

# DHS HIRING

## Additional Actions Needed to Enhance Vetting Processes Across the Department



Report to Congressional Requesters

June 2024

GAO-24-106153

United States Government Accountability Office

Accessible Version

# GAO Highlights

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Highlights of [GAO-24-106153](#), a report to congressional requesters

June 2024

## DHS HIRING

### **Additional Actions Needed to Enhance Vetting Processes Across the Department**

#### **Why GAO Did This Study**

DHS has a wide-ranging and disparate mission, including counterterrorism, cybersecurity, border security, and disaster response. Hiring qualified and trustworthy individuals across a wide range of positions in a timely manner is critical to DHS's ability to protect the homeland. When hiring, DHS and its components use a vetting process to decide whether a candidate can begin working while DHS completes their background investigation.

GAO was asked to review DHS's hiring and vetting processes. This report examines, among other things (1) the extent to which DHS and select components met their time-to-hire targets and reported these data for priority positions in fiscal year 2022; and (2) challenges selected DHS component officials have faced in vetting candidates in a timely manner and steps taken to address them.

GAO reviewed relevant federal laws, policies, and DHS documents and collected and analyzed DHS data for select priority positions. GAO also interviewed officials from DHS and select components responsible for hiring and vetting efforts as well as officials from OPM and the Department of Defense that oversee federal hiring and personnel vetting efforts.

#### **What GAO Recommends**

GAO is making four recommendations to DHS, including to improve data reporting and include hiring and vetting personnel in existing working groups and other forums to share practices with one another. DHS concurred with all four of our recommendations and has plans to address each of them.

#### **What GAO Found**

The Department of Homeland Security (DHS) has designated positions with the highest priority, such as Border Patrol agents, as priority positions. GAO reviewed data for 13 DHS priority positions across seven components and found that DHS did not meet its average time-to-hire targets in fiscal year 2022 for nine of the 13 positions. Time-to-hire ranges by DHS position, due in part to the different DHS vetting requirements and processes applicable for the position, such as a polygraph or medical exam.

## Select Hiring Requirements Applicable to Certain Department of Homeland Security (DHS) Positions



### Physical fitness test

Assessment of ability to execute job duties. May include push-ups, sit-ups, and step tests.



### Drug test

Assessment to detect the use of illegal drugs and certain prescription drugs.



### Medical exam

Assessment of overall health. Includes a medical history review, physician exam, and vision and hearing tests.



### Polygraph exam

Assessment of physiological response to a series of background and national security questions.

Source: GAO analysis of requirements applicable to DHS positions; Icons-Studio/stock.adobe.com. | GAO-24-106153

GAO found that components responsible for reporting time-to-hire to DHS do not track time-to-hire from the same starting point—leading to wide variability in its data on hiring times. For example, some begin tracking time-to-hire once applications are received, while others do so when first announcing a job opportunity. Components track from different starting points because some use open continuous announcements and mass hiring models that help fill urgent hiring needs, including for priority positions. Guidance to federal agencies from the Office of Personnel Management (OPM) allows for different hiring approaches. DHS reports this department-wide data to OPM but has not disclosed the variability in how time-to-hire is tracked across components. By clearly disclosing data limitations and associated assumptions it makes when reporting time-to-hire to OPM, DHS could provide more transparent, accurate information on whether it is making timely hiring decisions.

DHS and components identified several challenges in vetting candidates in a timely manner, including ensuring that candidates have completed all position-specific hiring requirements, such as medical exams, obtaining background investigations from previous employers, and verifying that the required candidate paperwork is complete and free of errors. They also shared several practices used to make faster hiring decisions, such as designating certain staff to collect and review candidate paperwork before forwarding it to adjudicators. Although DHS has two working groups at the management level to share practices that help expedite hiring decisions, these groups do not include personnel responsible for implementing hiring and vetting. Although DHS has solicited components to expand participation for one of the working groups, by ensuring that DHS and component personnel tasked with implementing hiring and vetting processes are included in existing working groups and other forums, DHS could better leverage practices across components to make faster hiring decisions.

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**Abbreviations**

CBP	U.S. Customs and Border Protection
CISA	Cybersecurity and Infrastructure Security Agency
DCSA	Defense Counterintelligence and Security Agency

DHS	Department of Homeland Security
EOD	Entry on Duty
FEMA	Federal Emergency Management Agency
ODNI	Office of the Director of National Intelligence
OPM	Office of Personnel Management
USSS	U.S. Secret Service
USCIS	U.S. Citizenship and Immigration Services

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June 11, 2024

The Honorable Gary C. Peters  
Chairman  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Ron Johnson  
Ranking Member  
Permanent Subcommittee on Investigations  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Department of Homeland Security (DHS) has a wide-ranging and disparate mission, including responsibilities such as cybersecurity, border security, national preparedness, disaster response, and countering terrorism. Hiring qualified and trustworthy individuals across such a large range of critical positions and missions in a timely manner is critical to DHS’s ability to protect the homeland. In 2018, the DHS Office of the Chief Human Capital Officer (DHS Human Capital) identified 15 priority positions, such as Border Patrol Agents and Transportation Security Officers, which had the greatest impact on the Department’s goals and objectives. According to DHS officials, as of the end of fiscal year 2023, DHS had about 221,000 federal employees spread across 16 separate components.<sup>1</sup>

When hiring and onboarding federal job applicants or contractors (which we will refer to as “candidates” in this report), DHS components begin a vetting process and make “entry on duty” (EOD) determinations.<sup>2</sup> These are preliminary risk management decisions wherein DHS determines that a given candidate can be trusted enough to begin working while the department completes the full background investigation. In instances where candidates have previous existing federal background investigations, DHS components may grant “reciprocity,” in which they recognize and accept adjudicative determinations or an existing investigation, which may preclude the need for a new investigation.

Members of Congress and companies with DHS contracts have raised concerns about DHS’s ability to make timely EOD determinations and grant reciprocity which may result in candidates dropping out of consideration

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<sup>1</sup>According to DHS officials, of the 221,000 employees, about 11 percent (25,000) began working in fiscal year 2023. This number represents new hires to the department/components only. Federal employees who transferred internally from one DHS component to another are not included in these counts. In addition, about 76,000 contractors were assigned to DHS contracts in fiscal year 2023, according to DHS.

<sup>2</sup>Vetting is a process by which covered individuals undergo investigation, evaluation, and adjudication of whether they are, and remain over time, suitable or fit for Federal employment, eligible to occupy a sensitive position, eligible for access to classified information, eligible to serve as a non-appropriated fund employee or contractor, eligible to serve in the military, or authorized to be issued a federal credential. Vetting includes all steps in the end-to-end process, including determining need (appropriate position designation), validating need (existence of a current investigation or adjudication), collecting background information via standard forms, investigative activity, adjudication, providing administrative due process or other procedural rights, and ongoing assessments to ensure that individuals continue to meet the applicable standards for the position for which they were favorably adjudicated. Exec. Order No. 13,467, §1.3(q), 73 Fed. Reg. 38,103 (July 2, 2008), as amended.

and hinder DHS in filling important staffing gaps. Companies have also raised concerns about the consistency and transparency of vetting processes across DHS's various components for contractors. DHS monitors and sets targets for how long it takes to onboard candidates, which the Office of Personnel Management (OPM) calls "time-to-hire."

In January 2024, we found that the federal government could take a range of actions to address government-wide challenges associated with federal agency transfers of trust determinations (i.e., reciprocity).<sup>3</sup> In May 2023, we found that the Federal Emergency Management Agency (FEMA) had challenges calculating and reporting consistent and accurate time frames for hiring, and we recommended that FEMA improve its collection and calculation of time-to-hire data.<sup>4</sup> In June 2018, we reported on time-to-hire challenges at U.S. Customs and Border Protection (CBP) and recommended that CBP collect and analyze data on department law enforcement officers to inform retention efforts.<sup>5</sup> In addition, we have an ongoing review of CBP recruitment, hiring, and retention for law enforcement personnel.

You asked us to review DHS's hiring and vetting processes. This report examines (1) the extent to which DHS and select components met their time-to-hire targets and reported these data for priority positions in fiscal year 2022; (2) the extent to which DHS collects and reports reciprocity data for priority positions; (3) challenges selected DHS components have faced in vetting candidates in a timely manner and steps they took to address them; and (4) the extent to which DHS has taken steps to improve candidates' vetting experience from fiscal year 2018 through August 2023.

To address each of our objectives, we reviewed documents regarding hiring and vetting at DHS, including Office of Personnel Management (OPM) guidance, DHS policies, informational publications from DHS components, and DHS documentation describing actions taken to improve hiring and vetting processes. We also obtained and analyzed DHS data on time-to-hire and reciprocity for priority positions from seven components that had priority positions in fiscal year 2022, the most recent year data were available during our review.<sup>6</sup>

We interviewed officials from DHS headquarters offices, including the Office of the Chief Human Capital Officer (DHS Human Capital), the Office of the Chief Security Officer (DHS Security), and the Office of the Chief Procurement Officer. We also interviewed officials from four DHS components: U.S. Customs and Border Protection (CBP), Cybersecurity and Infrastructure Security Agency (CISA), U.S. Citizenship and Immigration Services (USCIS), and U.S. Secret Service (USSS). We selected these components because they have priority positions subject to certain hiring requirements such as polygraph exams and medical exams. We also

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<sup>3</sup>GAO, *Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations*, [GAO-24-105669](#) (January 22, 2024). OPM concurred with our recommendations and as of May 2024 reported it has actions underway to begin to implement them. The Office of the Director of National Intelligence (ODNI) did not provide formal comments on the recommendations.

<sup>4</sup>GAO, *FEMA Disaster Workforce: Actions Needed to Improve Hiring Data and Address Staffing Gaps*, [GAO-23-105663](#) (May 2, 2023). FEMA implemented this recommendation by October 2023.

<sup>5</sup>GAO, *U.S. Customs and Border Protection: Progress and Challenges in Recruiting, Hiring, and Retaining Law Enforcement Personnel*, [GAO-18-487](#) (June 27, 2018). CBP implemented this recommendation by October 2019.

<sup>6</sup>Nine components within DHS have priority positions. However, we excluded priority positions in the Coast Guard because they are military positions and our focus was on civilian hiring. Further, we excluded Federal Law Enforcement Training Centers because it lacked hiring data that were comparable to what the other components collect and report to DHS.



interviewed officials from other federal agencies responsible for overseeing federal hiring and vetting, specifically OPM and Department of Defense. We asked them questions regarding hiring and vetting processes at DHS, including how data are collected and shared across the department and with external parties. We also interviewed officials from two industry groups, the Professional Services Council and the Intelligence and National Security Alliance, to solicit the perspectives of companies that contract with DHS, as some of their employees also go through the vetting process. We asked them questions regarding their experiences with hiring and vetting at DHS. We also conducted three discussion groups with adjudicators, human resources personnel, and contracting officer's representatives from DHS Human Capital, DHS Security, and nine DHS components that have priority positions. We asked them questions about challenges they encounter with hiring and vetting and steps taken to address the challenges.

Across each objective, we assessed DHS hiring and vetting processes against relevant criteria, such as Federal Personnel Vetting Performance Management Standards, Standards for Internal Control in the Federal Government, and GAO's prior work identifying leading practices to enhance interagency collaboration.<sup>7</sup> For additional details on our scope and methodology for each objective, see appendix I of this report.

We conducted this performance audit from July 2022 to June 2024 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.

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## Background

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### DHS Hiring Processes

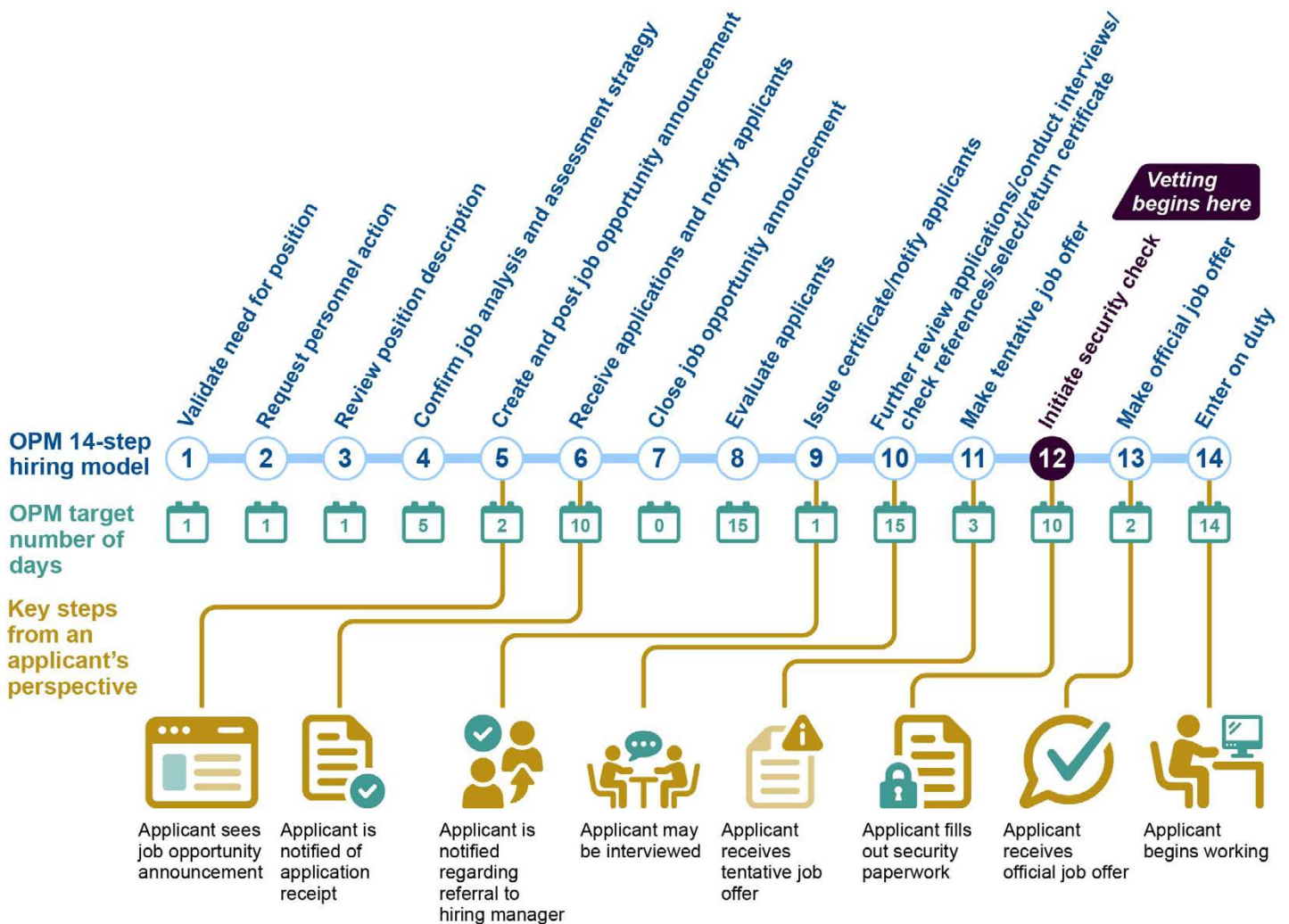
OPM has established a 14-step federal employee hiring model that all executive branch departments and agencies are required to use, including DHS (see figure 1).<sup>8</sup> Our review discusses time-to-hire, which includes steps 1 through 14. It also specifically focuses on the personnel vetting process, which begins after candidates accept a tentative job offer. In figure 1, the personnel vetting process begins at "initiate security check" (step 12) and can continue through and beyond "entry on duty" (step 14).

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<sup>7</sup>GAO. *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 9, 2014). Office of the Director of National Intelligence and the Office of Personnel Management, *Federal Personnel Vetting Performance Management Standards* (Washington, D.C.: September 14, 2022). GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023).

<sup>8</sup>OPM has a goal for most federal employees to enter on duty within 80 days.

**Figure 1: Office of Personnel Management’s (OPM) 14-Step Hiring Model with Targeted Timeframes for Each Step and Key Steps from a Federal Applicant’s Perspective**



Source: GAO presentation of OPM's 14-step hiring model; Icons-Studio/stock.adobe.com. | GAO-24-106153

Companies with federal contracts hire and assign employees to work on those contracts and then, if needed, the federal government is to vet those employees. Contractors that require unescorted access to DHS facilities

or access to DHS systems or sensitive information are vetted by DHS based on the risk level of their position.<sup>9</sup> The personnel vetting process for contractors is generally the same as it is for federal employees.

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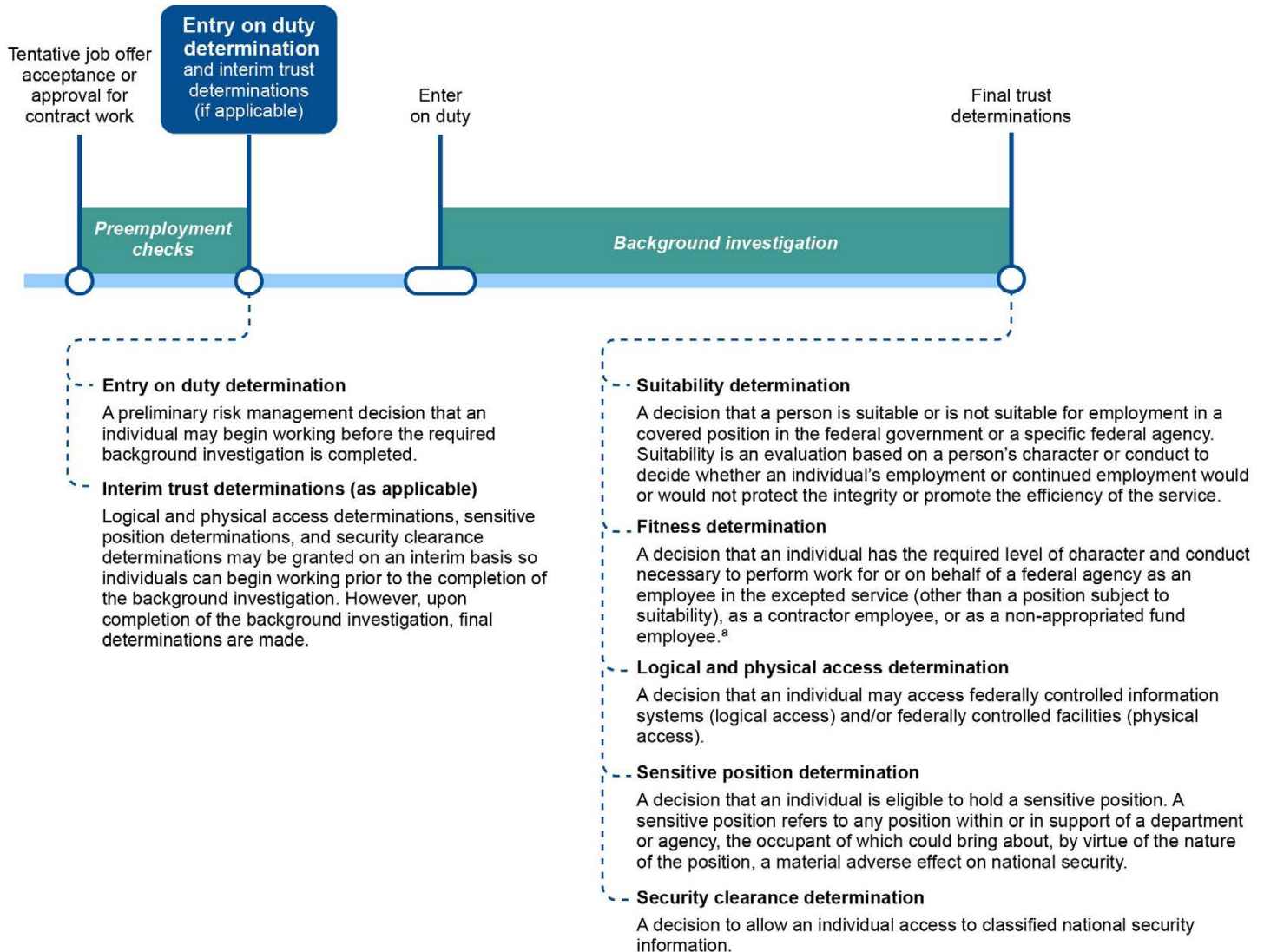
## DHS Trust Determinations and Background Investigations

Per DHS policy, for federal applicants and contractor employees that undergo vetting, DHS components make assessments to determine if individuals have the character or conduct necessary to work for the federal government. These assessments result in trust determinations. For federal applicants, trust determinations generally include suitability determinations, and for contractor employees and certain types of federal applicants, they include fitness determinations. Trust determinations may also include eligibility to access federal information systems (logical access) and federal facilities (physical access), eligibility to hold a sensitive position, and eligibility to access classified information. All final trust determinations are to occur after the completion of background investigations. However, with some exceptions, individuals may obtain entry on duty determinations (and related interim trust determinations) that allow them to begin working prior to the completion of their background investigations. See figure 2.

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<sup>9</sup>Agency heads must designate certain positions at high, moderate, or low risk levels as determined by the position's potential for adverse impact to the efficiency or integrity of the service. "Public trust" positions are those designated as being high or moderate risk. 5 C.F.R. § 731.106. Agency heads must also designate positions at their agencies as "national security positions," based on the degree of potential damage to national security. 5 C.F.R. § 1400.201. According to OPM officials, in a 2012 memorandum, the Security, Suitability, and Credentialing Performance Accountability Council determined that contractor employees should be subject to the same Federal Investigative Standards as apply to federal employees, assigning the Director of OPM the function of prescribing investigative standards for contractor employee fitness. The 2012 Federal Investigative Standards applied to all individuals working for or on behalf of the executive branch and individuals with access to federally controlled facilities and information systems. These requirements normally only apply to certain federal employees. In response and pursuant to 5 C.F.R. § 1400.102(b), DHS has expanded these position designation requirements to include DHS and contractor employees. See DHS Instruction 121-01-007-01, Revision 01.

**Figure 2: Sequence of Vetting Personnel Trust Determinations Relative to Preemployment Checks and Background Investigations at the Department of Homeland Security (DHS)**



Source: GAO analysis of DHS and other federal documentation. | GAO-24-106153

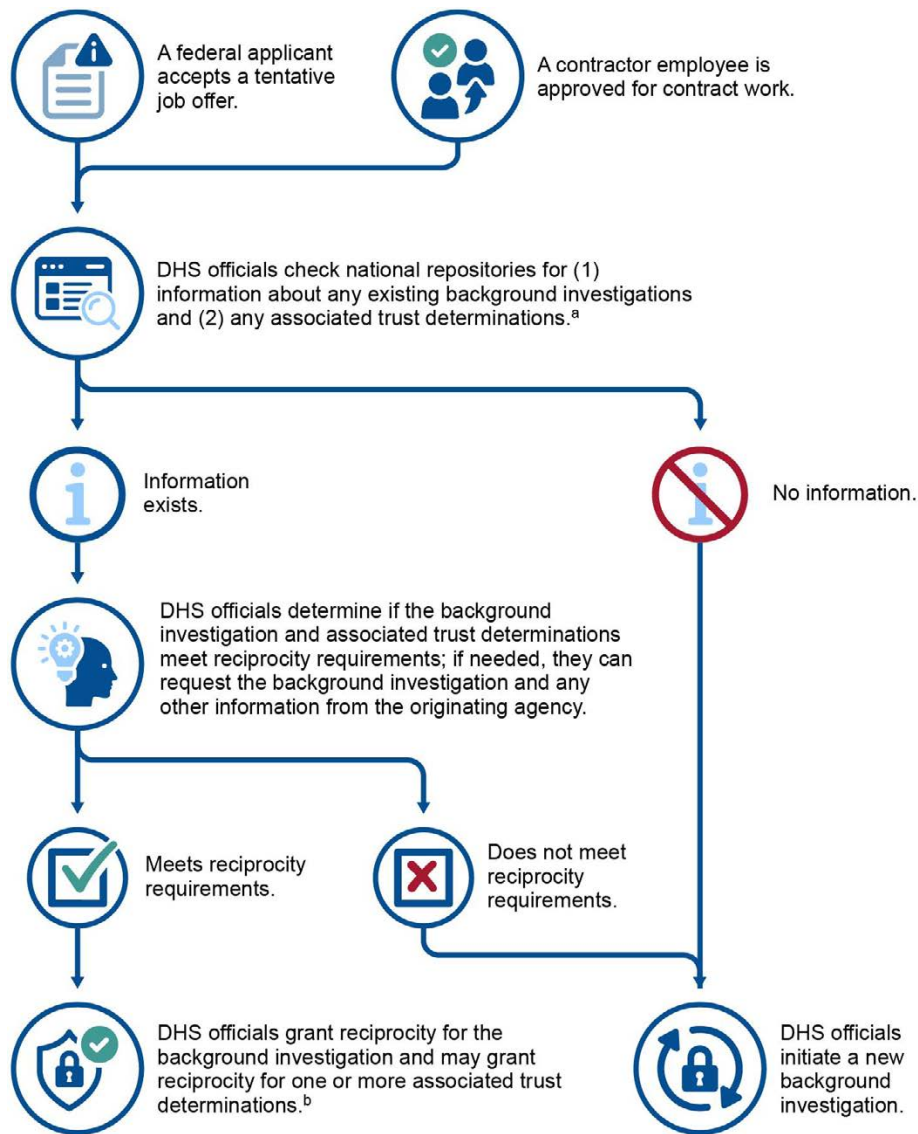
<sup>a</sup>Excepted service includes all civil service positions which are specifically excepted from the competitive service by or under statute, by the President, or by OPM and which are not in the Senior Executive Service. A non-appropriated fund employee is an employee paid from non-appropriated funds of the Army and Air Force Exchange Service, Navy Ships Stores Program, Navy exchanges, Marine Corps exchanges, Coast Guard exchanges, and other instrumentalities of the United States under the jurisdiction of the armed forces conducted for the comfort, pleasure, contentment, and mental and physical improvement of personnel of the armed forces.

## DHS's Use of Reciprocity from Prior Federal Service

Some candidates may have existing background investigations and favorable final trust determinations from prior service with the federal government. In these cases, DHS components may be able to accept the existing background investigation and/or trust determination—known as “reciprocity.” DHS’s process for granting reciprocity is shown in figure 3. Appendix III has additional information on DHS personnel vetting processes—

including processes for candidates going through the vetting process for the first time and those who may be eligible for reciprocity.

**Figure 3: Department of Homeland Security (DHS) Process for Considering Whether to Grant Reciprocity to a Federal Applicant or Federal Contractor**



Source: GAO analysis of DHS reciprocity information; Icons-Studio/stock.adobe.com (illustrations). | GAO-24-106153

<sup>a</sup>Trust determinations include suitability (for federal applicants) and fitness (for contractor employees and some federal applicants) determinations. Trust determinations also include eligibility for access to federal information systems (logical access), access to federal facilities (physical access), eligibility to hold a sensitive position, and eligibility to access classified information. However, agencies may have discretion on whether to make fitness determinations on excepted service or contractor positions.

<sup>b</sup>DHS officials may accept the background investigation but not accept any associated trust determinations. They may also accept the background investigation and one or more trust determinations.

## Position-Specific Hiring Requirements

Depending on the specific DHS position and component, candidates may also be required to meet certain requirements prior to entering on duty, as shown in figure 4. Although not always part of personnel vetting, these requirements can affect time-to-hire for the positions to which they apply. See appendix IV for details on position-specific requirements that are required by law.

**Figure 4: Department of Homeland Security (DHS) Hiring Requirements Applicable to Certain Federal and Contractor Employee Positions**



Source: GAO analysis of requirements applicable to DHS positions; Icons-Studio/stock.adobe.com. | GAO-24-106153

Note: DHS positions where these additional hiring requirements apply include Customs and Border Protection officers and U.S. Secret Service Criminal Investigators (Special Agents). These additional hiring requirements can vary by position.

## Roles of Key Federal Agencies in Hiring and Personnel Vetting

Several federal agencies have important roles in overseeing and administering hiring and personnel vetting processes, as described in table 1.

**Table 1: Key Federal Agency Roles in Hiring and Personnel Vetting**

Agency	Description
Office of Personnel Management (OPM)	<p>Serves as the chief human resources agency and personnel policy manager for the federal government.</p> <p>The Director of OPM, as the federal government’s Suitability and Credentialing Executive Agent, has oversight responsibilities for the suitability, fitness, and credentialing processes, including promoting reciprocity of suitability and fitness determinations.</p> <p>Prior to October 2019, OPM housed the National Background Investigations Bureau, which was the federal government’s primary entity for conducting background investigations. The Bureau was transferred to the Department of Defense and renamed the Defense Counterintelligence and Security Agency in October 2019.</p>

Agency	Description
Office of the Director of National Intelligence	The Director of National Intelligence is the federal government’s Security Executive Agent. As such, the Director is responsible for the development, implementation, and oversight of effective, efficient, and uniform policies and procedures governing the conduct of investigations and adjudications for eligibility for access to classified information and eligibility to hold a sensitive position. In this role, the responsibilities of the Director of National Intelligence extend beyond the Intelligence Community to cover government-wide personnel security processes, including reciprocity for national security determinations.
Defense Counterintelligence and Security Agency	The Defense Counterintelligence and Security Agency is the federal government’s primary entity for conducting background investigations. Agencies are not permitted to conduct their own background investigations unless the authority to do so has been delegated by the President, the Director of National Intelligence, or the Director of the Office of Personnel Management.

Source: GAO analysis of federal documentation. | GAO-24-106153

## DHS Component Roles and Key Participants

DHS’s Management Directorate, led by the Under Secretary for Management, oversees and administers the Department’s hiring and personnel vetting services. Specific roles and responsibilities for overseeing hiring and vetting are split between the Office of the Chief Human Capital Officer (DHS Human Capital) and the Office of the Chief Security Officer (DHS Security). See table 2 for the roles.

**Table 2: DHS Management Directorate Roles in Hiring and Personnel Vetting**

DHS Management Directorate component	Description and responsibilities
Office of the Chief Human Capital Officer (DHS Human Capital)	<p><u>Departmental oversight</u></p> <p>Responsible for the department’s human resources program, which includes policy, systems, and programs for strategic workforce planning; recruitment and hiring; pay and leave; performance management; employee development; executive resources; and labor relations.</p> <p><u>Component-level services</u></p> <p>Provides component-level human resource services to most DHS support (non-operational) components, such as the Science and Technology Directorate. These services include workforce planning, recruiting, and hiring.</p>
Office of the Chief Security Officer (DHS Security)	<p><u>Departmental oversight</u></p> <p>Responsible for the supervision, oversight and direction of the department’s security programs. Establishes unified policies and business practices to ensure the efficient and effective use of resources.</p> <p><u>Component-level services</u></p> <p>Provides personnel security services to most DHS support (non-operational) components. Responsible for collecting security paperwork from individuals, reviewing that paperwork, facilitating background investigations, and making trust determinations.</p>

Source: GAO analysis of DHS documentation. | GAO-24-106153

**Department of Homeland Security (DHS)  
Operational Components' Human  
Resources and Personnel Security Offices**

With a few exceptions, DHS operational components each have separate human resources and personnel security offices.

- Human resources offices:  
Responsible for workforce planning, recruiting, hiring, retention and determining if individuals meet job qualifications. In some instances, this office is responsible for collecting security paperwork from individuals and sending that paperwork to personnel security offices.
- Personnel security offices:  
Responsible for collecting security paperwork from individuals, reviewing that paperwork, facilitating background investigations, and making trust determinations.

DHS operational components include

- U.S. Citizenship and Immigration Services
- U.S. Coast Guard
- U.S. Customs and Border Protection
- Cybersecurity and Infrastructure Security Agency
- Federal Emergency Management Agency
- U.S. Immigration and Customs Enforcement
- U.S. Secret Service
- Transportation Security Administration

Note: DHS's Science and Technology Directorate and the Office of Intelligence and Analysis are examples of non-operational components (support components). According to DHS officials, support components generally utilize internal DHS shared services through the DHS Management Directorate.

Source: GAO analysis of DHS documentation. | GAO-24-106153

DHS's operational components, such as the Cybersecurity and Infrastructure Security Agency, each administer their own hiring and personnel vetting services. These operational components follow the general structure laid out and used by DHS's Management Directorate (i.e., each component generally has a human resources office and a personnel security office).

In addition to DHS components, a range of federal and non-federal individuals are key participants in the hiring and vetting processes, as shown in table 3.



**Table 3: Key Participants in Personnel Vetting at the Department of Homeland Security’s (DHS) Operational Components**

Key participant	Description
Federal applicant	An applicant for a DHS position.
Contractor	An employee of a company that contracts with DHS and a candidate to work on a DHS contract.
Company Security Representative	According to DHS officials, a Company Security Representative is an employee of a company that contracts with DHS who is responsible for pre-screening and submitting a completed Contractor Fitness/Security Screening Request form to the Contracting Officer’s Representative. They act as liaison between the Contracting Officer’s Representative and the company.
Contracting Officer’s Representative	An employee of the DHS component’s office that is requiring the contract work who performs specific technical or administrative functions of a contract. According to DHS officials, the COR assists in the performance of post-award duties by, among other things, reviewing the Contractor Fitness/Security Screening Request form and other information, then forwarding the form to the component’s personnel security office. According to DHS officials, the COR acts as liaison between the component’s personnel security office and the Company Security Representative.
Human Resources Specialist	An employee of a DHS component’s human resources office. Gathers security-related paperwork from federal applicants, reviews the paperwork for completeness and accuracy, then forwards the paperwork to the component’s personnel security office.
Adjudicator	An employee of a DHS component’s personnel security division. Reviews security paperwork for federal applicants and contractor employee candidates and makes trust determinations.

Source: GAO analysis of DHS documentation and interviews. | GAO-24-106153

Note: This table uses general descriptions and terms. Official titles and specific roles and duties vary among components and contracting companies.

## Customer Experience

Pursuant to executive branch policy, DHS has launched a broad customer experience effort across components, including a website with additional guidance and tools.<sup>10</sup> A December 2021 executive order that established the new policy defines customer experience as “the public’s perceptions of and overall satisfaction with an agency, product, or service.”<sup>11</sup> An Office of Management and Budget circular expands on this definition by including a range of factors that result from interactions with the government, which can include ease or simplicity, efficiency or speed, transparency, and equity. This circular also provides guidance on steps federal agencies can take to improve customer experience.<sup>12</sup>

## DHS Priority Positions

In 2018, DHS Human Capital identified 15 positions, spread across nine DHS components, which had the greatest impact on the department’s goals and objectives. DHS calls these 15 positions “Priority Mission Critical Occupations,” and we call them “priority positions” in this report. Some priority positions are subject to

<sup>10</sup>In the context of hiring and vetting, candidates are all customers, and their perception of and satisfaction with that process is their customer experience. For the purposes of this report, we use the terms “candidate” and “candidate experience” in place of “customer” and “customer experience,” except when quoting directly from executive orders and executive policy documents. For the executive branch policy, see *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, Exec. Order No. 14,058, 86 Fed. Reg. 71,357 (December 16, 2021).

<sup>11</sup>See Exec. Order No. 14,058 § 3(b), 86 Fed. Reg. 71,358-59 (Dec. 16, 2021).

<sup>12</sup>Office of Management and Budget, Circular No. A-11: Preparation, Submission, and Execution of the Budget, § 280 (August 2022).

more hiring requirements than others, which can affect time-to-hire. To illustrate this, we selected four of the 15 priority positions to review in greater depth, as shown in table 4.

**Table 4: Differences in Hiring Requirements Across Selected Department of Homeland Security (DHS) Positions**

Position (job Series and title)	Component	Polygraph exam <sup>a</sup>	Physical fitness test	Medical exam	Drug test	Confinement contact requirement <sup>b</sup>	Firearm requirement <sup>c</sup>
1895 Customs and Border Protection Officer	Customs and Border Protection	yes	yes	yes	yes	yes	yes
1811 Criminal Investigator (Special Agent)	U.S. Secret Service	yes	yes	yes	yes		yes
1801 Immigration Services Officer	U.S. Citizenship and Immigration Services				yes		
Cyber Defense Incident Responder <sup>d</sup>	Cybersecurity and Infrastructure Security Agency				yes		

Source: GAO presentation of hiring requirements provided by DHS's Office of the Chief Human Capital Officer (OCHCO). | GAO-24-106153

<sup>a</sup>Polygraph exams are assessments of physiological responses to a series of background and national security questions. Customs and Border Protection law enforcement positions are required by law to have a polygraph exam. Anti-Border Corruption Act of 2010, Pub. L. No. 111-376, § 3, 124 Stat. 4104 (2011).

<sup>b</sup>The confinement contact requirement refers to an assessment of criminal history and other incidents to ensure those who may have contact with individuals in confinement meet legal standards related to sexual conduct. Prison Rape Elimination Act of 2003 (PREA), Pub. L. No. 108-79, 117 Stat. 972; 28 C.F.R. §§ 115.17, .117, .217, .317.

<sup>c</sup>The firearm requirement refers to an assessment of criminal history to ensure those required to carry a firearm have not been convicted of a misdemeanor crime of domestic violence, as prohibited by Lautenberg Amendment. 18 U.S.C. § 922(g)(9).

<sup>d</sup>The Cybersecurity and Infrastructure Security Agency (CISA) 2210 Information Technology Specialist with National Initiative for Cybersecurity Education work role code 531 Cyber Defense Incident Responder position listed here is one of many positions included in the "2210 CISA Cyber Subset" position. Our analysis only includes CIS positions with a 531 National Initiative for Cybersecurity Education primary work role code indicating a "Cyber Defense Incident Responder."

For each of our four selected positions, we created detailed profiles in appendix V. Each profile includes 1) key job duties, 2) an overview of the hiring processes and position requirements, and 3) analysis of time-to-hire and attrition trends since fiscal year 2018.

## DHS Did Not Meet Time-to-Hire Targets for Most Priority Positions in Fiscal Year 2022, and Components Did Not Report These Data Consistently

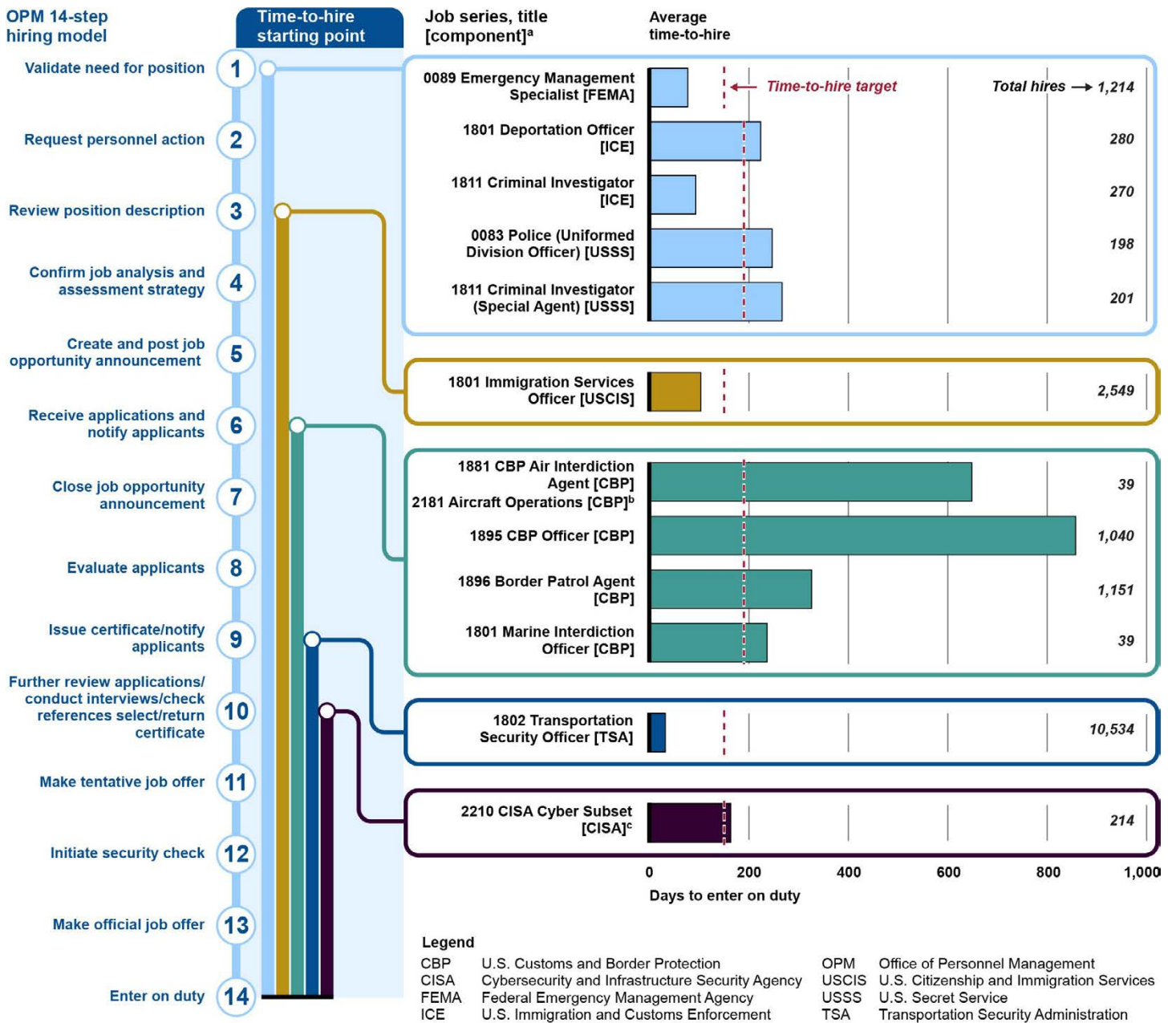
We reviewed time-to-hire data summary statistics for 13 DHS priority positions provided by DHS Human Capital and found that DHS did not meet its average time-to-hire targets in fiscal year 2022 for nine of these

priority positions.<sup>13</sup> According to DHS officials, time-to-hire ranges by position, due in part to the different requirements and vetting processes that are necessary for the position, such as a polygraph exam. DHS's time-to-hire targets for fiscal year 2022 were 150 days for positions that do not require a polygraph exam and 190 days for positions that require a polygraph exam. However, we found that the seven components we examined do not track and report time-to-hire consistently. For example, each component does not have the same starting point for tracking time-to-hire. Figure 5 shows fiscal year 2022 time-to-hire data for the 13 DHS positions we assessed and includes components' use of different starting points.

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<sup>13</sup>DHS identified 15 positions as being priority positions. DHS lists all Coast Guard military personnel as a priority position. We excluded these positions because the focus of our review is on civilian positions. DHS also lists Transportation Security Administration Federal Air Marshals as a priority position. However, we excluded this position because data on this position are sensitive. DHS does not formally identify cybersecurity positions as priority positions. However, DHS documentation states that cybersecurity is a focus across DHS, but notes that due to the multi-series nature of the workforce, it is not listed as a priority position. To ensure coverage of this important category of positions, we included a group of positions called the "CISA Cyber Subset" in our analysis of DHS priority positions. We excluded the Federal Law Enforcement Training Centers 1801 Law Enforcement Instructor position because it started tracking the 14 steps for its priority positions fiscal year 2023.

**Figure 5: Time-to-Hire Starting Points for Department of Homeland Security (DHS) Priority Positions in Fiscal Year 2022**



Source: GAO presentation of DHS Office of the Chief Human Capital Officer data. | GAO-24-106153

**Accessible Data for Figure 5: Time-to-Hire Starting Points for Department of Homeland Security (DHS) Priority Positions in Fiscal Year 2022**

Job series	Job title	Component	Average time-to-hire	Time-to-hire target	Total hires	Time-to-hire starting point
0089	Emergency Management Specialist	FEMA	77	150	1214	1. Validate need for position
1801	Deportation Officer	ICE	223	190	280	1. Validate need for position
1811	Criminal Investigator	ICE	93	190	270	1. Validate need for position
0083	Police (Uniformed Division Officer)	USSS	246	190	198	1. Validate need for position
1811	Criminal Investigator (Special Agent)	USSS	266	190	201	1. Validate need for position
1801	Immigration Services Officer	USCIS	103	150	2549	3. Review position description
1881	CBP Air Interdiction Agent & 2181 Aircraft Operations	CBP	646	190	39	6. Receive applications and notify applicants
1895	CBP Officer	CBP	854	190	1040	6. Receive applications and notify applicants
1896	Border Patrol Agent	CBP	325	190	1151	6. Receive applications and notify applicants
1801	Marine Interdiction Officer	CBP	236	190	39	6. Receive applications and notify applicants
1802	Transportation Security Officer	TSA	32	150	10534	9. Issue certificate/notify applicants
2210	CISA Cyber Subset	CISA	163	150	214	10. Further review applications/conduct interviews/check references/return certificate

Source: GAO presentation of OHS Office of the Chief Human Capital Officer data. GAO-24-106153

Note: DHS identified 15 positions as being priority positions. DHS lists all Coast Guard military personnel as a priority position. We excluded this position because the focus of our review is on civilian positions. DHS also lists TSA Federal Air Marshals as a priority position. However, we excluded this position because data on this position are sensitive. DHS does not formally identify cybersecurity positions as priority positions. However, DHS documentation states that cybersecurity is a focus across DHS, but notes that due to the multi-series nature of the workforce, it is not listed as a priority position. To ensure coverage of this important category of position, we included a group of positions called the “CISA Cyber Subset” in our analysis of DHS priority positions. We excluded the Federal Law Enforcement Training Centers 1801 Law Enforcement Instructor position from the figure because it started tracking the 14 steps for its priority positions starting in fiscal year 2023.

<sup>a</sup>A 4-digit job series, designated by OPM, identifies a group of positions with similar lines of work and qualification requirements. For instance, the series 1801 (General Inspection, Investigation, Enforcement, and Compliance) covers positions that supervise, lead, or perform inspection, investigation, enforcement, or compliance work.

<sup>9</sup>DHS Human Capital combined data for the CBP 1881 Air Interdiction Agent position and 2181 Aircraft Operations position into data for one position. The 1881 position requires a polygraph and has a 190-day time-to-hire target. The 2181 position does not require a polygraph and has a 150-day time-to-hire target. Since some people required a polygraph, the single bar for both positions is bisected at the 190-day mark.

<sup>10</sup>The 2210 “CISA Cyber Subset” position, as included in the figure, consists of a group of positions that have a job series of 2210 (Information Technology Management Series) and a separate National Initiative for Cybersecurity Education work role code that is not zero. A non-zero code indicates a cyber position.

As shown in figure 5, for fiscal year 2022, hiring was completed for four of 13 priority positions within their designated time-to-hire targets. Transportation Security Administration (TSA) and Federal Emergency Management Agency (FEMA) completed hiring for two of the four positions that met targets in fiscal year 2022—the TSA Transportation Security Officer and the FEMA Emergency Management Specialist—on average, in approximately half or less of the targeted time. Of the nine positions in which components did not meet targets, seven were positions that required polygraph exams.<sup>14</sup> For example, CBP completed hiring for the Customs and Border Protection Officer position on average, over 2 years after the hiring began. While polygraph exams generally increase average time-to-hire at DHS, CBP officials said that during fiscal years 2022 and 2023, they were able to process both positions through the polygraph stage on an average of under 30 days.

DHS officials provided several factors that contributed to missed targets. For instance, candidates may delay entering on duty to finish college coursework or fulfill a military obligation. These obligations might delay the entry on duty date by 100 days. Staff from some DHS components said DHS’s time-to-hire targets, which end with the entry on duty date, are not adjusted to account for such delays. We describe challenges DHS faces making timely entry on duty determinations later in this report.

DHS Human Capital officials said they use time-to-hire data internally to assess performance against targets and consider strategies for improvement. DHS Human Capital officials told us that the components track time-to-hire from different starting points because some components use open continuous announcements and mass hiring models, which help DHS fill urgent hiring needs, including for priority positions. They explained that open continuous models establish a pipeline or pool of potential candidates. Mass hiring models maintain the agency’s candidate pipelines, which allows components to efficiently fill vacancies and ensure a steady influx of new personnel to support operational needs.<sup>15</sup> Further, OPM’s time-to-hire guidance allows for agency flexibility in using different hiring approaches.

In January 2023, DHS Human Capital used these time-to-hire data to provide its annual report to OPM. According to OPM guidance, it uses such data from federal agencies to respond to inquiries from Congressional committees as part of its central oversight and evidence-based strategic human capital policy functions.<sup>16</sup> The guidance states agencies are to provide time-to-hire data for all positions beginning at the date when the agency validated the need for the position (i.e., step 1 of OPM’s 14-step hiring model) but also acknowledges that its processes are designed for hiring approaches with specific open and close dates and not open continuous announcements. As shown in figure 5, the data that components report to DHS Human Capital—and which DHS Human Capital in turn reports to OPM—begins at different steps depending on the

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<sup>14</sup>These nine positions that did not meet targets include both the CBP 1881 Air Interdiction Agent position and CBP 2181 Aircraft Operations position. These seven positions that require polygraph exams and did not meet targets do not include CBP 2181 Aircraft Operations positions because they do not require polygraph exams.

<sup>15</sup>For this type of hiring approach, steps 1–5 of OPM’s 14-step hiring model are not applicable, according to DHS officials. Open continuous announcements are job opportunity announcements which are left open over an extended period of time for which selections are made after various cut-off dates.

<sup>16</sup>OPM, *Updated Instructions for Reporting Annual Time-to-Hire (T2H)*, Washington, D.C.: December 2019).

position and hiring approach and do not always begin at step 1, as requested by OPM. Therefore, DHS is not able to clearly communicate to OPM how long it actually takes to hire individuals for priority positions.

Officials from a DHS component told us that they estimate dates for steps, usually assuming 1 day per step, when they do not have step data. Other components leave certain steps blank if the steps are not applicable. Our review of these data found that DHS did not disclose that it took these actions and associated assumptions, such as components using different hiring models, in its submission to OPM. However, DHS officials told us they verbally told OPM that components measure time-to-hire from different starting points.

*Standards for Internal Control in the Federal Government* state that management should use quality information to achieve the entity's objectives.<sup>17</sup> Further, the standards state that management communicates quality information externally through reporting lines so that external parties can help the entity achieve its objectives and address related risks. Given the flexibilities that OPM allows federal agencies like DHS to take with various hiring approaches to meet critical hiring needs, measuring time-to-hire using different starting dates is a reasonable approach. However, by clearly disclosing data limitations and associated assumptions it made when compiling time-to-hire data from components when reporting to OPM, DHS can provide more transparent, accurate time-to-hire information needed that provides important feedback on whether DHS is making timely hiring decisions and informs OPM's oversight of federal hiring efforts.

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## DHS Collects and Reports Personnel Vetting and Reciprocity Data but Could Improve Data Collection for Certain Priority Positions

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### DHS Collects and Reports Personnel Vetting Data, Including Security Clearance Reciprocity Cases and Timeliness Metrics

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DHS Security collects and reports total annual DHS-wide adjudicated security clearance cases to the Office of the Director of National Intelligence (ODNI) on a quarterly basis, as required by ODNI.<sup>18</sup> These data are broken out by government employees and contractors.<sup>19</sup> In addition, DHS Security collects and reports department-wide data on 1) total security clearance cases that were ongoing for over 1 year, 2) time required to complete

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<sup>17</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

<sup>18</sup>Office of the Director of National Intelligence, *Metric Reporting Requirements for National Security Vetting in Fiscal Year 2018 and Beyond*, Washington D.C., (November 2018).

<sup>19</sup>These metrics include 1) total people who are eligible to access classified information; 2) total security clearance cases initiated; 3) total security clearance cases which still require adjudication at the end of the reporting period; 4) total interim security clearances granted; 5) total security clearance case determinations broken down by clearance granted, clearance denied, clearances revoked, and clearances not able to be reciprocally accepted by an agency head; 6) total security clearance cases which resulted in incomplete information; 7) total security clearance cases appealed; and 8) total security clearance cases overturned upon appeal.

the investigation, 3) time required to adjudicate the case, and 4) which of the 13 personal conduct factors were flagged for potential violation.<sup>20</sup>

DHS Security also collects and reports several security clearance reciprocity metrics for federal employees and contractors by DHS component, as required by ODNI. These metrics include the total number of cases in which security clearance reciprocity was approved, the total number of cases in which security clearance reciprocity was not approved, and the time to complete security clearance reciprocity cases. The total number of security clearance cases approved for reciprocity and the median time to complete those security clearance cases in fiscal year 2022 for government employees are displayed in tables 5 and 6.

**Table 5: Department of Homeland Security (DHS) Government Employees Approved for Security Clearance Reciprocity in Fiscal Year 2022, by Component**

Component	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Customs and Border Protection	10	6	21	27
Cybersecurity and Infrastructure Security Agency	64	108	76	147
DHS Headquarters	140	75	133	141
Federal Emergency Management Agency	38	38	67	63
Federal Law Enforcement Training Centers	1	4	3	5
Immigration and Customs Enforcement	475	111	478	475
Transportation Security Administration	14	12	13	16
Coast Guard	96	69	102	113
U.S. Citizenship and Immigration Services	2	2	15	10
U.S. Secret Service	28	13	43	40

Source: GAO analysis of DHS Office of the Chief Security Officer data. | GAO-24-106153

Note: We could not independently verify the reliability of these data because comparative data was not available. This table does not include information on contractors.

**Table 6: Department of Homeland Security (DHS) Median Time (days) to Complete Security Clearance Reciprocity Cases in Fiscal Year 2022, by Component**

Component	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Customs and Border Protection	89	45	57	11
Cybersecurity and Infrastructure Security Agency	5.5	4.5	7	5
DHS Headquarters	3	1	1	1
Federal Emergency Management Agency	0	0	0	0
Federal Law Enforcement Training Centers	-	-	-	3
Immigration and Customs Enforcement	7	4	6	15

<sup>20</sup>The Office of the Director of National Intelligence established 13 National Security Adjudicative Guidelines applicants must meet for initial or continued eligibility for access to classified information or eligibility to hold a sensitive position. These guidelines are 1) allegiance to the United States, 2) foreign influence, 3) foreign preference, 4) sexual behavior, 5) personal conduct, 6) financial considerations, 7) alcohol consumption, 8) drug involvement and substance misuse, 9) psychological conditions, 10) criminal conduct, 11) handling protected information, 12) outside activities, and 13) use of information technology. Office of the Director of National Intelligence, *Security Executive Agent Directive 4: National Security Adjudicative Guidelines*, Washington D.C., (December 10, 2016). DHS tracks cases which developed information relating to these 13 guidelines. We call these collective guidelines “personal conduct factors.”



Component	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Transportation Security Administration	37.5	28.5	31	15.5
Coast Guard	6	5	5	6
U.S. Citizenship and Immigration Services	na	na	42	124
U.S. Secret Service	58.5	245	89	72

Source: GAO analysis of DHS Office of DHS Chief Security Officer data. | GAO-24-106153

Note: We could not independently verify the reliability of these data because comparative data was not available. For cells denoted with a “-,” no median time was calculated because there were too few observations for that component in that quarter. This table does not include information on contractors.

## DHS Internally Tracks Information on Vetting for Suitability and Fitness but Cannot Easily Track Reciprocity Data for Priority Positions

Unlike with security clearance cases where DHS is required to report to ODNI, DHS is not required to report its completed vetting cases for suitability and fitness. Instead, DHS tracks this internally. DHS officials told us they do so although they are not required to record or report the application of reciprocity for suitability or fitness cases, including for how many applicants they applied reciprocity.

DHS Security officials told us their information technology (IT) vetting system for tracking reciprocity cases does not easily distinguish candidates who did not qualify for reciprocity because they had never worked for the federal government, or on a federal contract, from candidates who did not qualify for different reasons.<sup>21</sup> These officials explained that to do so would require them to manually review every case.

Further, DHS Security officials told us their current IT vetting system does not easily track the specific type of reciprocity. For example, the system does not distinguish between denying reciprocity for a security clearance, a background investigation, or a suitability or fitness determination. These officials explained that to do so would require customized queries, which would be challenging and time consuming to produce.

In addition, DHS Security officials told us that users manually enter position titles for all DHS positions, including DHS’s 15 priority positions, into the IT vetting system. Based on our review of a sample of position titles DHS officials recorded in the IT vetting system for four job series, we found that the same positions appeared to have different position titles. Table 7 provides examples of related titles listed in DHS’s IT vetting system for a priority position at CBP. These related titles provide additional details, such as an indication for a supervisor or special concentration.

**Table 7: Related Positions in the Department of Homeland Security’s IT Vetting System for a Customs and Border Protection (CBP) Priority Position**

Component	Job Series <sup>a</sup>	Position Title <sup>b</sup>
CBP	1895	CUSTOMS AND BORDER PROTECTION OFFICER
CBP	1895	SUPVY CBP OFFCR
CBP	1895	CBP OFFCR (CANINE)
CBP	1895	CBPO SPECIAL RESPONSE TEAM (SRT)

<sup>21</sup>Different reasons may include an out-of-scope investigation. An investigation is out-of-scope if it was completed outside of the time frame required for the position, which is 5 years for DHS positions.

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Component	Job Series <sup>a</sup>	Position Title <sup>b</sup>
CBP	1895	CBPO (ENFORCEMENT)
CBP	1895	CBP OFFICER (AIRCRAFT)

Source: GAO analysis of DHS Office of the Chief Security Officer data. | GAO-24-106153

<sup>a</sup>A 4-digit job series, designated by the Office of Personnel Management (OPM), identifies a group of positions with similar lines of work and qualification requirements.

<sup>b</sup>A position consists of duties and responsibilities which make up the performed work. OPM has designated position titles for positions within selected job series. OPM requires positions within the 1895 job series (Customs and Border Protection) to be titled “Customs and Border Protection Officer.”

Further, some position titles are the same position with different spellings or acronyms, as shown in table 8. For instance, according to data from DHS Security’s IT vetting system, the most common position title for the Information Technology Specialist priority position at CISA is entered as “ITSPEC (INFOSEC).” However, the IT vetting system has over 20 position titles that are some variation of this position title and these variations collectively accounted for over 400 personnel, as of June 16, 2023.<sup>22</sup> This results in multiple entries for the same position. According to DHS Security officials, because these positions are entered into the system manually, there is potential to inaccurately tabulate the number of people who hold one priority position.

**Table 8: Variations and Duplicate Entries in Position Titles in Department of Homeland Security’s Security IT Vetting System for a Cybersecurity and Infrastructure Security Agency (CISA) Priority Position, as of June 16, 2023**

Component	Job Series <sup>a</sup>	Position Title <sup>b</sup>	Number of people with position title
CISA	2210	ITSPEC (INFOSEC) <sup>c</sup>	357
CISA	2210	INFORMATION TECHNOLOGY SPECIALIST (INF	93
CISA	2210	IT SP (INFOSEC)	92
CISA	2210	IT SPECIALIST (INFOSEC)	61
CISA	2210	IT SPECIALIST (INFOSEC)	52
CISA	2210	INFORMATION TECHNOLOGY SP (INFOSEC)	20
CISA	2210	IT SP (INFOSEC)	15
CISA	2210	Information Technology Specialist (INFOSEC)	14
CISA	2210	ITSPEC (INFOSEC)	12
CISA	2210	INFORMATION TECHNOLOGY SPEC (INFOSEC)	11
CISA	2210	IT SPEC (INFOSEC)	4
CISA	2210	IT SPEC. (INFOSEC)	4
CISA	2210	INFORMATION TECHNOLOGY SPECIALIST (INF	4
CISA	2210	IT SPEC (INFOSEC)	4
CISA	2210	IT SPECIALIST(INFOSEC)	4
CISA	2210	IT SP ( INFOSEC)	4
CISA	2210	IT SPECIALIST(INFOSEC)	2
CISA	2210	INFORMATION TECHNOLOGY SPECIALIST(INFO	2
CISA	2210	IT Specialist I(INFOSEC)	2
CISA	2210	IT SPECIALIST (INFO SEC)	2
CISA	2210	Information Technology Specialist (INFOSEC)	2

<sup>22</sup>“ITSPEC” is an abbreviation for “Information Technology Specialist.” “INFOSEC” refers to positions with security specialty.

Component	Job Series <sup>a</sup>	Position Title <sup>b</sup>	Number of people with position title
CISA	2210	IT SP(INFOSEC)	2
CISA	2210	IT SP( INFOSEC)	2
<b>Total duplicate position titles</b>			<b>408</b>

Source: GAO analysis of Office of the Chief Security Officer data. | GAO-24-106153

<sup>a</sup>A 4-digit job series, designated by the Office of Personnel Management (OPM), identifies a group of positions with similar lines of work and qualification requirements.

<sup>b</sup>A position consists of duties and responsibilities which make up the performed work. OPM has designated position titles for positions within selected job series. OPM requires positions within the 2210 job series (Information Technology Management) to be titled "Information Technology Specialist."

<sup>c</sup>"ITSPEC" is an abbreviation for "Information Technology Specialist." "INFOSEC" refers to positions with security specialty.

*Federal Personnel Vetting Performance Management Standards* identify minimum characteristics of quality management programs used to determine the quality of personnel vetting programs.<sup>23</sup> Those standards indicate that quality management programs should prevent information errors. Moreover, *Standards for Internal Control in the Federal Government* state that management should use quality information to achieve the entity's objectives.<sup>24</sup> In doing so, management is to change information requirements as needed to meet modified objectives as they change.

In the case of DHS Security's IT vetting system, reporting data on priority positions would be subject to human error because such analysis requires manual data checks and expanded queries to capture all relevant observations. Adding standardized position titles in its IT vetting system would make tracking total suitability or fitness cases and reciprocity cases for priority positions easier, provide more accurate information, and provide DHS greater visibility on the vetting process for positions that have the most impact on DHS's mission.

Further, having the capability in the IT vetting system to easily measure cases in which reciprocity is applied as a proportion of candidates that have a previous background investigation, suitability or fitness determination, or security clearance would allow DHS to better understand the extent to which reciprocity is applied. Distinguishing candidates for whom reciprocity is applied in a fitness or suitability determination from those for whom reciprocity is applied for a security clearance would allow DHS to more easily quantify the total pool of candidates who qualify for one but not the other.

Lastly, as a result of adding additional capabilities—such as distinguishing between different types of reciprocity—in its IT vetting system, DHS would be better able to be transparent with stakeholders, such as contracting companies, that candidates who have the right security clearance may still need additional vetting for a fitness determination. DHS Security officials noted that, while it would be beneficial to have additional capabilities in its IT vetting system, it would not be financially prudent to update their current system to capture these data points.

However, DHS Security officials stated that a new IT vetting system is currently under development that they will begin using in fiscal year 2026. DHS officials acknowledged the importance of having an IT vetting system

<sup>23</sup>Office of the Director of National Intelligence and the Office of Personnel Management, *Federal Personnel Vetting Performance Management Standards* (Washington, D.C: September 14, 2022).

<sup>24</sup>[GAO-14-704G](#). Office of the Director of National Intelligence and the Office of Personnel Management, *Federal Personnel Vetting Performance Management Standards* (Washington, D.C: September 14, 2022). GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023).

with enhanced capabilities and stated that they are still working on identifying the requirements for the new system. Given that the requirements for the new IT vetting system are still being identified, the timing presents an opportunity for DHS to include standardized position titles or ways to distinguish between candidates who qualify for suitability or fitness reciprocity from security clearance reciprocity in the new IT vetting system. Ensuring that the new IT vetting system that is under development includes these enhanced capabilities would provide DHS Security with the means to more easily track and monitor whether DHS is applying reciprocity effectively, particularly in its hiring efforts for priority positions.

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## DHS and Selected Components Have Taken Steps to Address Vetting Challenges but Could Benefit from Better Sharing Such Steps

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### DHS Components Identified Various Challenges to Making Timely Entry on Duty Determinations and Granting Reciprocity

We held three discussion groups with DHS personnel who facilitate or administer the personnel vetting process to discuss challenges they face in facilitating or making timely entry on duty (EOD) determinations and reciprocity decisions. These personnel represented nine components in addition to DHS headquarters.<sup>25</sup> Examples of the challenges component officials described are detailed in table 9.

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**Table 9: Challenges Department of Homeland Security (DHS) Hiring and Vetting Personnel Identified to Making Timely Entry on Duty (EOD) Determinations**

Challenge identified	Description
Position-specific requirements	Vetting personnel to ensure they meet position-specific requirements—such as passing a physical fitness test or criminal history check for specific offenses—can delay EOD determinations, whether via initial vetting or reciprocity vetting (see appendix III). For example, one human resources staff told us it may take candidates for law enforcement positions months to pass medical exams because candidates often need to see a medical specialist. An adjudicator told us candidates must travel to component facilities to receive polygraph exams, which can add time to the process.

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<sup>25</sup>We held three discussion groups with DHS personnel that facilitate or administer the personnel vetting process. Participants included adjudicators who make vetting determinations (discussion group one); human resources personnel who collect security paperwork (discussion group two); and contracting officer's representatives who assist in gathering security paperwork for contracting candidates (discussion group 3). These three discussion groups were comprised of personnel from nine components, DHS Security, and DHS Human Capital. We considered DHS Security and DHS Human capital as "components" when tabulating responses. Separately, we interviewed component officials from ICE, USCIS, and USSS. For purposes of this section of the report, we refer to all officials we held discussions with or interviewed as DHS "staff." If a staff member from one component shared a practice, we use the phrase "staff from one component..." If two or three staff members from two or three different components shared a practice or agreed with a practice, we use the phrase: "staff from some components..." If four or more staff members from four or more different components agreed with a practice, we use the phrase "staff from many components..." We specifically note occasions when multiple staff from one single component agreed with a practice.

Challenge identified	Description
Limited resources	Staff explained several scenarios where limited resources delayed EOD determinations. For instance, one adjudicator said candidates may live over 100 miles from a DHS office, requiring components to mail fingerprint cards to candidates. They said that candidates must then send the fingerprint cards back to the components, who then forward them to the Defense Counterintelligence and Security Agency. Human resources staff from some components expressed concerns about scheduling candidates for fingerprinting appointments due to faulty equipment and few available appointments. Another human resources staff said they have few polygraphers to utilize.
Questionable candidate conduct	Component staff sometimes seek additional information when they identify questionable conduct in a candidate's history. Such conduct may relate to criminal history, employment history, or financial history (e.g., poor credit or unpaid taxes), among other things. Adjudicators from many components said that even if the conduct identified was acceptable for a previously held position, components may need to explore the conduct further. This is because conduct acceptable for one position may not be acceptable for another position. One adjudicator said seeking additional information creates back and forth exchanges between candidates and staff that can take significant time.
Obtaining background investigation files	Staff from many components said they sometimes have trouble obtaining background investigation files from non-DHS departments. <sup>a</sup> Some adjudicators said this most often occurs for files held by the Department of Justice and intelligence community agencies.
Candidate delays	Human resources staff from some components said candidates frequently submit required forms toward the end of the time frames components give candidates. One human resources staff said some candidates who are already working at DHS—but are seeking to transfer positions or contracts within DHS—may be slow to submit paperwork. A contracting officer's representative staff from a different component said this may be because they are already working for, or on behalf of, DHS and believe they have already been vetted, even though they have not been vetted for their new position or role. Further, according to officials, time-to-hire data may be skewed because of choices candidates have when given their job offer. For example, one component's staff said candidates are allowed to select their own academy class and choose to register for classes months after accepting their new positions. Another component's staff added that candidates may choose to delay their start date until after finishing college coursework or a military obligation. A third component's officials said some of their candidates cannot begin working until annual leave for their previous position expires.
Candidate errors	Human resources staff from all components said various clerical errors such as the use of nicknames, unsigned forms, and mismatched information between forms are common. Human resources staff from one component estimated that 75–80 percent of cases require staff to reach back to candidates to correct errors.
Accepting previously performed exams	Officials from one component said they do not accept polygraph, physical, drug, or medical exams administered by other components or agencies. They said polygraphs administered by others do not contain questions related to candidate family members and acquaintances, which they view as essential to vetting for law enforcement positions in their component. As a result, this component administers new exams to those seeking law enforcement positions. A human resources staff from the same component said administering new exams makes applying reciprocity for law enforcement positions takes more time than for non-law enforcement positions.

Source: GAO summary of DHS discussion group personnel statements. | GAO-24-106153

<sup>a</sup>When vetting a candidate, DHS staff check national repositories to see if candidates have an existing background investigation. These repositories contain information about any existing background investigations, but they do not contain the actual background investigations. Sometimes information about the background investigations is not sufficient, and DHS staff need to obtain the actual background investigation file which is housed at the originating federal agency.

## DHS Components Could Better Share Practices Used to Help Address Vetting Challenges

DHS component staff from all three of our discussion groups shared several practices they use to support faster EOD determinations and help address the challenges noted above. Examples of practices they noted are in table 10.

**Table 10: Practices Department of Homeland Security Hiring and Vetting Personnel Identified to Support Faster Entry on Duty Determinations**

Practice identified	Description
Shifting paperwork collection and review responsibilities	Some human resources staff said they have “intake” sections that collect paperwork and ensure it is free from errors before forwarding the paperwork to adjudicators. A contracting officer’s representative from one component said they require contracting companies to collect paperwork from their candidates—and ensure the paperwork is error free—before submitting it to contracting officer representatives. They said paperwork quality submitted by contracting company representatives may affect future contract awards.
Creating a separate group for reciprocity	Adjudicators from some components said they have separate teams for processing cases where reciprocity may apply, which allows them to process cases faster than if potential reciprocity cases were mixed with cases for candidates new to the federal government.
Administering drug tests early	Human resources staff from some components said they administer drug tests before other types of tests—such as medical exams, physical fitness tests, or polygraph exams. Thus, if a candidate fails a drug test, that candidate will not advance in the process to take other tests. They said this approach saves time and resources.
Sharing training and tips with contractors and candidates	Adjudicators and human resources staff from some components said they provide training and tips to help candidates navigate their component’s vetting process. For instance, one component adjudicator said they email candidates before sending them certain forms. These emails advise candidates to flag any credit issues and explain how they are taking steps to resolve them in conjunction with submitting their forms. A human resources staff from a different component said they provide training to contracting company representatives to help them understand their component’s process and terminology. Another human resources staff from a third component said they developed a video series and shared it with candidates to help them navigate, prepare for, and take required exams (drug test, physical fitness test, polygraph, and medical exam).

Source: GAO summary of DHS discussion group personnel statements. | GAO-24-106153

DHS has taken some action, such as forming working groups, to share across-the-department practices used to address certain challenges. For instance, as a part of the government-wide effort to reform personnel vetting, called Trusted Workforce 2.0, DHS Security formed a Trusted Workforce Working Group in December 2020 for DHS personnel security managers across the department that discussed practices used for background investigations. We discuss DHS’s efforts under Trusted Workforce 2.0 in more detail later in this report. In addition, DHS Human Capital formed the Human Capital Efficiencies Advisory Team for DHS human capital managers. According to DHS Human Capital officials, the team met with officials from six components to identify and map hiring process improvements. According to DHS officials, DHS Security’s Trusted Workforce Working Group and DHS Human Capital’s Human Capital Efficiencies Advisory Team primarily focus on their respective areas of responsibility. That is, DHS Human Capital’s group discusses topics related to the overall hiring process, and DHS Security’s group discusses personnel vetting topics.

While there is routine interaction and coordination regarding overlapping areas between or among these groups, according to DHS Security and Human Capital officials, the participants tend to be managers and not staff tasked with implementing hiring and vetting processes. Based on our discussion groups with staff that implement hiring and vetting processes, we found that some challenges, such as applicants submitting

paperwork with clerical errors or paperwork close to deadlines, were similar across components. However, DHS does not have mechanisms, such as regular meetings, where these staff can share practices they have used to address such challenges. According to DHS officials, while they believe that such practices are discussed at these groups, they acknowledged there would be a benefit to include staff who are responsible for implementing hiring and vetting processes day-to-day. In response to our raising this issue, in January 2024, DHS Security sent out a solicitation for additional participants from these groups of staff to join the Trusted Workforce Working Group and DHS reported that the participants joined the group beginning in February 2024. However, DHS Human Capital has not taken steps to solicit new participants to join the Human Capital Efficiencies Advisory Team because in May 2024, DHS reported that the group was a short-term focus group that reported out its findings to stakeholders, including OPM, in June 2023. DHS Human Capital reported that it does host and participate in other forums, such as the Staffing Policy Council, which does include practitioner-level staff participants from components. While these groups are a good first step, it is too soon to tell whether the feedback from component personnel tasked with implementing hiring and vetting processes is resulting in faster entry on duty determinations.

Our prior work that identified leading practices to enhance interagency collaboration and address crosscutting challenges discusses including relevant participants.<sup>26</sup> Specifically, participating agencies must ensure that they have invited not only the relevant organizations but also any individuals who may have a stake in the collaborative effort.

By ensuring that component personnel tasked with implementing hiring and vetting processes are included in existing working groups and other applicable forums regarding human capital and personnel security, respectively, so that practices used to address challenges can be regularly shared, DHS could better leverage leading practices across components to make faster entry on duty determinations.

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## DHS Has Taken Steps to Improve Candidates' Vetting Experience but Does Not Have a Framework to Guide This Effort

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### DHS Has Taken Steps to Implement Government-Wide Reforms to Improve the Candidate Vetting Experience

The federal government is reforming its overall approach to personnel vetting, and these changes will affect DHS's current policies and processes. The effort, called Trusted Workforce 2.0, is intended to reform the personnel vetting process and establish a single vetting system for the U.S. government. These reforms aim to reduce time required to hire and onboard candidates, enhance the mobility of the federal workforce, and improve transparency and two-way communication between candidates and the federal government. For example, Trusted Workforce 2.0 plans to replace the current requirement to periodically reinvestigate personnel at fixed intervals with systems for automated continuous vetting.<sup>27</sup> Implementation of Trusted

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<sup>26</sup>GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#), (Washington, D.C.: May 24, 2023).

<sup>27</sup>In January 2023, OPM proposed a rule to, among other things, align investigation and position designation requirements among federal employee and contractor populations, with certain exceptions, and replace manual periodic reinvestigation of personnel with automated continuous vetting. See 88 Fed. Reg. 6192 (January 31, 2023).

Workforce 2.0 at DHS began in March 2019 and is currently targeted for completion across the federal government by the end of fiscal year 2028.<sup>28</sup>

In addition to its efforts to implement Trusted Workforce 2.0, DHS has made changes to its personnel vetting processes that may improve candidate experience.<sup>29</sup> A list of additional actions taken by DHS that may improve candidate experience is in appendix VI. Some examples, including actions implementing Trusted Workforce 2.0 and changes developed independently of that effort, are detailed below:

- **Modernizing forms.** In September 2021, DHS awarded a contract to modernize the forms that contractors use during the personnel vetting intake process. For example, modernization includes transitioning PDF-based forms into an online portal, so candidates can fill out forms and upload required documentation directly through a website, rather than having to email DHS personnel. According to DHS Security officials, these new forms are intended to provide more accurate data collection and improve quality assurance. DHS Security officials also told us that they expect this effort to provide greater transparency for industry program managers, procurement staff, and candidates. Some forms have already been modernized as part of a phased implementation effort, and this project is currently targeted for completion in fiscal year 2025.
- **Faster background investigations.** In August 2019 and October 2021, DHS obtained delegated authority for the remaining four of its eight operational components to perform, or contract for, their own background investigations.<sup>30</sup> In March 2021, DHS awarded a contract to a vendor to conduct some background investigations for components.<sup>31</sup> DHS officials told us that their vendor has since been able to conduct faster and more cost-effective background investigations than the Defense Counterintelligence and Security Agency (DCSA) while still meeting investigatory standards. For example, as of July 2023, DHS data showed that for a moderate-risk suitability (tier 2) background investigation, those performed by DCSA took an average of 70 days to complete, while those performed by DHS's vendor took an average of

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<sup>28</sup>Trusted Workforce 2.0's expected full implementation is determined by the Security, Suitability, and Credentialing Performance Accountability Council, whose member agencies include the Office of Management and Budget, the Office of the Director of National Intelligence, the Office of Personnel Management, the Department of Defense, and others. GAO has previously reported in December 2021, August 2023, and January 2024 on Trusted Workforce 2.0 and challenges associated with its deployment. See GAO, *Personnel Vetting: Actions Needed to Implement Reforms, Address Challenges, and Improve Planning*, [GAO-22-104093](#), (Washington, D.C.: December 9, 2021); GAO, *Personnel Vetting: DOD Needs a Reliable Schedule and Cost Estimate for the National Background Investigation Services Program*, [GAO-23-105670](#), (Washington, D.C.: August 17, 2023); and GAO, *Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations*, [GAO-24-105669](#) (January 22, 2024).

<sup>29</sup>According to DHS Security officials, candidates who receive personnel vetting include (1) applicants for federal employment and (2) employees of companies who work on federal contracts or task orders.

<sup>30</sup>The Department of Defense's Defense Counterintelligence and Security Agency (DCSA) conducts most of the federal government's background investigations as the primary investigative service provider, but some executive branch agencies have the authority to conduct all or some of their own background investigations. Prior to August 2019, DHS had already obtained delegated background investigation authority for U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, the U.S. Coast Guard, and the U.S. Secret Service. In August 2019, DHS obtained authority for U.S. Citizenship and Immigration Services, the Federal Emergency Management Agency, and the Transportation Security Administration. In October 2021, DHS also obtained delegated background investigation authority for the Cybersecurity and Infrastructure Security Agency.

<sup>31</sup>As of April 2023, DHS estimated that 55 percent of background investigations were performed by DCSA, and 45 percent by DHS's own vendors.



46 days. Similarly, for high-risk suitability (tier 4) background investigations, DCSA took an average of 122 days, while DHS’s vendor took an average of 50 days.<sup>32</sup>

- **Updated tool to gather security information.** In September 2023, DHS finished deploying its new eApplication online security questionnaire for background investigations across almost all components.<sup>33</sup> This electronic questionnaire is being rolled out across the federal government under the leadership of DCSA and is a component of the Trusted Workforce 2.0 initiative. DHS Security officials said that the new questionnaire is simpler, more intuitive, and will reduce the time needed for applicant completion.

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## DHS Security Does Not Have a Framework to Guide Its Candidate Experience Efforts

Although DHS Security officials told us that they are working to improve the experience of candidates, DHS Security does not have a documented framework to guide its efforts. Executive Order 14058—Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government—requires federal agencies to put an emphasis on improving the customer experience.<sup>34</sup> Further, Office of Management and Budget Circular A-11, Section 280—which operationalizes Executive Order 14058—lists several best practices agencies should implement.<sup>35</sup>

Among other things, the circular states that agencies should (1) have a knowledge of the services they provide, and, for a given service, be able to articulate how the components of the service, such as roles and tools, come together to make up the agencies’ approach to service design and delivery; (2) collect data to better understand how customers (i.e., candidates) are engaging with products/services; (3) obtain customer feedback, such as through surveys; and (4) define and institute customer experience outcome measures.

Further, a 2023 RAND Corporation report commissioned by the federal government suggested the use of a “candidate experience framework” to institutionalize an approach for creating a positive personnel vetting experience.<sup>36</sup> According to the report, a framework includes identifying types of factors relevant to candidates’ experience and linking those with end-to-end maps of the hiring process to serve as a tool for assessment and improvement of candidates’ experience.

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<sup>32</sup>The federal government categorizes background investigations by numbered tier. There are currently five investigative tiers with the required tier being dependent upon the risk and sensitivity level designation of the position. The type of adjudication required for each tier is dependent on the position. For example, a suitability/fitness determination may be required for all tiers whereas only positions designated as sensitive will require a national security determination.

<sup>33</sup>National Background Investigation Services’ eApplication replaced the Electronic Questionnaires for Investigations Processing, which had been in service since 2003. The only DHS component that has not yet deployed the new eApplication is CBP. According to DHS officials, CBP has an approved extension for delayed implementation and is actively working with DCSA to build the needed capabilities that were not originally available.

<sup>34</sup>See *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, Exec. Order No. 14,058, 86 Fed. Reg. 71,357 (December 16, 2021).

<sup>35</sup>See Office of Management and Budget, *Circular No. A-11: Preparation, Submission, and Execution of the Budget*, § 280 (August 2022).

<sup>36</sup>See David Stebbins, Richard S. Girven, and Samantha Ryan, *National Security Employment: Improving the Candidate Experience Journey Through the Personnel Vetting Process* (Santa Monica: RAND Corporation, 2023). This report was sponsored by the Security, Suitability, and Credentialing Performance Accountability Council Program Management Office.

While DHS Security officials acknowledged they do not have such a framework, officials said their efforts are guided by DHS-wide and Trusted Workforce 2.0 customer experience documentation. While this documentation may be helpful, officials did not explain how those documents specifically guide their candidate experience efforts. Further, this documentation does not specifically address the candidate experience as it relates to personnel vetting.<sup>37</sup> Below are a few elements identified in the Office of Management and Budget circular A-11 that, if included in a candidate vetting framework, could improve candidate experience efforts.

- **Definitions of key terms.** While DHS has defined “customer” and “customer experience” more broadly for the agency as a whole, DHS Security officials told us they had not documented definitions of “candidate” or “candidate experience” as they specifically pertain to personnel vetting.<sup>38</sup> DHS Security officials told us that “customers” are candidates in the vetting process but said they had not formally defined “candidate experience.” Because personnel vetting involves a range of steps that can vary from candidate to candidate and by position, formally defining “customers” and “customer experience”—as they pertain to personnel vetting—would help DHS Security clarify the populations it should target, customize its approach to improving their experiences, and assess desired outcomes.
- **Collection of candidate feedback.** There are no mechanisms for collecting feedback from candidates who have yet to begin working at DHS, or who recently began working at DHS. However, DHS Security officials told us that they recently began gathering feedback from employees in DHS components who assist with vetting candidates. Specifically, DHS Security officials told us that they added hyperlinks to surveys as part of their email signature. Gathering feedback from those who assist with vetting candidates may provide helpful information. However, collecting feedback directly from candidates and recent hires would likely provide more substantive insights and allow DHS to directly address feedback to drive service improvements.
- **Goals and performance assessment.** DHS Security officials told us that they do not have specific, documented candidate experience goals or performance targets against which performance can be assessed. Having goals, sub-goals, and performance targets would help DHS better focus its efforts on achieving specific service improvements. It would also enable measurement against those goals and targets.

DHS Security officials said they have not developed a personnel vetting candidate experience framework because they have been focused on operations and on efforts related to Trusted Workforce 2.0. When we raised the issue, they said they plan to develop such a framework after Trusted Workforce 2.0 is implemented in 2028. However, the development of a candidate experience framework would not only fit within ongoing Trusted Workforce 2.0 implementation, but it may augment these efforts. Specifically, Trusted Workforce 2.0 *Federal Personnel Vetting Engagement Guidelines* call for outcomes such as two-way communication and improved collaboration between candidates and the agency. These guidelines also call for “enlisting individuals as active participants in the personnel vetting program.”<sup>39</sup> These outcomes, for example, could be incorporated

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<sup>37</sup>DHS Security officials told us their efforts follow guidance laid out in internal memoranda from 2021 and 2023, as well the Federal Personnel Vetting Performance Management Standards issued in September 2022.

<sup>38</sup>Executive Order 14058, *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government* and section 280 of Office of Management and Budget Circular A-11—which operationalizes Executive Order 14058—define “customer” and “customer experience.” The definitions in these documents include candidates for federal employment or contract work under the umbrella of “customer.” Additionally, DHS has published or shared a range of resources related to these topics that also include definitions of customer and customer experience. These resources are available to the public at <https://www.dhs.gov/cx/>.

<sup>39</sup>See Office of the Director of National Intelligence and Office of Personnel Management, *Federal Personnel Vetting Engagement Guidelines* (February 10, 2022).

into a candidate experience framework to include goals and targets to assess these outcomes for candidates hired prior to the full implementation of Trusted Workforce 2.0 in 2028.

Developing a candidate experience framework for personnel vetting that implements the DHS-wide customer experience strategy and is aligned with Trusted Workforce 2.0 objectives and other federal guidance could help DHS Security be more strategic, targeted, and effective in improving candidate experience and efficiently vet candidates to meet DHS's urgent hiring needs, especially for priority positions. For example, a candidate experience framework for personnel vetting that defines key terms, solicits candidate feedback, establishes goals, and assesses progress toward those goals aligns with Trusted Workforce 2.0 purposes and can position DHS to assess whether its vetting efforts are helping DHS meet its hiring needs. Further, it positions DHS to improve the experience of candidates vetted prior to Trusted Workforce 2.0's implementation while allowing for additional planning to take place after implementation is completed.

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## Conclusions

Hiring qualified and trustworthy individuals across a large range of positions in a timely manner is critical to DHS's ability to fulfill its wide-ranging and disparate mission. To accomplish this, DHS and its components have implemented processes to hire and vet candidates and collect and report data on these efforts. However, these processes are not consistent across the department, making it somewhat difficult to collect, analyze, and transparently report hiring and vetting data. This information provides DHS and external agencies like OPM or ODNI important feedback on whether DHS's processes are working effectively. Having more accurate information could help provide additional clarity on DHS's hiring and vetting efforts, including whether DHS is making timely hiring decisions so that it does not result in DHS losing out on otherwise qualified candidates.

By clearly disclosing data limitations and associated assumptions it made when compiling time-to-hire data from components when reporting to OPM, DHS Human Capital would provide more transparent, accurate information to OPM that provides important feedback on whether DHS is making timely hiring decisions that informs OPM's oversight of federal hiring efforts.

Moreover, DHS collects and reports a variety of data related to personnel vetting across the department. However, DHS Security's IT vetting system is limited in its ability to provide important information on personnel vetting as it relates to DHS priority positions. DHS intends to replace the system. As it does, ensuring that the personnel vetting IT system that DHS is developing includes enhanced capabilities, such as being able to track information for DHS priority positions and distinguish between different types of reciprocity, would provide DHS Security with the means to more easily track and monitor its efforts to understand whether reciprocity is being applied effectively, particularly for its priority positions.

DHS has taken a range of actions to improve its personnel vetting candidate experience and formed two working groups to share practices to address hiring and vetting challenges. However, DHS's existing working groups do not include personnel—such as component human capital, personnel security, and contracting officer's representatives—who are responsible for implementing vetting processes. While DHS has taken steps to expand the participation in its working groups and other forums to include these groups of staff, it is too soon to tell how DHS is using the feedback to make improvements to its processes. By ensuring that component personnel tasked with implementing hiring and vetting processes are included in existing working groups and other applicable forums regarding human capital and personnel security, respectively, so that practices used to

address challenges can be regularly shared, DHS could better leverage practices across components to make faster entry on duty determinations.

Further, the steps DHS Security has taken to improve the candidate experience with personnel vetting have not been guided by a documented framework that aligns with related ongoing efforts, such as Trusted Workforce 2.0. Developing a candidate experience framework for personnel vetting that implements the DHS-wide customer experience strategy and aligns with Trusted Workforce 2.0 objectives and other federal guidance could help DHS Security be more strategic, targeted, and effective in improving the candidate experience and position it to efficiently vet candidates to meet DHS's urgent hiring needs.

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## Recommendations for Executive Action

We are making the following four recommendations to DHS:

The DHS Chief Human Capital Officer should clearly disclose data limitations and associated assumptions it made when compiling time-to-hire data from components when reporting to OPM. (Recommendation 1)

The DHS Chief Security Officer should ensure that the IT vetting system that is under development includes enhanced capabilities, such as being able to track information for DHS priority positions and distinguish between different types of reciprocity. (Recommendation 2)

The DHS Under Secretary for Management should ensure that component personnel tasked with implementing hiring and vetting are included in working groups and other applicable forums regarding human capital and personnel security so that practices that support faster entry on duty determinations can be regularly shared. (Recommendation 3)

The DHS Under Secretary for Management should develop a candidate experience framework for personnel vetting that implements the DHS-wide customer experience strategy and is aligned with Trusted Workforce 2.0 objectives and other federal guidance. (Recommendation 4)

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## Agency Comments

We provided a draft of this report to DHS, OPM, and DOD for review and comment. DHS provided written comments that are reprinted in appendix II and summarized below. DHS, OPM, and DOD provided technical comments, which we incorporated, as appropriate.

In its written comments, DHS noted that, consistent with the requirements set by ONDI, DHS Security calculates the time it takes to grant security clearance reciprocity using the average number of days even though our report presents this information as the median number of days. While we recognize that DHS Security reporting of reciprocity data is directed by ODNI, we chose to report this data as the median number of days because reporting it this way reduces the influence of outliers and therefore better captures the experience of most applicants.

DHS agreed with our four recommendations. With respect to recommendation 1, DHS reported that it has set a goal of reducing time-to-hire by 10 percent and in March 2024 it formed a focus group to set business rules

and reporting expectations for time-to-hire data across the department. In May 2024, DHS reported that it shared these updated reporting requirements with the cross-component Human Capital Leadership Council. DHS also stated that it plans to update the data collection system with five additional DHS-specific steps to make time-to-hire reporting easier for the components, which it aims to complete by July 31, 2024. DHS added that it is changing its hiring platform which it believes will also improve reporting for time-to-hire and this transition should be complete by December 31, 2024. The actions DHS described, if implemented effectively, would address our recommendation.

With respect to recommendation 2, DHS stated that the procurement is underway for two systems to improve personnel security vetting, including its updated IT vetting system. DHS noted that as the systems are developed and implemented, DHS Security will focus on tailoring the systems with capabilities to meet the demands of DHS's priority positions and distinguishing between different types of reciprocity determinations. DHS reported that the phased deployment for the first system will begin for contractor onboarding in June 2024 and full deployment in September 2024. In fiscal year 2025, DHS plans to gather requirements from components on their onboarding processes and update the system accordingly starting in September 2025 with a completion date of September 2026. For its updated IT vetting system, DHS anticipates awarding the contract in March 2025 and make the enhancements to the system through March 2026, depending on funding availability. The actions DHS described, if implemented effectively, would address our recommendation.

With respect to recommendation 3, DHS noted that DHS Security's Trusted Workforce working group will be establishing a charter by September 30, 2024 to document its purpose, roles, responsibilities, and membership, among other things. DHS reported that DHS Human Capital's Human Capital Efficiencies Advisory Team was a short-term focus group, so it has not expanded participation to include component personnel tasked with implementing hiring and vetting processes. However, DHS Human Capital reported that it has several other forums that do include these personnel, such as the Human Resource Information Technology Advisory Team and the Staffing Policy Council. DHS anticipates observing hiring improvements because of the feedback from these groups through its time-to-hire data which it monitors on an ongoing basis. The actions DHS described, if implemented effectively, would address our recommendation.

With respect to recommendation 4, DHS reports that DHS Security will engage and collaborate with other relevant stakeholders, such as DHS Human Capital, to develop a customer experience framework for personnel vetting. DHS Security's efforts to improve and update its personnel security IT systems, as described above, will also be a part of its efforts to improve customer experience. As stated above, DHS anticipates a completion date for the implementation of these systems by September 30, 2026. The actions DHS described, if implemented effectively, would address our recommendation.

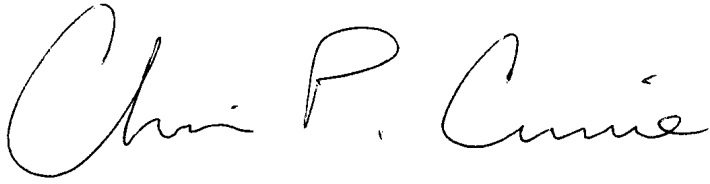
We are sending copies of this report to the appropriate congressional committees, the Secretary of Homeland Security, the Director of the Office of Personnel Management and the Secretary of Defense. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact Christopher P. Currie at (404) 679-1875 or [curriec@gao.gov](mailto:curriec@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VII.

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Letter

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A handwritten signature in black ink that reads "Chris P. Currie". The signature is written in a cursive style with a large initial "C" and a distinct "P".

Christopher P. Currie  
Director, Homeland Security and Justice

# Appendix I: Objectives, Scope, and Methodology

This report examines

1. the extent to which Department of Homeland Security (DHS) and selected components met their time-to-hire targets and reported these data for priority positions in fiscal year 2022;
2. the extent to which DHS collects and reports reciprocity data for priority positions;
3. challenges selected DHS components have faced in vetting candidates in a timely manner and steps taken to address them; and
4. the extent to which DHS has taken steps to improve candidates' vetting experience from fiscal year 2018 through August 2023.

We employed multiple methodologies to conduct our work, including reviewing documents and data, interviewing officials, and conducting discussion groups.

To address each of our objectives, we reviewed documents regarding hiring and vetting at DHS, including Office of Personnel Management (OPM) guidance, DHS policies, informational publications from DHS components, and DHS documentation describing actions taken to improve hiring and vetting processes. We also interviewed officials from DHS headquarters offices, including the Office of the Chief Human Capital Officer (DHS Human Capital); the Office of the Chief Security Officer (DHS Security); and the Office of the Chief Procurement Officer. We also interviewed officials from four DHS components: U.S. Customs and Border Protection (CBP), Cybersecurity and Infrastructure Security Agency (CISA), U.S. Citizenship and Immigration Services (USCIS), and U.S. Secret Service (USSS). We selected these components because they have priority positions subject to certain hiring requirements, such as polygraph exams and medical exams.

We also interviewed officials from other federal agencies responsible for overseeing hiring and vetting, specifically OPM and the Department of Defense. We asked them questions regarding hiring and vetting processes at DHS, including how data are collected and shared across the department and with external parties. We also interviewed officials from two industry groups—the Professional Services Council and the Intelligence and National Security Alliance—to solicit the perspectives of companies that contract with DHS, as some of their employees also go through the vetting process. We asked them questions regarding their experiences with hiring and vetting at DHS.

To address our first objective, we reviewed DHS Human Capital data on the amount of time required to hire candidates for priority positions in fiscal year 2022 (the most recent data available at the time of our review) and compared them to the time-to-hire targets set by DHS. We also sourced these data from DHS Human Capital and DHS components, including CBP, CISA, USCIS, and USSS. We selected these components for additional review because, of the 15 priority positions designated by DHS for hiring, four positions at these components were subject to varying legal or position-specific requirements which might affect their time-to-hire. We used these as examples to help illustrate the effects that various requirements may have on time-to-

hire. We also examined Standards for Internal Control in the Federal Government related to quality information and external communication to assess DHS's process for reporting time-to-hire data to OPM.<sup>1</sup>

To review these data, the team undertook a multistep process to assess data reliability, analyze data found reliable, and draw conclusions from the analyses of those data. To assess the data's reliability, we (1) performed electronic testing, (2) reviewed existing information about the data and the system that produced them, and (3) interviewed agency officials knowledgeable about the data and worked with these officials on any data problems. When we found discrepancies (such as missing data, duplicate records, or data entry errors), we brought them to DHS's attention and worked with officials to correct the discrepancies before conducting our analyses. We found these data to be sufficiently reliable for the purpose of describing time-to-hire trends at DHS. We presented DHS Human Capital data in the report body and DHS component data in appendix V.

The data for time-to-hire and attrition in appendix V demonstrate overall time-to-hire and attrition from a candidate's perspective for fiscal years 2018–2022. We used record-level application data from 1) CBP, 2) CISA, 3) USCIS, and 4) USSS.<sup>2</sup> For our time-to-hire analysis, we present the overall median time between the point of application submission to entry on duty for candidates who entered on duty between October 1, 2017, and September 30, 2022.<sup>3</sup> Our attrition analysis demonstrates overall attrition within the first 12 months of personnel vetting. We present the percentage of candidates who were sent or had accepted a tentative job offer between October 1, 2017, and March 31, 2022, who within 1 year of that date were either 1) hired (entered on duty), 2) had an application withdrawn or cancelled, or 3) remained active.<sup>4</sup> We only considered one application per candidate for both analyses, the earliest application that resulted in a candidate 1) entering on duty or 2) having a withdrawn or cancelled application (only for the attrition analysis).<sup>5</sup> CBP and USSS track the date candidates were scheduled to enter on duty but not necessarily their actual enter on duty date. We considered candidates for positions within these components as "entering on duty" if they did not have an

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<sup>1</sup>GAO-14-704G

<sup>2</sup>CISA data contained individuals new to the component and current employees being reassigned.

<sup>3</sup>Application submission is the first step in OPM's 14-step hiring model that involve action from candidates after candidates see a job opportunity announcement. The final step is entry on duty. These make natural starting and ending points for measuring time-to-hire from a candidate's perspective. Accounting for right censoring in our calculations was not necessary as we are only looking at individuals that entered on duty and not those who are still in hiring process as of September 30, 2022.

<sup>4</sup>To present fiscal year 2022 data, we limited analysis to candidates who were sent or had accepted a tentative job offer within the first six months of fiscal year 2022. DHS Security officials told us they do not collect information from applicants until after candidates receive a tentative job offer.

<sup>5</sup>We used all observations for the USCIS analyses for candidates who lacked a unique identification number. Thus, our analysis may include multiple applications from the same candidate. For all analyses, if two applications had the same entry on duty date, we used the application with the earliest application submission date for the time-to-hire analysis and the earliest tentative job offer sent or acceptance date for the attrition analysis. If two applications also had the same application submission date or tentative job offer sent or acceptance date, we used a random application. If candidates had multiple active applications, we used the application with the earliest tentative job offer sent or acceptance date.



application withdrawn or cancelled within 60 days of that scheduled date.<sup>6</sup> We classified the USSS candidates as hired, withdrawn/cancelled, or pending using application status.<sup>7</sup> For the time-to-hire analysis, we took additional steps to identify the starting point of the hiring process when the application submission date was not available.<sup>8</sup> Additionally, in the attrition analysis, we took additional steps to identify the starting point of the hiring process when the tentative job offer acceptance date was not available<sup>9</sup>

To address our second objective, we reviewed component-level DHS Security data on the amount of time required to make security clearance reciprocity determinations in fiscal year 2022. We sourced these data from DHS Security. Due to the lack of comparable data, we could not independently verify their reliability. We also examined relevant criteria, such as Federal Personnel Vetting Performance Management Standards and Standards for Internal Control in the Federal Government related to quality information to assess DHS's capability to collect and analyze vetting data for its priority positions.

To address our third objective, we conducted three virtual discussion group sessions with officials from CBP, CISA, Federal Emergency Management Agency, Federal Law Enforcement Training Centers, Immigration and Customs Enforcement, Transportation Security Administration, U.S. Coast Guard, USCIS, USSS, DHS Human Capital, and DHS Security. From those entities, we spoke to contracting officer's representatives, adjudicators, and human resources personnel who collect paperwork from applicants. For each discussion group, we requested five potential participants from each component's audit liaison. For each discussion group, we randomly selected two potential participants from each component.

To select the participants for the adjudicators discussion group, we selected one of the two potential participants from each component. We selected individuals who make entry on duty determinations. To the greatest possible extent, we also prioritized individuals who 1) make interim sensitive position eligibility decisions, 2) conduct preemployment checks, 3) communicate results to candidates, and 4) make final suitability determinations. We confirmed their experience and job responsibilities through a questionnaire provided to potential participants.

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<sup>6</sup>For our time-to-hire analysis for CBP, we considered a candidate entering on duty if they had a date scheduled to report for duty and did not have an application withdrawn or canceled within 60 days after that scheduled date. For our time-to-hire analysis for USSS, we considered a candidate entering on duty if they had a date scheduled to report for duty and did not have an application withdrawn or canceled at most 60 days after that scheduled date. For both our CBP and USSS attrition analyses, we considered candidates who had a withdrawn or canceled application more than 60 days after being scheduled to report for duty as "Hired" and candidates with a withdrawn or canceled application at most 60 days after that scheduled date as "Withdrawn or canceled."

<sup>7</sup>USSS tracks the most recent stage in the application process a candidate took part as well as the most recent date the status changed. GAO requested that USSS categorize its 78 statuses into four categories: 1) Discontinued, 2) Hired, 3) Pending, and 4) Unfavorable. For the time-to-hire analysis, we considered the candidate as "hired" if they were in the "Hired" category. For the attrition analysis, we considered candidate status within one year of accepting a tentative (i.e., conditional) job offer. We considered the candidate as hired if they were in the "Hired" category. We considered a candidate "Withdrawn/canceled" if they had 1) no scheduled entry on duty date and 2) were "Unfavorable" or "Discontinued." We considered a candidate "Active" if they had a 1) no scheduled entry on duty date and 2) were "Pending."

<sup>8</sup>For CBP, we used the date the application closed, provided that date was prior to the tentative job offer date. For USCIS, we used the date USCIS human resources received an SF-52 form. For CISA, we used the date CISA human resources identified a candidate to recruit.

<sup>9</sup>For USCIS, we used the date USCIS human resources selected an individual to potentially hire. For CISA, we used the date the tentative job offer was sent to candidates. For USSS, we limited analysis to candidates who had a tentative (i.e., conditional) job offer on or before either a known security interview, polygraph, medical exam, drug test, background investigation, or scheduled entry on duty date.

To select the participants for the human capital discussion group, we selected one of the two potential participants from each component. We selected individuals who forward personnel vetting materials to adjudicators. We prioritized individuals who 1) collect personnel vetting materials from candidates, 2) review the materials for completeness, 3) conduct preemployment checks, 4) review the material for issues, 5) communicate results to candidates, and 6) set entry on duty dates. We confirmed their experience and job responsibilities through a questionnaire provided to potential participants.

To select the participants for the contracting officer's representatives discussion group, we used the same criteria for the human capital participants, provided they delegated administrative responsibility for a contract of at least \$10 million in value. We confirmed their experience and job responsibilities through a questionnaire provided to potential participants.

These sessions involved structured small group discussions that were guided by a moderator who used a standardized list of questions to encourage participants to share their thoughts and experiences. Our overall objective in using a discussion group approach was to obtain views, insights, and feelings of officials involved in the hiring and vetting process at DHS headquarters offices and components. We asked the discussion group participants about challenges they faced in vetting personnel in a timely manner, as well as any solutions they were considering or had implemented to address those challenges.

We recorded and summarized each of the three discussion groups. We conducted a content analysis of these summaries to identify similarities and differences across participants' responses to each discussion question. Our method of organization for the content analysis was to identify themes of each discussion group question, using these themes to organize participants' responses for further analysis. We identified key themes across responses, as well as illustrative examples of these key themes. For example, one theme we identified was limited resources for hiring and vetting.

Given that participants shared a wide variety of experiences, we also identified examples that were mentioned less frequently, including information that was only mentioned in some discussion groups, but that illustrated this variation in responses across participants. Additionally, while our analysis focused on the participants' response to scripted questions, it also included answers to probing questions from the moderator and some comments they volunteered. This content analysis was conducted by an analyst after the approach was reviewed by a second analyst and methodologist.

While discussion groups can provide valuable insights on the views of participants, the results of our discussion groups are not generalizable. First, the information includes only responses from a relatively small number (27 in total) of staff involved in the hiring and vetting process at DHS from the three selected groups of personnel. Second, the groups were not randomly selected, with the initial pool of participants provided by DHS audit liaisons pursuant to guidance from us. The pool was then further narrowed down by us in an effort to further ensure the attendance of staff who performed the duties we were interested in discussing. Third, participants were asked questions about their experiences, and other officials not in the discussion groups may have had other experiences. Because of these limitations, we did not rely entirely on discussion groups, but rather used several different methods to corroborate and support our conclusions. We also examined relevant

criteria, such as our prior work that identified leading practices for interagency coordination to address crosscutting challenges.<sup>10</sup>

To address our fourth objective, we compared documents we reviewed to guidance outlined in an executive order, an OMB circular, and best practices suggested in a report by the RAND Corporation on behalf of the federal government.<sup>11</sup> Through this comparative analysis, we generated a list of actions we identified that DHS had taken relating to vetting, and further identified which of those actions directly affected the candidate experience by tying actions taken to specific customer experience factors described in the documents we reviewed. The list that resulted, containing actions we identified that directly affect the candidate experience, is contained in appendix VI of this report.

We conducted this performance audit from July 2022 to June 2024 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.

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<sup>10</sup>[GAO-23-105520](#).

<sup>11</sup>*Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, Exec. Order No. 14,058, 86 Fed. Reg. 71,357 (December 16, 2021). Office of Management and Budget, Circular No. A-11: Preparation, Submission, and Execution of the Budget, § 280 (August 2022). David Stebbins, Richard S. Girven, and Samantha Ryan, *National Security Employment: Improving the Candidate Experience Journey Through the Personnel Vetting Process* (Santa Monica: RAND Corporation, 2023).

# Appendix II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

May 22, 2024

Christopher P. Currie  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-24-106153, "DHS HIRING:  
Additional Actions Needed to Enhance Vetting Processes Across the Department"

Dear Mr. Currie:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS, or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition of the Department's efforts to improve the candidate vetting experience through the implementation of government-wide reforms, such as Trusted Workforce (TW) 2.0, and several key initiatives undertaken by DHS to modernize and streamline the personnel vetting processes. DHS actions, including the modernization of forms, expedited background investigations, and the deployment of updated tools for gathering security information reflect the Department's dedication to fostering efficiency, transparency, and effectiveness.

DHS remains committed to continuing collaboration within the Department, with interagency partners, and other stakeholders as appropriate to further refine and optimize DHS's candidate hiring and vetting processes. This includes DHS's participation in the interagency TW 2.0 Executive Steering Group, in which executive leaders meet monthly to discuss ways to improve the personnel vetting process through TW 2.0 reform. In addition, DHS's internal TW 2.0 Executive Steering Committee (ESC) consists of senior-level representatives from across the Department that, since formation in April 2020, help direct Component-level offices to improve and support personnel vetting processes. The TW 2.0 ESC also prepares short- and long-term strategies for DHS Components to implement reform through TW 2.0 efforts.

It is important to clarify, however, that while GAO's draft report uses the median time (days) taken to complete security clearance reciprocity as the metric to depict the Department's performance for FY 2022, DHS uses average days to calculate its personnel security vetting performance for security clearance reciprocity. DHS uses the average number of days to remain consistent with the Office of the Director of National Intelligence's (ODNI's) metrics calculations. Specifically, DHS reports quarterly detailed security clearance reciprocity data in a case-by-case format to ODNI in accordance with metrics reporting requirements for national security vetting.<sup>1</sup>

For DHS's internal security clearance reciprocity performance reporting, the monthly calculations include a recapitulated version of the data provided to ODNI, as DHS focuses on isolating and monitoring security vetting-related data. By doing so, the Department as a whole can better identify and isolate non-security factors (e.g., other position-specific requirements like physical fitness or medical requirements for law enforcement personnel) that impact overall time to hire (T2H). DHS's internal performance reporting is shared within the Department as well as with Congressional staff and other Federal Government departments and agencies, as needed. DHS's internal data from Fiscal Year (FY) 2023 to April 30, 2024, indicates that DHS's processing time for the application of reciprocity has improved. The current average from this time period is seven days, which is down from an average of 11 days for FY 2020 - 2021, and nine days in FY 2022.

From FY 2020 - 2022, it is also important to note that DHS, like many other Federal Government departments and agencies, was operating under COVID-19 pandemic procedures. This resulted in temporary procedural changes authorized by the U.S. Office of Personnel Management (OPM)<sup>2</sup> and the Defense Counterintelligence and Security Agency<sup>3</sup> that provided DHS with more flexibility to prioritize the health and safety of Department personnel, as well as applicants. In FY 2022, DHS began transitioning back to regular operations, which involved catching up on and closing personnel vetting cases in which certain actions (e.g., obtaining an individual's fingerprints) were deferred. As a result, metrics in general from FY 2020 - 2022 are not necessarily indicative of the true performance of DHS personnel security operations.

The draft report contained four recommendations, with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

<sup>1</sup> ES2018-00758, Memorandum from the Director of National Intelligence, "Metrics Reporting Requirements for National Security Vetting in Fiscal Year 2018 and Beyond," dated November 19, 2018.

<sup>2</sup> <https://www.opm.gov/policy-data-oversight/covid-19/opm-memorandum-on-boarding-processes-for-new-employees-during-the-covid-19-emergency/>.

<sup>3</sup> <https://www.dcsa.mil/Portals/128/Documents/pv/GovHRSec/FIN%2020-03%20Temporary%20Deferral%20of%20Fingerprinting%20due%20to%20COVID-19%20Impacts%2003302020C.pdf>.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H CRUMPACKER Digitally signed by JIM H  
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Date: 2024.05.22 13:33:48 -04'00'

JIM H. CRUMPACKER  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendations  
Contained in GAO-24-106153**

GAO recommended that the DHS Chief Human Capital Officer:

**Recommendation 1:** Clearly disclose data limitations and associated assumptions it made when compiling time-to-hire data from components when reporting to OPM.

**Response:** Concur. As the lead for the “Secretary’s Priority” to reduce T2H by 10 percent, the DHS Office of the Chief Human Capital Officer (OCHCO) formed a focus group in March 2024 to establish a data collection system that sets business rules and reporting expectations across the Department. OCHCO and the DHS Office of the Chief Security Officer (OCSO) coordinate as appropriate to review actions taken to address the DHS Secretary’s 2024 Priorities,<sup>4</sup> including the effort to reduce T2H. For example, on May 8, 2024, OCHCO shared updated T2H reporting requirements with the cross-Component Human Capital Leadership Council during the semi-annual offsite meeting. These updated reporting requirements provide flexibility for better identifying successful practices and streamlining processes.

OCHCO continues to work with DHS Components to standardize DHS T2H requirements and reporting. By July 31, 2024, the DHS-wide data collection system for T2H reporting will be updated with an additional five DHS-specific steps to make T2H reporting by the DHS Components easier. OCHCO also continues to hold, and evaluate, Human Capital Review (HCR) discussions held with each Component as part of OPM’s annual evidence-based review of DHS design and implementation of Human Capital Operating Plans, independent audit, and other programs to support mission accomplishment and human capital outcomes. During HCRs, Component-specific data is reviewed, including T2H, retention, diversity, etc.

By December 31, 2024, all DHS Components will convert to USA Staffing rather than using Monster as a hiring platform. This move will improve data limitations because OPM has developed government-wide dashboards to more effectively manage T2H. The Department expects to see marked progress in reducing T2H after several quarters of reporting, which will be monitored and shared with GAO before requesting closure of this recommendation.

Estimated Completion Date (ECD): July 31, 2025.

<sup>4</sup> Memorandum from the Department of Homeland Security Secretary, “2024 Priorities,” dated January 25, 2024.

GAO recommended that the DHS Chief Security Officer:

**Recommendation 2:** Ensure that the IT vetting system that is under development includes enhanced capabilities, such as being able to track information for DHS priority positions and distinguish between different types of reciprocity.

**Response:** Concur. As part of OCSO's ongoing efforts to strengthen the security infrastructure within DHS, OCSO is currently leading several key initiatives intended to enhance vetting processes and bolster workforce capabilities. For example, transitioning to TW 2.0 is a key step in modernizing personnel security within the Department. Accordingly, OCSO is updating systems to equip the DHS workforce with adaptable tools while upholding rigorous security standards. Simultaneously, the Enterprise Security Forms System (eSFS) will streamline hiring processes to help onboard top talent faster. OCSO is also focused on replacing the 17-year-old legacy Integrated Security Management System (ISMS) with the Enterprise Vetting Management System (eVMS), which underscores DHS's commitment to innovation and efficiency. Through collaboration and the procurement underway for this effort, DHS is leveraging cutting-edge technology to enhance the effectiveness, agility, and reliability of its vetting processes.

As these systems are developed and implemented, OCSO will focus on tailoring these systems and incorporating enhanced capabilities, as appropriate, to meet the unique demands of DHS priority positions. This will include the ability to track and manage information specific to their roles, as well as distinguishing between different reciprocity determinations to ensure a comprehensive and robust vetting framework. OCSO will begin phased deployment of eSFS across the Department for contractor onboarding in June 2024, with full deployment completion scheduled for September 2024.

During FY 2025, OCSO will begin Phase 2 discovery, requirements gathering, and system development to ensure a clear understanding of how each Component currently onboards personnel. The eSFS will then be enhanced to address Component-specific onboarding requirements and will be deployed in a phased approach for federal employees. Deployment is expected to begin in September 2025 and end in September 2026.

With respect to eVMS, the anticipated contract award date is March 2025, and to support TW 2.0 implementation, OCSO will make needed ISMS enhancements through March 2026; however, these actions depend on funding availability.

ECD: September 30, 2026.



GAO recommended that the DHS Under Secretary for Management:

**Recommendation 3:** Ensure that component personnel tasked with implementing hiring and vetting are included in existing working groups and other applicable forums regarding human capital and personnel security so that practices that support faster entry-on-duty determinations can be regularly shared.

**Response:** Concur. OCSO continues to steadily increase engagement within the Department by participating in, and establishing, various working groups regarding human capital and personnel security. For example, since its establishment in July 2019, the DHS Personnel Security Committee (PSC) remains a steadfast security-focused working group providing essential support to Department personnel tasked with implementing hiring and vetting process improvements, which evolved to include the DHS Secretary’s 2024 Priorities. The PSC includes personnel security office directors and other leaders from DHS Headquarters and all DHS Operational Components, providing a forum for these members to discuss common topics, issues, and functions impacting the DHS personnel security community and its processes. The PSC also addresses future solutions regarding new products, standardization, reform efforts, and long-term strategy implementation, as well as ensures that policy formulation and implementation are consistent with applicable government regulations.

In December 2020, OCSO also established the Trusted Workforce Working Group (TWWG) to enable Department-wide collaboration and standardization of TW 2.0 implementation. Since February 2024, the TWWG was expanded to include Component personnel security practitioners, as well as representatives from OCSO, OCHCO, the DHS Office of the Chief Procurement Officer (OCPO), the DHS Office of the Chief Financial Officer, and Component participants representing human capital, procurement, and contracting officer’s representatives (CORs). The TWWG also includes industrial security representatives. Since inception, the TWWG has established several tiger teams to address specific topics such as impacts to other lines of business (e.g., developing joint policies) and communications (e.g., fact sheets and videos). By September 30, 2024, OCSO will establish a TWWG charter documenting the purpose, roles and responsibilities, authorities, membership, and expected working group duration.

Regarding the OCHCO-led DHS Human Capital Efficiencies Advisory Team (HEAT) discussed in the draft report, it should be clarified that HEAT was a short-term focus group that provided process mapping reviews and recommendations to the DHS Components regarding hiring processes. Outcomes reported in the “Human Capital Efficiencies Advisory Team Annual Report 2023,” signed on June 23, 2023, were shared with stakeholders, including OPM, and have since driven ongoing coordination with OCSO and the DHS Components in a wide range of areas impacting hiring efficiency. However, since HEAT was not a long-term continuing working group, OCHCO has not expanded participation.

In January 2024, DHS also established the Personnel Security Legal Working Group (PSLWG) to address the concern that some Component personnel security offices tasked with vetting did not have dedicated and readily accessible legal counsel for consultation and legal sufficiency determinations in adjudications. The PSLWG, established jointly by the DHS Office of the General Counsel and OCSO, includes permanent membership from personnel security attorneys, as well as labor and employment legal counsel offices across the Department. Accordingly, these members bring knowledge and experience in employee and labor relations, national security, suitability, fitness, and credentialing criteria to PSLWG activities. The working group ensures the Department takes a consistent, integrated, and holistic approach to hiring and vetting through human capital and personnel security.

In March 2024, OCSO also established the DHS Pre-employment Polygraph Program Working Group, which brings together DHS Component stakeholders to review, observe, advise, and discuss issues, concerns, or proposed adjustments to the DHS pre-employment polygraph program. The working group's immediate focus includes Department-wide efficiencies, standardization, guidance, and adoption of best practices. Participants currently include senior leadership from all DHS Operational Components that utilize pre-employment polygraphs, as well as DHS Headquarters senior leadership representatives from OCSO, OCHCO, and the DHS Office of Strategy, Policy, and Plans—Law Enforcement Policy.

Further, OCHCO, alongside OCSO and other DHS Headquarters offices, currently hosts and regularly participates in several other forums that provide opportunities for greater collaboration. For example, OCHCO shares human capital best practices and procedures through the DHS Pre-employment Polygraph Program Working Group hosted by OCSO, as well as through OCHCO's Human Resource Information Technology (HRIT) Advisory Team and the Staffing Policy Council. Both the HRIT Advisory Team and the Staffing Policy Council include human capital Component practitioner-level staff participants.

As a result of these efforts that holistically address challenges and enhance capabilities that support accelerated hiring efforts, DHS anticipates observing results in reducing T2H by June 28, 2024. FY 2024 data will be available in early FY 2025, which will be monitored and shared with GAO before requesting closure of this recommendation.

ECD: January 31, 2025.

**Recommendation 4:** Develop a candidate experience framework for personnel vetting that implements the DHS-wide customer experience strategy and is aligned with Trusted Workforce 2.0 objectives and other federal guidance.

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**Response:** Concur. In October 2023, the DHS Office of the Chief Information Officer (OCIO) established the DHS Customer Experience (CX) Directorate, which is responsible for modernizing and building frameworks for CX and CX improvements. Through these improvements, DHS intends to reduce administrative burdens, simplify both public-facing and internal processes to improve efficiency, and empower the DHS workforce to solve problems to meet mission goals. As OCSO continues to drive DHS's TW 2.0 implementation and personnel vetting systems modernization, OCSO will engage and collaborate with OCIO, OCHCO, and OCPO to develop a CX framework for personnel vetting.

To ensure CX focus and alignment, OCSO has already prioritized the user experience by hiring a contractor responsible for incorporating all CX designs into OCSO-led applications. The contractor is tasked with engaging DHS business owners, system users, and IT development teams to implement and operate CX with a human-centered design approach that enables transition from CX design to technical design and implementation.

As modernization efforts continue, OCSO also will work in conjunction with OCHCO, OCPO, and OCIO to modernize the hiring process, including the deployment of eSFS. The DHS-wide CX strategy, as it relates to personnel vetting and TW 2.0 objectives, begins with the initial email a candidate receives to start the online application process, which will be initiated via eSFS. The eSFS is a secure, one-stop solution for candidate security onboarding developed to reduce processing time and increase the efficiency of candidate onboarding procedures by incorporating paperless forms automation, focused data collection, and electronic submission of required documents. Furthermore, eSFS includes process tracking for candidates and onboarding personnel of time-sensitive activities based on business rules and adjudicative guidelines to provide operational transparency and identify potential risks.

As previously noted in this management response letter, OCSO will begin phased deployment of eSFS across the Department for contractor onboarding in June 2024, with full deployment completion scheduled for September 2024. During FY 2025, OCSO will begin Phase 2 discovery, requirements gathering, and system development, after which eSFS will be deployed in a phased approach for federal employees beginning in September 2025 and ending in September 2026.

ECD: September 30, 2026.

# Accessible Text for Appendix II: Comments from the Department of Homeland Security

May 22, 2024

Christopher P. Currie  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-24-106153, "DHS HIRING: Additional Actions Needed to Enhance Vetting Processes Across the Department"

Dear Mr. Currie:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS, or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition of the Department's efforts to improve the candidate vetting experience through the implementation of government-wide reforms, such as Trusted Workforce (TW) 2.0, and several key initiatives undertaken by DHS to modernize and streamline the personnel vetting processes. DHS actions, including the modernization of forms, expedited background investigations, and the deployment of updated tools for gathering security information reflect the Department's dedication to fostering efficiency, transparency, and effectiveness.

DHS remains committed to continuing collaboration within the Department, with interagency partners, and other stakeholders as appropriate to further refine and optimize DHS's candidate hiring and vetting processes. This includes DHS's participation in the interagency TW 2.0 Executive Steering Group, in which executive leaders meet monthly to discuss ways to improve the personnel vetting process through TW 2.0 reform. In addition, DHS's internal TW 2.0 Executive Steering Committee (ESC) consists of senior-level representatives from across the Department that, since formation in April 2020, help direct Component-level offices to improve and support personnel vetting processes. The TW 2.0 ESC also prepares short- and long-term strategies for DHS Components to implement reform through TW 2.0 efforts.

It is important to clarify, however, that while GAO's draft report uses the median time (days) taken to complete security clearance reciprocity as the metric to depict the Department's performance for FY 2022, DHS uses average days to calculate its personnel security vetting performance for security clearance reciprocity. DHS uses the average number of days to remain consistent with the Office of the Director of National Intelligence's

(ODNI's) metrics calculations. Specifically, DHS reports quarterly detailed security clearance reciprocity data in a case-by-case format to ODNI in accordance with metrics reporting requirements for national security vetting.<sup>1</sup>

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From FY 2020 - 2022, it is also important to note that DHS, like many other Federal Government departments and agencies, was operating under COVID-19 pandemic procedures. This resulted in temporary procedural changes authorized by the U.S. Office of Personnel Management (OPM)<sup>2</sup> and the Defense Counterintelligence and Security Agency<sup>3</sup> that provided DHS with more flexibility to prioritize the health and safety of Department personnel, as well as applicants. In FY 2022, DHS began transitioning back to regular operations, which involved catching up on and closing personnel vetting cases in which certain actions (e.g., obtaining an individual's fingerprints) were deferred. As a result, metrics in general from FY 2020 - 2022 are not necessarily indicative of the true performance of DHS personnel security operations.

The draft report contained four recommendations, with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H CRUMPACKER

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<sup>3</sup> <https://www.dcsa.mil/Portals/128/Documents/pv/GovHRSec/FIN%2020-03%20Temporary%20Deferral%20of%20Fingerprinting%20due%20to%20COVID-19%20Impacts%2003302020C.pdf>.

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JIM H. CRUMPACKER  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendations  
Contained in GAO-24-106153**

GAO recommended that the DHS Chief Human Capital Officer:

Recommendation 1: Clearly disclose data limitations and associated assumptions it made when compiling time-to-hire data from components when reporting to OPM.

Response: Concur. As the lead for the “Secretary’s Priority” to reduce T2H by 10 percent, the DHS Office of the Chief Human Capital Officer (OCHCO) formed a focus group in March 2024 to establish a data collection system that sets business rules and reporting expectations across the Department. OCHCO and the DHS Office of the Chief Security Officer (OCSO) coordinate as appropriate to review actions taken to address the DHS Secretary’s 2024 Priorities,<sup>4</sup> including the effort to reduce T2H. For example, on May 8, 2024, OCHCO shared updated T2H reporting requirements with the cross- Component Human Capital Leadership Council during the semi-annual offsite meeting. These updated reporting requirements provide flexibility for better identifying successful practices and streamlining processes.

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<sup>4</sup> Memorandum from the Department of Homeland Security Secretary, “2024 Priorities,” dated January 25, 2024.

Estimated Completion Date (ECD): July 31, 2025.

GAO recommended that the DHS Chief Security Officer:

Recommendation 2: Ensure that the IT vetting system that is under development includes enhanced capabilities, such as being able to track information for DHS priority positions and distinguish between different types of reciprocity.

Response: Concur. As part of OCSO's ongoing efforts to strengthen the security infrastructure within DHS, OCSO is currently leading several key initiatives intended to enhance vetting processes and bolster workforce capabilities. For example, transitioning to TW 2.0 is a key step in modernizing personnel security within the Department. Accordingly, OCSO is updating systems to equip the DHS workforce with adaptable tools while upholding rigorous security standards. Simultaneously, the Enterprise Security Forms System (eSFS) will streamline hiring processes to help onboard top talent faster. OCSO is also focused on replacing the 17-year-old legacy Integrated Security Management System (ISMS) with the Enterprise Vetting Management System (eVMS), which underscores DHS's commitment to innovation and efficiency. Through collaboration and the procurement underway for this effort, DHS is leveraging cutting-edge technology to enhance the effectiveness, agility, and reliability of its vetting processes.

As these systems are developed and implemented, OCSO will focus on tailoring these systems and incorporating enhanced capabilities, as appropriate, to meet the unique demands of DHS priority positions. This will include the ability to track and manage information specific to their roles, as well as distinguishing between different reciprocity determinations to ensure a comprehensive and robust vetting framework. OCSO will begin phased deployment of eSFS across the Department for contractor onboarding in June 2024, with full deployment completion scheduled for September 2024.

During FY 2025, OCSO will begin Phase 2 discovery, requirements gathering, and system development to ensure a clear understanding of how each Component currently onboards personnel. The eSFS will then be enhanced to address Component-specific onboarding requirements and will be deployed in a phased approach for federal employees. Deployment is expected to begin in September 2025 and end in September 2026.

With respect to eVMS, the anticipated contract award date is March 2025, and to support TW 2.0 implementation, OCSO will make needed ISMS enhancements through March 2026; however, these actions depend on funding availability.

ECD: September 30, 2026.

GAO recommended that the DHS Under Secretary for Management:

Recommendation 3: Ensure that component personnel tasked with implementing hiring and vetting are included in existing working groups and other applicable forums regarding human capital and personnel security so that practices that support faster entry- on-duty determinations can be regularly shared.

Response: Concur. OCSO continues to steadily increase engagement within the Department by participating in, and establishing, various working groups regarding human capital and personnel security. For example, since its establishment in July 2019, the DHS Personnel Security Committee (PSC) remains a steadfast security-focused working group providing essential support to Department personnel tasked with implementing

hiring and vetting process improvements, which evolved to include the DHS Secretary's 2024 Priorities. The PSC includes personnel security office directors and other leaders from DHS Headquarters and all DHS Operational Components, providing a forum for these members to discuss common topics, issues, and functions impacting the DHS personnel security community and its processes. The PSC also addresses future solutions regarding new products, standardization, reform efforts, and long-term strategy implementation, as well as ensures that policy formulation and implementation are consistent with applicable government regulations.

In December 2020, OCSO also established the Trusted Workforce Working Group (TWWG) to enable Department-wide collaboration and standardization of TW 2.0 implementation. Since February 2024, the TWWG was expanded to include Component personnel security practitioners, as well as representatives from OCSO, OCHCO, the DHS Office of the Chief Procurement Officer (OCPO), the DHS Office of the Chief Financial Officer, and Component participants representing human capital, procurement, and contracting officer's representatives (CORs). The TWWG also includes industrial security representatives. Since inception, the TWWG has established several tiger teams to address specific topics such as impacts to other lines of business (e.g., developing joint policies) and communications (e.g., fact sheets and videos). By September 30, 2024, OCSO will establish a TWWG charter documenting the purpose, roles and responsibilities, authorities, membership, and expected working group duration.

Regarding the OCHCO-led DHS Human Capital Efficiencies Advisory Team (HEAT) discussed in the draft report, it should be clarified that HEAT was a short-term focus group that provided process mapping reviews and recommendations to the DHS Components regarding hiring processes. Outcomes reported in the "Human Capital Efficiencies Advisory Team Annual Report 2023," signed on June 23, 2023, were shared with stakeholders, including OPM, and have since driven ongoing coordination with OCSO and the DHS Components in a wide range of areas impacting hiring efficiency. However, since HEAT was not a long-term continuing working group, OCHCO has not expanded participation.

In January 2024, DHS also established the Personnel Security Legal Working Group (PSLWG) to address the concern that some Component personnel security offices tasked with vetting did not have dedicated and readily accessible legal counsel for consultation and legal sufficiency determinations in adjudications. The PSLWG, established jointly by the DHS Office of the General Counsel and OCSO, includes permanent membership from personnel security attorneys, as well as labor and employment legal counsel offices across the Department. Accordingly, these members bring knowledge and experience in employee and labor relations, national security, suitability, fitness, and credentialing criteria to PSLWG activities. The working group ensures the Department takes a consistent, integrated, and holistic approach to hiring and vetting through human capital and personnel security.

In March 2024, OCSO also established the DHS Pre-employment Polygraph Program Working Group, which brings together DHS Component stakeholders to review, observe, advise, and discuss issues, concerns, or proposed adjustments to the DHS pre-employment polygraph program. The working group's immediate focus includes Department-wide efficiencies, standardization, guidance, and adoption of best practices. Participants currently include senior leadership from all DHS Operational Components that utilize pre-employment polygraphs, as well as DHS Headquarters senior leadership representatives from OCSO, OCHCO, and the DHS Office of Strategy, Policy, and Plans—Law Enforcement Policy.

Further, OCHCO, alongside OCSO and other DHS Headquarters offices, currently hosts and regularly participates in several other forums that provide opportunities for greater collaboration. For example, OCHCO



shares human capital best practices and procedures through the DHS Pre-employment Polygraph Program Working Group hosted by OCSO, as well as through OCHCO's Human Resource Information Technology (HRIT) Advisory Team and the Staffing Policy Council. Both the HRIT Advisory Team and the Staffing Policy Council include human capital Component practitioner-level staff participants.

As a result of these efforts that holistically address challenges and enhance capabilities that support accelerated hiring efforts, DHS anticipates observing results in reducing T2H by June 28, 2024. FY 2024 data will be available in early FY 2025, which will be monitored and shared with GAO before requesting closure of this recommendation.

ECD: January 31, 2025.

Recommendation 4: Develop a candidate experience framework for personnel vetting that implements the DHS-wide customer experience strategy and is aligned with Trusted Workforce 2.0 objectives and other federal guidance.

Response: Concur. In October 2023, the DHS Office of the Chief Information Officer (OCIO) established the DHS Customer Experience (CX) Directorate, which is responsible for modernizing and building frameworks for CX and CX improvements. Through these improvements, DHS intends to reduce administrative burdens, simplify both public-facing and internal processes to improve efficiency, and empower the DHS workforce to solve problems to meet mission goals. As OCSO continues to drive DHS's TW 2.0 implementation and personnel vetting systems modernization, OCSO will engage and collaborate with OCIO, OCHCO, and OCPO to develop a CX framework for personnel vetting.

To ensure CX focus and alignment, OCSO has already prioritized the user experience by hiring a contractor responsible for incorporating all CX designs into OCSO-led applications. The contractor is tasked with engaging DHS business owners, system users, and IT development teams to implement and operate CX with a human-centered design approach that enables transition from CX design to technical design and implementation.

As modernization efforts continue, OCSO also will work in conjunction with OCHCO, OCPO, and OCIO to modernize the hiring process, including the deployment of eSFS. The DHS-wide CX strategy, as it relates to personnel vetting and TW 2.0 objectives, begins with the initial email a candidate receives to start the online application process, which will be initiated via eSFS. The eSFS is a secure, one-stop solution for candidate security onboarding developed to reduce processing time and increase the efficiency of candidate onboarding procedures by incorporating paperless forms automation, focused data collection, and electronic submission of required documents. Furthermore, eSFS includes process tracking for candidates and onboarding personnel of time-sensitive activities based on business rules and adjudicative guidelines to provide operational transparency and identify potential risks.

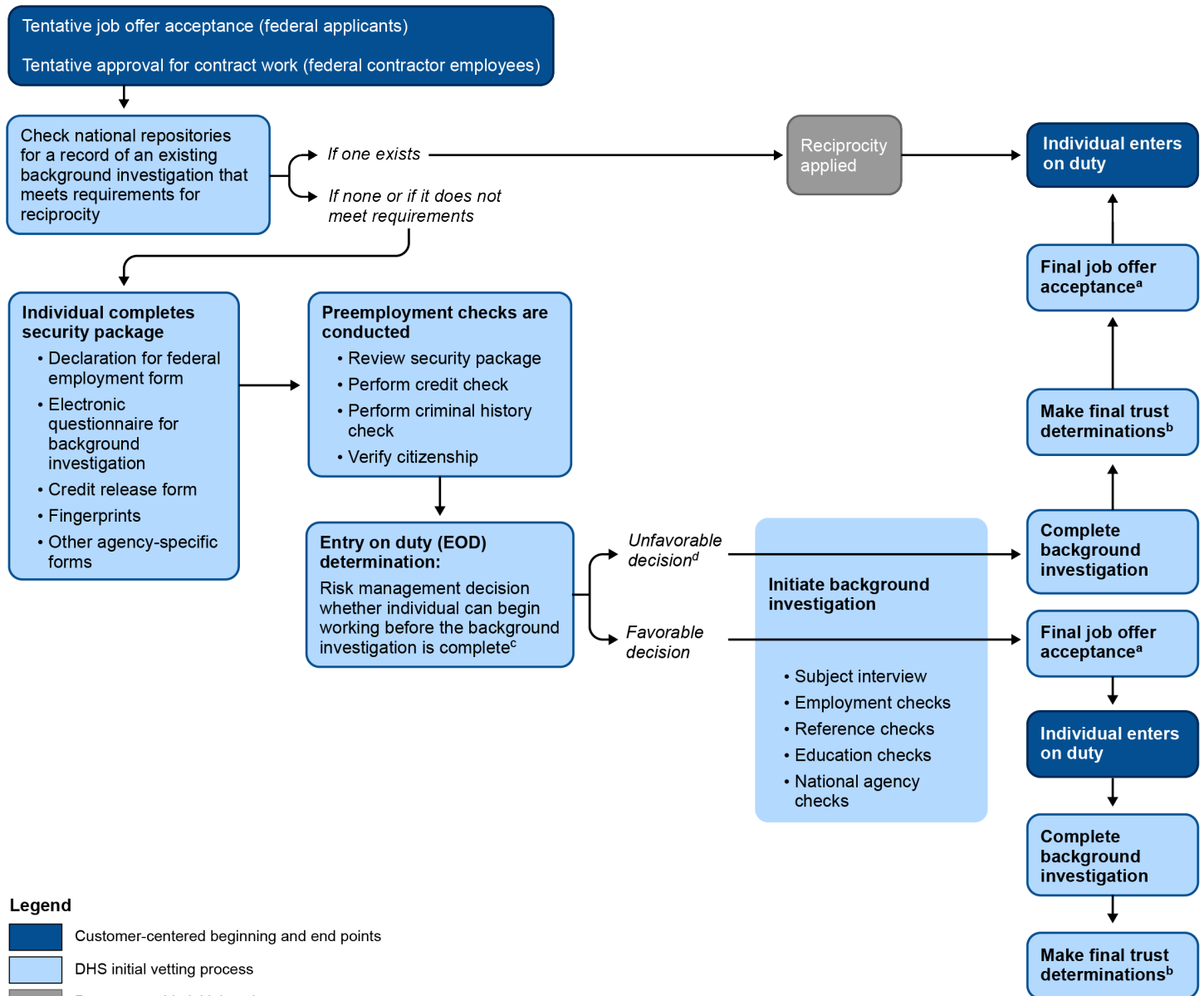
As previously noted in this management response letter, OCSO will begin phased deployment of eSFS across the Department for contractor onboarding in June 2024, with full deployment completion scheduled for September 2024. During FY 2025, OCSO will begin Phase 2 discovery, requirements gathering, and system development, after which eSFS will be deployed in a phased approach for federal employees beginning in September 2025 and ending in September 2026.

ECD: September 30, 2026.

## Appendix III: Department of Homeland Security Personnel Vetting Processes

Figures 6 and 7 below show Department of Homeland Security (DHS) personnel vetting processes. Specifically, figure 6 shows DHS's vetting process including initial vetting, which DHS generally uses for individuals new to the federal government. Figure 7 shows DHS's vetting process for reciprocity, which DHS generally uses for those transferring positions within the federal government.

Figure 6: Department of Homeland Security (DHS) Vetting Process



**Legend**

- Customer-centered beginning and end points
- DHS initial vetting process
- Process outside initial vetting process

Source: GAO analysis of DHS documents and interviews. | GAO-24-106153

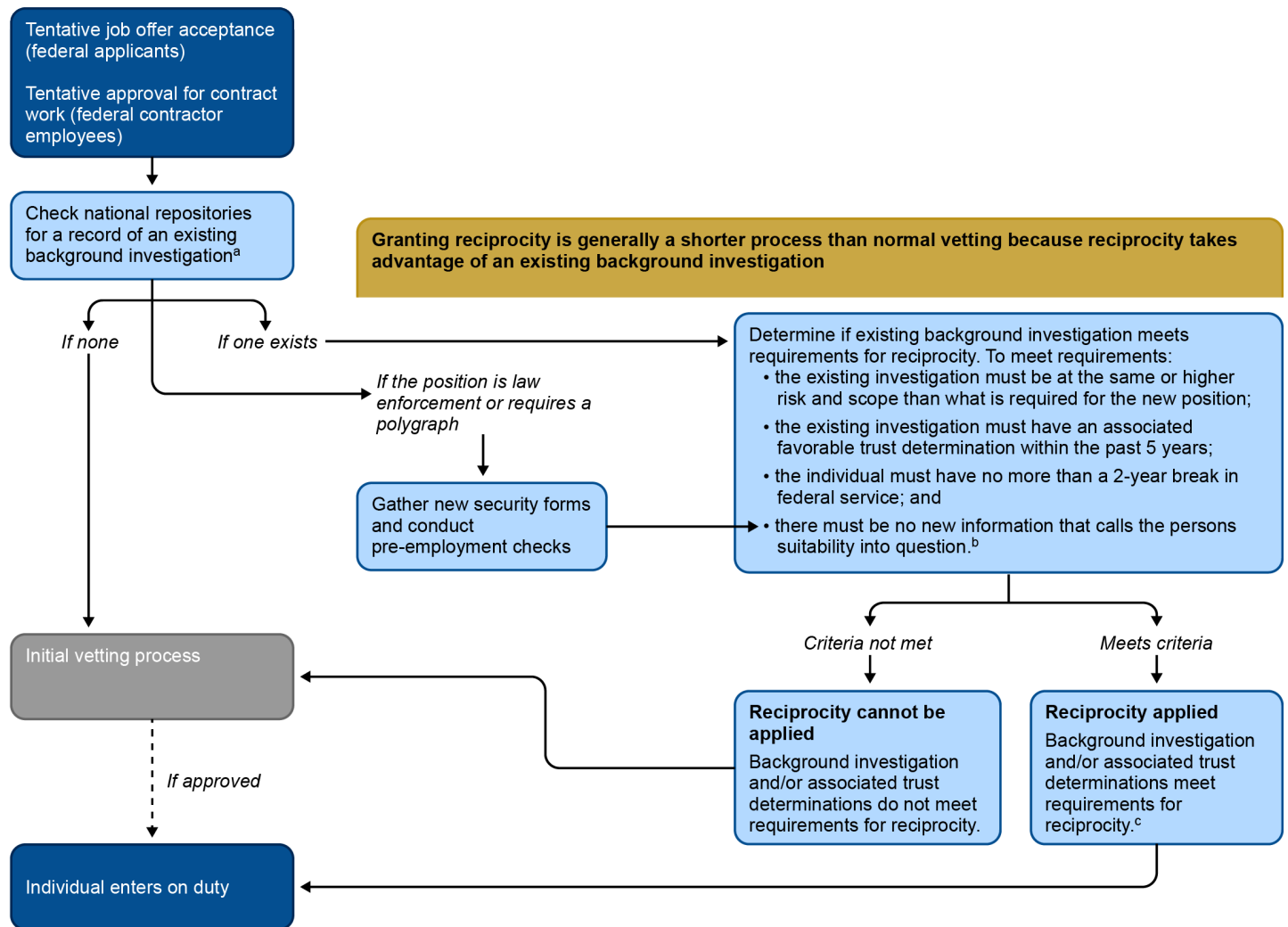
<sup>a</sup>Final job offer acceptance is not applicable to contractor employees.

<sup>b</sup>Final trust determinations include suitability or fitness determinations. Final determinations may also include eligibility for logical and physical access, eligibility to hold a sensitive position, or eligibility for access to classified information.

<sup>c</sup>A favorable EOD determination may include interim trust determinations, including eligibility for interim logical and physical access, temporary eligibility to hold a sensitive position, or eligibility for interim access to classified information. Individuals filling positions in the civil service designated as “special sensitive” are prohibited by law from entering on duty prior to the completion of the background investigation. 5 C.F.R. § 732.202(a)(2)(i). Thus, there are no EOD determinations made for these individuals.

<sup>d</sup>DHS may make an unfavorable EOD determination at this point; or, if warranted, DHS may make an unfavorable suitability or fitness determination at this point. In the case of the latter, the vetting process ends.

Figure 7: Department of Homeland Security (DHS) Reciprocity Vetting Process



Legend

- Customer-centered beginning and end points
- DHS reciprocity processes
- Process outside reciprocity process

Source: GAO analysis of DHS and Office of Personnel Management documents and interviews. | GAO-24-106153

<sup>a</sup>According to DHS officials, a DHS employee checks DHS’s Integrated Security Management System, as well as national repositories—including the Central Verification System, Defense Information Security System, and Scattered Castles—to determine if there is an existing background investigation.

<sup>b</sup>Based on a review of information in national repositories, a DHS employee may request the full background investigation from the originating agency. The full background investigation may help the employee determine if there is information that calls the individual’s suitability or fitness into question. Additionally, if the position is law enforcement or requires a polygraph, DHS policy allows DHS employees to gather new security forms and conduct preemployment checks, which may also help DHS employees determine if there is information that calls the person’s suitability or fitness into question.

<sup>c</sup>DHS and OPM officials said acceptance of a background investigation does not necessarily imply acceptance of one or more existing associated trust determinations. If those making trust determinations have a prior adjudication that contains an exception or there is newly developed information, they may have the option to gather more information before accepting or making final trust determinations.

# Appendix IV: Legal Requirements Applicable to Certain Positions

The Department of Homeland Security (DHS) has a diverse and wide-ranging mission set where some of its positions are subject to unique legal requirements. Table 11 outlines the legal requirements that are applicable to certain DHS positions.

**Table 11: Legal Requirements Applicable to Certain Department of Homeland Security (DHS) Positions**

Requirement shorthand name	Source of requirement	Requirement summary	Type of position affected
Customs and Border Protection (CBP) polygraph	Anti-Border Corruption Act of 2010, Pub. L. No. 111-376, § 3, 124 Stat. 4104 (2011).	All applicants for law enforcement positions with CBP receive polygraph examinations before being hired for such a position.	CBP law enforcement positions.
Confinement contact	Prison Rape Elimination Act of 2003 (PREA), Pub. L. No. 108-79, 117 Stat. 972; 28 C.F.R. §§.17,.117,.217,.317.	Agencies shall not hire or promote anyone, nor shall agencies enlist the services of any contractor, who may have contact with individuals in confinement, if they have engaged in sexual abuse in a prison or other institution or been convicted of, or adjudicated to have engaged in, certain sexual activities.  Agencies shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with individuals in confinement.	Federal or contractor positions where contact with individuals in confinement may occur
Aviation support	49 U.S.C. § 44936(b); 49 C.F.R. § 1542.209.	Unless approved by the Federal Aviation Administrator, no entity may employ, or authorize or make a contract for the services of, individuals with certain aviation security or support responsibilities, if these individuals were convicted of certain offenses in the past 10 years.	Federal or contractor positions with certain aviation security or support responsibilities
Firearm	18 U.S.C. § 922(g)(9).	Anyone convicted of a misdemeanor crime of domestic violence is prohibited from possessing a firearm.	Federal or contractor law enforcement positions with a firearm requirement.
Childcare	34 U.S.C. § 20351.	Any conviction for a sex crime, an offense involving a child victim, or a drug felony, may be grounds for denying employment or for dismissal of a childcare services employee.  Conviction of a crime other than a sex crime may be considered if it bears on an individual's fitness to have responsibility for the safety and well-being of children	Federal or contractor positions involved with the provision childcare services for children under the age of 18.  Agencies are encouraged to include criminal history checks for volunteers who may have contact with children, according to DHS officials.

Source: GAO analysis. | GAO-24-106153

# Appendix V: Selected Position Profiles

APPENDIX V: Selected Position Profiles

**1895 CUSTOMS AND BORDER PROTECTION (CBP) OFFICER**



Source: U.S. Customs and Border Protection. | GAO-24-106153

**KEY JOB DUTIES**

- Enforcing customs, immigration, and agriculture law and regulations.
- Facilitating the flow of legitimate trade and travel.
- Conducting inspections of individuals and conveyances.
- Determining the admissibility of individuals for entry into the United States.
- Preventing the illegal entry of individuals and prohibited goods and the smuggling of illegal drugs and other contraband.

**REQUIREMENTS**



**Physical fitness test**  
Assessment of ability to execute job duties. May include push-ups, sit-ups, and step tests.



**Medical exam**  
Assessment of overall health. Includes a medical history review, physician exam, and vision and hearing tests.



**Drug test**  
Assessment to detect the use of illegal drugs and certain prescription drugs.



**Polygraph exam**  
Assessment of physiological response to a series of background and national security questions.



**Confinement contact**  
Assessment of criminal history and other incidents to ensure those who may have contact with individuals in confinement meet legal standards related to sexual conduct.



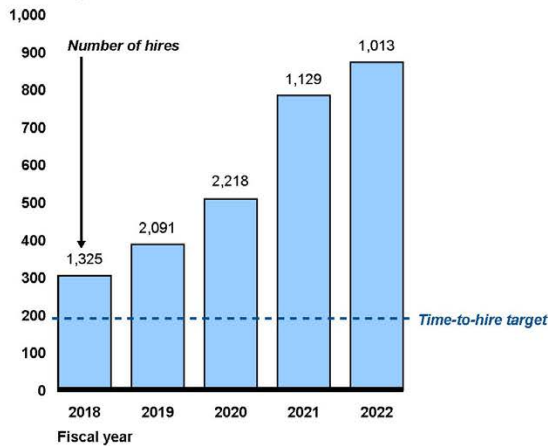
**Firearm**  
Assessment of criminal history to ensure those required to carry a firearm have not been convicted of a misdemeanor crime of domestic violence.

Source: GAO analysis of requirements applicable to Department of Homeland Security (DHS) positions; Icons-Studio/stock.adobe.com. | GAO-24-106153

**NOTES ON HIRING PROCESS**

- Candidates begin the hiring process with an entrance exam, which consists of an online personal/professional experience test and a 4-hour proctored exam with questions regarding logical reasoning, arithmetic reasoning, and writing ability.
- Candidates have a structured interview to assess judgment/decision-making, emotional maturity, interpersonal skills, and cooperativeness/sensitivity to the needs of others.
- CBP uses 1) job application questions, 2) a prescreening interview, 3) polygraph exams, and 4) law enforcement databases to address several position requirements, according to CBP officials.
- About 40 percent of candidates clear the medical exam on their first attempt. About 60 percent require follow-up appointments with their physician, which requires around 30 additional days, according to CBP officials.
- Candidates receive Tier 5 background investigations. Each investigation typically costs about \$4,300 and takes 44 days on average to complete, according to CBP officials.
- CBP polygraphs cost \$2,352 on average in fiscal year 2022, according to CBP officials.
- Reciprocity is not often possible for these and other law enforcement positions, according to CBP officials.

Median days

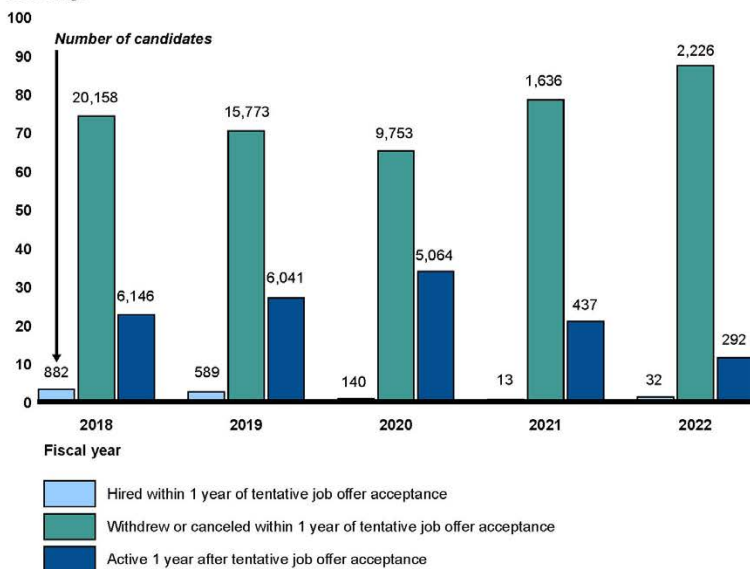


Source: GAO analysis of CBP data. | GAO-24-106153

Note: Data for a given fiscal year reflect data for those who entered on duty during that fiscal year. We only considered one application per candidate (the earliest application that resulted in a candidate entering on duty). We considered a candidate entering on duty if they had a date scheduled to report for duty and did not have an application withdrawn or canceled within 60 days after that scheduled date. If the application submission date was missing, we used the application closed date, provided that date was prior to the tentative job offer acceptance date.

**Candidate Status 1 Year after Tentative Job Offer Acceptance, Fiscal Years 2018–2022**

Percentage



Source: GAO analysis of CBP data. | GAO-24-106153

Note: Data for a given fiscal year reflect data for those who accepted a tentative job offer within that fiscal year. Fiscal year 2022 estimates only include candidates who accepted a tentative job offer by March 31, 2022. We only considered one application per candidate (the application with the earliest entry on duty or withdrawal/cancellation date). If they had multiple active applications, we used the application with earliest tentative job offer acceptance date. We considered candidates who had a withdrawn or canceled application more than 60 days after being scheduled to report for duty as "Hired" and candidates with a withdrawn or canceled application at most 60 days after that scheduled date as "Withdrew or canceled."

**Time-to-Hire Against Target**

- CBP had more candidates in its pipeline than needed to meet funded hiring targets in fiscal year 2022, according to CBP officials. For instance, CBP had about 4,200 candidates in this pipeline in July 2022. About 1,000 would enter on duty by the end of fiscal year 2022.
- CBP prefers to maintain a large candidate pipeline because this position has a high candidate failure rate and it takes time to vet candidates. This approach helps CBP fill positions as they open but also creates lengthy backlogs, according to CBP officials.
- We have ongoing work looking into this and other related issues.

**Candidate Attrition and Active Cases**

- From fiscal year 2018 through fiscal year 2022, about 65 to 90 percent of candidates dropped out of contention for the position within 1 year of accepting a tentative job offer.
- From fiscal year 2018–2022, about 10 to 30 percent of candidates had an active application within 1 year of accepting a tentative job offer. They were neither 1) hired, 2) had their application withdrawn, or 3) had their application cancelled, within 1 year of accepting a tentative job offer.



## 1801 U.S. CITIZENSHIP AND IMMIGRATION SERVICES (USCIS) IMMIGRATION SERVICES OFFICER



Source: U.S. Citizenship and Immigration Services. | GAO-24-106153

### KEY JOB DUTIES

- Grant or deny applications and petitions for immigration benefits.
- Research, interpret and apply appropriate statutes, regulations, and precedent decisions to make adjudicative decisions, and update databases with appropriate information and decisions.
- Interview applicants and petitioners to elicit statements, assess credibility, and analyze information to identify facts that form the basis for a decision concerning eligibility for immigration benefits.
- Conduct security checks and provide assistance to federal law enforcement agencies to identify individuals who are ineligible for immigration benefits due to national security, public safety, or other legal grounds.

### REQUIREMENTS



#### Drug test

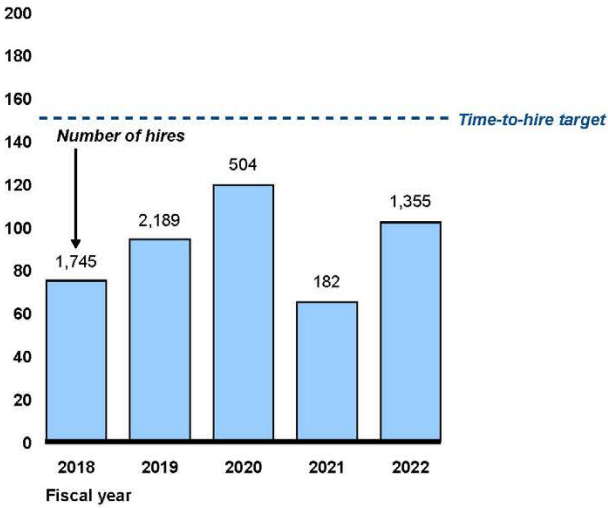
Assessment to detect the use of illegal drugs and certain prescription drugs.

Source: GAO analysis of requirements applicable to DHS positions; icons-Studio/stock.adobe.com. | GAO-24-106153

### NOTES ON HIRING PROCESS

- Candidates begin the hiring process with an online assessment (as part of the application package) to measure interpersonal skills, reasoning, technical competence, and writing.
- All candidates receive Tier 5 background investigations. USCIS uses a single vendor that can close background investigations several weeks sooner than the Defense Counterintelligence and Security Agency, according to USCIS officials, which other federal agencies use. These investigations can also save about \$2,100 per investigation, according to USCIS officials.
- Background investigations are closed in approximately 64 days and cost \$3,715 if completed by a single vendor. They close in about 96 days and cost \$5,485 per investigation if completed by the Defense Counterintelligence and Security Agency.
- USCIS performs citizenship checks on all candidates, employees, and their cohabitants. USCIS also checks all candidates' foreign-born immediate relatives, according to USCIS officials.
- With some exceptions depending on casework, these positions do not require a security clearance, according to USCIS officials.

Median days



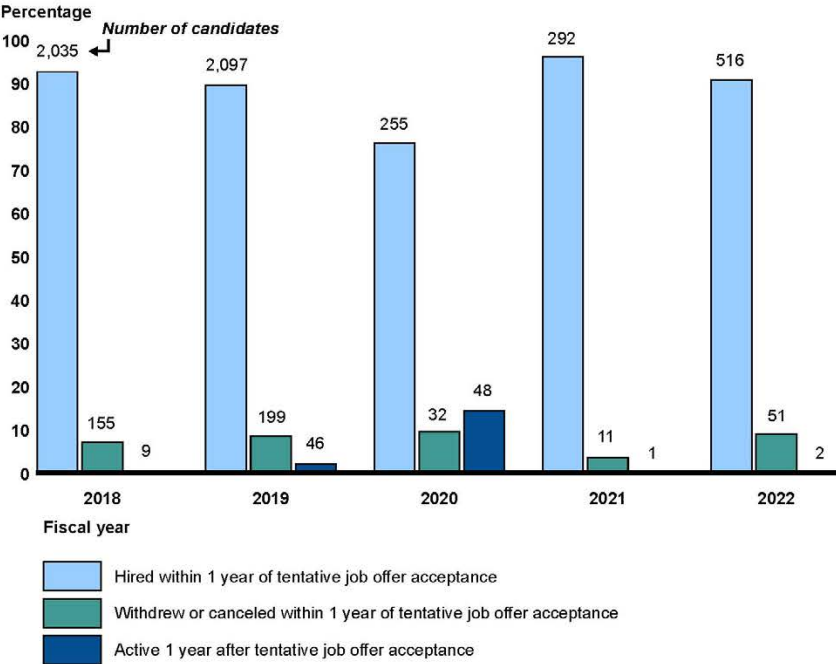
Source: GAO analysis of USCIS data. | GAO-24-106153

Note: Data for a given fiscal year reflect data for those who entered on duty during that fiscal year. We only considered one application per candidate (the earliest application that resulted in a candidate entering on duty). We considered the request personnel action date as the date USCIS human resources was authorized to fill a vacancy.

**Time-to-Hire Against Target**

- Median time-to-hire has consistently remained under DHS’s 150-day target each year since fiscal year 2018.
- USCIS had a hiring freeze from February 24, 2020, until April 1, 2021, according to USCIS officials.

**Candidate Status 1 Year after Tentative Job Offer Acceptance, Fiscal Years 2018–2022**



Source: GAO analysis of USCIS data. | GAO-24-106153

Note: Data for a given fiscal year reflect data for those who accepted a tentative job offer within that fiscal year. Fiscal year 2022 estimates only include candidates who accepted a tentative job offer by March 31, 2022. We only considered one application per candidate (the application with the earliest entry on duty or withdrawal/cancellation date). If they had multiple active applications, we used the application with earliest tentative job offer acceptance date.

**Candidate Attrition and Active Cases**

- From fiscal year 2018 through fiscal year 2022, 76 to 96 percent of candidates were hired within 1 year of accepting a tentative job offer.
- Except for candidates in fiscal year 2020, no more than 2 percent had an active application 1 year after accepting a tentative job offer.

## CYBERSECURITY AND INFRASTRUCTURE SECURITY AGENCY (CISA) CYBER DEFENSE INCIDENT RESPONDER



Source: Gorodenkoff/stock.adobe.com. | GAO-24-106153

### KEY JOB DUTIES

- Collect intrusion artifacts (e.g., source code, malware, trojans) and use discovered data to enable mitigation of potential cyber defense incidents.
- Coordinate and provide expert technical support to cyber defense technicians to resolve cyber defense incidents.
- Monitor external data to assess cyber defense threat conditions and perform cyber defense trend analysis and reporting.
- Receive and analyze network alerts from various sources within the enterprise and determine possible causes of such alerts.
- Write and publish responses to actions taken, cyber defense techniques, guidance, and reports on incident findings to appropriate constituencies.

### HOW DHS CYBERSECURITY POSITIONS ARE CLASSIFIED AND CONTROLLED: THE NATIONAL INITIATIVE FOR CYBERSECURITY EDUCATION (NICE)

In addition to traditional four-digit job series codes established by the Office of Personnel Management (used for most federal positions), CISA classifies its positions with three-digit National Initiative for Cybersecurity Education (NICE) work role codes to identify different cyber-related knowledge, skills, and abilities, according to CISA officials. CISA filled 1,606 positions with one of 50 work role codes at the end of fiscal year 2022. CISA considers positions with the “531” (Cyber Defense Incident Responder) NICE work role code core cybersecurity positions, according to CISA officials.

### REQUIREMENTS



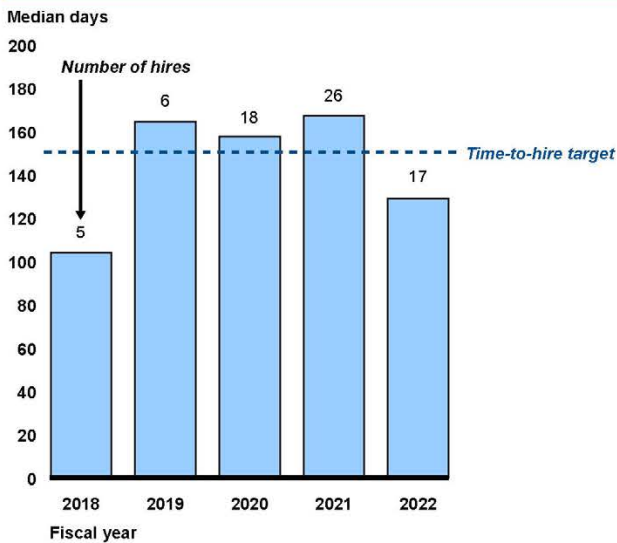
#### Drug test

Assessment to detect the use of illegal drugs and certain prescription drugs.

Source: GAO analysis of requirements applicable to DHS positions; Icons-Studio/stock.adobe.com. | GAO-24-106153

### NOTES ON HIRING PROCESS

- Some CISA positions require polygraphs; usually when an employee has a cross-DHS-component internal detail. In these cases, Customs and Border Protection administers the polygraphs, according to CISA officials.
- CISA did not make hiring eligibility decisions until October 2021. Before that time, DHS headquarters made hiring eligibility decisions, according to CISA officials.
- CISA began reclassifying position NICE codes after receiving updated guidance around 2018, but use of a mapping tool which did not update CISA’s official system led to significant mismatched data, according to CISA officials. CISA has an ongoing effort to clean up its data and efforts decreased since 2020 due to system improvements, according to CISA officials. Due to CISA’s internal data cleaning efforts, we used slightly different data for our second analysis than we used for our first.
- Tier 5 background investigations, completed by the Defense Counterintelligence and Security Agency, cost about \$5,500 per investigation and take about 94 days to complete, according to CISA officials.



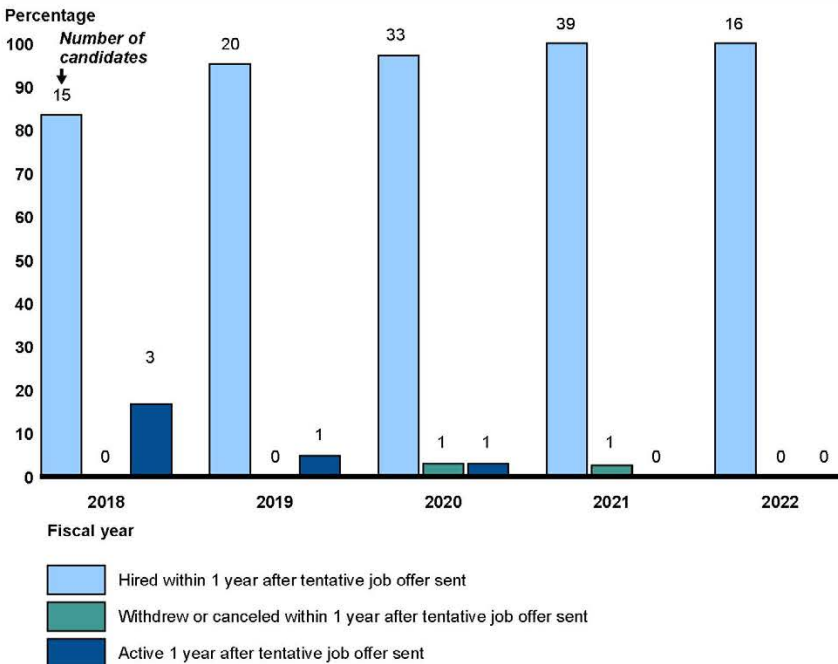
Source: GAO analysis of CISA data. | GAO-24-106153

Note: Data for a given fiscal year reflect data for those who entered on duty during that fiscal year. We only considered one application per candidate (the earliest application that resulted in a candidate entering on duty). We considered the request personnel action date as the date CISA human resources identified a candidate to recruit for the position and the entry on duty date as either the date newly hired candidates reported for work or the date reassigned candidates began their new role. Data only include positions with a primary 531 National Initiative for Cybersecurity Education code (Cyber Defense Incident Responder).

**Time-to-Hire Against Target**

- Median time-to-hire was below DHS’s 150-day target in fiscal years 2018 and 2022 but above the target by 7–17 days between fiscal years 2019 and 2021.
- About 70 percent of these positions filled by the end of fiscal year 2022 were special sensitive positions, according to CISA officials. CISA cannot allow candidates for Title 5 special sensitive positions to enter on duty before the completed background investigation, per 5 C.F.R. § 732.202(a)(2)(i).

**Candidate Status 1 Year after Tentative Job Offer Sent, Fiscal Years 2018–2022, as of Aug. 21, 2023**



Source: GAO analysis of CISA data. | GAO-24-106153

Note: Data for a given fiscal year reflect data for those who were sent a tentative job offer within that fiscal year. Fiscal year 2022 estimates only include candidates who were sent a tentative job offer by March 31, 2022. We only considered one application per candidate (the application with the earliest entry on duty or withdrawal/cancellation date). If they had multiple active applications, we used the application with earliest tentative job offer sent date. Data only include positions with a primary 531 National Initiative for Cybersecurity Education code (Cyber Defense Incident Responder).

**Candidate Attrition and Active Cases**

- From fiscal year 2018 through fiscal year 2022, at least 83 percent of candidates were hired within 1 year of being sent a tentative job offer.
- Except for candidates in fiscal year 2018, no more than 5 percent had an active application 1 year after being sent a tentative job offer.
- CISA officials said the low attrition rate is, in part, caused by CISA’s ongoing effort to clean up its data.

## 1811 U.S. SECRET SERVICE (USSS) CRIMINAL INVESTIGATOR (SPECIAL AGENT)



Source: U.S. Secret Service. | GAO-24-106153

### KEY JOB DUTIES

- Protect the President, Vice President, Vice President, their immediate families, former Presidents and Vice Presidents, major Presidential and Vice Presidential candidates, visiting heads of foreign states or foreign governments, other distinguished foreign visitors, and others.
- Detect and arrest persons who violate laws protecting United States financial institutions and payment systems from fraud obligations of the U.S. from counterfeiting, computers and systems from unauthorized access, identities from theft and misuse, and related cyber-enabled financial crimes.
- Participate in the planning, coordination, and implementation of security operations at special events of national significance, and to provide a safe and secure environment for event participants and the public.

### REQUIREMENTS



#### Physical fitness test

Assessment of ability to execute job duties. May include push-ups, sit-ups, and step tests.



#### Medical exam

Assessment of overall health. Includes a medical history review, physician exam, and vision and hearing tests.



#### Drug test

Assessment to detect the use of illegal drugs and certain prescription drugs.



#### Polygraph exam

Assessment of physiological response to a series of background and national security questions.



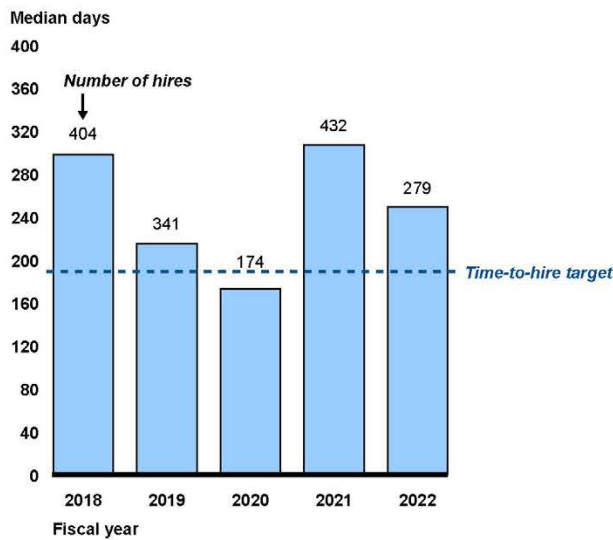
#### Firearm

Assessment of criminal history to ensure those required to carry a firearm have not been convicted of a misdemeanor crime of domestic violence.

Source: GAO analysis of requirements applicable to DHS positions; Icons-Studio/stock.adobe.com. | GAO-24-106153

### NOTES ON HIRING PROCESS

- USSS uses 1) supplemental application forms, 2) interviews, 3) polygraph exams, and 4) law enforcement databases to address several requirements, according to USSS officials.
- Candidates begin the hiring process with a roughly 3-hour entrance exam with questions regarding logic-based reasoning, personal experience, language usage, and detail observation.
- Candidates must be between the ages of 21 (as of the application submission date) and 37 (or 40 if they have Veterans' Preference) as of the tentative (i.e., conditional) job offer date.
- Background investigations (for those who are favorable) take about 103 days from the dates the investigations open to the entry on duty dates, according to USSS officials.
- The hiring process for the Special Agent position is broken into two phases:
  - The first phase (competency) includes several sequential stages: application review/criminal background check, entrance exam, physical fitness exam, selected interviews, and ends with the tentative (i.e., conditional) job offer, according to USSS officials.
  - The second phase (suitability and security) consists of a security interview, polygraph, medical test, drug test, and background investigation. The medical test, drug test, and background investigation are done concurrently after the polygraph exam, according to USSS officials.



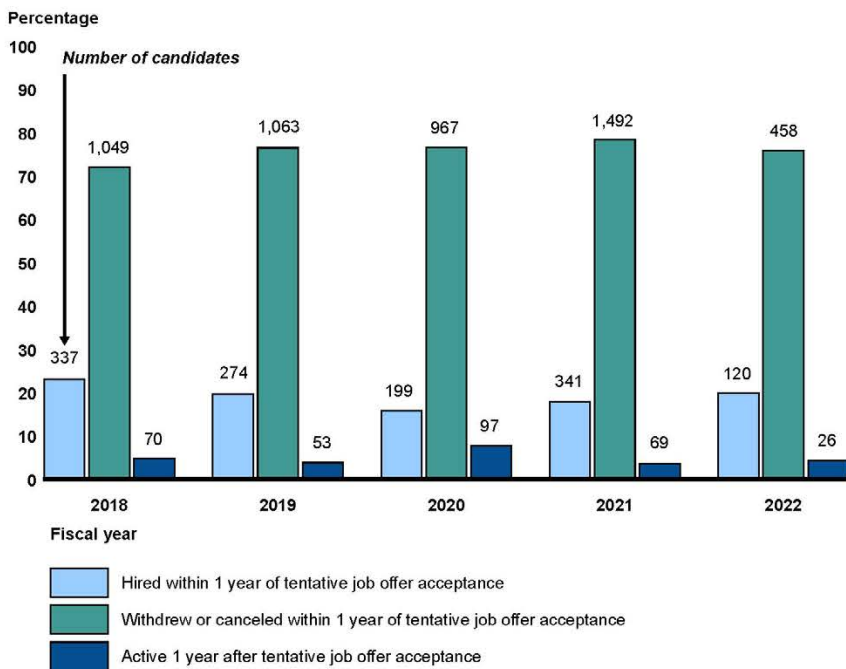
Source: GAO analysis of USSS data. | GAO-24-106153

Note: Data for a given fiscal year reflect data for those who entered on duty that fiscal year. We only considered one application per candidate (the earliest application that resulted in a candidate entering on duty). We considered a candidate entering on duty if they had a date scheduled to report for duty and did not have an application withdrawn or canceled at most 60 days after that scheduled date.

**Time-to-Hire Against Target**

- USSS often exceeded DHS's 190-day target between fiscal years 2018 and 2022.

**Candidate Status 1 Year after Tentative Job Offer Acceptance, Fiscal Years 2018–2022**



Source: GAO analysis of USSS data. | GAO-24-106153

Note: Data for a given fiscal year reflect data for those who accepted a tentative (i.e., conditional) job offer within that fiscal year, provided the offer was accepted before the security interview, polygraph, medical exam, drug test, background investigation, or scheduled entry on duty date. Fiscal year 2022 estimates only include candidates who met these criteria by March 31, 2022. We only considered one application per candidate (the application with the earliest scheduled entry on duty or withdrawal/cancellation date). If they had multiple active applications, we used the application with earliest tentative job offer acceptance date. We considered candidates who had a withdrawn or canceled application more than 60 days after being scheduled to report for duty as "Hired" and candidates with a withdrawn or canceled application at most 60 days after that scheduled date as "Withdrew or canceled."

**Candidate Attrition and Active Cases**

- From fiscal year 2018 through fiscal year 2022, about 70 to 80 percent of candidates dropped out of contention for the position within 1 year of accepting a tentative (i.e., conditional) job offer.
- Except for candidates in fiscal year 2020, no more than 5 percent had an active application 1 year after accepting a tentative (i.e., conditional) job offer.

# Appendix VI: Department of Homeland Security (DHS) Actions Taken to Improve Candidate Experience for Personnel Vetting

DHS has taken at least 10 actions that may have improved candidate experience for personnel vetting. This list is not intended to be comprehensive and reflects only actions identified by GAO during our review. See table 12.

**Table 12: Actions Taken that Improve Candidate Experience for Personnel Vetting**

Action taken	Assessed effect on candidate experience	Status of implementation
Issued policy to grant expedited entry on duty (EOD) to certain contractors with active final security clearances	May reduce time spent waiting to begin working by allowing more of the personnel vetting process to take place after EOD	Implemented as of July 2018
Issued guidance to promote the reciprocal acceptance of polygraph exams, including by clarifying which types of polygraphs should be accepted and how they should be recorded in DHS's data systems	May accelerate personnel vetting by eliminating the need for a second polygraph exam for some candidates	Implemented as of June 2019
Issued guidance to adjust how debt is considered in risk management decisions	May allow additional candidates to be granted EOD by counting events beyond an employee's control as mitigating circumstances for debt	Implemented as of August 2020
Received delegated authority for and contracted for background investigations with a private vendor instead of the Defense Counterintelligence and Security Agency	Has reduced investigation times for candidates, which may allow candidates to complete personnel vetting sooner	Implemented as of September 2022
Issued policy to grant interim Secret and Top Secret clearances	May allow more candidates to be granted EOD faster by expanding the set of positions eligible for EOD prior to the completion of a background investigation to include those requiring Secret and Top Secret clearances	Implemented as of January 2022
Distributed a fact sheet on fitness determinations for contractors	May ease contracting companies' and candidates' experience with personnel vetting by providing additional information at all points before, during, and after the process	Implemented as of July 2020
Updated and standardized some forms submitted by candidates during the personnel vetting process	May ease candidates' experience with personnel vetting by simplifying the form completion process	Implementation in progress since September 2021
Published a new web page with guidance on the personnel security process	May ease contracting companies' and candidates' experience with personnel vetting by providing additional information at all points before, during, and after the process	Implemented as of approximately 2019
Standardized contract security language department-wide, including language on personnel security requirements	May ease contracting companies' experience with personnel vetting by simplifying security-related activities in the contracting process	Implemented as of an unknown date

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**Appendix VI: Department of Homeland Security (DHS) Actions Taken to Improve Candidate Experience for Personnel Vetting**

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<b>Action taken</b>	<b>Assessed effect on candidate experience</b>	<b>Status of implementation</b>
Launched new online security questionnaire (eApplication)	May ease candidates' experience with personnel vetting by simplifying questionnaire and reducing time necessary to complete questionnaire	Implementation in progress since May 2023

Source: GAO analysis of DHS documentation and interviews. | GAO-24-106153



# Appendix VII: GAO Contact and Staff Acknowledgments

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## GAO Contact

Christopher P. Currie, 404-679-1875 or [curriec@gao.gov](mailto:curriec@gao.gov)

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## Staff Acknowledgments

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