



441 G St. N.W.  
Washington, DC 20548

September 26, 2024

The Honorable Mark Warner  
Chairman  
The Honorable Marco Rubio  
Vice Chairman  
Select Committee on Intelligence  
United States Senate

The Honorable Michael Turner  
Chairman  
The Honorable Jim Himes  
Ranking Member  
Permanent Select Committee on Intelligence  
House of Representatives

### Status of Open GAO Recommendations to the Director of National Intelligence

GAO's mission is to support Congress in meeting its constitutional responsibilities. We make recommendations to improve the accountability, operations, and services of government agencies and to increase the effectiveness of federal spending. In fiscal year 2023, our work yielded about \$70.4 billion in financial benefits—a return of about \$84 for every dollar invested in GAO.<sup>1</sup> We also identified 1,220 other benefits—those that cannot be measured in dollars but that led to program and operational improvements across the government, including at the Office of the Director of National Intelligence (ODNI).

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 included a provision for the Comptroller General to submit a list to the congressional Intelligence Committees and to the Director of National Intelligence (DNI) of all open recommendations made by GAO to the DNI originally by September 30, 2023, and annually thereafter through 2028.<sup>2</sup> The provision also directs the DNI to submit a report of actions taken and actions the DNI intends to take in response to each open recommendation within 120 days of receiving the list.<sup>3</sup> This report and its enclosures is our second submission, which formally transmits and communicates the final results of our work. It describes DNI's (1) progress in implementing recommendations from GAO reports issued from July 2011 through September 15, 2024; (2) initial responses to open recommendations; and (3) progress in implementing priority

---

<sup>1</sup>GAO, *Performance and Accountability Report: Fiscal Year 2023*, [GAO-24-900483](#) (Washington, D.C.: November 15, 2023).

<sup>2</sup>Pub. L. No. 117-263, § 6304 (2022). This provision requires the Comptroller General to submit the annual list no later than September 30, 2023, and each September 30 thereafter through 2028.

<sup>3</sup>GAO, *Status of Open GAO Recommendations Made to the Director of National Intelligence*, [GAO-23-106892](#) (Washington, D.C.: September 29, 2023) (2023 Letter); ODNI, *Response to GAO-23-106892: Open Recommendations for the Office of the Director of National Intelligence* (Washington, D.C.: April 2024).

recommendations.<sup>4</sup> Enclosure 1 includes a list of the open unclassified recommendations, and enclosures 2 and 3 include a list of the open classified recommendations that we have made to the DNI from July 2011 through September 15, 2024.

The scope of the engagement included all recommendations directed to the DNI in unclassified; sensitive but unclassified (SBU); and classified reports issued from July 2011 through September 15, 2024. To identify the specific recommendations directed to the DNI, we queried the GAO recommendation follow-up system for unclassified recommendations and reviewed GAO records for SBU and classified recommendations. We identified ODNI's initial response of concurrence, partial concurrence, or non-concurrence to our recommendations from reports where ODNI provided formal written comments on the associated draft reports. We were unable to provide ODNI's position on 24 open recommendations for the reports where ODNI did not provide a formal response to our recommendations in writing. To determine the status of open recommendations, we contacted ODNI officials to obtain information on ODNI's efforts to implement them.<sup>5</sup> Where applicable and when available, we ascertained ODNI's rationale for partially implementing or not implementing recommendations or for closing recommendations that we consider to be open and determined the implementation status of each recommendation based on our review of the information collected.

We conducted this performance audit from June 2024 to September 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.

## Overview of GAO Recommendations

In summary, we have made 108 recommendations to the DNI from July 2011 through September 15, 2024. ODNI has implemented 63 of those recommendations, for an implementation rate of 58 percent.<sup>6</sup> We positively note ODNI's recent focus and progress on closing recommendations; however, its implementation rate still lags significantly behind the government-wide average. In November 2023, we reported that on a government-wide basis, 75 percent of our recommendations made from fiscal year 2019 through fiscal year 2023 were

---

<sup>4</sup>Priority recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

<sup>5</sup>GAO, *Status of Open GAO Recommendations Made to the Director of National Intelligence*, [GAO-23-106892](#) (Washington, D.C.: September 29, 2023) (2023 Letter). In May 2024, ODNI responded to all 63 GAO open recommendations and stated either the actions taken to address—or stated its plans to address—the open recommendations. In addition, ODNI included its response to five additional recommendations GAO made to the DNI after the issuance of our 2023 Letter. From May 2024 through September 15, 2024, ODNI provided GAO documentation on 16 recommendations related to actions it had taken. As of September 15, 2024, ODNI did not provide GAO with documentation of actions taken to fully implement the 39 open recommendations. As a result, GAO cannot assess the steps taken to determine whether these 39 open recommendations can be closed.

<sup>6</sup>ODNI's 58 percent implementation rate reflects recommendations made to the DNI from July 2011 through September 15, 2024. We closed an additional five recommendations as not implemented, and we closed one recommendation as no longer valid.

implemented.<sup>7</sup> For this same time frame, ODNI’s implementation rate for recommendations made in fiscal year 2019 through fiscal year 2023 was 56 percent. ODNI had an implementation rate of 7 percent from fiscal year 2018 through fiscal year 2022.<sup>8</sup>

As of September 15, 2024, ODNI had not implemented 39 of the 108 recommendations to the DNI since July 2011, or 36 percent of the recommendations remained open. Table 1 provides an overview of the recommendations made and the status of their implementation from July 2011 through September 15, 2024.<sup>9</sup>

**Table 1: Recommendations Made by GAO to the Director of National Intelligence (DNI) and Implementation Status, from July 2011 through September 15, 2024**

<b>Total recommendations</b>	<b>Recommendations open or open – partially addressed<sup>a</sup></b>	<b>Recommendations closed – implemented or closed – no longer valid<sup>b</sup></b>	<b>Recommendations closed – as implemented</b>
108	39	6	63

Source: GAO. | GAO-24-107671

<sup>a</sup>GAO lists a recommendation as “open – partially addressed” when the agency has completed action(s) that contribute to the closure of the recommendation as implemented. However, the recommendations remain open until all actions to implement the recommendation have been completed. As of September 15, 2024, 8 recommendations are open – partially addressed.

<sup>b</sup>GAO does not close a recommendation because an agency does not concur with it or has said it will not take the action. However, prior to July 2023, GAO would close a recommendation as “not implemented” when circumstances have changed or in our professional judgment, sufficient time has passed, and the agency is unlikely to implement the recommendation. As of July 2023, GAO closes a recommendation as “no longer valid” when a law has been updated or terminated; when a program has been terminated, replaced, or changed; when an office is terminated (and its functions are dissolved); or when the time frame for implementation has passed. We closed one recommendation as no longer valid and closed five recommendations as not implemented.

The enclosures to this correspondence identify the 39 unclassified and classified recommendations directed to the DNI that remain open. The recommendations relate to areas of intelligence enterprise management, infrastructure and facilities, workforce management, and personnel vetting.<sup>10</sup> By fully implementing these recommendations, ODNI could improve its ability to help ensure the intelligence community best manages its workforce and infrastructure and increases the efficiency and effectiveness of its operations in support of its mission.

GAO provides responsible agency officials with an opportunity to review and provide comments on a draft of a product before it is issued. GAO seeks agency comments to ensure products are fair, objective, balanced, and complete. In its response to GAO’s draft reports, ODNI concurred

<sup>7</sup>GAO, *Performance and Accountability Report: Fiscal Year 2023*, [GAO-24-900483](#) (Washington, D.C.: November 15, 2023).

<sup>8</sup>Since the issuance of the 2023 Letter, ODNI has worked collaboratively with GAO to close recommendations. In addition to the 33 recommendations closed as implemented in fiscal year 2024, ODNI has taken actions and provided documentation that contributes to the closure of many of the remaining open recommendations. However, in instances when the evidence does not fully address the intent of the recommendations, GAO continues to work with ODNI to obtain evidence that does so. GAO has also made 10 new recommendations to ODNI since the issuance of the 2023 Letter.

<sup>9</sup>Recommendations remain open until they are designated as “closed – implemented” or “closed – no longer valid”. GAO closes a recommendation as “closed – no longer valid” when circumstances, such as when a law has been updated or terminated; when a program has been terminated, replaced, or changed; when an office is terminated (and its functions are dissolved); or when the time frame for implementation has passed.

<sup>10</sup>Due to the classified nature of some of the recommendations, additional details on the recommendations in the key areas noted in this report can be found respectively in the classified Enclosures 2 and 3.

or partially concurred with 13 of the 39 open recommendations, or 33 percent of all recommendations, made from July 2011 through September 15, 2024. However, ODNI did not provide comments on 24 of the 39 open recommendations, or 62 percent of the recommendations made since July 2011. Table 2 provides an overview of ODNI's response to the 39 recommendations, that remain open as of September 15, 2024.

**Table 2: Office of the Director of National Intelligence (ODNI) Responses to Open Recommendations Issued by GAO, from July 2011 through September 15, 2024**

Total open recommendations	ODNI concurred	ODNI partially concurred	ODNI did not concur	ODNI did not provide comments
39	12	1	2	24

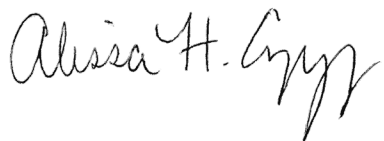
Source: GAO. | GAO-24-107671

In 2022, GAO issued its first annual priority recommendation letter to the DNI. In the letter, we designated 19 recommendations as priority recommendations.<sup>11</sup> We identified an additional five priority recommendations in our 2024 priority recommendation letter to the DNI.<sup>12</sup> As of September 15, 2024, ODNI had not implemented 11 of the priority recommendations.

-----

We are sending copies of this report to the appropriate congressional committees and DNI. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff has any questions about this report and accompanying enclosures, please contact me at (202) 512- 3058 or [CzyzA@gao.gov](mailto:CzyzA@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 key contributions to this report include Jennifer Andreone (Assistant Director), Hannah Elliott (Analyst-in-Charge), Kasey Hudson, Demetrios Marinides, Tracy Barnes, and Michele Fejfar.



Alissa H. Czyz  
 Director, Defense Capabilities and Management

Enclosures – 3

<sup>11</sup>GAO, *Priority Open Recommendations: Office of the Director of National Intelligence*, [GAO-22-105852](#) (Washington, D.C.: September 1, 2022). In May 2023, we issued the second annual priority recommendation letter to the DNI. We did not designate any additional recommendations as priority recommendations in our 2023 Letter. GAO, *Priority Open Recommendations: Office of the Director of National Intelligence*, [GAO-23-106579](#) (Washington, D.C.: May 11, 2023). Since our May 2023 letter, ODNI implemented eight of the 19 open priority recommendations, and we closed one priority recommendation as “closed – no longer valid”.

<sup>12</sup>GAO, *Priority Open Recommendations: Office of the Director of National Intelligence*, [GAO-24-107337](#) (Washington, D.C.: June 17, 2024). In June 2024, we issued the third annual priority recommendation letter to the DNI where we designated five priority recommendations, in addition to the 10 remaining priority recommendations that remained open from [GAO-23-106579](#).

## Enclosure 1: Overview of Open Unclassified Recommendations to the Director of National Intelligence in GAO Reports from July 2011 through September 15, 2024

Table 3 outlines the unclassified recommendations made to the Director of National Intelligence from July 2011 through September 15, 2024, that remain open.

**Table 3: List of Open Unclassified Recommendations Made by GAO to the Director of National Intelligence (DNI) from July 2011 through September 15, 2024**

GAO report title and number	Recommendation	Priority recommendation	DNI response
<i>Personnel Security Clearances: Additional Guidance and Oversight Needed at the Department of Homeland Security and Department of Defense to Ensure Consistent Application of Revocation Process</i> , <a href="#">GAO-14-640</a> (Washington, D.C.: September 8, 2014)	To facilitate department-wide review and assessment of the quality of the personnel security clearance revocation process, the Director of National Intelligence (DNI) should, in consultation with the Secretaries of Defense and Homeland Security, develop performance measures to better enable them to identify and resolve problems, and direct the collection of related revocation and appeals information. (Recommendation 9)	No	Concur
	To help ensure that similarly situated individuals are treated consistently, and to facilitate oversight and help ensure the quality of the security clearance revocation process, the DNI should review whether the existing security clearance revocation process is the most efficient and effective approach. In this review, the DNI should consider whether there should be a single personnel security clearance revocation process used across all executive-branch agencies and workforces, with consideration of areas such as the timing of the personal appearance in the revocation process, and the ability to cross-examine witnesses. Further, to the extent that a single process or changes to the existing parallel processes are warranted, the DNI should consider whether there is a need to establish any policies and procedures to facilitate a more consistent process, and recommend as needed, any revisions to existing executive orders or other executive-branch guidance. (Recommendation 13)	No	Concur
<i>Personnel Security Clearances: Plans Needed to Fully Implement and Oversee Continuous Evaluation of Clearance Holders</i> , <a href="#">GAO-18-117</a> (Washington, D.C.: November 21, 2017)	The DNI should, once ODNI has further defined the continuous evaluation program, to include issuing a Security Executive Agent Directive and developing an implementation plan, in coordination with the Deputy Director for Management of the Office of Management and Budget in the capacity as Chair of the Security, Suitability, and Credentialing Performance Accountability Council, assess the potential effects of continuous evaluation on agency resources and develop a plan, in consultation with implementing agencies, to address those effects, such as modifying the scope of periodic reinvestigations, changing the frequency of periodic reinvestigations, or replacing periodic reinvestigations for certain clearance holders. (Recommendation 6)	No	Partial concur
<i>Personnel Security Clearances: Additional Actions Needed to Ensure Quality, Address Timeliness, and Reduce Investigation Backlog</i> , <a href="#">GAO-18-29</a>	The DNI, in his capacity as Security Executive Agent, and in coordination with the other Security, Suitability, and Credentialing Performance Accountability Council (PAC) Principals--the Deputy Director for Management of the Office of Management and Budget in his capacity as Chair of the PAC, the Director of the Office of Personnel Management, and the Under Secretary of Defense for Intelligence--should conduct an evidence-based review of the investigation and adjudication timeliness objectives for	Yes	Non-concur

(Washington, D.C.: December 12, 2017)	completing the fastest 90 percent of initial secret and initial top secret security clearances. (Recommendation 2) <sup>a</sup>		
	The DNI, in his capacity as Security Executive Agent, and in coordination with the other PAC Principals—the Deputy Director for Management of the Office of Management and Budget in his capacity as Chair of the PAC, the Director of the Office of Personnel Management, and the Under Secretary of Defense for Intelligence—should develop a government-wide plan, including goals and interim milestones, to meet those timeliness objectives for initial personnel security clearance investigations and adjudications. (Recommendation 3)	No	Non–concur
<i>Intelligence Community: Actions Needed to Improve Planning and Oversight of the Centers for Academic Excellence Program</i> , <a href="#">GAO-19-529</a> (Washington, D.C.: August 1, 2019)	The DNI should define and document comprehensive performance measures for the Intelligence Community Centers for Academic Excellence (IC CAE) program, collect and evaluate the completeness and reliability of information it receives from grant recipients and IC elements, and report this information on a regular basis. (Recommendation 4)	No	Concur
	The DNI should establish a requirement for and develop a plan to periodically evaluate the IC CAE program's performance through objective measurement and systematic analysis. (Recommendation 5)	No	Concur
	The DNI should develop a process for assessing why some IC elements are not participating in the IC CAE program and address these reasons in order to ensure the program is structured to meet the needs of IC elements. (Recommendation 6)	No	Concur
<i>National Security Space: Actions Needed to Better Use Commercial Satellite Imagery and Analytics</i> , <a href="#">GAO-22-106106</a> (Washington, D.C.: September 7, 2022) <sup>b</sup>	The DNI, in coordination with the Secretary of Defense, should ensure that the National Geospatial-Intelligence Agency (NGA) and the National Reconnaissance Office develop specific performance goals and measures that would support progress toward the goal of maximizing the use of commercial satellite imagery. (Recommendation 3)	No	No comment
	The DNI, in coordination with the Secretary of Defense, should ensure that NGA, in coordination with IC and DOD stakeholders, develops guidance to establish specific roles and responsibilities for commercial analytic services that use remote sensing data. The guidance should note the components responsible for addressing resourcing visibility and for identifying performance goals and measures related to commercial analytic services that use remote sensing data. (Recommendation 4)	No	No comment
<i>Violent Extremism: Agencies' and Financial Institutions' Efforts to Link Financing to Domestic Threats</i> , <a href="#">GAO-23-105928</a> (Washington, D.C.: September 13, 2023)	The Director of National Counterterrorism Center, in consultation with FBI and DHS, should ensure its process for developing any future updates to the U.S. Violent Extremist Mobilization Indicators booklet clarifies that Treasury can and should seek input and expertise from Financial Crimes Enforcement Network on potential financial indicators. (Recommendation 1)	No	No comment
<i>Federal Real Property: Improved Data and Access Needed for Employees with Disabilities Using Secure Facilities</i> , <a href="#">GAO-24-107117</a>	The DNI should ensure that the Director of the National Counterintelligence and Security Center, in collaboration with each of the sensitive compartmented information facilities (SCIF) accrediting agencies, develops and implements a plan outlining steps for SCIF accrediting agencies to report data on their inventory of SCIFs in a timely manner in accordance with Intelligence Community Directive 705. (Recommendation 1)	No	No comment

(Washington, D.C.: January 9, 2024) <sup>c</sup>	The DNI, in coordination with the IC element heads, should issue updated or new guidance that identifies minimum specifications for common accessibility concerns at entrances and within SCIFs, including automatic door openers, accessible door locks and intrusion detection systems, and tactile signage. (Recommendation 2)	Yes	No comment
	The DNI, in coordination with the IC element heads, should issue updated or new guidance that addresses accessibility in the annual SCIF security inspection process. This process could include an accessibility checklist to all federal agencies to identify and address—to the maximum practicable—physical access barriers to and inside SCIFs. (Recommendation 3)	No	No comment
<i>Federal Workforce: Actions Needed to Improve the Transfer of Personnel Security Clearances and Other Vetting Determinations</i> , <a href="#">GAO-24-105669</a> (Washington, D.C.: January 22, 2024)	The DNI should follow best practices for evaluating the reliability of the data that agencies submit related to security clearance reciprocity. Such best practices include interviewing knowledgeable officials about their data systems, reviewing data system documentation to determine if data entry controls are sufficient, and tracing a sample of data to or from source documents to assess the accuracy and completeness of the data. (Recommendation 1)	Yes	No comment
	The DNI should develop and implement a plan that addresses agencies' concerns that led them to mistrust some other agencies' security clearance processes. (Recommendation 2)	No	No comment
	The DNI should facilitate access to secure facilities and systems for agencies to ensure they can make reciprocity determinations. (Recommendation 3)	No	No comment
	The DNI, in coordination with the Director of the Defense Counterintelligence and Security Agency, should develop and implement a plan to ensure that current and future IT systems used for personnel vetting contain complete and accurate information required to make security clearance reciprocity determinations (Recommendation 4)	Yes	No comment
	The DNI should issue clarifying guidance, such as by updating Security Executive Agent Directive 7, to address whether communicating with prior agencies is permitted in the security clearance reciprocity process and, if so, under what circumstances. (Recommendation 6)	No	No comment
	The DNI should develop and implement a plan that accounts for contractor and agency concerns—with consideration of resource and privacy issues—to ensure that contractors are informed about the status of reciprocity determinations when there are delays. (Recommendation 8)	No	No comment

Source: GAO. | GAO-24-107671

Notes: From 2011 through 2013, GAO issued seven reports with 20 recommendations made to DNI. These 20 recommendations are “closed as implemented” and are not reflected in table 3. The information provided under “DNI response” indicates the status of ODNI’s response to our recommendation(s) at the time of the product’s issuance.

<sup>a</sup>This recommendation is “open – partially addressed”. A recommendation status is listed as “open – partially addressed” when the agency has completed action(s) that contribute to the closure of the recommendation as implemented. However, the recommendation remains open until all actions to implement the recommendation have been completed.

<sup>b</sup>GAO issued a classified version of this report under GAO-22-105072C with the same recommendations. The report at the higher classification is not included in Enclosure 2 so as to not double count the recommendations.

<sup>c</sup>GAO issued a sensitive version of this report under GAO-23-106120SU with the same recommendations. The report at the higher classification is not included in Enclosure 2 so as to not double count the recommendations. In its March 2024 response to GAO-23-106120SU, ODNI noted that it concurred with recommendations made in the report.

---

---

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



---

---

## GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

---

## Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

---

## Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

---

## Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).  
Subscribe to our [RSS Feeds](#) or [Email Updates](#). Listen to our [Podcasts](#).  
Visit GAO on the web at <https://www.gao.gov>.

---

## To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/about/what-gao-does/fraudnet>

Automated answering system: (800) 424-5454 or (202) 512-7700

---

## Congressional Relations

A. Nicole Clowers, Managing Director, [ClowersA@gao.gov](mailto:ClowersA@gao.gov), (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

---

## Public Affairs

Sarah Kaczmarek, Managing Director, [KaczmarekS@gao.gov](mailto:KaczmarekS@gao.gov), (202) 512-4800, U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548

---

## Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707 U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548

