

BEST PRACTICES IN VETTING PROSPECTIVE AND CURRENT EMPLOYEES



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Executive Summary

The 2019 Public-Private Analytic Exchange Program (AEP) Best Practices in Vetting Prospective and Current Employees (herein referred to as Best Practices) Team conducted research into how organizations across multiple sectors employ a variety of procedures to hire and retain the right people for the right positions. We narrowed the focus of our research based on Key Intelligence Questions (KIQs) and we identified consistent hurdles facing most organizations. The Team, comprised of individuals from National Security/intelligence entities, defense contractors, and the banking and manufacturing sectors, also chose to modify the assigned topic to include all potential “personnel” of each organization, instead of only focusing on direct “employees.”

More specifically, our research examined how organizations vet prospective and current personnel, respond to technological challenges, and design procedures to be as cost-effective and efficient as possible. The Team collected data via interviews—both on-site and telephonic—created an online survey, and conducted a literature review. The resulting data revealed how, when, and why personnel are vetted for employment, while also taking into account the potential impacts of not vetting, or improperly vetting, personnel. The impacts can take the form of insider threats, negligent actions, and other negative events.

Based on our research, we assess organizations can improve hiring and retention practices through a focus on ensuring cultural fit within the business unit and the overall organization. Additionally, we assess that technology investment is only cost-effective if there is a resulting improvement in hiring/promotions timeframes. Further, properly ordering and standardizing the process, along with the institution of a form of recurrent vetting, are key to selecting and retaining personnel that bring the most value to the organization.

Recommendations

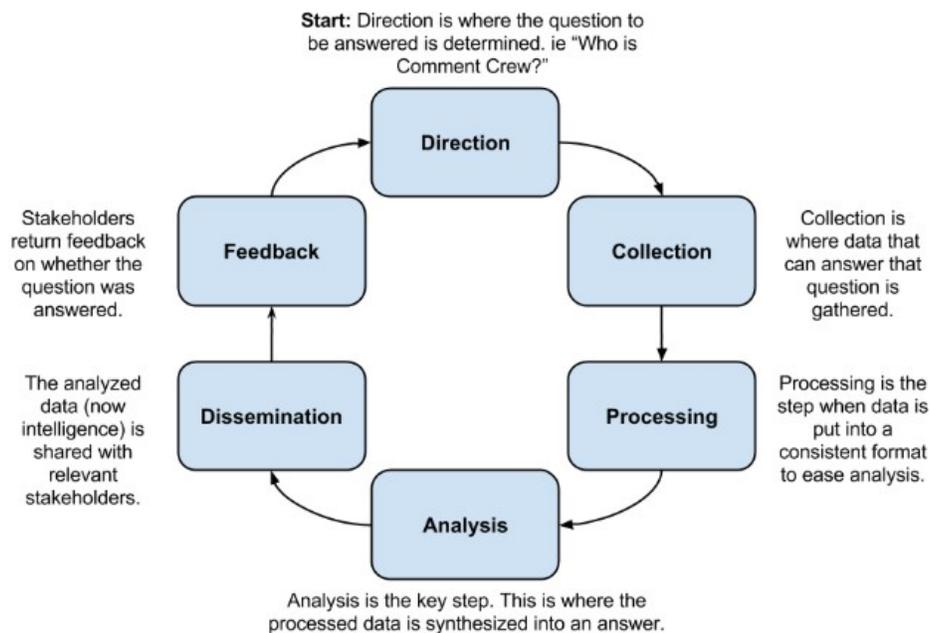
The themes in the chart below emerged in our interviews and surveys of a diverse cross-section of organizations. The following recommendations are limited in scope, and do not touch directly upon legal implications due to the lack of human resources and legal professionals participating on the Best Practices Team. We recommend organizations conduct HR and legal reviews of these recommendations prior to implementation.

| Theme | Action |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Organizational Culture | Incorporate culture into hiring process from first contact with applicants through the end of any evaluation/training period. |
| 2. Recurrent/Continuous Vetting | Leverage technology and reporting procedures to get ahead of potential issues. |
| 3. Standardized Process | Ensure interview questions, order of vetting procedures, and all review periods are consistent. |
| 4. Collaborate Across Industries | Institute information-sharing avenues, where possible, to identify additional best practices. |
| 5. Speed is Critical | Invest in/prioritize technology that speeds hiring and vetting procedures. Conduct less expensive processes first to create cost-savings. |

Methodology and Key Intelligence Questions (KIQs)

The Best Practices Team selected the Intelligence Cycle—see graphic below—as the primary methodology to complete the project. We selected this methodology as it includes a feedback loop to promote ongoing discussion of best practices as informed by stakeholder lessons learned.

The Intelligence Cycle



During the initial Team meeting as part of the 2019 AEP Kick-Off on March 25, 2019, the following overarching KIQ was identified during the direction phase:

“What are best practices an organization can implement for vetting prospective, current, and departing personnel in order to prevent negative events?”

The Team agreed we would not focus on:

- The federal clearance process;
- Legal constraints/requirements;
- Human resources/equal employment processes.

Overall, we agreed that organizational vetting procedures fit within the overall risk management framework of an organization.

The Team then conducted an open source literature review in order to understand prior research, to identify emerging trends, and to assist in developing sub-KIQs. Specifically, we wanted to clarify our understanding of the "vetting" field, to determine the broader context of why vetting is done, and to define key concepts and ideas. Much of the academic research we reviewed emphasized military careers and the hiring of veterans and was published by U.S. east coast institutions. Our review found that there was a great deal of emphasis in existing research on the federal security clearance processes and criminal "background checks," especially within the government sector.

- Of note, we found that ASIS International's second edition of the Pre-employment Background Screening Guideline¹ particularly helpful in identifying the difference between "background checks" and the team's more holistic viewpoint of "vetting." The guideline is an educational and practical tool that organizations can use as a resource in understanding the reasons for pre-employment background screening of job applicants, as well as the legal principles surrounding the issue of pre-employment background screening.

As the project progressed and the Team prepared for interviews and a research trip, we selected the following sub-KIQs to assist in answering the overarching KIQ and develop survey and interview questions as part of the collection phase:

- Should there be different levels of vetting for different levels of employment?
- What are state-of-the-art technologies that can assist with vetting?
- Which industries have best practices for vetting?
- What are the current fatal flaws with all vetting practices (e.g., as National Crime Information Center checks)?
- What are some recommendations for statutory changes?
- How can vetting tools crosscut with other initiatives, such as insider threat, and workplace violence?
- How do we improve the processes for employment checks?
- Can industries have a baseline of sharing information?
- What are the legal challenges of vetting practices?

¹ ASIS International. (2009-02-02). *Preemployment Background Screening Guideline*. (ASIS GDL PBS-2009).

From July 22-26, 2019, the Team conducted a research trip to the greater Chicago (IL) area. We selected this area because it has a large number of organizational headquarters; we were able to leverage local contacts to interview a number of diverse organizations. Conducting research on dissimilar organizations was in an attempt to determine if there were similar, effective vetting practices that may applied to most organizations. During the trip, we interviewed numerous organizations and were able to apply the fluid aspects of the intelligence cycle by consistently funneling our focus, resulting in more effective interviews and leading to more in-depth analysis. After the completion of the research trip, the Team conducted additional telephone interviews, and all of the gathered data was processed within a collaboration tool provided by the AEP.

Introduction to Vetting

The Best Practices Team initially researched the inherent need for vetting and the risks of failing to substantively vet personnel. The frequency and purpose of vetting varies between countries, industries, and individual organizations. The Team chose to focus on vetting within the United States, while looking for techniques and procedures that may be shared across as many organizations as possible.

The overall purpose of vetting identified by the Team is to investigate whether the right individual is selected for the right position. Selecting the right person the first time can result in a considerable cost-savings. According to Glassdoor, the average organization in the U.S. spends about \$4,000 and 24 days to fill a position.² It is detrimental to hire a candidate only to learn that their personality does not fit or that they bring no value to the organization.³ Many organizations have a standardized vetting system in place, and many contract parts of it out (e.g., third parties that specialize in conducting background screenings). The more important the role offered in the organization, the more in-depth vetting typically is.

Organizations choose to perform due diligence vetting of candidates when they are hired, promoted, or change positions. These checks reveal information about a job candidate's character, reputation, and experience by reviewing data such as financial information, civil records, education, licensing, criminal records, and employment history. According to the Society for Human Resource Management (SHRM), approximately 69% of organizations reported that they conduct criminal background checks on all of their jobs. Additionally, 18% of organizations conduct criminal checks on select job candidates, and 14% do not conduct criminal checks on any job candidates.⁴ These checks are important because they manage risk; organizations have the responsibility to keep their personnel and customers safe, with negligent hiring case law first appearing in a 1908 when an apprentice's prank killed a fellow employee.⁵

² Glassdoor Team. (2019-07-05). *How To Calculate Cost-Per-Hire*. Retrieved from: <https://www.glassdoor.com/employers/blog/calculate-cost-per-hire/>.

³ Levine, L. (n.d.). *Then and Now: How The Hiring Process Has Changed*. Retrieved from <https://hr.sparkhire.com/best-hiring-practices/now-hiring-process-changed/>.

⁴ SHRM. (2012-07-19). *Research & Surveys*. Retrieved from: <https://www.shrm.org/hr-today/trends-and-forecasting/research-and-surveys/Pages/criminalbackgroundcheck.aspx>.

⁵ Howard, R. (2018-01-26). *The History of Employment Background Screening*. Retrieved from <https://blog.verifirst.com/the-history-of-employment-background-screening>

Effective vetting procedures result in saving time and money during the hiring process by eliminating unqualified candidates, choosing someone who will be a good fit in the organization, and decreasing the possibility of personnel committing acts that violate policy/law, to include those related to insider threats. According to a study by SHRM, organizations need to spend the equivalent of six to nine months of one's salary in order to find and train their replacement. Doing the math, someone salaried at \$60,000/year will cost the organization anywhere from \$30,000 to \$45,000 to hire and train a replacement.⁶

It is common practice to vet onboarding personnel, but the vetting of current and exiting personnel is approached differently within all organizations. Some require additional vetting for positions of greater responsibility, but few organizations conduct continuous vetting through the years, and fewer still vet personnel who will be nonvoluntarily separating. More so, research has shown that “the 30-day period both before and after an employee has left an organization is critical and requires increased focus for [continuous evaluation] programs. There are notable instances of insiders looking to cause damage in the event of nonvoluntary separation and other instances in which employees have taken organizational intellectual property to bring to their next job.”⁷

Continuous vetting was implemented by the Office of the Director of National Intelligence (ODNI) and the Department of Defense to provide information regarding personnel with access to classified information or hold a sensitive position. As defined in Executive Order 13467, as amended, continuous vetting means reviewing the background of a covered individual at any time to determine whether that individual continues to meet applicable employment requirements.⁸ During a test pilot of 1.1 million government and industry continuous vetting cases, 8% of cases triggered an alert. More specifically, 74% of those were financial issues and 18% were criminal.⁹

⁶ Kantor, J. S., & Crosser, A. (2016-02-11). *High Turnover Costs Way More Than You Think*. Retrieved from: https://www.huffpost.com/entry/high-turnover-costs-way-more-than-you-think_b_9197238.

⁷ RAND Corporation. (2019). *Assessing Continuous Evaluation Approaches for Insider Threats: How Can the Security Posture of the U.S. Departments and Agencies be Improved?* Retrieved from: https://www.rand.org/content/dam/rand/pubs/research_reports/RR2600/RR2684/RAND_RR2684.pdf.

⁸ Executive Order 13467, as amended, (2016-09-29). *Amending the Civil Service Rules, Executive Order 13488, and Executive Order 13467 To Modernize the Executive Branch-Wide Governance Structure and Processes for Security Clearances, Suitability and Fitness for Employment, and Credentialing, and Related Matters*. Retrieved from: <https://www.federalregister.gov/documents/2017/01/23/2017-01623/amending-the-civil-service-rules-executive-order-13488-and-executive-order-13467-to-modernize-the>.

⁹ Sutphin, M. J. (2018-08-14). *NISPPAC Security Policy Updates*. Retrieved: https://classmgmt.com/nisppac/nisppac_presentation_Aug_2018.pdf.

The vetting process also typically includes analyzing a candidate's resume. This can help weed out a significant number of applicants who may have embellished their resume. For example, one applicant falsely claimed to be a Nobel Prize winner, while another listed a prior employer from whom they had embezzled money, resulting in an outstanding arrest warrant for the applicant.¹⁰

¹⁰ Grasz, J., & Lorenz, M. (2015-08-13). *CareerBuilder About Us*. Retrieved from: <https://www.careerbuilder.com/share/aboutus/pressreleasesdetail.aspx?ed=12/31/2015&id=pr909&sd=8/13/2015>.

Advancements in Technology

Vetting of personnel has transformed dramatically over the years, in large part due to technological advances. Prior to the internet, an organization looking to expand its team had to hope that a qualified individual saw their posting in a local newspaper, magazine, or heard about it via word of mouth. Historically, recruiting was limited, with hiring managers often finding themselves interviewing the same candidates over and over again to fill vacancies. They often would have to choose less qualified candidates, simply because of a limited candidate pool.

Technology has changed how both organizations and job candidates deal with employment. It has allowed organizations to make drastic improvements in the hiring process over the last 20 years, from allowing organizations to expand their reach in searching for candidates to scheduling and conducting interviews. There are now software solutions and third-party companies that aid organizations in scheduling interviews in a more efficient manner. Organizations also leverage virtual interviewing technologies, which saves a great deal of time and money. Use of such technology results in a better sense of the candidate rather than relying merely on phone interviews or paying for travel expenses.¹¹

Organizational processes have evolved to ensure the hiring process is as easy and transparent as possible.¹² The Team learned during interviews that one Fortune 500 company is developing a revised app to make it easier and seamless for job candidates to apply for a job, all with a focus on a positive first experience with the organization. Their purpose is to provide the applicant with a simple and straightforward way of applying for positions within the organization. This will provide them with a larger pool of applicants and give them a better chance of hiring a good candidate.

Likewise, technology enables organizations conduct cyber vetting to look at who the candidate is as an individual based on a public persona derived from social media accounts. Some organizations choose to review accounts and the general World Wide Web for photos, postings/comments, previous work experience, etc., to look for inaccurate or concerning information. Conversely, many organizations do not review candidate's social media accounts due to privacy concerns, potential discrimination claims, and the fact that information may not be accurate.

¹¹ Levine, L. (n.d.). *Then and Now: How The Hiring Process Has Changed*. Retrieved from <https://hr.sparkhire.com/best-hiring-practices/now-hiring-process-changed/>.

¹² Ibid.

Survey

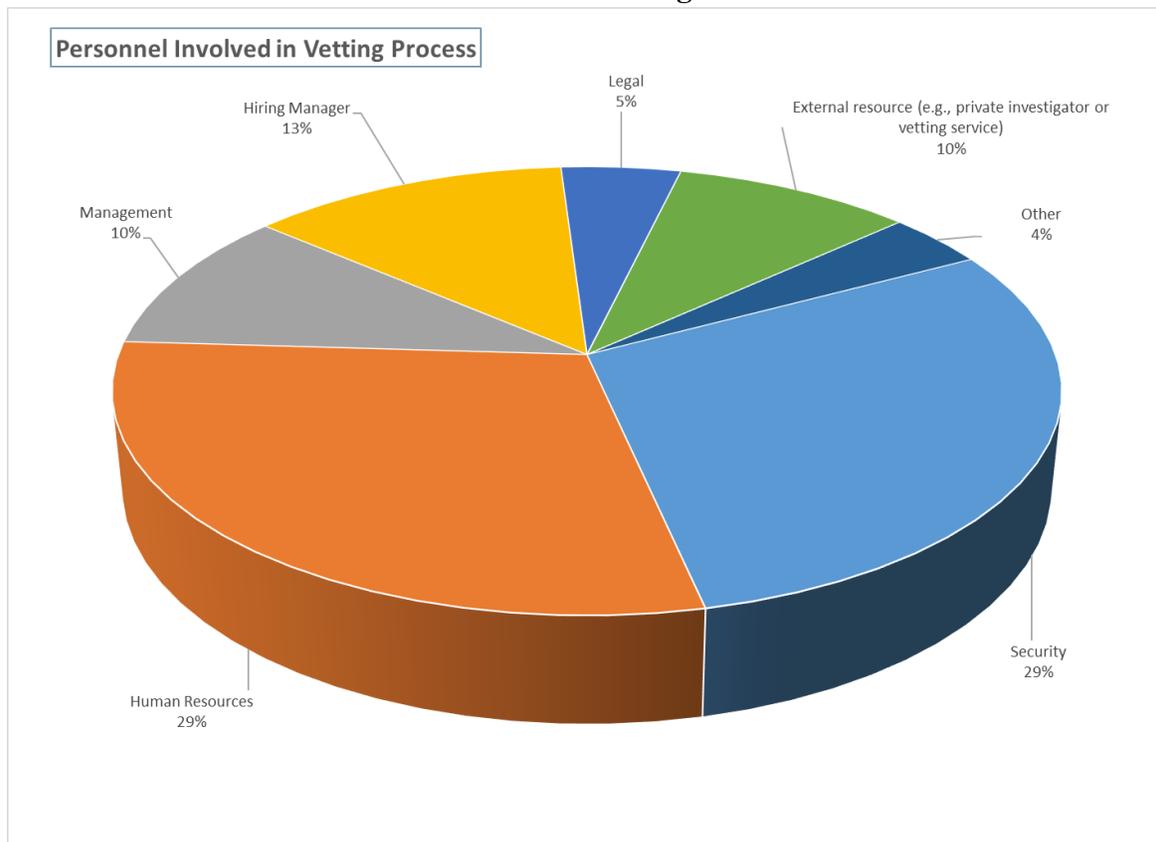
The Best Practices Team developed an online survey consisting of 29 questions to elicit information related to aspects of organizational hiring and vetting processes. There were 107 responses, and the survey was open for approximately two months.

Survey Sample

Of those who responded, 32.7% represent public sector organizations while the remaining 67.3% represent private sector organizations. With regard to organizational size, 26.1% of the respondents are from companies with less than 100 employees, while 24.3% are from companies with greater than 5,000 employees.

Analysis of Survey Data

1. Functional Roles of those who Perform Vetting



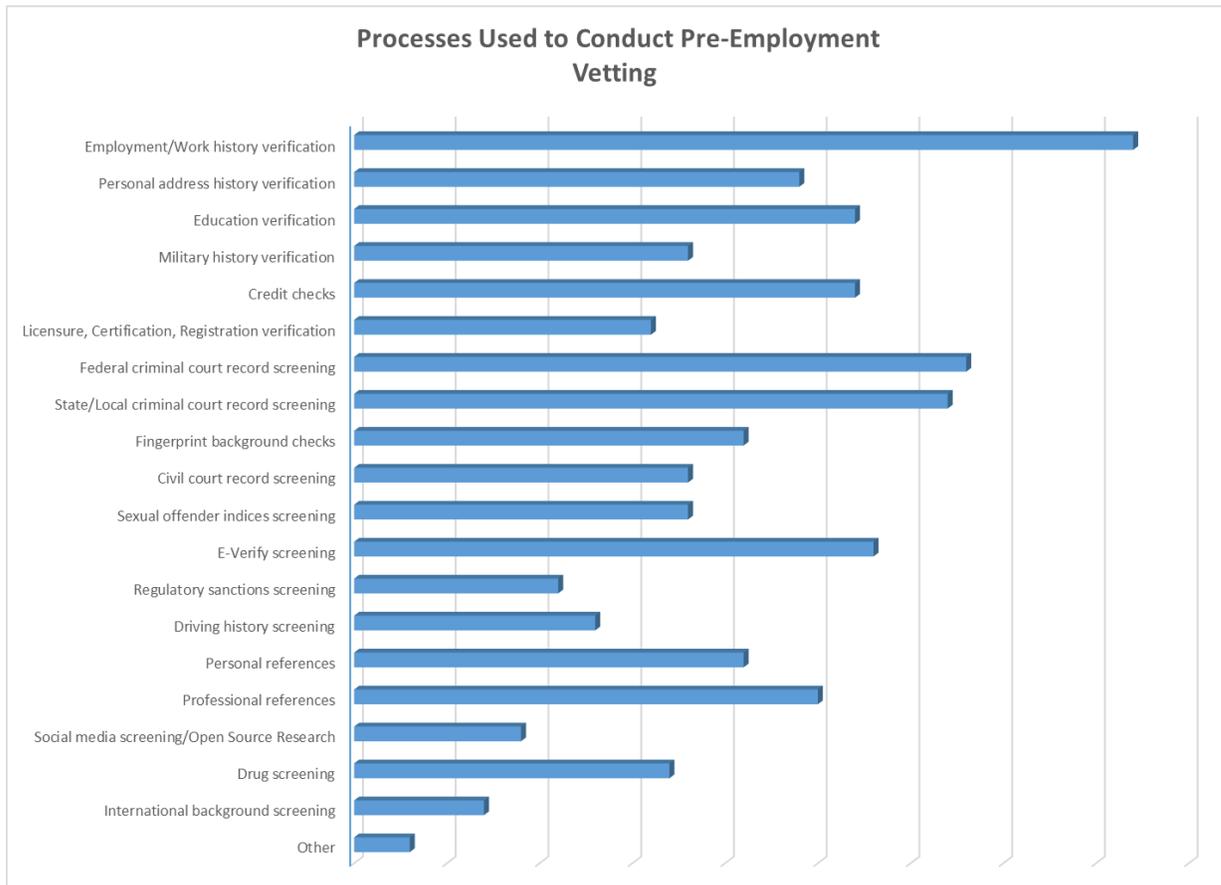
A majority of respondents indicate that vetting is a function of the human resources and/or security entities within their organizations. (See Figure 1). *Note:* Respondents were able to make multiple selections if more than one entity was responsible for vetting personnel.

Figure 1. Personnel Involved in the Vetting Process

2. Common Processes Used

The three most common processes used during pre-employment vetting are (see Figure 2):

- Employment/Work History Verification
- Federal Criminal Court Record Screening
- State/Local Court Record Screening



In-person interviews conducted by the Team revealed a trend toward the use of social media screening and open source research as a valuable vetting tool. While not evident in the online survey, the Team did discuss the benefits and disadvantages during the interviews.

Figure 2. Processes Used to Conduct Pre-Employment Vetting

3. Frequency of Recurrent/Continuous Vetting

The Team sought to determine what, if any, recurrent vetting of personnel is conducted after onboarding. Respondents to the survey indicate that most organizations conduct some form of recurrent vetting, although the frequency varies. The durations range from annually to every five years. Other responses indicate that there is additional vetting when there is a change of position, such as lateral move or promotion, or a notification of a significant life event, such as marriage or divorce.

4. Other Considerations from the Survey

Respondents provided additional insight into vetting practices:

- 28% of respondents indicate personnel are permitted to work pending a background check, while 16.8% indicated personnel must await final adjudication before beginning employment.
- 36% of respondents indicate inaccurate application information, criminal histories, or findings that an applicant was ineligible for a position, were the primary reasons they were unable to offer employment to or retain personnel.
- 22.4% of respondents indicate adjudication of personnel was completed in under two weeks, and another 13.1% indicated adjudication was completed within two to four weeks.
- 36.4% of respondents currently have, and 4.6% are developing, some form of an insider threat program. In addition, 35.5% employ specific procedures to minimize insider threats within their organizations.

Key Findings

During the Team’s research trip, several overarching themes emerged. We assess these to be the most significant findings of the project. The prevailing message from all the organizations interviewed was that they desired to hire “*The Right Person for the Right Position*,” rather than simply hiring an individual who exhibits the desired credentials and/or work experience. The Team assesses the additional findings identified below support this predominant theme. More importantly, these findings may be useful discussion points for organizations to self-assess whether or not current vetting procedures satisfactorily mitigate negative events (e.g., workplace violence, insider threat, legal, business, reputational risk, and high turnover rates).

Effective Processes

1. Ensure the Applicant fits the Organizational Culture

“A company’s culture is the personality of a company. It defines the environment in which personnel work. Company culture includes a variety of elements, including work environment, company mission, value, ethics, expectations, and goals.”¹³

Personnel thrive both inside and outside of the workplace when they identify with a workplace culture. Positive organizational culture was a recurring theme during the Team’s interviews. Culture can and should be blended into the hiring process, either formally or informally. Every touch point of the hiring process should be a point of reference for overall fit. The Team discovered the following during their research:

- One organization asks each interviewee to recall the name of the assistant who greeted them and set them up for the interview, as a way to gauge the candidate’s desire to get to know potential co-workers.
- Another organization uses job fairs to screen potential applicants for cultural fit.
- One Fortune 500 company conducts a *standardized* cultural fit assessment, which includes behavioral-based questions at the beginning of candidacy. This assessment forms a baseline for evaluation of personnel who apply for new positions.
- As part of their visible culture, one organization utilizes every single interaction with applicants as a screening method to ensure that they are hiring people who are respectful of all. This is an informal process based on one-on-one feedback, and it is highly effective in removing candidates from consideration when there is not a cultural fit.

¹³ Doyle, A. (2019-05-04). *Understanding Company Culture*. Retrieved from <https://www.thebalancecareers.com/what-is-company-culture-2062000>.

- One organization encourages all personnel recruit potential applicants based on cultural fit. As an additional check for cultural fit, all new-hires receive a formal mentor from a different department and an informal “onboarding buddy” which supplements the standardized evaluation process with their supervisor.
- Several organizations interviewed by the Team practiced some form of *servant leadership*, or an *inverted leadership model*, where key management positions strive to develop and empower their personnel. This type of leadership model as organizational doctrine appears to lead to high levels of satisfaction in the workplace.

The commitment of personnel to the organization is a major contributor to how well an organization functions. Perceptions of servant leadership practices and the support of senior personnel and co-workers has a positive effect on one's family life. Servant Leadership is also said to decrease emotional exhaustion, which is the leading cause of burnout.¹⁴

2. Hire Those Who Believe in the Mission

Personnel who feel their work is meaningful and who possess a vested interest in the success of the organization and its mission are less likely to become discontented. Several phrases involving meaningful work arose from interviews: personnel desired to “make a difference,” “give back,” or to “be part of something greater than themselves.”

- One organization we interviewed is 100% employee-owned. The organization advertises the term “owners” when looking for new talent. They stressed that this structure results in significantly higher vested interest in the organization and its management, processes, and even in the care of their manufacturing equipment. This harkens back to the key finding of positive “culture.”
- Several of the organizations interviewed focused on personnel retention, contentment, and education and training programs. One organization offers onsite, accredited degree programs for all staff. Others conduct periodic checks for job fit, satisfaction, and identify advancement training to keep personnel engaged. Other organizations highlight the importance of comprehensive Employee Assistance Programs to help personnel in time of need or crisis, inside or outside of the workplace. Additionally, others use surveys to identify if personnel needs are being met, to identify unknown issues, and to create another feedback mechanism.

¹⁴ Tang, Guiyao; Kwan, Ho Kwong; Zhang, Deyuan; Zhu, Zhou (2015-02-04). "Work–Family Effects of Servant Leadership: The Roles of Emotional Exhaustion and Personal Learning". *Journal of Business Ethics*. **137** (2): 285–297.

3. Standardization is Critical

The Team assesses that standardization increases the odds of hiring the right person for the right position. Not having a standardized vetting process is one of the biggest hiring mistakes. Some use of personality testing might be beneficial, though any use needs to be a standardized part of the hiring process and should be reviewed for legal implications.

Organizations that embrace the enterprise risk management approach to vetting—including staff from a variety of departments such as legal, human resources, and security—enable sound hiring decisions with a consistent team approach. Ways to standardize the vetting process might include:

- *Conduct Rigorous Background Checks and Interviews.* Standardizing the vetting process is vital - from conducting rigorous background checks to the fullest extent of the law, down to the order and type of the interview questions used. Behavioral-based interview questions are beneficial and utilized by several of the organizations we interviewed, with many of those stating that they gather much more useful information about job fitment from these types of questions than by other traditional methods.
- *Continuous/Ongoing Vetting.* One organization conducts a continuous evaluation program for personnel depending on organizational department, type of work, and level of position. This is conducted in similar fashion to the federal government’s security clearance process; personnel with higher or more sensitive access within the organization are subjected to more comprehensive vetting.
 - *Annual Reviews.* A standardized annual review process can be a valuable continuous evaluation tool by which to screen personnel for concerning behavior, job fit, and cultural fit in addition to work performance. This requires training raters to recognize and report indicators as soon as possible.
- *Eligibility list.* One organization utilizes an internal “not eligible for re-hire” list where all personnel terminated for cause were banned from future employment with that organization. This list is not published or provided to other organizations within the same industry, partially due to potential legal concerns. It is a risk management tool to screen all applicants who were previously terminated for adverse behavior or poor performance.
- *Personality Assessments.* Several of the organizations incorporate a personality assessment tool into their hiring processes. Measuring “soft” attributes, including but not limited to, ambition, humility, respect, integrity, emotional intelligence, empathy, and drive can ensure not only position-specific competencies, but also cultural fit. The assessments are tailored for each position’s desired attributes. Some organizations use a more comprehensive personality assessment when hiring for senior leadership positions versus entry-level positions.

- *Team Approach.* One organization embraces an enterprise risk management approach to hiring decisions. The human resources staff works closely with the legal department when making hire/no hire determinations based on review of applicant derogatory information. The organization conducted a similar process known as the “return to work” team, which conducts drug screens and background checks for returning personnel who have been on extended absence.
- *Exit Surveys and Interviews.* One organization stressed the importance of conducting exit surveys for departing personnel. Exit surveys, when part of a standardized process, can help to answer the “why” and can identify ways to improve future relationships within the organization.

4. Evaluation/Training Periods Ensure a More Holistic Vetting Process

The Team assesses implementation of an evaluation process¹⁵ as valuable to ensuring that the right person is hired for the right position. An evaluation period enables an organization to monitor work performance and identify areas for improvement; but more importantly, it may help to prevent future negative events by detecting behavioral concerns and determining successful cultural integration into the organization.

- Several organizations use an evaluation period ranging from 45-180 days and assigned more senior staff members to new hires during this period. Some of these are relatively informal, while others are formalized and integrated into new-hire training programs.
- One organization emphasizes feedback related to new-hires from personnel who oversaw an initial training program. Management sought feedback related to cultural fit, on and off-duty behavior, and training progress from other individuals who interact with the new-hires.
- Another organization implemented an onboarding program that involves two-way mentoring, to re-energize long-term employees and to share skills across personnel with different experiences.

¹⁵ Overman, S. (2019-01-23). *Are Probationary Periods Passé?* Retrieved from <https://www.shrm.org/resourcesandtools/hr-topics/talent-acquisition/pages/are-probationary-periods-pass%C3%A9.aspx>.

Common Challenges

1. Legal

During interviews, we encountered a few consistent themes with respect to legal challenges surrounding vetting. There are a multitude of laws/rules/regulations/policies and organizational culture/standards to track and measure. Additionally, recurrent vetting can be highly dependent on union rights/collective bargaining. Further, validating candidate references and conducting social media checks can raise legal concerns.

2. Timing

Timing is critical. Organizations with long vetting processes lose out on talent who do not wish to wait for a decision to be made.

3. Expense

Vetting for cultural fit should occur at the beginning of the process. By screening out candidates sooner rather than later, more expensive portions of the process (background checks, drug screening) only need to be completed on candidates that are more likely to be hired.

4. Other

Many smaller organizations struggle with a process to understand and validate the attributes needed for all positions being advertised.

Conclusions

The Best Practices Team entered into this project with a set of preconceived beliefs. Being comprised of analysts mostly from security/law enforcement/national intelligence backgrounds, there was a natural gravitation towards the general concept of background checks versus the whole-person concept. As the Team identified and overcame inherent biases, we adopted the idea of taking a much broader perspective of vetting. As a result, we focused on how organizations find the best job fit that results in successful employment from the perspective of both the organization and the personnel.

Our research indicates that organizations, regardless of size or industry, face similar challenges when it comes to hiring the right people for the right positions. Access to technology that can streamline the hiring process is a cost vs. benefit consideration, and small companies under 10 personnel face just as much of a challenge in understanding and navigating the multitude of hiring regulations as a multi-national Fortune 500 organization.

Despite inherent challenges, a tried-and-true method of vetting involves taking into account the workplace culture, to include tying together the interview process with organizational goals. More specifically, many successful organizations test candidates for a cultural fit by either long-standing informal processes, or through well-established formal means such as personality tests or job fairs.

With a rise of negative events being reported through social/national media, it has become even more important for organizations to conduct thorough and continuous vetting of personnel in order to not only prevent negative events, but to reduce the impact of association to issues that arise from third-parties. There can be grave impact to the parent organization should a vendor, affiliate, or subcontractor have personnel engage in harmful activity when directly associated to the organization. This inter-relatedness indicates that the vetting process often affects multiple organizations when a negative event occurs.

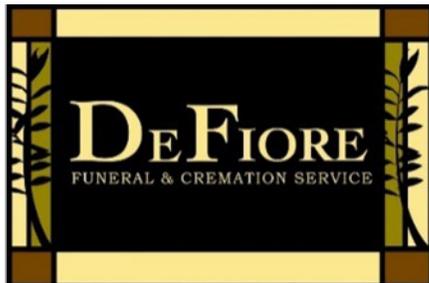
Based on our review, we make the following recommendations, which are limited in scope, due to the lack of human resources and legal professionals on our team. While we did interview human resources, security, and other individuals involved in the hiring and vetting process for this project, we recommend that no organization implement any changes to their vetting process prior to a relevant internal legal and human resources review.

- Incorporate organizational culture and/or mission-specific goals into the hiring process. Having a formal or informal method of communication amongst all personnel who have interactions with a candidate, from first contact all the way through an evaluation/training period, increases the likelihood that the right person is selected and retained for the right position.

- Institute a form of recurrent/continuous vetting (may be technology-centric, or issuance of standardized reporting guidelines) of current personnel to get ahead of potential issues. Focusing on prevention and programs for assistance reduces the stigmas associated with self-reporting or reporting on co-workers.
- Standardize the vetting process, to include the interview questions, the order of the procedures, and implementation of consistent review periods to validate the process while ensuring it is compliant with all policies, regulations, and laws.
 - More specifically, we recommend organizations research the use of behavioral-based interview questions as a method to gain a better understanding of both the cultural and technical fit of candidates. In addition, a thorough review of the costs of each vetting procedure can lead to more efficiency and cost savings, by placing less expensive portions that tend to disqualify a higher number of candidates during the beginning of the process.
- Invest only in technology (e.g., case management software) that is assessed to be cost-effective in terms of improving hiring/promotions timeframes. A common factor expressed by the majority of the Team's interviewees is that candidates will regularly exit the hiring process if they perceive it as moving too slowly.
- Innovate within and across industries to identify common hindrances, legal impacts, and effective ways of vetting prospective candidates. Increased information sharing will lead to the expansion of best practices and innovative solutions to common challenges.

Acknowledgements

Over 100 organizations completed our online survey to provide baseline information relevant to the topic of vetting. Additionally, the Best Practices Team wishes to express our sincere appreciation for the time and insights contributed by the following organizations that participated in formal interviews of which some of our conclusions and recommendations are drawn from:





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Note: We are grateful for the unique insights we received from interviewees and survey respondents who contributed to the body of knowledge utilized in this white paper. The Best Practices Team takes full responsibility for any errors of fact or interpretation, implied or explicit, referenced herein.

AEP Explained

The Department of Homeland Security (DHS) Office of Intelligence and Analysis (I&A) has a robust private sector engagement section whose mission is to ensure that private sector critical infrastructure owners and operators and private sector decision-makers are equipped with the intelligence and information necessary to fulfill their mission requirements. In today's dynamic and ever-evolving threat environment, it is not only important for both the public and private sector to maintain situational awareness, but also to actively coordinate and collaborate. It is only by building partnerships and proactively sharing information that we can grow our knowledge base and protect our great Nation – as well as the private organizations within it.

Each year, public and private sector subject matter experts are paired up to develop unclassified analytic deliverables of interest to the U.S. Government and private sector entities. DHS serves as the Executive Agent of the AEP on behalf of the ODNI. This annual program provides an opportunity to bring together intelligence community personnel with individuals or organizations outside the intelligence community in order to explore ideas and alternative perspectives; gain insights; or generate new knowledge and recommendations on how to improve upon intelligence community priorities and further other national security goals.

This program enables government, intelligence community, and private sector analysts to gain a greater understanding of how their distinct missions can benefit from public-private collaboration on topics of mutual interest. Topic teams publish unclassified analytic deliverables, which are disseminated across the government and private sector and are available to the public. Teams have been asked to present their work at various conferences and association events.

Definitions

The Best Practices Team developed the following definitions to ensure a clear understanding of the terms used during the research process. The Team reviewed definitions in common and professional use, developed draft definitions of terms, and then revised the definitions based on the best fit for the topic and the KIQ.

Vetting is the process of thoroughly investigating an individual in order to ensure selecting the right people for the right positions.

Prospective personnel are those who have submitted an application for employment, or are negotiating in relation to possible employment or services rendered.

Departing personnel are those who are voluntarily or involuntarily ceasing their business relationship with the organization.

Personnel are employees, officers, directors, agents, personnel, representatives, and contractors/subcontractors/temporary workers.

Impacts are the effects that events have on an organization, its personnel, their families, and the overall community.

A **negative event** is one that has the potential or actual ability to create adverse outcomes for the organization.

Feedback

The AEP approved the Best Practices Team to continue with a second phase of our project in calendar year 2020 to conduct additional research into potential KIQs related to exiting personnel, and how legal components validate vetting criteria to include accounting for conscious and subconscious biases. We solicit all feedback in order to follow-through on the intelligence cycle methodology.

You may contact the AEP at AEP@HQ.DHS.GOV. Please be sure to include “Best Practices Team Feedback” in the subject line.