



At a Glance

The EPA's Enhanced Personnel Security Program Is on Track, but Challenges to Full Implementation Remain

Why We Did This Evaluation

To accomplish this objective:

The U.S. Environmental Protection Agency Office of Inspector General conducted this evaluation to determine the EPA Personnel Security Branch's progress in implementing a fair and effective enhanced personnel security program in accordance with the director of National Intelligence's performance standards.

Executive Order 13467 requires all executive branch agencies to implement reforms to enhance their personnel security programs. These reforms are intended to establish a single vetting system for the federal government. For this evaluation, we assessed "fairness" and "effectiveness" as the extent to which the EPA is on track to achieve full implementation of the enhanced personnel security program by established milestones and is compliant with the applicable policies and guidance.

To support these EPA mission-related efforts:

- *Compliance with the law.*
- *Operating efficiently and effectively.*

To address this top EPA management challenge:

- *Managing grants, contracts, and data systems.*

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What We Found

As of October 2023, the EPA's Personnel Security Branch, or PSB, has successfully met all milestones and requirements to date to fairly and effectively implement the director of National Intelligence's enhanced personnel security program, known as the Trusted Workforce, or TW, Program. Specifically, the PSB has completed the first two of the program's three implementation steps, referred to as TW 1.25, TW 1.5, and TW 2.0. The final step, TW 2.0, must be completed by March 30, 2026, and will culminate in full implementation of the program. As of October 2023, the PSB is on track to meet full TW 2.0 implementation. To prepare for full implementation, the PSB has already adopted all applicable Office of the Director of National Intelligence policies, procedures, and controls.

The TW Program is designed to provide a continuous vetting environment that allows the PSB to track any risks to personnel security in real time. The PSB's most significant remaining challenge is ensuring that there is sufficient capacity to meet the full TW 2.0 continuous vetting requirements by the March 30, 2026 milestone. As of October 2023, the PSB had eight staff to implement the TW 1.5 requirements to provide continuous vetting services for the approximately 1,100 EPA employees classified as the Agency's national security population. Full TW 2.0 implementation will require continuous vetting services for the entire population of EPA employees and applicable contractor personnel—nearly 22,000 individuals, or 20 times the number vetted for TW 1.5. In addition, the PSB must also significantly increase the level of continuous vetting services it provides from TW 1.5 to TW 2.0 in 18 months. This rapid increase in workload, both in population served and services provided, will require sufficient implementation capacity, including more PSB staff who are appropriately trained to conduct continuous vetting tasks in a timely manner. If the PSB plans now for its additional resource needs, it will prevent delays in full TW 2.0 implementation, reduce national security risks, and ensure a fair and effective personnel security program.

If the EPA does not adequately plan to increase the PSB's capacity to respond to a 20-fold increase in employees receiving continuous vetting services, delays in processing and managing full TW 2.0 implementation may increase the risk to national security from insider threats.

Recommendation and Planned Agency Corrective Action

We recommend that the assistant administrator for Mission Support develop a plan for how the PSB will achieve the capacity necessary to meet the requirements of full TW 2.0 implementation. The Agency agreed with our recommendation and provided an acceptable planned corrective action and estimated milestone date. We consider the recommendation resolved with the corrective action pending.