Security, Suitability, and Credentialing
PERFORMANCE ACCOUNTABILITY COUNCIL

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

To: All Executive Branch Department and Agency Heads

Subject: Trusted Workforce 2.0 Implementation Strategy Endorsement

Date: April 2022

Purpose – This memorandum provides an endorsement from the Principals of the Security, Suitability, and Credentialing Performance Accountability Council (PAC), established by Executive Order 13467, that all Executive departments and agencies should implement personnel vetting reforms in accordance with the attached *Trusted Workforce 2.0 Implementation Strategy (Strategy)*, which is aligned with and supportive of the Federal Government's efforts to recruit and retain a diverse and talented workforce.

Background – The PAC is the interagency forum accountable to the President for driving reform and achieving the goals of the Executive Branch personnel vetting enterprise in order to establish and sustain a culture of trust in the Federal workforce. Under the Trusted Workforce (TW) 2.0 initiative, the PAC Principals are spearheading a transformation that will improve the policies, processes, and tools associated with the personnel vetting mission. These reforms will reduce the time required to onboard new personnel, enable workforce mobility, and improve insights into workforce behaviors while mitigating risk.

Using the Implementation Strategy – To facilitate the realization of TW 2.0, the PAC developed the attached *TW 2.0 Implementation Strategy*, which establishes a roadmap for modernizing the Government's personnel vetting mission. The Strategy identifies actions that agencies are expected to implement to ensure successful outcomes. Three critical actions required in the document are highlighted below:
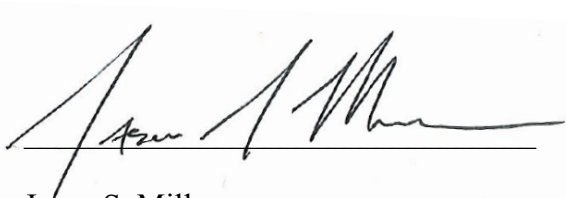
A) *Designate a Senior Implementation Official*: Department and agency heads are to designate a senior representative to be accountable for agency-level TW 2.0 implementation.

B) *Develop an Agency TW 2.0 Implementation Plan*: Departments and agencies are to develop a plan to implement TW 2.0 initiative reforms within the agency. Appendix A of the *Strategy* includes a summary of actions to be taken by agencies to support implementation efforts.

C) *Report Implementation Status to the PAC*: Department and agency Senior Implementation Officials will report updates on their implementation progress to the PAC.

The actions directed in the *Strategy* align with the President's Management Agenda under "Priority 1: Strengthening and Empowering the Federal Workforce" and OMB's instruction that agencies should prioritize personnel vetting modernization in their fiscal year 2023 budget requests to OMB. All Executive Branch departments and agencies shall ensure their implementation of TW 2.0 is consistent with the *Strategy*, as well as with the *Federal Personnel Vetting Core Doctrine* (February 2021).

Implementation Coordination – The PAC Enterprise Investment Board (EIB) will serve as a senior-level forum for discussions surrounding TW 2.0 implementation. The EIB will monitor agency progress toward implementation milestones, identify risks impeding progress, and serve as a coordinating body for identifying adjustments to the implementation approach. The TW 2.0 Executive Steering Group serves as the chief governance board for recommending changes.

As the TW 2.0 initiative progresses, the *Strategy* will be routinely updated to align with policy changes and capability deliveries. The PAC Program Management Office will maintain the document and supporting materials, including reference materials, job aids, and communications products to assist agencies with implementation. These resources will be housed on the "MAX.gov" portal at https://community.max.gov/x/z4MhO. As the PAC periodically updates the *Strategy*, agencies should ensure their internal TW 2.0 implementation plans remain aligned.
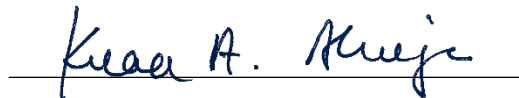
Endorsement – We, the PAC Principals, hereby endorse the attached *Trusted Workforce 2.0 Implementation Strategy* for use by all Executive Branch departments and agencies in implementing personnel vetting reforms.
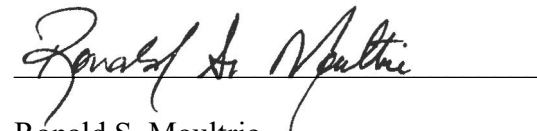

Jason S. Miller
Deputy Director for Management
Office of Management and Budget
Executive Office of the President
Chair, Performance Accountability Council

Avril Haines
Director of National Intelligence
Security Executive Agent

Kiran A. Ahuja
Director
U.S. Office of Personnel Management
Suitability and Credentialing Executive Agent

Ronald S. Moultrie
Under Secretary of Defense for
   Intelligence & Security
U.S. Department of Defense

Enclosure:
Trusted Workforce 2.0 Implementation Strategy

TRUSTEDWORKFORCE 2.0

Mission ▪ Mobility ▪ Insight

IMPLEMENTATION STRATEGY

April 2022

Revision History for TW 2.0 Implementation Strategy

Dated April 2022

Date	Page	Section	Change	Reason

To ensure you are accessing the most current version of the Strategy, please visit the TW 2.0 page on MAX.Gov: https://community.max.gov/x/z4MhO.

Contents

Introduction

The Security, Suitability, and Credentialing Performance Accountability Council (PAC) is spearheading personnel vetting reforms under the Trusted Workforce (TW) 2.0 initiative, with executive agent leadership from the Director of National Intelligence and the Director of the Office of Personnel Management (OPM) (collectively, the Executive Agents or EAs). These reforms aim to better support agencies' missions by reducing the time required to bring new hires onboard, enabling mobility of the Federal workforce, and improving insight into workforce behaviors. The Executive Agents issued the Federal Personnel Vetting Core Doctrine (Core Doctrine), which became effective in February 2021, establishing the philosophy for transforming the Federal Government's personnel vetting process. It defines the guiding principles, governance structure, key supporting processes, and policy priorities that will guide the next several years of TW 2.0 transformation.

In November 2021, the Administration released the Biden-Harris Management Agenda Vision, setting forth a vision to ensure an equitable, effective, and accountable Federal Government that delivers results for all. The President's Management Agenda (PMA) Vision references the need for personnel vetting reforms such as those included within this TW 2.0 Implementation Strategy as a key component to achieve PMA Priority 1: Strengthening and Empowering the Federal Workforce. The inclusion of TW 2.0 reforms within the PMA Vision will help ensure personnel vetting reforms continue to be elevated and receive the ongoing attention that will be critical for successful implementation. Then, in December 2021, the Administration issued a Cabinet Memorandum on transforming personnel vetting. The memorandum endorses Trusted Workforce 2.0 reforms and asks Federal departments and agencies to prioritize implementation.

To be successful, TW 2.0 implementation must be a whole-of-government effort. This TW 2.0 Implementation Strategy identifies the actions to be taken by the Executive Agents, departments and agencies, and authorized personnel vetting investigative service providers (ISPs) to implement personnel vetting reforms iteratively over the next several years. A Senior Implementation Official in each department and agency will be responsible for ensuring agency implementation of TW 2.0 is consistent with the principles of the Core Doctrine, implementation guidance issued by the Executive Agents, and this strategy.

This strategy should be used to focus organizational resources and efforts across the Executive Branch, to include guiding development of agency-specific TW 2.0 implementation plans as related TW 2.0 policies are finalized and new capabilities are deployed.

This TW 2.0 Implementation Strategy is organized into three sections and five appendices:

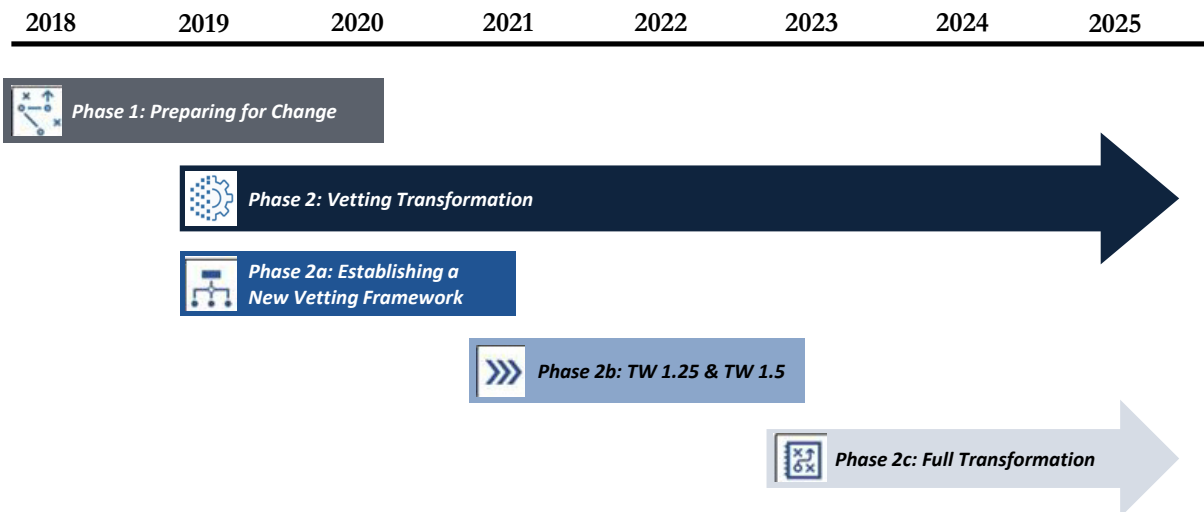| Section	Focus
Section I: Background	Describes the challenge and the TW 2.0 reform journey.
Section II: Guiding Strategy for Implementation	Describes the implementation approach.
Section III: Strategic Actions	Describes required actions for achieving specific milestones.
Appendix A: Next Steps for Agencies	Identifies next steps for agency implementation.
Appendix B: Agency Implementation Planning Guide	Provides a guide for implementation planning.
Appendix C: Roles and Responsibilities	Defines key roles and responsibilities.
Appendix D: Acronym Glossary	Describes acronyms used.
Appendix E: References	Provides a list of references used throughout this document.

Section I: Background

The approach used today for personnel vetting was developed over decades. Over time it was modified as new threats were identified but the underlying framework remains the same. Personnel vetting processes require modern transformational reform in line with today's complex missions, societal norms, threat landscape, changing workforce, and evolving technology. The Executive Agents have developed an iterative implementation approach that positions the enterprise to build momentum and accelerate TW 2.0 implementation timelines.

In March 2018, the Executive Agents convened leaders from the Executive Branch, Congress, academia, and industry for a two-day off-site meeting. Participants expressed a commitment to reform and agreed to fundamentally overhaul Federal personnel vetting. The resulting effort—"Trusted Workforce 2.0"— reimagines what it means to establish and maintain a relationship of trust with an individual throughout their affiliation with the Government. The group recommended initial TW 2.0 implementation be organized into two phases. Phase One was to focus on preparing the enterprise for change by addressing the sizeable background investigation inventory and improving timeliness of investigations. Once the investigation inventory was at a stable state, Phase Two would focus on transforming personnel vetting across the enterprise.

In Phase One the Executive Agents issued an Executive Correspondence with mitigation measures for reducing the inventory and improving timeliness. By March 2020, the inventory was stabilized at 200,000 cases and timelines for investigations were significantly reduced – with completion of Top Secret cases reduced from an average of 411 days down to 79 days and completion of Secret cases reduced from an average of 173 days down to 56 days ([Security Clearance, Suitability, Fitness, and Credentialing Reform Update, July 2020](#)). These improvements were made simultaneously with the transfer of the OPM's National Background Investigation Bureau's functions to the Department of Defense, Defense Counterintelligence and Security Agency, in accordance with section 925 of the National Defense Authorization Act for Fiscal Year 2018 (Pub. L. 115-91) and Executive Order 13869. Phase One is complete.

Phase Two's efforts to transform personnel vetting are divided into three sub-phases. Phase 2a established a new personnel vetting framework. Phase 2b implements the transitional states of continuous vetting to deliver early results while progress is made on finalizing policies and building new capabilities to support the TW 2.0 framework. Phase 2c focuses on the full implementation of TW 2.0.

Phase 2a: Establishing a New Vetting Framework

The new framework established in Phase 2a focused on managing risk, streamlining processes, and producing effective, efficient, and equitable outcomes. This framework drives on-going development of new policies and informs Phases 2b and 2c. Its major components are represented as 1-3-5:

1	3	5
One policy framework to align the personnel vetting domains—national security, suitability and fitness, and credentialing.	Three investigative tiers to speed up processing times, reduce duplication and complexity, and improve mobility.	Five personnel vetting scenarios to follow the lifecycle of an individual working for or on behalf of the Federal Government: Initial Vetting, Continuous Vetting, Upgrades, Transfer of Trust, and Re-establishment of Trust.

Phase 2b: Implementing TW 2.0 Transitional States

In February 2020 and January 2021, the Executive Agents issued Executive Correspondences establishing minimum standards for transitional continuous vetting states, called TW 1.25 and TW 1.5. These transitional states advance reform and improve risk management as the new suite of TW 2.0 policies is being developed. The Executive Agents directed agencies to establish a plan to fully enroll their national security populations in a minimum of a TW 1.25-compliant capability by September 30, 2021, and into a TW 1.5-compliant capability by September 30, 2022. Departments and agencies have enrolled their national security populations into continuous vetting capabilities, meeting the TW 1.25 deadline. This is a major step toward implementation of the new 1-3-5 framework.

Phase 2c: Implementing TW 2.0 Future State

With Phase 2a complete and enrollment in Phase 2b continuous vetting transitional states well underway, the primary focus turns to the Phase 2c work of transitioning from the interim state to implementing the new 1-3-5 framework for the entire Federal workforce. The scope of the work of Phase 2c includes finalizing the new TW 2.0 suite of policies to create one aligned model, implementing the three investigative tiers, and implementing the five vetting scenarios. The effort required to put the new TW 2.0 future state in place requires changes across all aspects of the personnel vetting enterprise.

Section II: Guiding Strategy for Implementation

A New Approach to Implementation

Past reform efforts primarily leveraged a sequential approach—policy development, then planning, then implementation—leading to long delays between the policy formulation phases and the delivery of products and services to customers. Seeking opportunities to deliver results sooner and taking full advantage of the rebuild of the information technology (IT) systems, TW 2.0 will leverage an iterative implementation approach, focusing on what is known currently with a high degree of confidence and publishing adjustments as needed.

TW 2.0 implementation requires the modernization and deployment of a new U.S. Government-wide IT architecture for personnel vetting. Departments and agencies will monitor policy issuances to ensure alignment with deployment of technical capabilities. Based on lessons learned from early implementation efforts, planning and actions will be adjusted to ensure efforts are correctly prioritized. These activities will drive timelines for the transition from legacy personnel vetting systems to the National Background Investigation Services (NBIS) and support the incremental decommissioning of legacy systems. Building the TW 2.0 future state iteratively will accelerate the overall timeline and position the enterprise to meet mission needs.

As the TW 2.0 effort progresses, Section III of this document will be updated to align with policy development and adjustments. The TW 2.0 Implementation Strategy and supporting materials, including reference materials, job aids, and communications products to assist agencies with implementation, will be maintained on a MAX.gov website located at: https://community.max.gov/x/z4MhQ.

TW 2.0 Suite of Policies: The Foundation for TW 2.0

The TW 2.0 future state will be supported by a comprehensive suite of policies consisting of *guidelines,* which describe the outcomes of successful implementation, and *standards,* which describe how those outcomes are achieved. Coordination of the policies began in fiscal year (FY) 2022. The Executive Agents anticipate issuing the new guidelines and standards as each is finalized, rather than waiting for the entire suite of policies to be completed. As these are issued, the major actions described in this strategy will be updated accordingly. The table below lists the key policies that agencies should expect to see issued and when.

Policy	Target Issue Date
Federal Personnel Vetting Core Doctrine	Issued
Federal Personnel Vetting Guidelines	Issued
Performance Management Guidelines	Issued
Personnel Vetting Engagement Guidelines	Issued
Investigative Standards and Appendices	FY 2022 Q2
Adjudicative guidance	FY 2022 Q3
Performance Management Standards and Appendices	FY 2022 Q3
Trusted Information Provider Program	FY 2022
5 CFR 731 regulatory updates*	FY 2022
5 CFR 1400 review and any necessary updates*	FY 2022
5 CFR 737 Credentialing regulation*	FY 2022
National Training Standards updates**	FY 2023 Q1
Personnel Vetting Management Standards and Appendices	FY 2023 Q2
SEAD reviews and any necessary updates**	FY 2023
Operational guidance in support of TW 2.0 policies**	Issued incrementally in FY 2022 and FY 2023

* Subject to public comments, which may cause unanticipated delays.
** Dependent on issuance of other policy documents; including DoD updates to National Industrial Security Program Rule 32 CFR, Part 117.

Section III: Strategic Actions

This section describes a set of strategic actions that work together to begin implementing TW 2.0's 1-3-5 framework to enable full implementation of TW 2.0. Specific milestones under each strategic action provide clarity on what needs to be done, by whom, and by when. Success indicators provide a way to assess progress and compliance. A more robust set of performance measures will be issued by the Executive Agents as part of the new personnel vetting policy framework.

In coordination with the PAC Program Management Office (PMO), milestone owners identify the subtasks, timelines, and deliverables necessary to achieve milestones and work with stakeholders to complete the milestones. Senior Implementation Officials will report their department or agency implementation progress to the PAC. The stakeholders below are identified as strategic action milestone owners.

Strategic Action Milestone Owner	Role
Executive Agents	Senior leaders responsible for developing and issuing policy, with oversight and compliance roles for suitability, fitness, national security, and credentialing personnel vetting activities
ISPs	Agencies authorized to conduct personnel vetting investigations using Federal staff and/or contractor personnel
Defense Counterintelligence and Security Agency (DCSA)	As the Federal Government's largest ISP, responsible for providing personnel vetting services and enterprise IT capabilities, to include designated shared services, to the vast majority of Federal departments and agencies; responsible for the development of NBIS and decommissioning of legacy personnel vetting systems
Agencies	Executive Branch departments and agencies conducting adjudications and personnel vetting management activities in support of the variety of Federal Government missions

Even when not listed as a milestone owner, the identified stakeholders are responsible for assessing the impact of the milestone to personnel vetting business operations, modifying their specific plans to adapt to the changes, and determining funding and cost impacts, to the extent possible. While industry is not assigned specific responsibilities in this plan, they are a critical partner contributing to the success of personnel vetting reform; their feedback, recommended best practices, and innovative solutions will help improve and advance reform. Roles and responsibilities of implementation stakeholders are further described in Appendix C.

The strategic actions described in the following pages enable the TW 2.0 1-3-5 framework. These actions are organized starting with those activities focused on putting the 1-3-5 framework into place, followed by the activities that enable personnel vetting reform to keep pace with agencies' mission and workforce needs as well as evolving threats and IT environments.

1. Agency TW 2.0 Implementation Plans

What problem are we trying to solve?
To ensure bold reforms that improve timely, reliable, and equitable recruitment and onboarding and retention of mission-critical talent, Trusted Workforce 2.0 implementation requires a concerted government-wide effort involving all Executive Branch agencies and a myriad of mission partners.

Where are we in the story?
While some agencies have developed initial implementation plans, others have made progress toward developing such plans by certifying their ability to conduct compliant TW 1.25 or TW 1.5 continuous vetting. OMB directed agencies to prioritize funding and implementation of personnel vetting transformation activities under TW 2.0 in their FY 2023 budget requests, including agencies' transition to continuous vetting of the workforce.

What does success look like?
Agencies have developed initial implementation plans aligned to this strategy and a process to keep their plans current based on the iterative approach to implementation as described in Section II. Developing implementation plans aligned to this strategy better positions agencies to successfully implement TW 2.0.

How are we going to achieve success?
Agencies should plan for TW 2.0 implementation and establish internal processes to modify their implementation plans over time. Implementation plans should account for a fully trained personnel security workforce (investigators, adjudicators, personnel vetting practitioners) given the magnitude of the changes in personnel security policy. To assist agencies in developing their approach to TW 2.0 implementation, a planning guide is provided in Appendix B. This guide should be used internally for initial TW 2.0 planning, and it will be updated as policies are finalized and additional capabilities are brought online.

Milestone	Owner	Target Date
Develop initial TW 2.0 implementation plan	Agencies	Complete
Establish a process for reviewing and revising, as needed, TW 2.0 implementation plans on a quarterly basis	Agencies	Complete
Designate a Senior Implementation Official to be accountable for agency implementation	Agencies	Complete
Provide initial report on agency TW 2.0 implementation plan to PAC Chair	Agencies	Jun 2022
Provide report on agency TW 2.0 implementation plan to PAC Chair	Agencies	Jun 2023
Provide report on agency TW 2.0 implementation plan to PAC Chair	Agencies	Jun 2024

Success Indicator	Direction
Percentage of agencies with implementation plans	⇧

2. Transition from Five to Three Investigative Tiers

What problem are we trying to solve?
Enhancing workforce mobility and alignment across the personnel vetting domains requires a less complex and more aligned investigative model than has been used in the past, focusing on the efficient collection of information needed to make informed trust determinations.

Where are we in the story?
The Executive Agents have developed a three-tier investigative framework to replace the current five investigative tiers and align investigative requirements for suitability, fitness, national security, and credentialing trust determinations.

What does success look like?
By transitioning from five to three investigative tiers, agencies and ISPs maximize uniformity across all Federal personnel vetting domains to enable faster onboarding and improve workforce mobility.

How are we going to achieve success?
Agencies should begin to assess and identify how their workforce will fall under the proposed tiered structure. ISPs should begin developing investigative products and pricing based on the new model. Full implementation of this strategic action depends on the issuance of Investigative Standards and regulatory updates; operational-level policy guidance to help ISPs and agencies transition from the old to new investigative tiers; development of new investigative products; policy updates on position designation; IT capabilities and updates to IT naming conventions consistent with the new policies; and agency onboarding to NBIS, where applicable. Information collection, including standard forms, to support the new investigative tiers is covered under Strategic Action 10 below.

Current Investigative Tiers	Position Designations by Tier
Tier 1	Low risk Non-sensitive Physical and logical access (HSPD-12) Credentialing
Tier 2	Moderate risk public trust
Tier 3	Non-critical sensitive Secret/Confidential "L" access
Tier 4	High risk public trust
Tier 5	Critical sensitive Special sensitive Top Secret Sensitive Compartmented Information "Q" access

TW 2.0 Investigative Tiers	Position Designations by Tier
Low Tier	Low risk Non-sensitive Physical and logical access (HSPD-12) Credentialing
Moderate Tier	Moderate risk public trust Non-critical sensitive Secret/Confidential "L" access
High Tier	High risk public trust Critical sensitive Special sensitive Top Secret Sensitive Compartmented Information "Q" access

Milestone	Owner	Target Date
Submit signed NBIS memorandum of understanding to DCSA	Agencies	Complete
Update TW 2.0 implementation plan with measures needed to meet TW 2.0 Investigative Standards requirements	ISPs	May 2022
Publish timeline and strategy to transition investigative cases from legacy systems to NBIS	DCSA	May 2022
Issue implementation memo for Investigative Standards, including rules for transitioning to three investigative tiers	EAs	FY 2022 Q3
Update the Position Designation System	EAs	Jun 2022
Issue operational-level guidance to agencies, including guidance for using existing tools such as the Position Designation Tool (PDT)	EAs	Jun 2022
Publish initial budget estimate for TW 2.0 investigative products and services for all five vetting scenarios	DCSA	Jun 2022
Technical release of background investigation services (NBIS R4.1)	DCSA	Sep 2022
Complete NBIS deployment/onboarding to allow for initiation capability within the system (allows agencies to order investigations and to use eApplication)	DCSA/ Agencies	Dec 2022
Publish final product pricing for TW 2.0 investigative products and services for all five vetting scenarios	DCSA	Dec 2022
Offer new Low, Moderate, and High Tier investigative products for all five vetting scenarios	DCSA	FY 2023 Q3
Modify internal policies and procedures to align with new investigative tiers	Agencies	FY 2023 Q3
Implement three-tiered model	ISPs	FY 2024
Update the PDT	DCSA	FY 2024

Success Indicator	Direction
Percentage of investigations processed under new tiers	⇧
Number of investigations processed in NBIS	⇧

3. Implement Initial Vetting

What problem are we trying to solve?
Agency mission readiness and the ability to compete for top talent demands a streamlined and efficient approach to quickly determine whether an individual can be trusted and brought onboard.

Where are we in the story?
The Executive Agents have published new Investigative Standards for the initial vetting process. In addition to streamlining investigative requirements overall, initial vetting includes delivering "high-yield" automated record checks to agencies quickly, the results of which may lead agencies to determine they can accept the risk of allowing an individual to enter on duty before the full investigation is complete.

What does success look like?
Processing all new cases under the new standards for initial vetting increases the speed of personnel vetting, reduces duplication and complexity, standardizes the process for making preliminary determinations, and improves workforce mobility across personnel vetting domains.

How are we going to achieve success?
ISPs should begin to explore capabilities and resource needs required to implement the full spectrum of investigative methodologies and data sources for initial vetting. Agencies should review the new initial vetting standards and assess expanded use of preliminary determination to onboard individuals more quickly. Full implementation of this strategic action depends on the issuance of Investigative Standards, adjudicative guidance, and Personnel Vetting Management Standards; the availability of investigative products and IT capabilities to support initial vetting; and modifications to internal agency policies and procedures to fully align with the initial vetting scenario.

Milestone	Owner	Target Date
Technical release for low-side repository capabilities (NBIS R3.3)	DCSA	Complete
Begin DCSA adjudications onboarding into NBIS to support the phased transition from Defense Information for Systems Security (DISS) to NBIS	DCSA	Apr 2022
Begin phased transition from legacy background investigation systems to NBIS to offer TW 2.0 initial vetting products	DCSA	Jun 2023
Offer initial vetting as government-wide service	DCSA	FY 2023 Q3
Enroll all individuals in Rap Back during the initial vetting process	Agencies	FY 2023
Update low-side repository to support initial vetting	ISPs	FY 2023
Update high-side repository as needed to support initial vetting	ODNI	FY 2023
Update preliminary determination procedures	Agencies	FY 2024
Implement initial vetting	Agencies	FY 2024

Success Indicator	Direction
Percentage of initial vetting processed using new standards	⇧
Average number of days to close initial investigations	⇩
Average number of days to provide personnel vetting approval for an individual to onboard (either preliminary or final, whichever comes first)	⇩

4. Implement Continuous Vetting

What problem are we trying to solve?

The traditional model for maintaining trust in the workforce through periodic reinvestigations is outdated and had not previously applied to all sectors of the workforce. Advances in technology provide the capability to replace the traditional periodic reinvestigation model with an improved risk-managed approach that continually assesses workforce behaviors.

Where we are in the story?

The Executive Agents have issued two Executive Correspondences establishing transitional states of continuous vetting (TW 1.25 and TW 1.5) for the national security population. Agencies have begun adopting these transitional states and have made significant progress toward the Executive Agents' enrollment targets for fiscal years 2021 and 2022.

What does success look like?

Fully enrolling all individuals who work for or on behalf of the Federal Government into a TW 2.0 continuous vetting capability enables agencies to identify concerning behavior in near real-time and, among other outcomes, may assist in getting individuals the help they need before small problems potentially escalate into larger problems.

How are we going to achieve success?

ISPs must build products and services to fully implement continuous vetting. Agencies must enroll their workforce in these services and make any necessary modifications to their internal policies, processes, and technology. Agencies must also ensure the workforce is fully apprised of the new approach to maintaining trust. Full implementation of this strategic action depends on the issuance of Investigative Standards, adjudicative guidance, and Personnel Vetting Management Standards; regulatory changes necessary to support continuous vetting for all populations; the availability of investigative products and IT capabilities to support continuous vetting; agency onboarding to NBIS; and modification of internal agency policies and procedures to fully align with the continuous vetting scenario in accordance with the new policy.

	Traditional	**TW 1.25** **Sep 30, 2021**	**TW 1.5** **Sep 30, 2022**	**TW 2.0** **2024**
Population	Public Trust & National security workforce	National security workforce	National security workforce	Entire workforce*
Continuous Data Sources	No automated checks	Limited automated checks	Expanded automated checks	Full suite of automated checks
Continuous Vetting	Reinvestigations every 5 years	Defers required reinvestigation	Satisfies required reinvestigation	Replaces required reinvestigation
CV Implementation Options	Agency-managed, scope limited to CE	Agency- or ISP-managed	ISP-managed (by 31 Dec 2022)	ISP-managed
Agency-Specific Information	Primarily self-reporting	Optional (Prepare to implement)	Required (Begin to implement)	Required
Previously Vetted Workforce	Full process to return after two years	Full process to return after two years	Full process to return after two years	Minimum process to reestablish trust
Workforce Mobility	Current reciprocity policy and process	Improved reciprocity	Improved reciprocity	New Transfer of Trust Scenario
Integrated IT Capability	None	Partially implemented	Moderately implemented	Fully implemented

Advance reform and improve risk management

*Entire workforce has the meaning of "covered individuals" as defined in Executive Order 13467, as amended, Section 1.3.

Trusted Workforce Transitional States

Milestone	Owner	Target Date
Provide TW 1.25 and TW 1.5 automated record checks	ODNI	Complete
Publish pricing for TW 1.25 as a service	DCSA	Complete
Offer TW 1.25 as government-wide service	DCSA	Complete
Publish initial pricing for TW 1.5 as a service	DCSA	Complete
Enroll full national security sensitive population into TW 1.25	Agencies	Complete
Publish pricing for fully compliant TW 1.5 service	DCSA	Complete
Technical release low-side continuous vetting (NBIS R3.3)	DCSA	Complete
Offer TW 1.5 as government-wide service	DCSA	FY 2022 Q3
Publish initial budget estimate for TW 2.0 continuous vetting as a service	DCSA	Jun 2022
Enroll full national security sensitive population into TW 1.5	Agencies	Sep 2022
Provide annual vetting appraisal capability for high-tier national security sensitive population	ODNI	Oct 2022
Publish pricing for TW 2.0 continuous vetting as a service	DCSA	Dec 2022
Leverage ISP-managed continuous vetting services for national security sensitive population	Agencies	Dec 2022
Offer TW 2.0 continuous vetting as government-wide service	DCSA	FY 2024
Provide annual vetting appraisal capabilities for high-tier national security sensitive populations (NCSC & NBIS)	ODNI/ DCSA	FY 2024
Provide annual vetting appraisal capabilities for all populations	DCSA	FY 2024
Enroll all populations in TW 2.0 continuous vetting service	Agencies	FY 2024

Success Indicator	Direction
Percentage of the national security sensitive population enrolled into a minimum of TW 1.25	⇧
Percentage of the national security sensitive population enrolled into a minimum of TW 1.5	⇧
Percentage of the full population enrolled in TW 2.0 continuous vetting	⇧
Percentage of agencies leveraging ISP-managed continuous vetting services	⇧
Percentage of Federal workforce using the annual vetting appraisal	⇧
Number of periodic reinvestigations	⇩
Average number of days to identify concerning behavior	⇩

5. Implement Upgrades, Transfer of Trust, and Re-establishment of Trust

What problem are we trying to solve?
Personnel vetting must be more agile to provide for and sustain agencies' workforce needs and enable the mobility of the Federal workforce.

Where are we in the story?
The Executive Agents approved Upgrades, Transfer of Trust, and Re-establishment of Trust as three of the five personnel vetting scenarios under the new approach framework. The Executive Agents are developing the policies that outline investigative requirements and decision paths to assist agencies when making a trust determination under each of these personnel vetting scenarios.

What does success look like?
Agencies have better and more timely access to the talent needed to accomplish their varied missions by processing Upgrades, Transfers of Trust, and Re-establishment of Trust using the new personnel vetting model. Individuals experience a more agile personnel vetting approach that follows the lifecycle of their affiliation with the Federal Government.

How are we going to achieve success?
While policies and enabling technical capabilities are being developed, agencies should begin evaluating internal personnel vetting processes to align to the new personnel vetting scenarios. Full implementation of this strategic action depends on the issuance of Investigative Standards, adjudicative guidance, including regulatory updates, and Personnel Vetting Management Standards; the availability of investigative products and IT capabilities to support these scenarios; and modifications to internal agency policies and procedures to fully align with the new personnel vetting scenarios.

Milestone	Owner	Target Date
Offer investigative services for Upgrades, Transfer of Trust, and Re-establishment of Trust scenarios	DCSA	FY 2023 Q3
Modify internal policies and procedures for Upgrades, Transfer of Trust, and Re-establishment of Trust scenarios	Agencies	FY 2023 Q3
Update low-side repository to support new scenarios	DCSA	FY 2023
Update high-side repository as needed to support new scenarios	ODNI	FY 2023
Implement Upgrades, Transfer of Trust, and Re-establishment of Trust scenarios	Agencies	FY 2024

Success Indicator	Direction
Average number of days to process an upgrade	⇩
Average number of days to process a transfer of trust	⇩
Average number of days to process a re-establishment of trust	⇩

6. Redesign Performance Management

What problem are we trying to solve?
Personnel vetting must include continuous performance improvement that supports data-driven policy decisions, remedial actions for when adverse events or other program failures occur, and integration of innovations and emerging technologies.

Where are we in the story?
The January 2021 Executive Correspondence modified the existing reporting framework to include the collection of data for continuous vetting metrics beginning in FY 2021 Q2. The Executive Agents have issued the Performance Management Guidelines and are finalizing the Performance Management Standards, which describe the components of Federal personnel vetting performance management pursuant to the Core Doctrine and introduce performance management categories for health, reform, and special interests as described in the table below. Once completed, the Executive Agents will publish the new performance goals and measures and provide implementation guidance.

Health	Reform	Special Interests
Aggregated, departmental and agency performance metrics used to determine effectiveness, efficiency, legal/policy compliance, and systemic risk.	Performance metrics used to drive implementation, policymaking, and development of enterprise-wide reforms. Also measures successful implementation and full operational capabilities of reform initiatives or new policy/legal mandates.	Performance metrics used to inform policy decisions and program development related to evolving threats, societal trends, research and innovation, or to accommodate process or technology improvements.

What does success look like?
A revised performance management framework is in place and measures are collected, analyzed, and used to inform decisions. The personnel vetting enterprise uses the insights to make systemic improvements, foster enterprise-wide innovation, and identify areas for policy enhancement.

How are we going to achieve success?
As the new framework is finalized, agencies will need to align their data collection, analysis, reporting, and decision-making to the TW 2.0 performance management framework. Full implementation of this strategic action depends on the issuance of Performance Management Standards, the deployment of capabilities to gather, report, and analyze performance data, and modification of internal agency policies and procedures.

Milestone	Owner	Target Date
Publish performance goals and implementation guidance	EAs	FY 2022 Q3
Implement automated performance collection tool	ODNI	Sep 2022
Technical release performance management capabilities (NBIS R4.1)	DCSA	FY 2022 Q4
Align/integrate internal agency systems with enterprise tools	Agencies	FY 2023
Implement performance management framework	Agencies	FY 2023

Success Indicator	Direction
Number of ad hoc performance data requests	⇩
Percentage of agencies implementing the new performance measures	⇧

7. Adopt Enterprise Shared Services

What problem are we trying to solve?
Personnel vetting requires modern, secure, and innovative technology available for government-wide use to improve operational efficiency, promote information sharing, and protect information collected during the personnel vetting process.

Where are we in the story?
In November 2016, the PAC approved enterprise-wide shared services for business services and IT services. As part of the NBIS capability development and the transformation phase of DCSA's maturation roadmap (transfer, transition, transformation), DCSA anticipates offering additional products and services to agencies and other ISPs in the future. These products and services will be communicated via established forums, such as the Background Investigation Stakeholders Group and the Trusted Workforce Advisory Group, and become part of future personnel vetting service improvement and product offerings.

What does success look like?
Shared services will continue to evolve, informed by research and innovation, as well as agency recommendations for enterprise shared services. The evolution of these capabilities and analytic tools will support personnel vetting business processes and assist agencies in making risk-based decisions. These capabilities will deliver consistency in products across all subscribing agencies and enable subscribing agencies to adopt modern technology, automate manual processes, reduce duplicative investments, decrease the cyber threat through fewer systems and interfaces, and allow agencies to focus on their primary mission. Over time, as many agencies as possible will have adopted enterprise shared services and will routinely evaluate the shared service catalog to identify additional opportunities for adoption.

How are we going to achieve success?
As part of their implementation planning, agencies should evaluate the shared service catalog and update their agency TW 2.0 Implementation Plans annually, as part of their performance planning and budget execution process, with their intention to adopt new shared services when practicable or mandatory.

Milestone	Owner	Target Date
Publish enterprise shared services catalog	PAC PMO	FY 2022 Q4
Evaluate shared services and update agency TW 2.0 Implementation Plan with intention to adopt new shared services	Agencies	FY 2022
Evaluate shared services and update agency TW 2.0 Implementation Plan with intention to adopt new shared services	Agencies	FY 2023
Evaluate shared services and update agency TW 2.0 Implementation Plan with intention to adopt new shared services	Agencies	FY 2024

Success Indicator	Direction
Percentage of agencies subscribing to shared services	⇧
Percentage of ISPs leveraging DCSA or ODNI shared services	⇧
Number of agencies onboarded into NBIS	⇧

8. Improve Information Sharing

What problem are we trying to solve?

Personnel vetting information must be shared among agency personnel vetting programs and complementary missions to effectively manage human risk.

Where are we in the story?

The Executive Agents issued guidance to incorporate agency-specific information from partner mission areas into continuous vetting. The Executive Agents are developing Trusted Information Provider (TIP) program policy to help streamline the investigative process and reduce the collection of redundant information. The Executive Agents are working to improve information-sharing with industry, consistent with the 2018 and 2020 National Defense Authorization Acts, and the Consolidated Appropriations Act, 2022.

What does success look like?

Agencies will have established internal information-sharing protocols, ISPs will have established TIP programs, and the Executive Agents will have issued subsequent guidance on information sharing with industry. In the end, personnel vetting practitioners and partner mission area personnel have the necessary and trusted information they need when they need it to make informed personnel vetting decisions.

How are we going to achieve success?

Agencies should begin internal discussions with their organizational complementary missions—including human resources, insider threat, counterintelligence, and information technology—to enable agency-specific information sharing to better manage risk and meet the standards for continuous vetting. ISPs should establish TIP programs and agencies should engage with their ISP to evaluate opportunities to participate in these programs. Full implementation of this strategic action depends on the issuance of Personnel Vetting Management Standards and TIP Program policy, the availability of enterprise IT capabilities for sharing personnel vetting information, and modifications to internal policies and procedures to align to TW 2.0 policy.

Milestone	Owner	Target Date
Update high-side repository to display continuous vetting enrollment status	ODNI	Complete
Technical release for low-side repository capabilities (NBIS R3.3)	DCSA	Complete
Establish information-sharing protocols within agency	Agencies	Sep 2022
Develop TIP plan	ISPs	FY 2022
Implement TIP programs	ISPs	FY 2023
Issue a policy on sharing covered insider threat information pertaining to contractor employees engaged by the Federal Government	ODNI	FY 2024

Success Indicator	Direction
Number of TIP programs established by ISPs	⇧
Number of agencies compliant with TW 2.0 information-sharing protocols	⇧

9. Enhance Individual Engagement

What problem are we trying to solve?

Executive Branch agencies must improve customer experience and service delivery throughout the personnel vetting process in accordance with OMB Circular No. A-11, section 280, dated August 2021. These efforts should also be considered as covered agencies implement Executive Order 14058 of December 13, 2021, Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government, including integrating activities to improve customer experience into their strategic plans and performance plans.

Where are we in the story?

The Executive Agents have issued the first-of-its-kind Personnel Vetting Engagement Guidelines designed around how individuals experience the personnel vetting process. The policy is intended to identify opportunities for individuals to stay informed of their current vetting status throughout the five personnel vetting scenarios, to share information needed to make and sustain a trust determination, and to participate in the personnel vetting process using modern IT capabilities.

What does success look like?

Effective two-way communications between individuals and agencies are established throughout the five personnel vetting scenarios. The trusted workforce exhibits a sense of shared responsibility in managing human risk and agencies receive information from the workforce expeditiously, which allows agencies to intervene early and provide help to individuals who need it.

How are we going to achieve success?

Agencies should begin preparing for enhanced individual engagement and proactively communicating TW 2.0 expectations and guidance to their workforce. Full implementation of this strategic action depends on the issuance of Personnel Vetting Management Standards, modifications to internal agency policies, procedures, and training aligned to these policies, and technical capabilities to enable two-way communication between individuals and the Federal Government throughout the personnel vetting process. In order to use these capabilities, agencies must also be using NBIS to process case data.

Milestone	Owner	Target Date
Technical release enterprise self-reporting capability (NBIS R4.1)	DCSA	Sep 2022
Train workforce on roles and responsibilities for reporting	Agencies	FY 2023
Launch an individual engagement awareness campaign	EAs	FY 2023
Integrate Personnel Vetting Engagement Guidelines into workforce annual training	Agencies	FY 2023
Provide individual experience survey capability	DCSA	FY 2024
Provide capabilities to improve individuals' access to personnel vetting information (e.g., investigation status, date of adjudication)	DCSA	FY 2024

Success Indicator	Direction
Percentage of individual experience survey results that are positive	⇧
Number of self-reports through NBIS or agency databases	⇧
Percentage of agencies using an integrated or enterprise self-reporting capability	⇧

10. Modernize Information Collection from Individuals

What problem are we trying to solve?
The new personnel vetting model requires changes in how and what type of information is collected from individuals.

Where are we in the story?
Work is underway to evaluate the current standard forms through the lens of eliciting the most valuable information to support adjudicative decisions, improving front-end processing accuracy and timeliness, and using reporting mechanisms to collect changes in an individual's information.

What does success look like?
The TW 2.0 approach aligns information collection across the personnel vetting domains through modernized forms and automated systems. These efforts ensure agencies have the information they need to better manage human risk through data collection that is aligned, comprehensive, and automated. The collection of low-yield and duplicative information is eliminated. Information collection is streamlined and the individual's "customer experience" is improved. The process adheres to principles for Diversity, Equity, Inclusion, and Accessibility.

How are we going to achieve success?
Agencies and ISPs should keep abreast of efforts to update forms and modify agency policy, procedures, and training accordingly. Full implementation of this strategic action depends on the issuance of Investigative Standards, adjudicative guidance, including regulatory updates, the issuance of new forms aligned to the new policies and Paperwork Reduction Act, and the integration of these new forms in shared service applications.

Milestone	Owner	Target Date
Establish framework for end-to-end information collection from Individuals	PAC PMO	Jun 2022
Update standard forms to meet TW 2.0 collection needs	EAs	Feb 2023
Provide new forms in eApplication within NBIS	DCSA	Aug 2023
Deploy Intelligence Community-focused eApplication solution	ODNI	Aug 2023

Success Indicator	Direction
Percentage of agencies implementing the new standard forms	⇧
Form submission rejection rate by ISPs	⇩

11. Continually Optimize Processes through Technology

What problem are we trying to solve?
Personnel vetting requires effective, secure, and innovative technology and the ability to integrate newer and better technology as it becomes available.

Where are we in the story?
DCSA is working to design an artificial intelligence (AI) platform as an enterprise service. Returns on investment are expected through risk assessment-based work prioritization and alert triaging, technology to reduce manual database checks and label attachments with investigative identifiers, tools to screen publicly available electronic information (PAEI) for risk indicators, alert bundling, use of automation for scoping investigations, scheduling optimization of investigative items, and AI-enabled investigation quality assurance using variance detection. In addition, the PAC has identified and funded research and innovation projects that are aligned with ongoing personnel vetting reform initiatives to inform policy, enable personnel operations, and eliminate identified security gaps. These projects include technology-focused efforts such as exploring applications for machine learning and exploring mechanisms for fair and traceable AI.

What does success look like?
ISPs, shared service providers, and agencies continually evaluate evolving technology and its application to improving personnel vetting business operations. Advanced analytic technology such as AI, machine learning, natural language processing, visualization, automation, optimization, and robotics processing automation replaces low-value repetitive human work with higher-value human touch points at critical steps in investigation, adjudication, and personnel vetting management. The vetting process leverages technology to lead to lower overall costs, faster throughput, higher-quality decisions, fewer errors, and overall improved efficiencies, all contributors to a more robust and secure vetting process.

How are we going to achieve success?
Agencies should continually assess the availability of technology to enhance and digitize manual personnel vetting business processes and participate in interagency forums that evaluate the use of such technologies at scale. ISPs, shared service providers, and agencies should ensure cutting-edge technologies are adopted to improve both quality and timeliness of personnel vetting while outdated and legacy IT capabilities are decommissioned. Full implementation of this strategic action depends on the issuance of Investigative Standards and adjudicative guidance, including any regulatory updates.

Milestone	Owner	Target Date
Select FY 2022 R&I projects to assess applicability of emerging technologies to personnel vetting processes	PAC PMO	Complete
Select FY 2023 R&I projects to assess applicability of emerging technologies to personnel vetting processes	PAC PMO	Dec 2022
Select FY 2024 R&I projects to assess applicability of emerging technologies to personnel vetting processes	PAC PMO	Dec 2023
Identify technology used outside of personnel vetting (e.g., supply chain operations, logistics) that could improve personnel vetting	DCSA	FY 2023 Q1
Identify how AI/ML could be used for decision support for personnel vetting (e.g., investigation scoping, identity resolution, quality enhancement)	DCSA	FY 2023 Q1
Establish test environment to analyze methods and tools	DCSA	FY 2023 Q4
Establish standard data schema for sharing personnel vetting-related information	DCSA	FY 2023 Q4
Prototype use of AI/ML to optimize personnel vetting capability (e.g., case assignment)	DCSA	FY 2023 Q4
Prototype use of AI/ML to screen PAEI for risk indicators	DCSA	FY 2024

Success Indicator	Direction
Number of completed PAC R&I projects dispositioned for action	⇧
Number of record providers using standard data schema	⇧
Number of new technologies identified and operationalized to improve personnel vetting	⇧
Use of AI/ML to improve personnel vetting	⇧

Appendix A: Next Steps for Agencies

Achieving TW 2.0 transformation will take time, strong leadership, adequate funding, and commitment from the personnel vetting community. Starting reform implementation planning and actions now rather than waiting for final policy issuance will require flexibility and adaptability at the agency level. While most decisions will be focused on the work of accomplishing the strategic actions to implement the 1-3-5 approach, there should be flexibility in how this work is performed. Where there is flexibility, agencies should use the guide rails of **mission**, **mobility**, and **insight** to make personnel vetting decisions throughout TW 2.0 implementation:

- **Mission**: Does the decision improve personnel vetting's ability to support the Federal Government's missions while providing a fair, consistent, and accountable process?

- **Mobility**: Does the decision enable workforce mobility, giving the Federal Government flexibility to move individuals when and where needed while also affording them opportunities for growth and advancement?

- **Insight**: Does the decision increase insight into workforce behavior or help to better identify areas for program improvement?

Making all decisions based on these factors will increase the chance of achieving the outcomes of a successful vetting program described in the Core Doctrine.

Steps agencies can take now toward achieving the desired TW 2.0 future state include:

- Designating a Senior Implementation Official to be accountable for implementing TW 2.0.

- Examining resource needs to ensure adequate funding for the FY 2023 budget cycle and beyond.

- Evaluating existing personnel vetting business operations' ability to support process changes for TW 2.0 vetting scenarios, including managing continuous vetting alerts, internal agency adjudication and other actions in response to alerts, and responses to requests for information from the ISP.

- Analyzing and counting populations based on the proposed tier structures to prepare for pending policy and budgetary impacts for future fiscal year budgets.

- Reviewing and aligning internal policies and processes to implement the 1-3-5 framework.

- Coordinating with DCSA for their NBIS onboarding plan, to include submission of a signed memorandum of understanding, if using or planning to use DCSA for investigative services.

- Continuing to develop and refine an agency-specific TW 2.0 implementation plan, which may include but is not limited to:
  - Resource, budget, and business process impacts of continuous vetting (enrollment and alert management)
  - Changes in vetting the workforce with three investigative tier levels
  - How to address policy and operational gaps between current processes and TW 2.0
  - Considerations for handling unique agency requirements
  - Training needs to meet TW 2.0 requirements, including implementation of revised National Training Standards for Background Investigators, National Security Adjudicators, and Suitability Adjudicators
  - Agency-managed processes that may be conducted by ISPs as new services emerge

- o Use of shared services (current and plans for future adoption) and decommissioning of internal agency tools or systems, where feasible
- o Communications required to socialize TW 2.0 and continuous vetting elements such as reporting requirements and annual vetting appraisals with the workforce and employee unions (as applicable)
- o Plans/protocols for information sharing

To assist agencies with TW 2.0 planning and implementation, the <u>agency-owned</u> milestones listed under each strategic action in the preceding pages are consolidated in the table below.

Strategic Action	Agency-Owned Milestone	Target Date
Agency TW 2.0 Implementation Plans	Develop initial TW 2.0 implementation plan	Complete
	Establish a process for reviewing and revising, as needed, TW 2.0 implementation plans on a quarterly basis	Complete
	Designate a Senior Implementation Official to be accountable for agency implementation	Complete
	Provide initial report on agency TW 2.0 implementation plan to PAC Chair	Jun 2022
	Provide report on agency TW 2.0 implementation plan to PAC Chair	Jun 2023
	Provide report on agency TW 2.0 implementation plan to PAC Chair	Jun 2024
Transition from Five to Three Investigative Tiers	Submit signed NBIS memorandum of understanding to DCSA	Complete
	Complete NBIS onboarding to allow for initiation capability within the system	Dec 2022
	Modify internal policies and procedures to align with new investigative tiers	FY 2023 Q3
Implement Initial Vetting	Enroll all individuals in Rap Back during the initial vetting process	FY 2023
	Update preliminary determination procedures	FY 2024
	Implement initial vetting	FY 2024
Implement Continuous Vetting	Enroll full national security sensitive population into TW 1.25	Complete
	Enroll full national security sensitive population into TW 1.5	Sep 2022
	Leverage ISP-managed continuous vetting services for national security sensitive population	Dec 2022
	Enroll all populations in TW 2.0 continuous vetting service	FY 2024
Implement Upgrades, Transfer of Trust, and Re-establishment of Trust	Modify internal policies and procedures for Upgrades, Transfer of Trust, and Re-establishment of Trust scenarios	FY 2023 Q3
	Implement Upgrades, Transfer of Trust, and Re-establishment of Trust scenarios	FY 2024
Redesign Performance Management	Align/integrate internal agency systems with enterprise tools	FY 2023
	Implement performance management framework	FY 2023
Adopt Enterprise Shared Services	Evaluate shared services and update agency TW 2.0 Implementation Plan with intention to adopt new shared services	FY 2022
	Evaluate shared services and update agency TW 2.0 Implementation Plan with intention to adopt new shared services	FY 2023
	Evaluate shared services and update agency TW 2.0 Implementation Plan with intention to adopt new shared services	FY 2024
Improve Information-Sharing	Establish information-sharing protocols within agency	Sep 2022
Enhance Individual Engagement	Train workforce on roles and responsibilities for reporting	FY 2023
	Integrate Personnel Vetting Engagement Guidelines into workforce annual training	FY 2023

Appendix B: Agency Implementation Planning Guide

IMPLEMENTATION PLANNING FOR TRUSTED WORKFORCE 2.0 GUIDE
Each agency should prioritize TW 2.0 implementation efforts consistent with the principles of the Federal Personnel Vetting Core Doctrine. Agencies should assess modifications needed to their internal policies, processes, technology, and workforce and begin planning for TW 2.0 implementation using this guide.

(1) AGENCY TW 2.0 IMPLEMENTATION PLANNING

A. Has the agency designated a senior implementation official? ☐ Yes ☐ No

B. Has the agency developed and/or updated an initial TW 2.0 implementation plan for incrementally transitioning personnel vetting activities to meet TW 2.0 implementation requirements? Plans may include, but are not limited to: (1) assessment of budgetary and operational impacts of TW 2.0 changes; (2) activities to prepare personnel vetting programs for TW 2.0; (3) transition from periodic reinvestigations to continuous vetting of the agency's workforce aligned to the February 2020 and January 2021 Executive Correspondences (EC) milestones; and (4) engagements with investigative services providers (ISPs) (DCSA for most agencies) to leverage ISP-managed continuous vetting if the agency has elected to currently conduct agency-managed TW 1.25 or TW 1.5 continuous vetting. *(Note: ISPs with original or delegated investigative authority are automatically considered ISP-managed.)*
☐ Yes ☐ Under Development ☐ No (What is the plan to establish a TW 2.0 implementation plan?)

C. If the answer above is "Yes" or "Under Development," has the Agency established a process to update the implementation plan over time? ☐ Yes ☐ No (briefly explain)

D. Has the Agency identified risk(s) in implementation, and if so, developed a risk mitigation plan?
☐ Yes (briefly describe)   ☐ No

E. Has the agency considered how to restructure internally to meet the new personnel vetting model?
☐ Yes (briefly describe)   ☐ No

F. Has the agency provided to DCSA updated implementation workload projections, if applicable?
☐ Yes (briefly describe)   ☐ No

G. If an ISP, has the agency considered modifications to contracts for investigative services that may be required?
☐ Yes (briefly describe)   ☐ No

H. If an ISP, has the agency considered how to implement investigative activities to resolve issue information found in continuous vetting alerts? ☐ Yes (briefly describe)   ☐ No

I. For agencies covered by the GPRA Modernization Act of 2010, has the agency considered whether it needs to modify its strategic plan and annual performance plan to address TW 2.0 implementation? ☐ Yes (briefly describe) ☐ No

(2) TRANSITIONAL STATES FOR CONTINUOUS VETTING

A. Executive Correspondence of January 15, 2021 directed agencies to establish a continuous vetting enrollment plan by February 15, 2021 and enroll their full national security sensitive population into a minimum TW 1.25 capability by September 30, 2021 and into a TW 1.5 capability by September 30, 2022. Will the agency achieve these milestones?
☐ Yes ☐ No (briefly describe the agency's plan to meet these milestones)

B. Indicate the continuous vetting state for FY 2022:
☐ TW 1.25 only   ☐ TW 1.5 only   ☐ TW 1.25 and TW 1.5   ☐ None (briefly explain)

C. Does the agency have a plan for enrolling individuals into Rap Back? ☐ Yes ☐ No (briefly explain)

D. Indicate the continuous vetting state for FY 2023:   ☐ TW 1.5 only   ☐ None (briefly explain)

E. Indicate which service provider the agency is using for FY 2022: ☐ Agency-Managed ☐ ISP-Managed (refer to note under para 1.A. above)

F. Indicate which service provider the agency is using for FY 2023:   ☐ Agency-Managed ☐ ISP-Managed

G. Full implementation of TW 2.0 will require agencies to use ISP-managed continuous vetting capabilities. Does the agency have a plan to transition to ISP-managed continuous vetting capabilities?
☐ Yes   ☐ Currently using ISP-Managed ☐ No (briefly explain)

H. While TW 1.25 and TW 1.5 allow for agency-managed continuous vetting capabilities, ISPs must still conduct all investigative work required to resolve a continuous vetting alert that meets established thresholds in the 2012 Federal Investigative Standards, as amended by the Executive Agents. Has the agency worked with its ISP to establish a process for requesting investigative activities to resolve issue information found in continuous vetting alerts?
☐ Yes   ☐ No (briefly explain)

(3) HUMAN CAPITAL IMPACTS
Has the agency considered changes to its staffing plan to address TW 2.0 impacts on the personnel vetting cadre? Resource types may include, but are not limited to, personnel vetting managers, practitioners, personnel security offices, access control/credentialing, investigators, and adjudicators. Changes considered may include, but are not limited to, realignments of programs supporting reinvestigations, new training requirements, reskilling practitioners, or other changes.   ☐ Yes   ☐ No (briefly explain)

(4) DIVERSITY, EQUITY, INCLUSION, and ACCESSIBILITY
A. Has the agency implemented TW 2.0 in a manner designed to prevent and mitigate disparate treatment or disparate impact with respect to any demographic community?   ☐ Yes   ☐ No (briefly explain) B. Has the agency worked with mission partners, e.g., HR, DEIA, CLPT, to examine whether there has been any negative impact of the implementation of TW 2.0 on various demographic communities?   ☐ Yes   ☐ No (briefly explain) C. If the agency found that there is a negative impact to a demographic community, has the agency worked with mission partners to mitigate the negative impact?   ☐ Yes   ☐ No (briefly explain)

(5) CONTRACTING
Has the agency communicated with its contracting offices and reviewed internal policies, processes, and contract administrative requirements to ensure alignment with TW 2.0 requirements impacting the agency contractor workforce?   ☐ Yes   ☐ No (briefly explain)

(6) SHARED SERVICES and IT PLANNING

A. The personnel vetting ecosystem includes a suite of IT shared services. Many of these are already operational today as part of the suite of IT operated by DCSA (e.g., PDT, eQIP, CVS). As DCSA deploys NBIS, IT shared services will be migrated to the new technology. Agencies should consider operational, budget, and business process impacts of using the designated shared services listed below, where applicable. NBIS will be a mandatory shared service on the low side for PDT, eApplication (replaces eQIP), and the low-side repository (replaces CVS and DISS). NBIS will be an optional shared service for the other functions such as adjudication management, security management, eAdjudication, etc. Agencies should begin executing or updating memoranda of understanding with DCSA as early as possible. *(Note: Agencies are encouraged to use the Personnel Vetting Business Reference Model, which describes the end-to-end lifecycle for the five personnel vetting scenarios under the TW 2.0 framework, to assist with understanding the business process impacts of TW 2.0).*
  - Position Designation   [Indicate current use or future intentions]
  - Low-side Repository   [Indicate current use or future intentions]
  - eApplication   [Indicate current use or future intentions]
  - Adjudication Management   [Indicate current use or future intentions]
  - eVetting (i.e., eAdjudication)   [Indicate current use or future intentions]
  - Post-Determination Management   [Indicate current use or future intentions]
  - Investigation Management (if Agency is an ISP)   [Indicate current use or future intentions]
B. How does the agency intend to support TW 2.0 IT needs? *(Select all that apply)*
  ☐ Acquiring or creating new IT systems, applications, or capabilities
  ☐ Enhancing existing IT, including internal case management systems to align with the five personnel vetting scenarios, investigative requirements, and performance management needs.
  ☐ Leveraging enterprise shared services and sunsetting legacy Agency systems
  ☐ To be determined (briefly explain)

(7) AGENCY-SPECIFIC INFORMATION SHARING
TW 1.5 requires (reference January 2021 EC) and TW 2.0 will require agencies to incorporate relevant information obtained from agency-specific data sources (human resources, insider threat, counterintelligence, information technology, etc.) into their ISP's continuous vetting process to identify risks in a timely manner, eliminate redundancy, improve quality, increase effectiveness, and maximize efficiency. Has the agency begun to establish information-sharing protocols with these complementary missions?   ☐ Yes   ☐ No (briefly explain)

(8) WORKFORCE ENGAGEMENT
Has the agency provided communications to the workforce (to include contractors) regarding TW 2.0 (e.g., continuous vetting) and established a capability to provide recurring updates?   ☐ Yes   ☐ No (briefly explain)

Appendix C: Roles and Responsibilities

Stakeholder	Roles and Responsibilities
Security, Suitability, and Credentialing Performance Accountability Council (PAC)	Drives implementation of personnel vetting reform effort. Monitors and provides feedback on pace of reform implementation. Facilitates alignment of the Executive Agents' processes.
Trusted Workforce 2.0 Executive Steering Group (TW 2.0 ESG)	Guides TW 2.0 reform efforts. Provides executive-level guidance and makes recommendations concerning the TW 2.0 strategy, direction, and focus of the TW 2.0 teams that specifically support personnel vetting reform, modernization, and transformation efforts.
Enterprise Investment Board (EIB)	Serves as a senior-level forum for discussions surrounding TW 2.0 implementation. Monitors agency progress toward implementation milestones, identifying risks impeding progress, and recommending solutions. Assists with implementation accountability and change management. Serves as a coordinating body for identifying shifts in the implementation approach.
Security Executive Agent (SecEA)	Develops uniform and consistent policies and procedures for the effective, efficient, timely, and secure completion of investigations and adjudications for individuals eligible to occupy national security sensitive positions or to access classified information.
Suitability and Credentialing Executive Agent (SuitEA/CredEA)	Develops uniform and consistent policies and procedures for the effective, efficient, and timely completion of investigations and adjudications relating to trust determinations of suitability and fitness and of eligibility determinations for HSPD-12 compliant credentialing for physical and logical access to Federal facilities or information systems.
Defense Counterintelligence and Security Agency (DCSA)	As the Federal Government's largest authorized ISP, provides personnel vetting services and enterprise IT capabilities to other agencies via NBIS.
Trusted Workforce Advisory Group (TWAG)	Informs progress on implementation. Gathers input on issues impacting interagency, including challenges and impediments to implementation. Identifies Federal IT capability requirements to the PVRC.
Personnel Vetting Requirements Council (PVRC)	Identifies, analyzes, and validates IT capability requirements for NBIS. Provides analysis, impacts, and recommendations to the PAC for approval.
Performance Accountability Council Program Management Office (PAC PMO)	Supports the PAC in maintaining the TW 2.0 Implementation Strategy, monitoring and reporting reform milestones and progress, and conducting risk management to identify and resolve issues to help keep implementation on track.
Authorized personnel vetting investigative service providers (ISP)	Assesses impacts of each strategic action and modifies investigative procedures, processes, and systems as necessary.
Departments and Agencies	Assess impacts to their organization of each strategic action and modify policies, processes, and systems as necessary. Develop agency-specific TW 2.0 implementation plans aligned to this Implementation Strategy. Work with milestone owners by participating in working groups, reviewing work products, and performing other tasks that will support completion of the milestones.
Industry	Serves as a partner by recommending best practices, innovative solutions, and other advice concerning personnel vetting reform activities.
Congress	Provides oversight of personnel vetting reform activities. Approves and issues the President's budget and changes to legislation impacting the personnel vetting mission.

Appendix D: Acronym Glossary

Acronym	Description
AI	Artificial Intelligence
CFR	Code of Federal Regulations
CLPT	Civil Liberties, Privacy, and Transparency
CredEA	Credentialing Executive Agent
CVS	Central Verification System
DCSA	Defense Counterintelligence and Security Agency
DEIA	Diversity, Equity, Inclusion, Accessibility
DISS	Defense Information System for Security
DoD	Department of Defense
Executive Agents / EAs	Security Executive Agent and Suitability and Credentialing Executive Agent
EIB	Enterprise Investment Board
eAdjudication	Electronic Adjudication
eApplication	Electronic Application
eQIP	Electronic Questionnaires for Investigations Processing
FBI	Federal Bureau of Investigation
FY	Fiscal Year
GPRA	Government Performance and Results Act
HR	Human Resources
HSPD-12	Homeland Security Presidential Directive-12
IA	Intelligence Amplification
ISP	Investigative Services Provider
IT	Information Technology
ML	Machine Learning
NBIB	National Background Investigation Bureau
NBIS	National Background Investigation Services
ODNI	Office of the Director of National Intelligence
OMB	Office of Management and Budget
OPM	Office of Personnel Management
PAC	Security, Suitability, and Credentialing Performance Accountability Council
PAC PMO	Performance Accountability Council Program Management Office
PAEI	Publicly Available Electronic Information
PDT	Position Designation Tool
PMA	President's Management Agenda
R&I	Research and Innovation
RPA	Robotic Processing Automation
SEAD	Security Executive Agent Directive
SecEA	Security Executive Agent
SuitEA	Suitability Executive Agent
SSC	Security, Suitability/Fitness, and Credentialing
TIP	Trusted Information Provider
TW	Trusted Workforce
TWAG	Trusted Workforce Advisory Group
TW 2.0 ESG	Trusted Workforce 2.0 Executive Steering Group

Appendix E: References

References are available on a MAX.gov website located at: https://community.max.gov/x/z4MhO (or upon request from PAC PMO).

Reference	Date
Cabinet Memorandum: Transforming Federal Personnel Vetting	December 2021
OMB Circular No. A-11, Preparation, Submission, and Execution of the Budget	August 2021
Federal Personnel Vetting Core Doctrine	February 2021
Transforming Federal Personnel Vetting: Continuous Vetting and Other Measures to Expedite Reform and Transition to Trusted Workforce 2.0, Joint DNI-OPM Memorandum	January 2021
Measures to Expedite Reform and Further Reduce the Federal Government's Background Investigation Inventory, Joint DNI-OPM Memorandum	February 2020
Executive Order 13869, Transferring Responsibility for Background Investigations to the Department of Defense	April 2019
Transforming Workforce Vetting: Measures to Reduce the Federal Government's Background Investigation Inventory in Fiscal Year 2018, Joint DNI-OPM Memorandum	June 2018
Transforming Workforce Vetting ("TW 2.0 Charter"), Joint DNI-OPM Memorandum	May 2018