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Comptroller General  
of the United States

May 1, 2025

The Honorable Tulsi Gabbard  
Director of National Intelligence  
Office of the Director of National Intelligence  
Washington, D.C. 20511

**Priority Open Recommendations: Office of the Director of National Intelligence**

Dear Director Gabbard:

Congratulations on your appointment. The purpose of this letter is to call your personal attention to three areas based on GAO's past work and 14 open priority recommendations.<sup>1</sup> Additionally, there are 31 other open GAO recommendations that we will continue to work with your staff to address.

We are highlighting the following areas that warrant your timely and focused attention as you consider mission and staffing needs. Specifically:

**Personnel Vetting Risks.** The Office of the Director of National Intelligence (ODNI) has not fully addressed all priority recommendations related to the security clearance process. We have made recommendations to improve ODNI's oversight of reciprocity and use of performance measures.<sup>2</sup> For example, related to reciprocity, we found that the data collected by ODNI are not sufficiently reliable to determine the extent to which agencies have granted security clearance reciprocity. In addition, 22 of the 31 agencies GAO surveyed in 2024 stated that incomplete and inaccurate information in information technology (IT) systems was the most significant reciprocity challenge they faced.

We recommended that the Director of National Intelligence (1) follow best practices for evaluating the reliability of agency-submitted data and (2) implement a plan to ensure that IT systems contain complete and accurate information required to make security clearance reciprocity determinations. By taking these actions, ODNI would likely improve reciprocity rates. This will enable agencies to access personnel with needed skills more quickly and help those agencies achieve their missions.

Addressing these personnel vetting-related recommendations is imperative to improving the government-wide personnel security clearance process, which has been on GAO's High-Risk List since 2018. We added this issue, in part, because of delays in the process. In subsequent updates, we have provided information on the extent to which agencies are meeting timeliness

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<sup>1</sup>GAO considers a recommendation to be a priority if, when implemented, it 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.

<sup>2</sup>Due to the sensitive nature of the recommendation related to ODNI's use of performance measures for the security clearance process, additional details are in the classified enclosure to this letter.

goals. However, since 2023, we were not able to provide such an update because ODNI did not have reliable timeliness data.<sup>3</sup> Specifically, in our 2025 biennial update, we reported that ODNI's clearance timeliness data were not sufficiently reliable for us to determine the percentage of executive branch agencies that did or did not meet timeliness objectives.<sup>4</sup> We have ongoing work to evaluate the reliability of timeliness data that ODNI uses to oversee the personnel security process that we plan to issue in the summer of 2025.

**Intelligence Enterprise Management Challenges.** ODNI could improve how it manages the standards, processes, and tools that are used across the Intelligence Community (IC) to ensure IC organizations are positioned to work independently, collaboratively, and efficiently to accomplish their missions. We have previously made recommendations related to enhancing IC business functions and support systems, including financial management, human resources, procurement, and security. For example, we recommended that ODNI enhance oversight, increase information sharing, and develop timelines for its efforts. By fully implementing these recommendations, ODNI will be better positioned to improve the IC's ability to perform mission activities independently, collaboratively, and efficiently.

**Infrastructure and Facilities Accessibility.** ODNI has not fully addressed accessibility issues for federal employees who use secure facilities to work with classified information. As we reported in September 2023, ODNI has guidance on the design and construction of sensitive compartmented information facilities (SCIF), but we found that such guidance includes limited information on ensuring physical access for people with disabilities. For example, ODNI has not identified minimum specifications for common accessibility concerns in its guidance to the IC, including for automatic door openers, accessible door locks and intrusion detection systems, and tactile signage. Without such guidance, agencies could miss opportunities to enhance accessibility for employees with disabilities.

Please see Enclosure 1 for additional information on the following: (1) ODNI's recommendation implementation rate; (2) implemented and new priority recommendations since our June 2024 letter to Director Haines; and (3) relevant management challenges from our High-Risk List that apply to ODNI. In response to legislation enacted in December 2022, this enclosure also includes information on additional congressional oversight actions that can help agencies implement priority recommendations and address underlying issues relating to such implementation.

Please see the classified Enclosure 2 for additional details about the status and actions needed to fully implement all 14 open priority recommendations out of the 45 total recommendations that remain open.<sup>5</sup>

Copies of this letter are being sent to the appropriate congressional committees. The letter will also be available on the GAO website at [Priority Recommendations | U.S. GAO](#).

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<sup>3</sup>GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to Be Maintained and Expanded to Fully Address All Areas*, [GAO-23-106203](#) (Washington, D.C.: Apr. 20, 2023).

<sup>4</sup>GAO, *High Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, [GAO-25-107743](#) (Washington, DC: Feb. 25, 2025).

<sup>5</sup>Due to the classified nature of some of the recommendations, additional details on the priority recommendations in the three key areas noted in the letter, including a complete list of all the priority recommendations, report details, and contact information, are in the classified enclosure to this letter.

If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Cathleen A. Berrick, Managing Director, Defense Capabilities and Management, at [berrickc@gao.gov](mailto:berrickc@gao.gov). Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this letter. Our teams will continue to coordinate with your staff on addressing these open priority recommendations. I appreciate ODNI's continued commitment and thank you for your personal attention to these important issues.

Sincerely,

**//SIGNED//**

Gene L. Dodaro  
Comptroller General  
of the United States

Enclosures – 2

cc: Art Miller, Assistant Director of National Intelligence for Legislative Affairs

David Mastro, Acting Deputy Assistant Director of National Intelligence, Legislative Affairs

## Enclosure 1

### Key Information About the Status of GAO Recommendations and Improving Agency Operations

#### ODNI Recommendation Implementation Rate

Our work on Intelligence Community (IC) oversight has generated numerous recommendations to help enhance the efficiency and effectiveness of the IC. We positively note ODNI's recent focus and progress on closing recommendations; however, its implementation rate still lags significantly behind the government-wide average. In November 2024, we reported that, on a government-wide basis, 70 percent of our recommendations made 4 years ago were implemented.<sup>6</sup> ODNI's 4-year recommendation implementation rate was 52 percent.<sup>7</sup> As of April 2025, ODNI had 45 open recommendations.<sup>8</sup>

#### Implemented, Closed, and New Priority Recommendations

Our June 2024 letter to Director Haines identified 15 priority recommendations. Since then, six recommendations were implemented and we added five new priority recommendations.<sup>9</sup>

**Implemented recommendations:** In October 2024, ODNI officials provided documentation demonstrating that executive branch agencies had conducted an evidence-based review to inform the update made to the timeliness objectives in the Federal Personnel Vetting Performance Management Standards Implementation Guidance in response to a recommendation in our 2017 report.<sup>10</sup> In July 2024, ODNI officials provided documentation demonstrating that the office had implemented a strategy related to workforce management in response to three recommendations in a 2020 report.<sup>11</sup>

**New priority recommendations:** The five new priority recommendations fall into the Intelligence Enterprise Management area. (See classified Enclosure 2.)

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<sup>6</sup>GAO, [Performance and Accountability Report, Fiscal Year 2024](#), [GAO-25-900570](#) (Washington, D.C.: Nov. 15, 2024).

<sup>7</sup>As of April 2025, ODNI's rate of implementation for all the recommendations we have made since 2011 was 58 percent.

<sup>8</sup>In September 2024, we reported that ODNI had 39 open recommendations, for an implementation rate of 58 percent of all recommendations we have made since 2011. Since we reported on the status of these open recommendations, ODNI has taken steps to implement eight additional recommendations. GAO, *Status of Open GAO Recommendations to the Director of National Intelligence*, [GAO-24-107671](#) (Washington, DC: Sept. 26, 2024).

<sup>9</sup>Two of the six implemented recommendations come from a classified report. As a result, information on actions ODNI took to implement these recommendations are not included in this unclassified letter.

<sup>10</sup>GAO, *Personnel Security Clearances: Additional Actions Needed to Ensure Quality, Address Timeliness, and Reduce Investigation Backlog*, [GAO-18-29](#) (Washington, D.C.: Dec. 12, 2017).

<sup>11</sup>GAO, *Intelligence Community: Additional Actions Needed to Strengthen Workforce Diversity Planning and Oversight*, [GAO 21-83](#) (Washington, D.C.: Dec. 17, 2020).

## High-Risk List

In February 2025, we issued our biennial update to our High-Risk List.<sup>12</sup> This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement. It also identifies the need for transformation to address economy, efficiency, or effectiveness challenges.<sup>13</sup>

ODNI has key responsibilities related to one of our high-risk areas—the [government-wide personnel security clearance process](#). We have identified some progress in addressing this high-risk issue. Addressing personnel vetting recommendations is imperative to improving the government-wide personnel security clearance process, which has been on GAO's High-Risk List since 2018.

Several other government-wide, high-risk areas also have direct implications for ODNI and its operations. These include (1) improving IT [acquisitions and management](#), (2) improving [strategic human capital management](#), (3) managing [federal real property](#), and (4) ensuring the [cybersecurity](#) of the nation.

In addition to the agency's high-risk areas, we urge your continued attention to other government-wide, high-risk issues as they relate to ODNI. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget (OMB), and the leadership and staff in agencies, including within ODNI. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.<sup>14</sup>

## Congress's Role on GAO Recommendations

We also recognize the key role Congress plays in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 includes a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.<sup>15</sup>

Congress can use various strategies to address our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes

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<sup>12</sup>GAO, *High Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, [GAO-25-107743](#) (Washington, DC: Feb. 25, 2025).

<sup>13</sup>In January 2018, we added the government-wide personnel security clearance process to our High-Risk List. In our most recent High-Risk report issued in February 2025, we reported that the agencies responsible for reforming the personnel security clearance process have substantially advanced personnel vetting reform, known as Trusted Workforce 2.0. This reform is designed to transform and align the security clearance process as well as other vetting processes, including determining suitability for government employment and credentialing for access to agency systems or facilities. A key aspect of Trusted Workforce 2.0 is the continuous vetting of individuals to ensure they remain trustworthy to hold a security clearance or a position of public trust. See [GAO-25-107743](#).

<sup>14</sup>GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

<sup>15</sup>James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), (2022); H.R. Rep. No. 117-389, at 43 (2022) (accompanying Legislative Branch Appropriations Act, H.R. 8237, 117th Cong. (2022)).

to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on ODNI's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress can follow up during the appropriations process and request periodic updates.

Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress can pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

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