency data to determine continued trustworthiness and eligibility/access. Currently, according to Performance Accountability Council documents, all employees in national security positions—and some other employees—are enrolled in continuous vetting.	Most employees in non-sensitive public trust positions are currently subject to periodic reinvestigations. As employees are enrolled into continuous vetting, agencies may phase out periodic reinvestigations.
Contractor role	The contractor requests that the individual submit an application to initiate a background investigation. ^b	The investigative service provider may request that the contractor or individual provide further information as needed for the investigation.	No action. The contractor and individual have no role in adjudicating the results of the investigation.	The contractor requests that employees submit information as needed to investigative service providers when continuous vetting alerts require investigation. Currently, all contractors in national security positions are enrolled in continuous vetting.	The contractor requests that employees submit information as needed to investigative service providers during periodic reinvestigations. As contractor employees are enrolled into continuous vetting, their contracting agencies may phase out periodic investigations.

Source: GAO analysis of executive branch agency documentation and contractor officials. | GAO-25-107325

^aImplementation of continuous vetting—and the extent to which enrolled employees and contractors are being actively vetted against all information sources—varies.

^bProcessing of contractor investigations can vary depending on the type of position. For example, the contracting department or agency, rather than the contractor security officials, may directly communicate with contractor employees in non-sensitive positions to initiate a background investigation.

Background

National Background Investigation Services System

Since 2016, DOD has delivered some capabilities through the NBIS system, an IT system intended to replace legacy systems and support all phases of personnel vetting. For example, current NBIS capabilities include:

- a data repository in which all federal departments and agencies that use NBIS will be expected to record the result of adjudications in the future; and
- an eApplication to collect the data necessary to begin a background investigation.

In prior work, we reported that according to an official from the PAC program management office, the most important factor in implementing TW 2.0 is DCSA's development of supporting IT systems like the NBIS system. However, we found that DCSA has repeatedly missed milestones for NBIS, partly because DCSA does not yet have a reliable schedule and cost estimate for NBIS. There are also cybersecurity and privacy concerns DCSA needs to address.

- In December 2021, DOD concurred with our recommendation to revise the NBIS program schedule to meet best practices, but the extent to which program management has prioritized schedule development was unclear.¹⁵ In March 2024, DOD stated it would complete actions to revise the NBIS schedule by the end of fiscal year 2024. However, DCSA did not meet this goal and continues to work on revising the schedule.

In August 2023, we also reviewed the NBIS program's 2022 cost estimate and found that it was not reliable.¹⁶ For example, the estimate's supporting documentation discussed some, but not all, ground rules and assumptions that could invalidate the estimate if any were rejected by management. We recommended that Congress consider directing DOD to develop a reliable cost estimate based on best practices for cost estimating we developed. This recommendation has not been implemented.

¹⁵GAO, *Personnel Vetting: Actions Needed to Implement Reforms, Address Challenges, and Improve Planning*, [GAO-22-104093](#) (Washington, D.C.: Dec. 9, 2021).

¹⁶GAO, *Personnel Vetting: DOD Needs a Reliable Schedule and Cost Estimate for the National Background Investigation Services Program*, [GAO-23-105670](#) (Washington, D.C.: Aug. 17, 2023).

Background

National Background Investigation Services System (continued)

In June 2024, we reported that DCSA faced challenges in managing risks related to its cybersecurity and privacy controls for NBIS and legacy personnel vetting systems that we reviewed.¹⁷ For example, DCSA selected baseline security controls for these systems but used an outdated version of government-wide guidance as the source for the control selections.

- We made 13 recommendations, including that DCSA update its controls to meet the requirements of current guidance and that it complete system-level risk assessments and document the results. DCSA has taken action to close 12 of these recommendations. The remaining recommendation has not been fully implemented.

¹⁷GAO, *Personnel Vetting: DOD Needs to Enhance Cybersecurity of Background Investigation Systems*, [GAO-24-106179](#) (Washington, D.C.: June 20, 2024).

Background

Federal Agencies We Surveyed

Table 1: List of 45 Federal Departments and Agencies Selected and Surveyed on Trusted Workforce 2.0 Implementation

Cabinet and military departments	Independent agencies	Intelligence components	Other agencies
Agriculture Commerce Defense Education Energy Health and Human Services Homeland Security Housing and Urban Development Interior Justice Labor State Transportation Treasury Veterans Affairs Air Force Army Navy	Commodity Futures Trading Commission Corporation for National and Community Service (AmeriCorps) Environmental Protection Agency General Services Administration National Aeronautics and Space Administration Peace Corps Pension Benefit Guaranty Corporation Railroad Retirement Board Small Business Administration Social Security Administration	Central Intelligence Agency Defense Intelligence Agency Federal Bureau of Investigation National Geospatial-Intelligence Agency National Reconnaissance Office National Security Agency	Alcohol, Tobacco, Firearms, and Explosives Citizenship and Immigration Services Customs and Border Protection Federal Emergency Management Agency Immigration and Customs Enforcement Tennessee Valley Authority Transportation Security Administration U.S. Agency for International Development U.S. Bureau of Engraving and Printing U.S. Postal Inspection Service U.S. Secret Service

Source: GAO. | GAO-25-107325

Enclosure 2: Federal Department and Agency Responses to Closed-Ended Questions in GAO's Trusted Workforce 2.0 Survey

We selected and surveyed a non-generalizable sample of 45 federal departments and agencies (hereinafter agencies) to collect information on the government-wide implementation of Trusted Workforce 2.0. While we received responses from all 45 agencies, not all agencies responded that they were conducting all of the activities we asked about. For example, 28 of 45 agencies reported they were using elements of Trusted Workforce 2.0 in making preliminary determinations when onboarding new personnel, while the remaining 17 reported they did not do so. Table 2 provides responses from agencies that were conducting the activities described in the question. The number of agencies responding to each question is noted at the end of the question. Table 3 provides the responses to questions directed to those agencies in our sample that conduct background investigations, again with the number of agencies responding to each question noted at the end of the question.

Table 2: Federal Agency Responses to Closed-Ended Questions in GAO's Trusted Workforce 2.0 Survey

	Number	Percent
1. How has the implementation of Trusted Workforce 2.0 to date affected the efficiency, quality of information, timeliness, and ability to mitigate risk of making preliminary determinations when onboarding new personnel to your agency? (Number that responded = 28)		
Efficiency		
Significantly reduced	2	7.1
Somewhat reduced	1	3.6
No change	13	46.4
Somewhat improved	11	39.3
Significantly improved	—	—
No basis to judge	1	3.6
Quality of information		
Significantly reduced	—	—
Somewhat reduced	1	3.6
No change	13	46.4
Somewhat improved	13	46.4
Significantly improved	—	—
No basis to judge	1	3.6
Timeliness		
Significantly reduced	1	3.6
Somewhat reduced	4	14.3
No change	11	39.3
Somewhat improved	11	39.3
Significantly improved	—	—
No basis to judge	1	3.6
Ability to mitigate risk		
Significantly reduced	—	—

Enclosure 2

	Number	Percent
Somewhat reduced	2	7.1
No change	13	46.4
Somewhat improved	11	39.3
Significantly improved	1	3.6
No basis to judge	1	3.6
2. How has the implementation of Trusted Workforce 2.0 to date affected the efficiency, quality of information, timeliness, and ability to mitigate risk of adjudicating the results of initial investigations when onboarding new personnel to your agency? (Number that responded = 30)		
Efficiency	Number	Percent
Significantly reduced	1	3.3
Somewhat reduced	2	6.7
No change	13	43.3
Somewhat improved	13	43.3
Significantly improved	1	3.3
No basis to judge	—	—
Quality of information		
Significantly reduced	—	—
Somewhat reduced	1	3.3
No change	18	60.0
Somewhat improved	9	30.0
Significantly improved	1	3.3
No basis to judge	1	3.3
Timeliness		
Significantly reduced	—	—
Somewhat reduced	3	10.0
No change	16	53.3
Somewhat improved	9	30.0
Significantly improved	—	—
No basis to judge	2	6.7
Ability to mitigate risk		
Significantly reduced	—	—
Somewhat reduced	1	3.3
No change	14	46.7
Somewhat improved	13	43.3
Significantly improved	1	3.3
No basis to judge	1	3.3
3. How has the implementation of Trusted Workforce 2.0 to date affected the efficiency, quality of information, timeliness, and ability to mitigate risk of adjudicating the results when alerts occur under continuous vetting at your agency? (Number that responded = 40)		
Efficiency	Number	Percent
Significantly reduced	1	2.5
Somewhat reduced	4	10.0

Enclosure 2

	Number	Percent
No change	5	12.5
Somewhat improved	19	47.5
Significantly improved	8	20.0
No basis to judge	3	7.5
Quality of information		
Significantly reduced	—	—
Somewhat reduced	3	7.5
No change	4	10.0
Somewhat improved	24	60.0
Significantly improved	6	15.0
No basis to judge	3	7.5
Timeliness		
Significantly reduced	1	2.5
Somewhat reduced	5	12.5
No change	1	2.5
Somewhat improved	19	47.5
Significantly improved	10	25.0
No basis to judge	4	10.0
Ability to mitigate risk		
Significantly reduced	1	2.5
Somewhat reduced	2	5.0
No change	2	5.0
Somewhat improved	20	50.0
Significantly improved	9	22.5
No basis to judge	6	15.0
4. How, if at all, has the implementation of Trusted Workforce 2.0 to date affected the efficiency, quality of information, timeliness, and ability to mitigate risk of making clearance upgrade determinations at your agency? (Number that responded = 21)		
Efficiency	Number	Percent
Significantly reduced	1	4.8
Somewhat reduced	1	4.8
No change	5	23.8
Somewhat improved	8	38.1
Significantly improved	4	19.1
No basis to judge	2	9.5
Quality of information		
Significantly reduced	—	—
Somewhat reduced	1	4.8
No change	8	38.1
Somewhat improved	9	42.9
Significantly improved	1	4.8

Enclosure 2

	Number	Percent
No basis to judge	2	9.5
Timeliness		
Significantly reduced	—	—
Somewhat reduced	2	9.5
No change	4	19.1
Somewhat improved	11	52.4
Significantly improved	2	9.5
No basis to judge	2	9.5
Ability to mitigate risk		
Significantly reduced	—	—
Somewhat reduced	1	4.8
No change	7	33.3
Somewhat improved	9	42.9
Significantly improved	2	9.5
No basis to judge	2	9.5
5. How, if at all, has the implementation of Trusted Workforce 2.0 to date affected the efficiency, quality of information, timeliness, and ability to mitigate risk of making transfer of trust determinations at your agency? (Number that responded = 30)		
Efficiency		
Significantly reduced	1	3.3
Somewhat reduced	2	6.7
No change	7	23.3
Somewhat improved	12	40.0
Significantly improved	8	26.7
No basis to judge	—	—
Quality of information		
Significantly reduced	—	—
Somewhat reduced	4	13.3
No change	13	43.3
Somewhat improved	11	36.7
Significantly improved	2	6.7
No basis to judge	—	—
Timeliness		
Significantly reduced	—	—
Somewhat reduced	3	10.0
No change	8	26.7
Somewhat improved	12	40.0
Significantly improved	6	20.0
No basis to judge	1	3.3
Ability to mitigate risk		
Significantly reduced	—	—

Enclosure 2

	Number	Percent
Somewhat reduced	2	6.7
No change	11	36.7
Somewhat improved	12	40.0
Significantly improved	4	13.3
No basis to judge	1	3.3
6. How, if at all, has the implementation of Trusted Workforce 2.0 to date affected the efficiency, quality of information, timeliness, and ability to mitigate risk of making re-establishment of trust determinations at your agency? (Number that responded = 25)		
Efficiency	Number	Percent
Significantly reduced	1	4.0
Somewhat reduced	2	8.0
No change	6	24.0
Somewhat improved	9	36.0
Significantly improved	4	16.0
No basis to judge	3	12.0
Quality of information		
Significantly reduced	—	—
Somewhat reduced	1	4.0
No change	12	48.0
Somewhat improved	8	32.0
Significantly improved	1	4.0
No basis to judge	3	12.0
Timeliness		
Significantly reduced	—	—
Somewhat reduced	3	12.0
No change	7	28.0
Somewhat improved	8	32.0
Significantly improved	3	12.0
No basis to judge	4	16.0
Ability to mitigate risk		
Significantly reduced	—	—
Somewhat reduced	1	4.0
No change	9	36.0
Somewhat improved	9	36.0
Significantly improved	2	8.0
No basis to judge	4	16.0
7. How, if at all, has the implementation of Trusted Workforce 2.0 to date affected the efficiency, quality of information, timeliness, and ability to mitigate risk of conducting background investigations for onboarding new personnel? (Twenty-one agencies reported using elements of TW 2.0 in this process, while 11 provided specific responses on the effects.) (Number that responded = 11)		
Efficiency	Number	Percent
Significantly reduced	3	27.3

Enclosure 2

	Number	Percent
Somewhat reduced	1	9.1
No change	3	27.3
Somewhat improved	3	27.3
Significantly improved	1	9.1
No basis to judge	—	—
Quality of information		
Significantly reduced	1	9.1
Somewhat reduced	—	—
No change	6	54.6
Somewhat improved	4	36.4
Significantly improved	—	—
No basis to judge	—	—
Timeliness		
Significantly reduced	2	18.2
Somewhat reduced	2	18.2
No change	4	36.4
Somewhat improved	2	18.2
Significantly improved	—	—
No basis to judge	1	9.1
Ability to mitigate risk		
Significantly reduced	—	—
Somewhat reduced	—	—
No change	5	45.5
Somewhat improved	5	45.5
Significantly improved	—	—
No basis to judge	1	9.1
8. How, if at all, has the implementation of Trusted Workforce 2.0 to date affected the efficiency, quality of information, timeliness, and ability to mitigate risk of conducting additional investigations as needed when alerts occur under continuous vetting? (Thirty-six agencies reported using elements of TW 2.0 in this process, while 17 provided specific responses on the effects.) (Number that responded = 17)		
Efficiency	Number	Percent
Significantly reduced	1	5.9
Somewhat reduced	2	11.8
No change	4	23.5
Somewhat improved	8	47.1
Significantly improved	1	5.9
No basis to judge	1	5.9
Quality of information		
Significantly reduced	1	5.9
Somewhat reduced	2	11.8
No change	5	29.4

Enclosure 2

	Number	Percent
Somewhat improved	7	41.2
Significantly improved	1	5.9
No basis to judge	1	5.9
Timeliness		
Significantly reduced	1	5.9
Somewhat reduced	1	5.9
No change	3	17.7
Somewhat improved	10	58.8
Significantly improved	—	—
No basis to judge	2	11.8
Ability to mitigate risk		
Significantly reduced	—	—
Somewhat reduced	—	—
No change	3	17.7
Somewhat improved	10	58.8
Significantly improved	1	5.9
No basis to judge	3	17.7

9. Has your agency identified and secured the resources required to support Trusted Workforce 2.0 implementation in the following areas? (Number that responded = 45)

a. Adapting annual workforce training for personnel adjudicating the results of background investigations

Identified but not secured	20	44.4
Identified and secured	17	37.8
Neither identified nor secured	5	11.1
No basis to judge	3	6.7

b. Maintaining and/or updating internal information systems for managing personnel vetting

Identified but not secured	18	40.0
Identified and secured	18	40.0
Neither identified nor secured	4	8.9
No basis to judge	5	11.1

c. Securing personnel to implement Trusted Workforce 2.0 to date

Identified but not secured	25	55.6
Identified and secured	15	33.3
Neither identified nor secured	3	6.7
No basis to judge	2	4.4

d. Enrolling personnel in Rap Back

Identified but not secured	14	31.1
Identified and secured	27	60.0
Neither identified nor secured	4	8.9
No basis to judge	—	—

10. How adequate is the guidance from the Performance Accountability Council (PAC) program management

Enclosure 2

	Number	Percent
office for identifying and planning for your agency's resource requirements while transitioning to Trusted Workforce 2.0? (Number that responded = 45)		
Less than adequate	8	17.8
Adequate	24	53.3
More than adequate	12	26.7
Did not receive guidance	1	2.2
11. How adequate is the guidance from the Security and Suitability and Credentialing Executive Agents for identifying and planning for your agency's resource requirements while transitioning to Trusted Workforce 2.0? (Number that responded = 45)		
Less than adequate	10	22.2
Adequate	30	66.7
More than adequate	4	8.9
Did not receive guidance	1	2.2
12. To what extent has your agency developed and implemented internal policy to supplement Trusted Workforce 2.0 implementation guidance from the PAC program management office and the Security and Suitability and Credentialing Executive Agents? (Number that responded = 44)		
No plans to develop internal policy	1	2.2
Currently developing internal policy	32	71.1
Developed but not yet implemented internal policy	5	11.1
Developed and implemented internal policy	6	13.3
13. How adequate is current Trusted Workforce 2.0 guidance from the PAC program management office and the Security and Suitability and Credentialing Executive Agents for developing internal policy at your agency to implement Trusted Workforce 2.0 capabilities in each of the following areas? (Number that responded = 45)		
a. Standards/guidelines for adjudicating the results of personnel background investigations		
Less than adequate	3	6.7
Adequate	33	73.3
More than adequate	5	11.1
No basis to judge	4	8.9
b. Standards/guidelines for making clearance upgrade determinations		
Less than adequate	5	11.1
Adequate	34	75.6
More than adequate	3	6.7
No basis to judge	3	6.7
c. Standards/guidelines for making transfer of trust determinations		
Less than adequate	5	11.1
Adequate	35	77.8
More than adequate	2	4.4
No basis to judge	3	6.7
d. Standards/guidelines for making re-establishment of trust determinations		
Less than adequate	6	13.3

Enclosure 2

	Number	Percent
Adequate	32	71.1
More than adequate	2	4.4
No basis to judge	5	11.1
e. Performance measurement standards for personnel vetting		
Less than adequate	10	22.2
Adequate	28	62.2
More than adequate	2	4.4
No basis to judge	5	11.1
14. How challenging, if at all, have the following elements of Trusted Workforce 2.0 been to implement at your agency to date? (Number that responded = 45)		
a. Revising internal agency guidance to align with Trusted Workforce 2.0 government-wide guidance from the PAC program management office and the Security and Suitability and Credentialing Executive Agents		
Not at all challenging	3	6.7
Somewhat challenging	13	28.9
Moderately challenging	16	35.6
Very challenging	10	22.2
Not applicable	3	6.7
b. Incorporating current elements of Trusted Workforce 2.0 into your agency's annual workforce training for adjudicators		
Not at all challenging	7	15.6
Somewhat challenging	14	31.1
Moderately challenging	12	26.7
Very challenging	7	15.6
Not applicable	5	11.1
c. Enrolling personnel in Rap Back		
Not at all challenging	5	11.1
Somewhat challenging	18	40.0
Moderately challenging	10	22.2
Very challenging	9	20.0
Not applicable	3	6.7
d. Adapting your agency's legacy or current information systems for personnel vetting processes to the requirements of Trusted Workforce 2.0		
Not at all challenging	1	2.2
Somewhat challenging	13	28.9
Moderately challenging	10	22.2
Very challenging	19	42.2
Not applicable	2	4.4
e. Planning for the adaptation or replacement of your agency's legacy or current information systems for personnel vetting processes to be compatible with the requirements of Trusted Workforce 2.0 when it is fully implemented		
Not at all challenging	—	—
Somewhat challenging	8	17.8
Moderately challenging	10	22.2

Enclosure 2

	Number	Percent
Very challenging	21	46.7
Not applicable	6	13.3
f. Preparing to adapt vetting adjudications to the 3-tier investigation framework		
Not at all challenging	7	15.6
Somewhat challenging	10	22.2
Moderately challenging	10	22.2
Very challenging	12	26.7
Not applicable	6	13.3
g. Securing adequate funding to implement current Trusted Workforce 2.0 elements		
Not at all challenging	3	6.7
Somewhat challenging	11	24.4
Moderately challenging	10	22.2
Very challenging	20	44.4
Not applicable	1	2.2
h. Securing personnel to implement current Trusted Workforce 2.0 elements		
Not at all challenging	2	4.4
Somewhat challenging	12	26.7
Moderately challenging	9	20.0
Very challenging	20	44.4
Not applicable	2	4.4
i. Securing adequate technology to implement Trusted Workforce 2.0		
Not at all challenging	1	2.2
Somewhat challenging	4	8.9
Moderately challenging	16	35.6
Very challenging	21	46.7
Not applicable	3	6.7
j. Receiving adequate communication from your agency's Investigative Service Provider, if applicable, about alerts arising from continuous vetting		
Not at all challenging	18	40.0
Somewhat challenging	3	6.7
Moderately challenging	4	8.9
Very challenging	4	8.9
Not applicable	16	35.6
15. Based on your experience, how has the implementation of Trusted Workforce 2.0 to date affected your ability to manage risk when onboarding new personnel? (Number that responded = 45)		
Significantly reduced	—	—
Somewhat reduced	4	8.9
No change	12	26.7
Somewhat improved	20	44.4
Significantly improved	3	6.7
No basis to judge	6	13.3

— = No responses

Source: GAO analysis of our survey of 45 federal departments and agencies | GAO-25-107325

Table 3: Responses to Additional GAO Trusted Workforce 2.0 Survey Questions, Specific to Federal Agencies That Conduct Background Investigations

	<u>Number</u>	<u>Percent</u>
1. In its capacity as an Investigative Service Provider, to what extent has your agency observed the following changes as a result of the implementation of Trusted Workforce 2.0 to date? (Number that responded = 4)		
a. Improved the efficiency of my agency's collection of personnel background information to enable better-informed adjudication decisions		
No extent at all	—	—
To a small extent	1	25.0
To some extent	—	—
To a moderate extent	—	—
To a great extent	—	—
No basis to judge	3	75.0
b. Improved the timeliness of my agency's personnel background investigations for customer agencies		
No extent at all	1	25.0
To a small extent	—	—
To some extent	—	—
To a moderate extent	—	—
To a great extent	—	—
No basis to judge	3	75.0
c. Supported my agency's efforts to decrease risk for customer agencies when they make preliminary clearance determinations		
No extent at all	—	—
To a small extent	—	—
To some extent	—	—
To a moderate extent	—	—
To a great extent	—	—
No basis to judge	4	100.0
d. Supported my agency's efforts to decrease risk for customer agencies when they adjudicate the results of initial investigations		
No extent at all	—	—
To a small extent	—	—
To some extent	—	—
To a moderate extent	1	25.0
To a great extent	—	—
No basis to judge	3	75.0
e. Allowed my agency to decrease risk for customer agencies through continuous vetting		
No extent at all	—	—

Enclosure 2

	<u>Number</u>	<u>Percent</u>
To a small extent	—	—
To some extent	—	—
To a moderate extent	1	25.0
To a great extent	1	25.0
No basis to judge	2	50.0
f. Allowed my agency to develop a more streamlined approach to conducting personnel background investigations for customer agencies		
No extent at all	1	25.0
To a small extent	—	—
To some extent	—	—
To a moderate extent	1	25.0
To a great extent	—	—
No basis to judge	2	50.0
2. Has your agency identified and secured the resources required to implement the following investigation-related elements of Trusted Workforce 2.0? (Number that responded = 19)		
a. Incorporating revised investigative standards into initial background investigations conducted by your agency		
Identified but not secured	11	57.9
Identified and secured	6	31.6
Neither identified nor secured	—	—
No basis to judge	2	10.5
b. Incorporating revised investigative standards when conducting further investigation in response to an alert under continuous vetting		
Identified but not secured	11	57.9
Identified and secured	6	31.6
Neither identified nor secured	1	5.3
No basis to judge	1	5.3
c. Adapting annual workforce training to include revisions to investigative standards		
Identified but not secured	9	47.4
Identified and secured	7	36.8
Neither identified nor secured	2	10.5
No basis to judge	1	5.3
d. Maintaining current/legacy internal information systems for managing personnel vetting in your agency's capacity as an Investigative service provider		
Identified but not secured	4	21.1
Identified and secured	11	57.9
Neither identified nor secured	1	5.3
No basis to judge	3	15.8
3. How adequate is current guidance from the Performance Accountability Council program management office and Executive Agents for developing internal policy at your agency to implement Trusted Workforce 2.0 standards/guidelines for conducting personnel background investigations as an Investigative Service Provider? (Number that responded = 19)		
Less than adequate	4	21.1

Enclosure 2

	<u>Number</u>	<u>Percent</u>
Adequate	14	73.7
More than adequate	—	—
No basis to judge	1	5.3
4. How challenging, if at all, have the following elements of Trusted Workforce 2.0 been to implement at your agency to date? (Number that responded = 19)		
a. Incorporating current elements of Trusted Workforce 2.0 into your agency's annual workforce training for personnel that conduct background investigations		
Not at all challenging	4	21.1
Somewhat challenging	4	21.1
Moderately challenging	7	36.8
Very challenging	1	5.3
Not applicable	3	15.8
b. Providing adequate information to customer agencies about alerts arising from continuous vetting		
Not at all challenging	2	10.5
Somewhat challenging	3	15.8
Moderately challenging	1	5.3
Very challenging	—	—
Not applicable	13	68.4

— = No responses

Source: GAO analysis of our survey of 45 federal departments and agencies. | GAO-25-107325

Enclosure 3: Federal Agency Responses to Open-Ended Questions in GAO's Survey on Trusted Workforce 2.0 Implementation

We conducted a content analysis of the federal department and agency (hereinafter agency) responses to our open-ended survey questions. These questions provided opportunities for respondents to share additional thoughts about the benefits, challenges, ability to manage risk when onboarding new personnel, and agency planning during Trusted Workforce 2.0 implementation, as of early September 2024. Not all respondents shared thoughts about each category in table 4 below; therefore, the categories are not representative of all survey respondents.

To complete the content analysis, two analysts jointly developed an overarching framework of general codes for categorizing responses to the open-ended survey questions—for example, risk, efficiency, timeliness, quality of information, resources, etc. The results of this content analysis demonstrated significant overlap of topics—for example, comments about agency IT systems that support personnel vetting activities covered data accuracy in some instances but were related to resource availability in others. Based on initial coding, some categories were combined since there was overlap and very few responses coded to some categories. The two analysts also categorized each response as either positive, neither positive or negative, or negative. They then independently assigned each response to a category. They reviewed and compared their coding to identify any areas of disagreement, discussed each comment and category assigned, and reached consensus for the final categorization of each survey response.

Table 4 provides the results of our analysis of agency responses to open-ended questions about their experiences with the benefits, challenges, and ability to mitigate risk related to Trusted Workforce 2.0 implementation.

Table 4: Results of GAO Analysis of Federal Agency Responses to Open-Ended Survey Questions on Trusted Workforce 2.0

Category	Category elements	Number of agencies that shared related positive comments	Number of agencies that shared related comments that were neither positive or negative	Number of agencies that shared related negative comments
Agency IT systems—resources	Resource requirements and maintenance related to Trusted Workforce 2.0 (TW 2.0) implementation	—	—	11
Agency IT systems—data	Data accuracy and visibility across systems, including in transfer of trust cases; compatibility and interoperability with other systems, including the National Background Investigation Services (NBIS) system	2	—	15
NBIS system	Effects on TW 2.0 implementation; system technical capabilities; limitations	1	1	23

Category	Category elements	Number of agencies that shared related positive comments	Number of agencies that shared related comments that were neither positive or negative	Number of agencies that shared related negative comments
Continuous vetting enrollment	Non-sensitive public trust population; population of foreign nationals in the military; ease or difficulty of enrollment process	—	10	16
Continuous vetting resource requirements	Personnel, funding and technology needed to determine accuracy of alerts; managing the volume of alerts; cost savings; effects of elimination of periodic reinvestigations	11	—	7
Continuous vetting alerts	Risk mitigation; efficiency; timeliness of information; accuracy and visibility of information	32	1	7
Quality of information	Ability to access information from the Performance Accountability Council (PAC) and investigative service providers; completeness of information shared with agencies	5	2	24
Timeliness of processes (without reference to continuous vetting)	Preliminary determinations; initial background investigations; additional investigations; adjudications	3	—	4
TW 2.0 policy	Clarity of policies from the Security and Suitability and Credentialing Executive Agents and the PAC; implementation requirements; changes to policy; revisions to internal agency policies; efficiency of policies	9	14	22
TW 2.0 implementation schedule	Delays; milestones; pace of change; scope of changes; implementation of investigative standards and vetting scenarios	—	2	19
Interagency differences	Differences in capabilities; differences in internal processes; communication between agencies (not directly referencing the availability of information)	1	1	6

Category	Category elements	Number of agencies that shared related positive comments	Number of agencies that shared related comments that were neither positive or negative	Number of agencies that shared related negative comments
Vetting scenarios	General comments on making transfer of trust, clearance upgrade, and re-establishment of trust determinations; determinations for onboarding new personnel	10	2	3
Resources	General comments on resources; adequate personnel; adequate training; adequate funding; ease or difficulty of planning and budgeting for implementation	1	5	28

— = No responses

Source: GAO analysis of our survey of 45 federal departments and agencies. | GAO-25-107325

Note: The number of responses differ by category because not all agencies provided responses related to all categories. Some agencies also made more than one comment related to a category; when these differed as to being positive, neither positive or negative, or negative, they were tabulated separately.

Enclosure 4: Federal Contractor Responses to Closed-Ended Questions in GAO's Trusted Workforce 2.0 Survey

We sent electronic surveys to a generalizable stratified sample of 626 federal contractors to collect information on the government-wide implementation of Trusted Workforce 2.0. Three hundred contractors completed the survey, resulting in a 48 percent response rate. A complete respondent was determined by identifying respondents that responded to at least 50 percent of the questions asked of all respondents. We conducted a nonresponse bias analysis to identify significant factors associated with responding to the survey. We used these factors to develop weights to account for significant response patterns and used the weights to produce generalizable estimates. We generated survey estimates using SAS's Surveyfreq procedure and Taylor series linearization for variance estimation. We used the default Wald confidence limits when generating proportion estimates that were between 0.1 and 0.9. For estimated proportions that were less than 0.1 or higher than 0.9 we used Logit confidence limits.

Table 5 below has closed-ended questions contained in our survey. The weighted percent column indicates the estimated percentage of contractors experiencing the topic discussed in each survey question. The lower and upper confidence levels provide the range of possible results we would expect to observe if we were to administer the same survey to a different random sample of 626 contractors. Survey results are presented as estimates to the full population of contractors and have margins of error of plus or minus 13 percentage points or fewer at the 95 percent confidence level.

Table 5: Federal Contractor Responses to Closed-Ended Questions in GAO's Trusted Workforce 2.0 Survey

	Weighted percent	Lower 95% confidence level	Upper 95% confidence level
Since it began in 2018, how has the implementation of Trusted Workforce 2.0 affected the following aspects of personnel vetting at your facility?			
Efficiency of requesting security clearance investigations for employees, including completing required documentation^a			
Significantly reduced	—	—	—
Somewhat reduced	4.7	2.8	7.9
No change	30.3	25.0	35.7
Somewhat improved	28.1	22.8	33.4
Significantly improved	12.1	8.3	15.9
No basis to judge	24.2	19.1	29.3
Timeliness of preliminary clearance determinations by contracting agency			
Significantly reduced	2.5	1.2	5.2
Somewhat reduced	5.7	3.7	8.9
No change	21.2	16.4	26.1
Somewhat improved	27.6	22.4	32.9
Significantly improved	17.3	12.9	21.8
No basis to judge	25.6	20.4	30.8
Timeliness of security clearance investigation results following preliminary determination			
Significantly reduced	2.0	0.9	4.5
Somewhat reduced	6.1	3.9	9.4
No change	23.1	18.1	28.0
Somewhat improved	28.3	23.0	33.6
Significantly improved	15.7	11.4	19.9

Enclosure 4

	Weighted percent	Lower 95% confidence level	Upper 95% confidence level
No basis to judge	24.9	19.8	30.1
Timeliness of security clearance investigation results for upgrading a clearance^b			
Significantly reduced	—	—	—
Somewhat reduced	3.3	1.8	6.0
No change	17.7	13.3	22.2
Somewhat improved	16.0	11.6	20.3
Significantly improved	7.4	4.9	11.1
No basis to judge	54.6	48.7	60.4
Timeliness of security clearance investigation results for transfer of trust determinations^c			
Somewhat reduced	—	—	—
No change	15.7	11.4	19.9
Somewhat improved	9.9	6.9	14.0
Significantly improved	5.3	3.2	8.6
No basis to judge	67.8	62.3	73.3
Timeliness of security clearance investigation results for re-establishment of trust^d			
Significantly reduced	—	—	—
Somewhat reduced	2.1	0.9	4.5
No change	15.9	11.7	20.1
Somewhat improved	8.7	5.9	12.7
Significantly improved	4.9	2.8	8.2
No basis to judge	67.9	62.4	73.4
Quality of information available during security clearance investigations			
Significantly reduced	2.0	0.9	4.4
Somewhat reduced	5.3	3.2	8.6
No change	38.4	32.7	44.2
Somewhat improved	16.6	12.2	20.9
Significantly improved	4.6	2.766	7.8
No basis to judge	33.2	27.6	38.8
Since it began in 2018, has the implementation of Trusted Workforce 2.0 required additional technology or upgrades to technology systems at your facility?			
Yes	12.8	9.0	16.6
No	70.1	64.7	75.5
No basis to judge	17.1	12.6	21.6
Since it began in 2018, has the implementation of Trusted Workforce 2.0 required additional staff at your facility?			
Yes	14.0	9.9	18.1
No	70.5	65.1	75.9
No basis to judge	15.5	11.2	19.8
Since it began in 2018, has the implementation of Trusted Workforce 2.0 required additional workforce training at your facility?			
Yes	50.1	44.2	55.9
No	34.1	28.5	39.7
No basis to judge	15.8	11.5	20.2
How adequate is the guidance provided by the Security, Suitability and Credentialing Performance Accountability Council (PAC) regarding the implementation of Trusted Workforce 2.0?			
Less than adequate	4.5	2.6	7.7
Adequate	31.8	26.3	37.3
More than adequate	5.2	3.1	8.6
Did not receive guidance	58.5	52.7	64.3
How adequate is the guidance provided by the federal agencies that perform background investigations of your personnel regarding the implementation of Trusted Workforce 2.0?			
Less than adequate	7.3	4.8	11.1
Adequate	56.4	50.5	62.2
More than adequate	18.8	14.2	23.5

Enclosure 4

	Weighted percent	Lower 95% confidence level	Upper 95% confidence level
Did not receive guidance	17.5	13.1	21.9
Does your facility plan to update its personnel security policies to accommodate the requirements of Trusted Workforce 2.0?			
No plan to update policies	17.5	13.00	22.1
Plan to update policies but have not yet begun	19.7	15.0	24.4
Currently updating policies	32.1	26.6	37.7
Completed updates to policies	30.6	25.2	36.1
How challenging, if at all, have the following processes been at your facility since the implementation of Trusted Workforce 2.0 began in 2018?			
Initiating personnel background investigations			
Not at all challenging	51.3	45.4	57.2
Somewhat challenging	22.8	17.9	27.7
Moderately challenging	10.0	6.4	13.6
Very challenging	2.0	0.9	4.4
Not yet begun	13.9	9.8	18.1
Obtaining information about ongoing personnel background investigations			
Not at all challenging	32.4	27.0	37.9
Somewhat challenging	25.5	20.3	30.7
Moderately challenging	15.1	10.9	19.3
Very challenging	10.9	7.3	14.5
Not yet begun	16.1	11.8	20.3
Obtaining information about the causes of continuous vetting alerts			
Not at all challenging	32.8	27.2	38.3
Somewhat challenging	12.2	8.4	16.0
Moderately challenging	12.1	8.3	15.9
Very challenging	7.3	4.8	10.9
Not yet begun	35.6	30.0	41.3
Obtaining information about the status of continuous vetting alerts			
Not at all challenging	32.1	26.6	37.6
Somewhat challenging	16.5	12.2	20.9
Moderately challenging	11.8	8.0	15.6
Very challenging	6.3	4.1	9.7
Not yet begun	33.3	27.7	38.8
Does your facility collect performance metrics related to personnel vetting?			
Yes	12.3	8.5	16.1
No	87.7	83.9	91.5
Do your facility's policies include criteria for managing risk specific to personnel vetting?			
Yes	59.3	53.5	65.1
No	40.7	34.9	46.5
Based on your experience, how has the implementation of Trusted Workforce 2.0, since it began in 2018, affected your ability to manage risk when onboarding new personnel?			
Somewhat reduced	7.6	5.0	11.3
No change	45.3	39.4	51.2
Somewhat improved	18.9	14.3	23.6
Significantly improved	3.0	1.5	5.9
No basis to judge	24.7	19.6	29.8
Yes	41.9	36.1	47.7
No	58.1	52.3	63.9
For respondents who answered yes to the previous question, does your facility share this information with federal agencies with which you have contracts?			
Yes	21.5	13.9	29.1
No	78.5	70.9	86.1

— = No response

Source: GAO analysis of our survey of 626 federal contractors. | GAO-25-107325

Enclosure 4

^a“Significantly reduced” statistic for this question was either found to be not reliable enough or had too few respondents to be reported.

^b“Significantly reduced” statistic for this question was either found to be not reliable enough or had too few respondents to be reported.

^c“Somewhat reduced” statistic for this question was either found to be not reliable enough or had too few respondents to be reported.

^d“Significantly reduced” statistic for this question was either found to be not reliable enough or had too few respondents to be reported.

Enclosure 5: Federal Contractor Responses to Open-Ended Questions in GAO’s Survey on Trusted Workforce 2.0 Implementation

We conducted a content analysis of federal contractors’ responses to open-ended survey questions to identify examples relevant to our objectives. The open-ended survey questions provided opportunities for respondents to share additional thoughts about the benefits and challenges experience by contractors—as well as any effects on their ability to manage risk when onboarding new personnel—during Trusted Workforce 2.0 (TW 2.0) implementation, as of September 2024. Not all respondents shared thoughts about each category in the tables below; therefore, the categories are not representative of all survey respondents.

To complete the content analysis, two analysts reviewed the open-ended survey responses and developed a preliminary list of themes. The two analysts reviewed and discussed each other’s list of themes and reached consensus on the final themes they would use to categorize the responses. Using the established themes, each analyst independently reviewed the open-ended responses and coded them according to the agreed methodology. The two analysts then reviewed and compared their coding to identify areas of disagreement and discussed to reach consensus. Table 6 provides contractor responses to open-ended survey questions.

Table 6: Results of GAO Analysis of Federal Contractor Responses to Open-Ended Survey Questions on Trusted Workforce 2.0

	Number of contractor responses
1. Overall, what have been the greatest benefits to your facility since the implementation of Trusted Workforce 2.0 began in 2018? (Number that responded = 221)	
Improved efficiency	42
Improved timeliness	97
Improved quality of information	12
Resource-related benefits	22
No benefits	43
Other	34
Not applicable / No basis to judge	10
2. What are the greatest challenges your facility experienced with implementing Trusted Workforce 2.0 since it began in 2018? (Number that responded = 221)	
Reduced efficiency	22
Reduced timeliness	7
Information-related challenges	27
Resource-related challenges	72
No challenges	55
Other	50
Not applicable / No basis to judge	27
3. What factors have affected your ability to manage risk when onboarding new personnel during the implementation of Trusted Workforce 2.0 since it began in 2018? (Number that responded = 207)	
Positive effects on ability to manage risk	38
Negative effects on ability to manage risk	24
No change to ability to manage risk	60
Other	25
Not applicable / No basis to judge	60

— = No response

Source: GAO analysis of our survey of 626 federal contractors. | GAO-25-107325

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