

ADVISORY: Insider Threat Program Activities and Compliance with Trusted Workforce 2.0

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Trusted Workforce (TW) 2.0 is a clearance reform effort designed to modernize and transform the Federal personnel vetting arena across the Executive Branch. Key to TW 2.0 is the implementation of continuous vetting (CV) programs embedded within all Department and Agencies (D/As), pivoting away from the traditional periodic reinvestigation process. Adjudicatively relevant insider threat information is a critical piece of CV programs. However, agency specific Insider Threat Programs, while complementary of personnel security programs, including continuous vetting (CV) and other federal investigative reform initiatives, are independent from and not specifically a part of CE, CV, or TW 2.0.

Departments and Agencies have expressed concern that full implementation of TW 2.0 *may* require (D/As) insider threat programs be assessed at Fully Operational Capability (FOC) with User Activity Monitoring (UAM) being a specified requirement under TW 2.0. It is important to clarify that relevant insider threat information serves as partial fulfillment to the agency specific information required for each CV program, but InTh programs operating at FOC with robust UAM is not a mandated requirement.

TW 2.0 is an iterative process and is currently pivoting towards an implementation transitional state. D/As are required to have their national security populations enrolled in the minimum continuous vetting program by 30 Sept. 2021. Mature agency specific information must be embedded within their continuous vetting programs by 30 Sept. 2022. Full TW 2.0 compliance is reliant on several other policy modifications to include, but not limited to, adjudicative and investigative standards.

In summary, the National Insider Threat Task Force advises that:

- TW 2.0 continues to develop, but will not be fully implemented prior to FY 2023
- Transitional states moving towards TW 2.0 are TW 1.25 and TW 1.5. TW 1.5 is a more
 mature CV program, utilizing seven automated record checks, agency specific information
 and time and event driven investigative activity. TW 1.5 compliance replaces the need for
 traditional periodic reinvestigations.

 Neither TW 1.25 nor TW 1.5 require a D/A to have an insider threat program assessed at FOC, but processes should be established to share relative information with their respective personnel vetting teams

It is important to note that at this writing the specific requirements of TW 2.0, although generally agreed upon, have not been finalized.

NITTF POC: If you have any questions regarding this Advisory, please contact the NITTF at <a href="https://nitrack.nit

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