

ARTICLE

SO, WHAT IS TW 2.0 ANYWAY?

NCMS SECURITY CONSULTANT INDUSTRY SUBCOMMITTEE

Most of us have heard of Trusted Workforce 2.0 (TW 2.0) by now, especially after the recent release of the “Transforming Federal Personnel Vetting” Executive Correspondence (EC) Fact Sheet from the DNI and OPM in their capacities as the Security Executive Agent and Suitability/Credentialing Executive Agent, respectively. The EC anticipates the signing by the President of a National Security Presidential Memorandum (NSPM) establishing TW 2.0 as a “security doctrine” for the nation. But what is TW 2.0 and what does it mean to you and me?

TW 2.0 is comprised of two parts and involves sequential implementation. The first part required the reduction of the 725,000 case backlog (aka “backlog”) of outstanding background investigations of all types. This has been an arduous, but successful, effort led by the now retired Director Charlie Phalen, first in his capacity as the director of the National Background Investigations Bureau (NBIB) in 2016, and recently as the acting director of a new organization, the Defense Counterintelligence and Security Agency (DCSA), when NBIB merged with DCSA (formerly Defense Security Service) in 2019. As of February of this year, the investigative inventory had been dramatically reduced to a “target state” of just over 200,000 cases, which is the sustaining number to keep the investigative system operational. Many have contributed to this foundational-to-national-security achievement over such a short period of time, including Congress, the DNI, OPM, OMB, and the USD(I). Both industry and government Investigative Service Providers (ISPs) are also to be commended for persevering and overcoming the organizational changes, hiring challenges, and pressures to succeed so quickly in such a short timeframe.

That brings us to the second part of TW 2.0—the reform of the security clearance, suitability, and credentialing determination processes. Even the processing name is changing. It will be referred to as Personnel Vetting (PV), not credentialing, suitability, or clearance processing, as it encompasses all three. PV is the long overdue reform that began in 2008, led to the Federal Investigative Standards of 2012, and then stalled for a variety of reasons, including events leading to the 725,000 case inventory problem. This “part two” of TW 2.0 is the creation of a new vetting policy and infrastructure across the Executive Branch for the establishment of a trusted federal workforce, including contractors, vendors, and anyone working with government information and/or accessing government facilities and systems. This aspirational trust is only provided after a successful security clearance investigation or a suitability (“Public Trust” or “Fitness”) determination to include credentialing -- in other words, via the PV process.

So, what does TW 2.0 seek to accomplish through PV? PV encapsulates five scenarios of investigation: The Initial Vetting, Continuous Vetting, Upgrades, Transfer of Trust, and Re-establishment of Trust. The initial investigation as we know it today will not change dramatically from the past, as it sets the baseline for initial trust for the individual to enter the federal workforce. However, it will expand the adjudicative focus from the current adjudicative guidelines, which tend to be outcome-driven, to a more event and behavioral focus incorporating mitigation as a risk managed aspect of the adjudicative decision. Once vetted, the person becomes a trusted insider and moves into Continuous Vetting (CV).

ARTICLE

CV is the continual review of each trusted person and replaces what has been known for decades as the periodic reinvestigation (PR). It is based on automated records checks (aka the capability that supports Continuous Evaluation (CE)), self-reporting, security incident and insider threat reporting, monitoring the use of government cyber systems, time- or event-driven investigative activity, and other reporting mechanisms. CV exceeds the effectiveness and functionality of the PR, since it provides a frequent and timely assessment of each trusted person—it does not wait five or more years to be completed, as with the current PR. CV will improve the mitigation of security and safety risks because concerns are identified sooner. This permits earlier intervention and timely assistance to a trusted employee before possible serious adjudicative issues develop.

An Upgrade is the simplified means for trusted individuals to be authorized to move to a different level of trust than they currently possess without restarting the entire investigative process. An example would be upgrading from a Secret to a Top Secret clearance. Transfer of Trust allows the level of trust a person has to be reciprocated across the federal workforce; for instance, a joint duty assignment, change/addition of contracts, or change of employer. And, finally, Re-establishment streamlines re-entering the federal work environment after having separated. This eliminates the current rule that has required those having left the federal workforce for over two years to start over as if they had never been trusted previously.

Elements of these TW 2.0 scenarios had been set in motion, but the EC memorandum, informally referred to as "TW 1.5", creates a transitional state of policy, processes, and capabilities bridging the current status with the future TW 2.0 objectives of PV. For example, TW 1.5 enables federal agencies to formally transition away from the traditional PR sooner and accelerates the transition. Departments and agencies can proceed with implementation of CV standards to better mitigate trusted person and position risk and begin enrollment of national security positions into CV that comply with the traditional PR requirements.

TW 1.5 will be a measured but aggressive, persistent roll out since the National Defense Authorization Act of 2020 has funded TW 2.0 initially to the end of 2021. A major requirement will be for all federal organizations to enroll their trusted Tier 3 (Secret-cleared) and Tier 5 (Top Secret-cleared) workforce into a CE program by January 2021. DoD started this in the fall of 2018 and the DNI's "CE System" followed in the spring of 2019.

Meanwhile, budgeting, personnel, policy, procedures, and IT changes will require transition planning and implementation. To assist, the Executive Agents will work with the departments, agencies, and ISPs for PV execution and operation.

Other changes during the rest of this year will include moving toward the new Trusted Information Provider (TIP) program to reduce duplication of effort in vetting federal and industry clearance holders, and the later introduction of an annual vetting appraisal process for supervisors to identify security concerns earlier in the process for trusted staff. When fully implemented in 2022, PV will have also incorporated all credentialing and suitability determinations processing as well.

TW 2.0 introduces the modernization of a new information technology system to manage and appropriately share CV information across the federal workforce. The National Background Investigative System (NBIS), currently under development by DCSA, will be key to ensuring CV information is protected and accessible for security purposes, so that the performance of PV will be realized, compliant, measurable, and valued. Looking further into the future, although there are no changes to adjudicative policy presently, new adjudicative standards are being developed to better align security clearance, suitability, and credentialing determinations as components of PV.

To ensure all these changes are coordinated, implemented and corrective actions undertaken as necessary, oversight of the efficacy of TW 2.0 will be the responsibility of the Executive Agents. Departments and agencies will be required to demonstrate effectiveness and compliance with the EC, and eventually the NSPM, for TW 2.0 guidelines, standards, and performance requirements.

So that is TW 2.0. For national security, its reforms raise the standard of vetting across the Executive Branch and permits agencies to address possible trusted workforce member risks sooner. It is a long sought and now much anticipated reform of the federal workforce security clearance and suitability determination policies, procedures, and practices. It will impact everyone who works for or with the federal government. For you and me, these reforms and their implementation will provide us processing clarity and timeliness through PV, greater opportunity for reciprocity of access, increased understanding of responsibilities as a member of the trusted workforce, and a level of security support not imagined in the past. We should all welcome the arrival of Trusted Workforce 2.0.