Exhibit 4
-- Filed Under Seal --

[Instructor: If you have not previously been introduced, please tell students who are you and why are you qualified to teach this course.]

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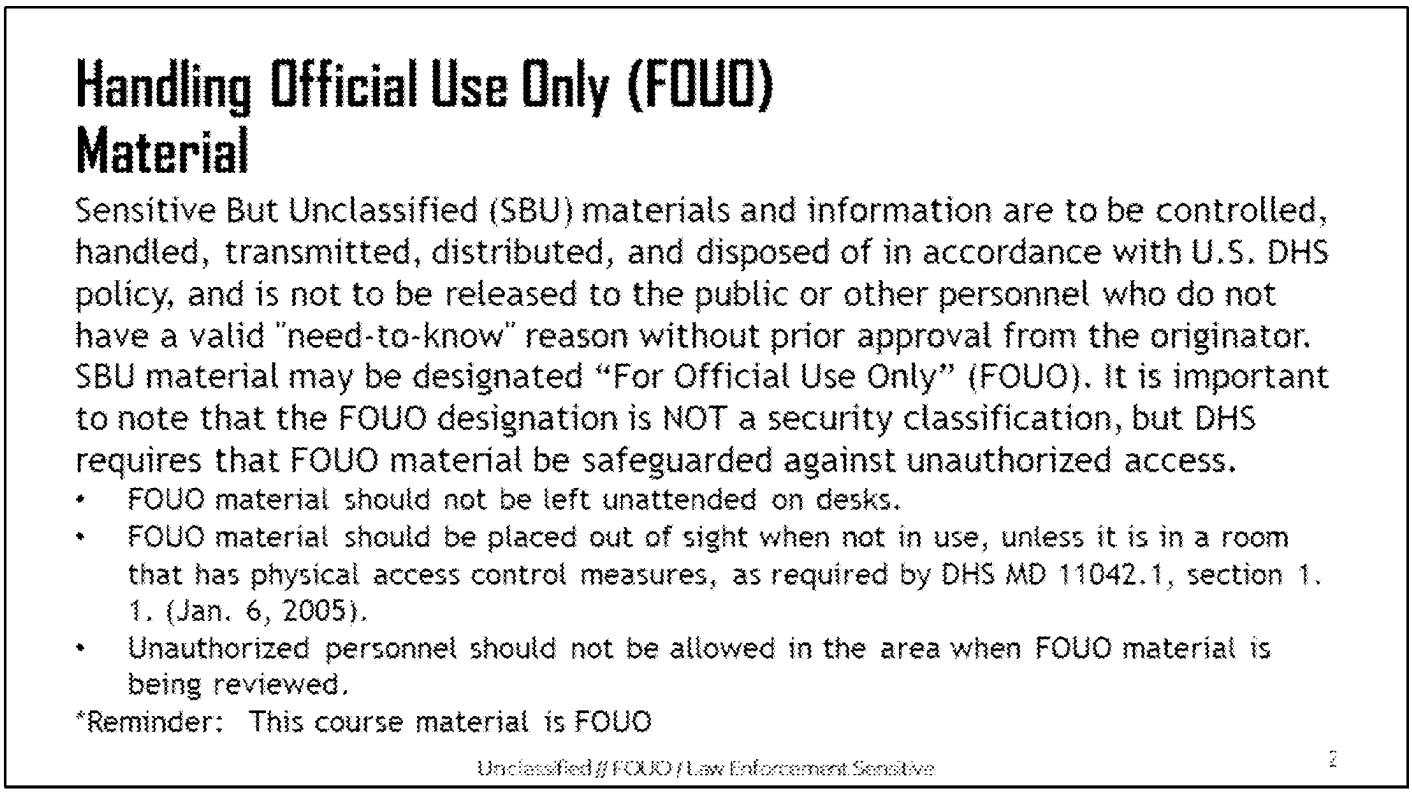

Say:

Just another reminder that the CARRP process and all materials related to CARRP are For Official Use Only (FOUO) and should be handled accordingly.

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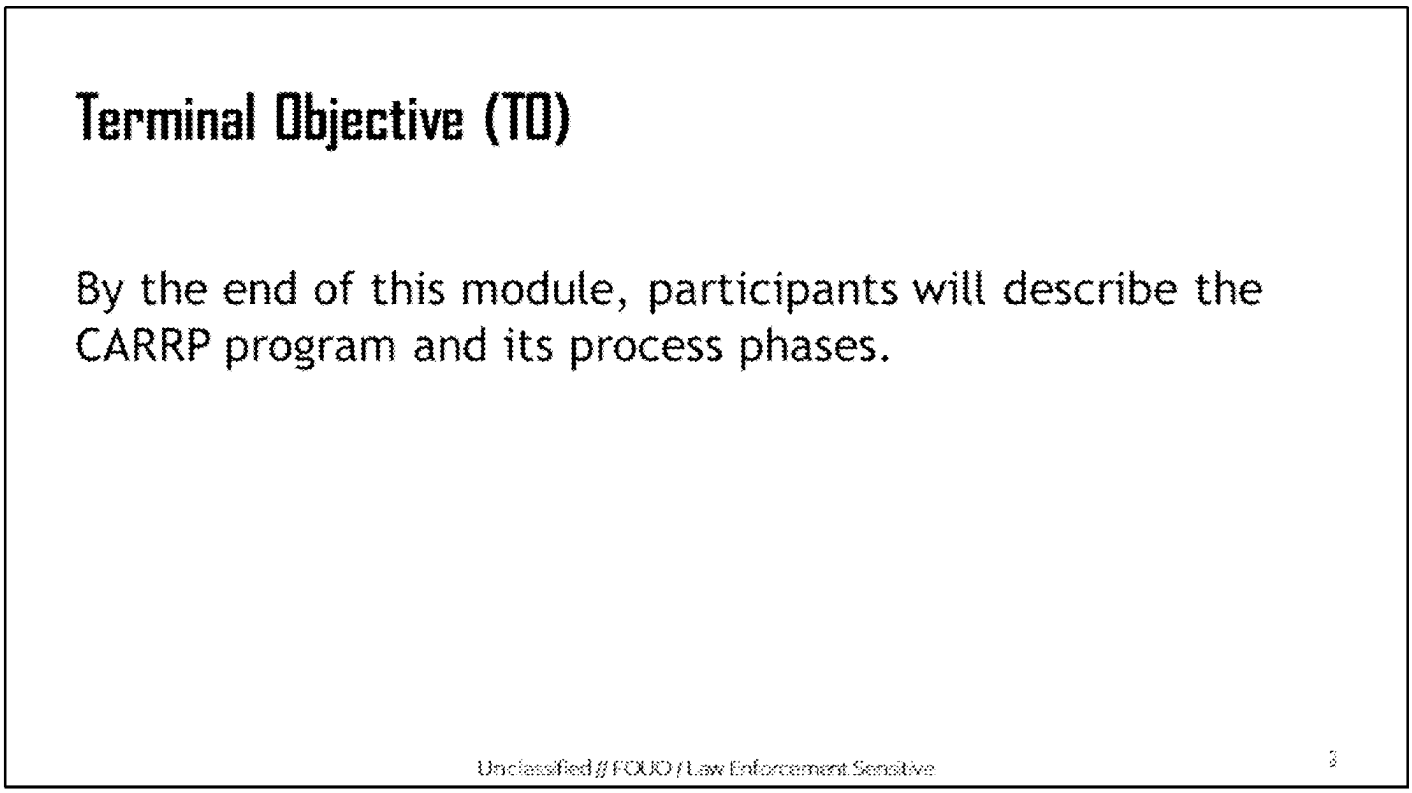

Say:

Our main objective for this module is that by the end you will have a general understanding of the CARRP program and its process phases.

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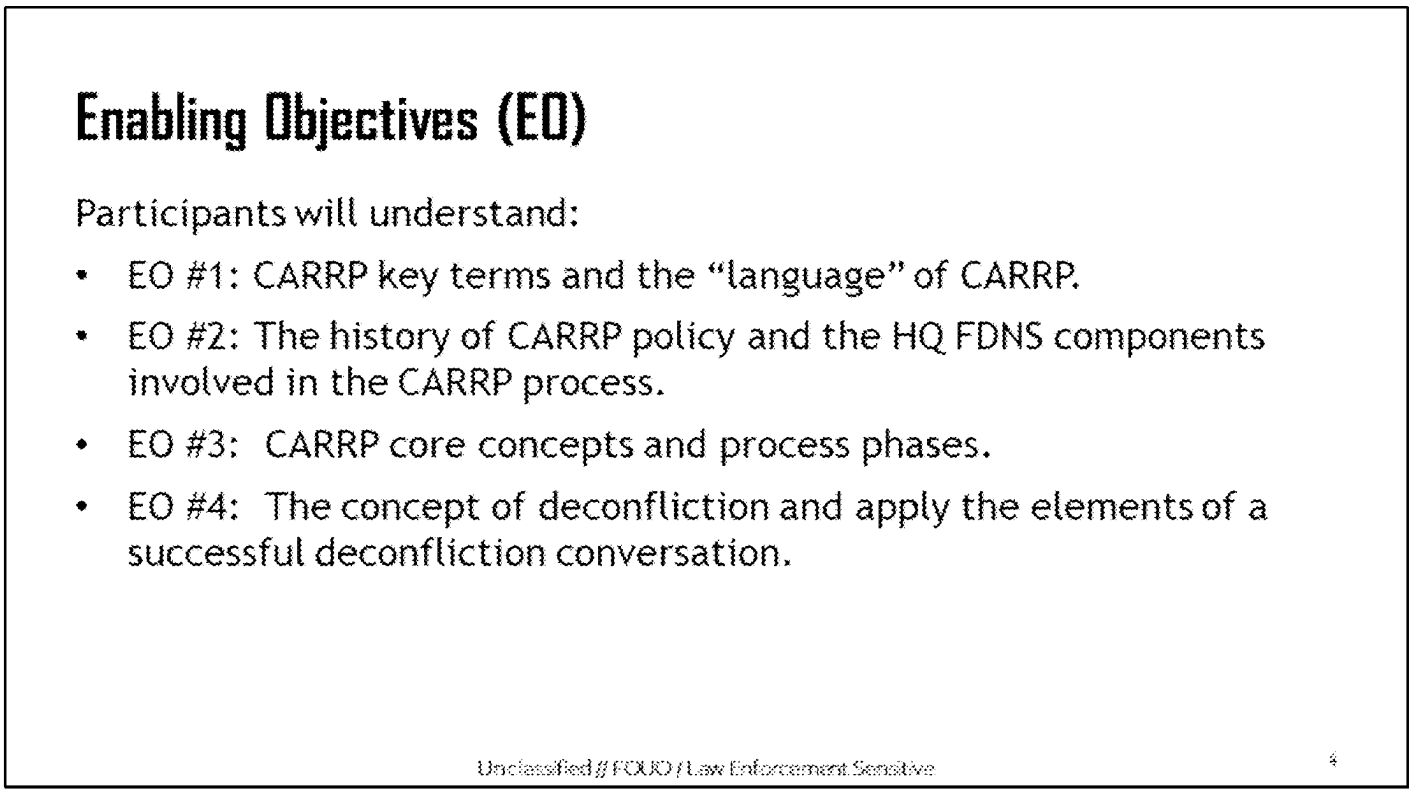

Say:

In this module we'll first discuss CARRP key terms. Second, we'll discuss the history of CARRP, the HQ FDNS entities involved in the process, and relevant policy documents. Third, we'll discuss CARRP core concepts and the various phases of the CARRP process. Lastly, we'll discuss deconfliction and how to have a deconfliction conversation with a law enforcement officer (LEO).

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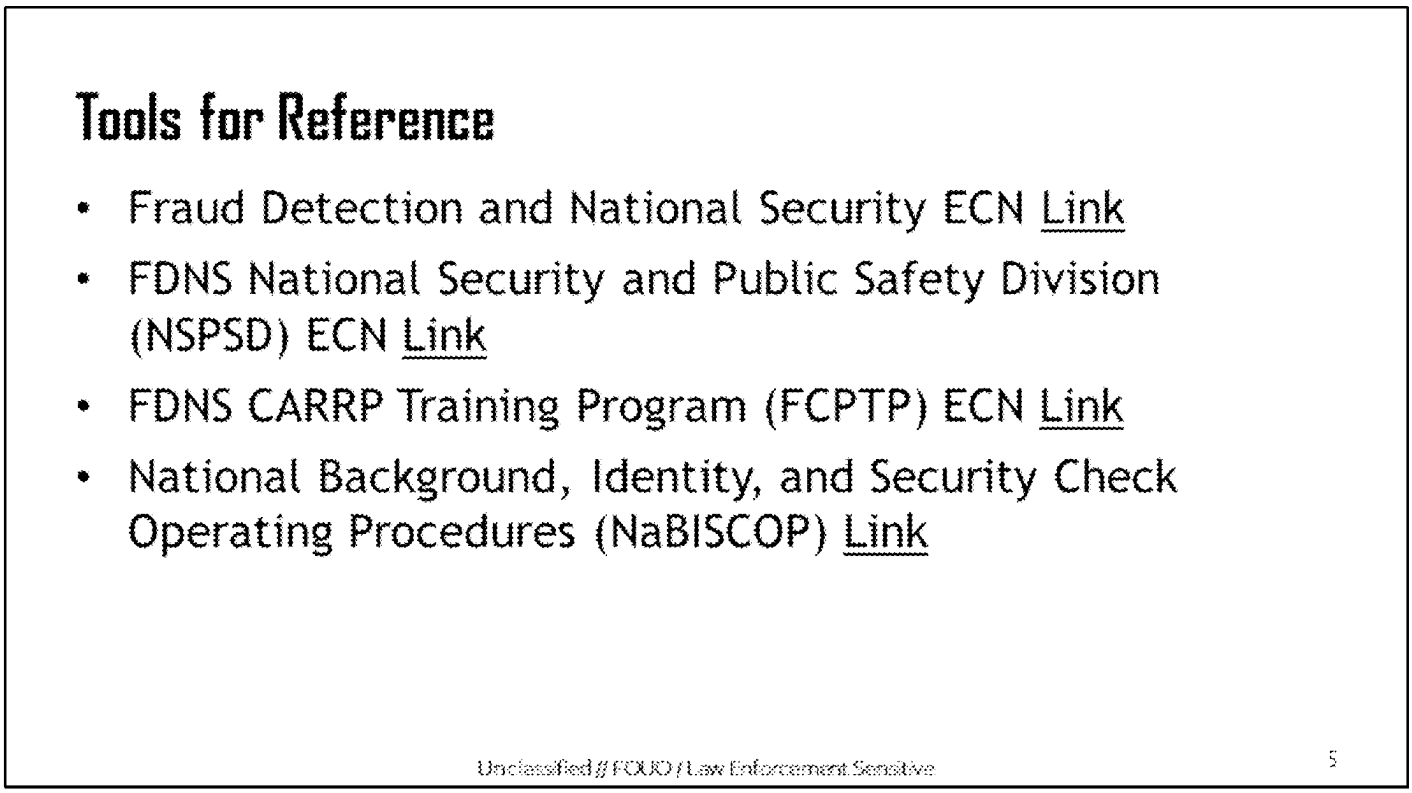

Say:

This slide provides you with links to various reference tools you may find helpful during this course, or when working CARRP cases in the future. Links are provided to the FDNS ECN page, the NSPSD ECN page, the FCPTP ECN page (our course page), and the National Background, Identity, and Security Check Operating Procedure (NaBISCOP) site. The tools listed on this slide do evolve and change over time, so please check back regularly for additional information and to verify accuracy.

The training materials for this course are located on the FCPTP ECN page. For more information on screening and vetting procedures, the NaBISCOP is a useful reference tool. We will reference the NaBISCOP throughout the CARRP modules.

[Facilitator: Copy and paste links into the chat.]

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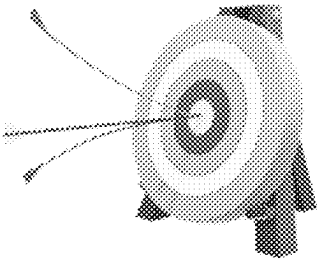
Module 2: CARRP Overview

- Build a common vocabulary for discussing CARRP cases.
- Understand USCIS policies impacting CARRP cases.
- Learn the four phases of the CARRP process.
- Characterize the discrete elements of an NS concern.
- Understand FDNS-DS documentation requirements for CARRP cases.
- Distinguish CARRP from other USCIS policies.
- Discuss what CARRP is not.
- Be able to have a deconfliction conversation.



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Say:

The goal of this section is to explain to the class what we will discuss in Module 2, because it covers multiple topics. By explaining the sections and then key terms by groups, hopefully you can take outline-style notes if that is helpful to you.

This module is your introduction to CARRP. Think of this section as an overview – your 50,000 foot look in to the CARRP process. Everything we talk about in this module, such as roles in the process, DS entry, etc., will be covered in greater detail as we look at the individual phases of the CARRP process later in the course.

We will also be talking about the common vocabulary used in CARRP. This is very important, so it isn't something we will gloss over. In order for any the CARRP training to make sense, we all need to be able to speak the "language" of national security. The vocabulary we use must be accurate and consistent.

In addition to discussing CARRP vocabulary, we will talk about CARRP policy, the various process phases, the elements of a national security, or "NS" concern, and how CARRP cases are documented in FDNS-DS. Moreover, we

will distinguish CARRP policies from other USCIS policies, talk about what CARRP is not, and how we carry out deconfliction conversations.

[Go to the next slide.]

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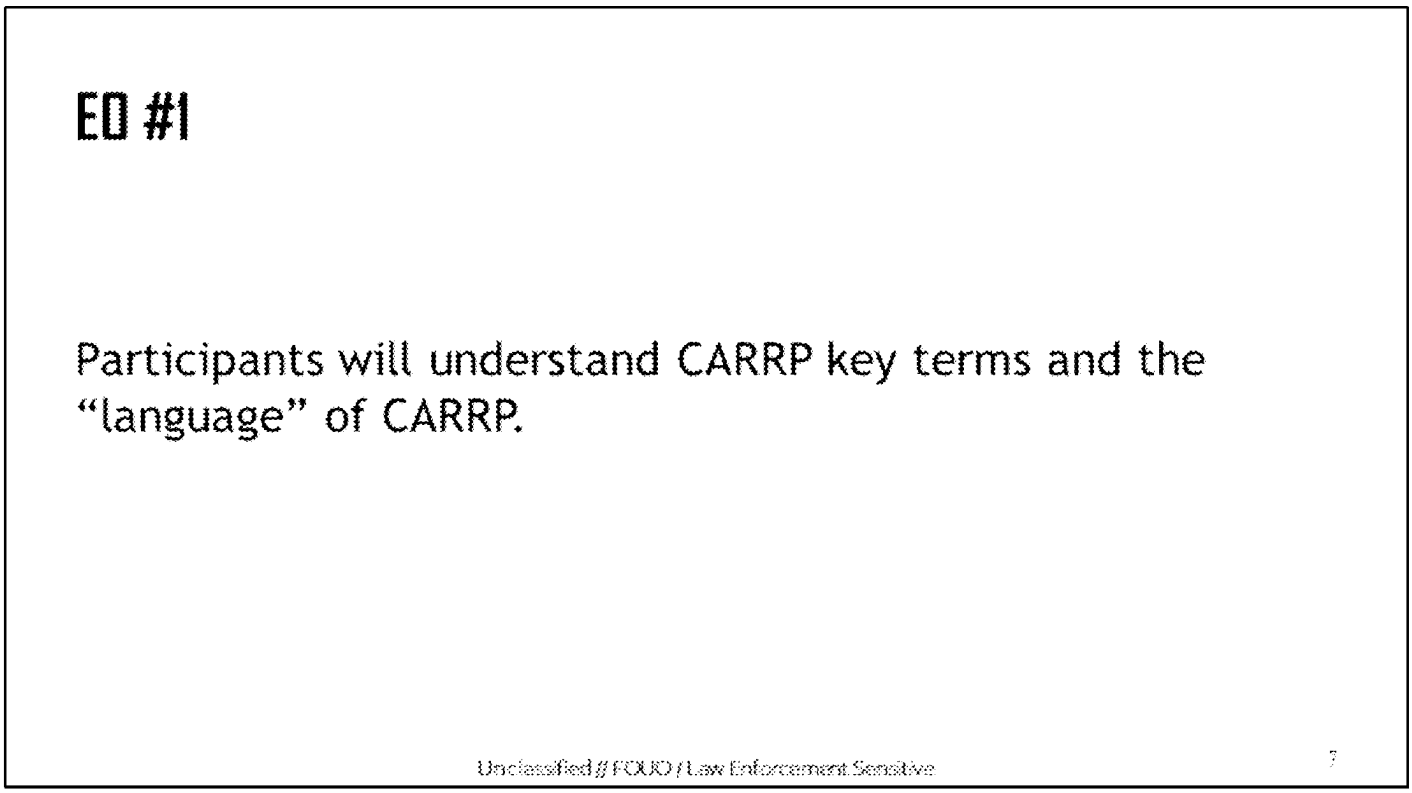

Say:

The objective of the first section of this module is to introduce you to CARRP key terms and the "language" of CARRP.

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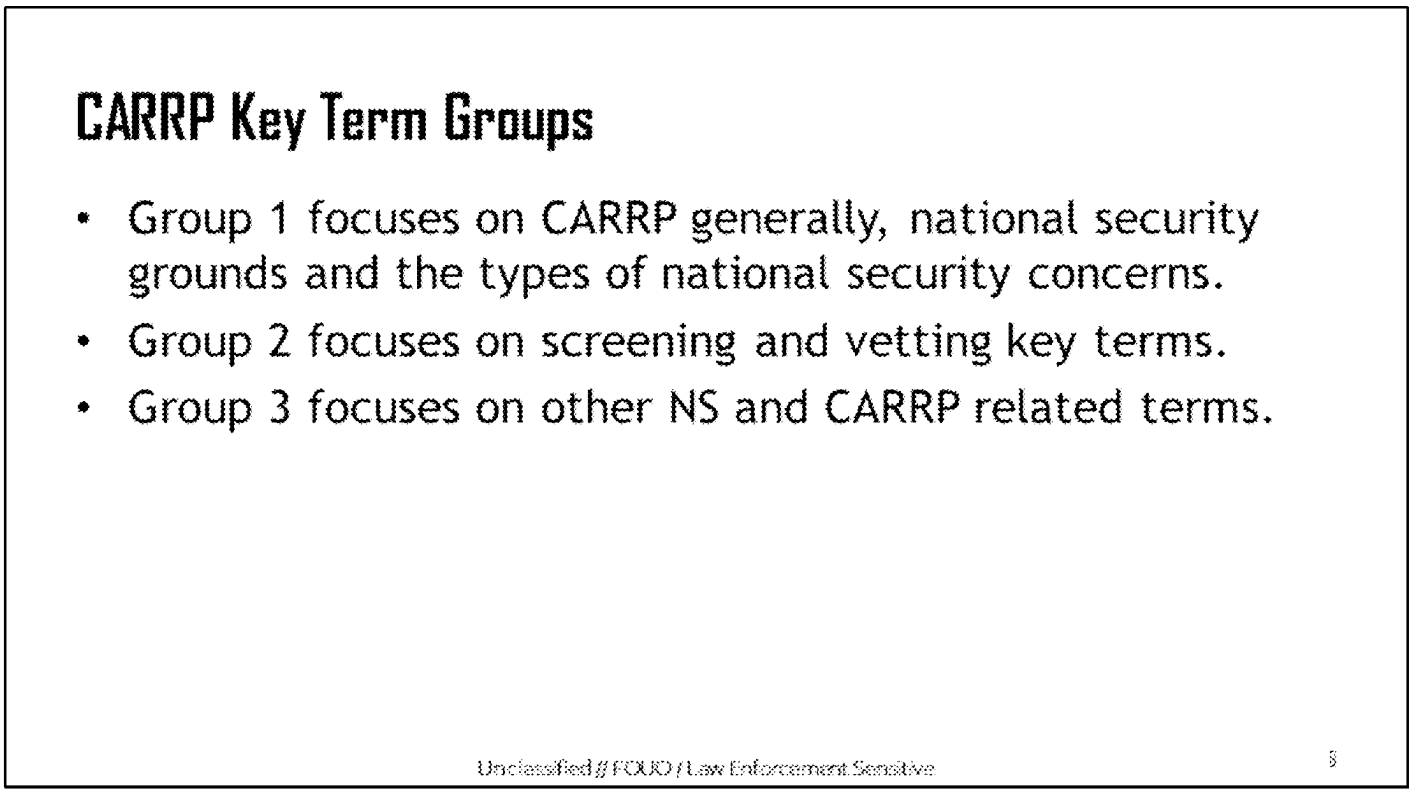

Say:

Let's start with the CARRP key terms. We will talk about these terms in three groups. The first group of terms will center around CARRP in general, the NS grounds that tell us if a case is a CARRP case, and the types of NS concerns we encounter. The second group of terms will be focused on the screening and vetting process. And the third group includes terms not discussed in the other two groups.

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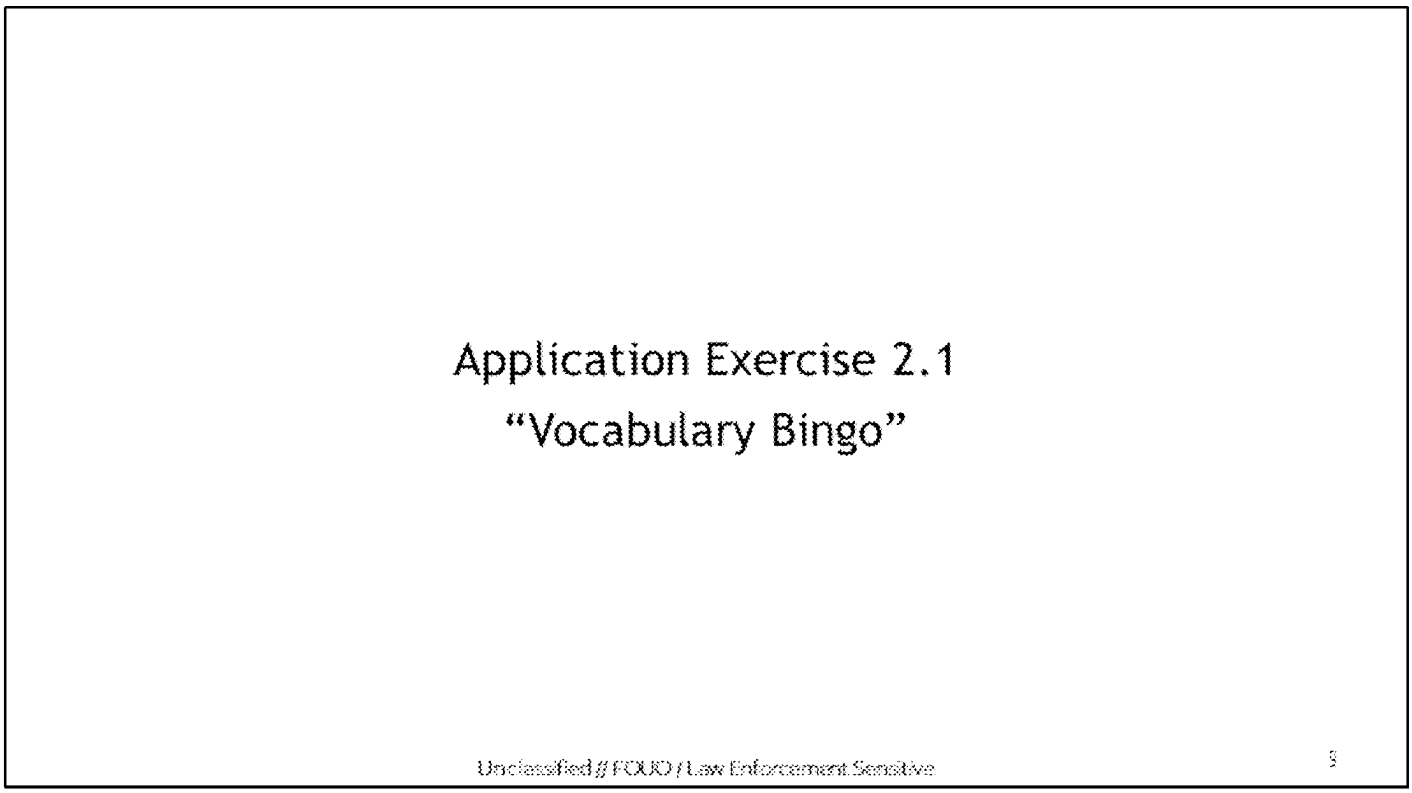

[Instructor: Each student will be assigned a Bingo Card number (1 through 24). Students will access their cards in Teams Exercise Folder. Provide the class with brief instructions on how to play "Blackout BINGO", a game in which the students must fill out <u>every space</u> on their BINGO card in order to win. Any word that any instructor says during their lecture is fair game and if the student has that word on his or her card, they can cross it off until the entire card is "blacked out" or marked off. You can choose if you want to reward the winning student. Perhaps you can give them a "free pass" from being called on for a module etc.]

Say:

At this time please take a moment to locate your BINGO card using the student roster and your student number, and your corresponding BINGO card.

We are now going to start CARRP "Vocabulary Bingo." Please find your respective Bingo card in the Module 1 Channel under "Exercise 2.1". Student number 1 will select Bingo Card number 1, and so on. Each of you should now have a BINGO card. Any time I, or another instructor, says a word located on your BINGO card, you can cross that word off. This is Blackout BINGO- so you MUST fill your entire card, not just a line of 5 like traditional

BINGO. We will start the BINGO challenge beginning with the next slide and continue for the rest of the training, so don't worry if you haven't filled out your card by the end of the module. You will have plenty of chances to win! The instructors and I will decide on a virtual prize- perhaps a pass from being called on or something like that. If this is too much for you to keep track of then don't worry about playing- this is just to keep your attention and help learn the key terms in a fun way.

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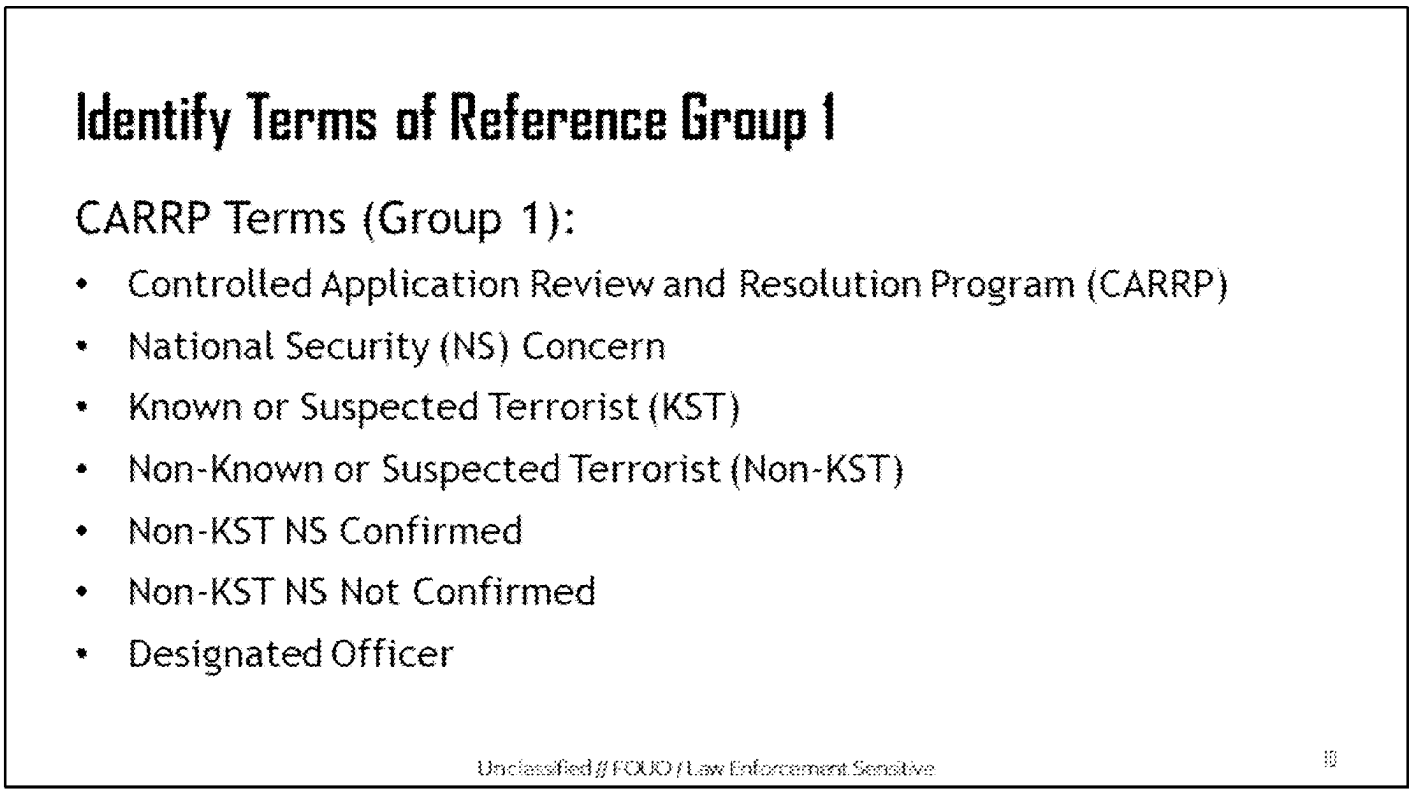
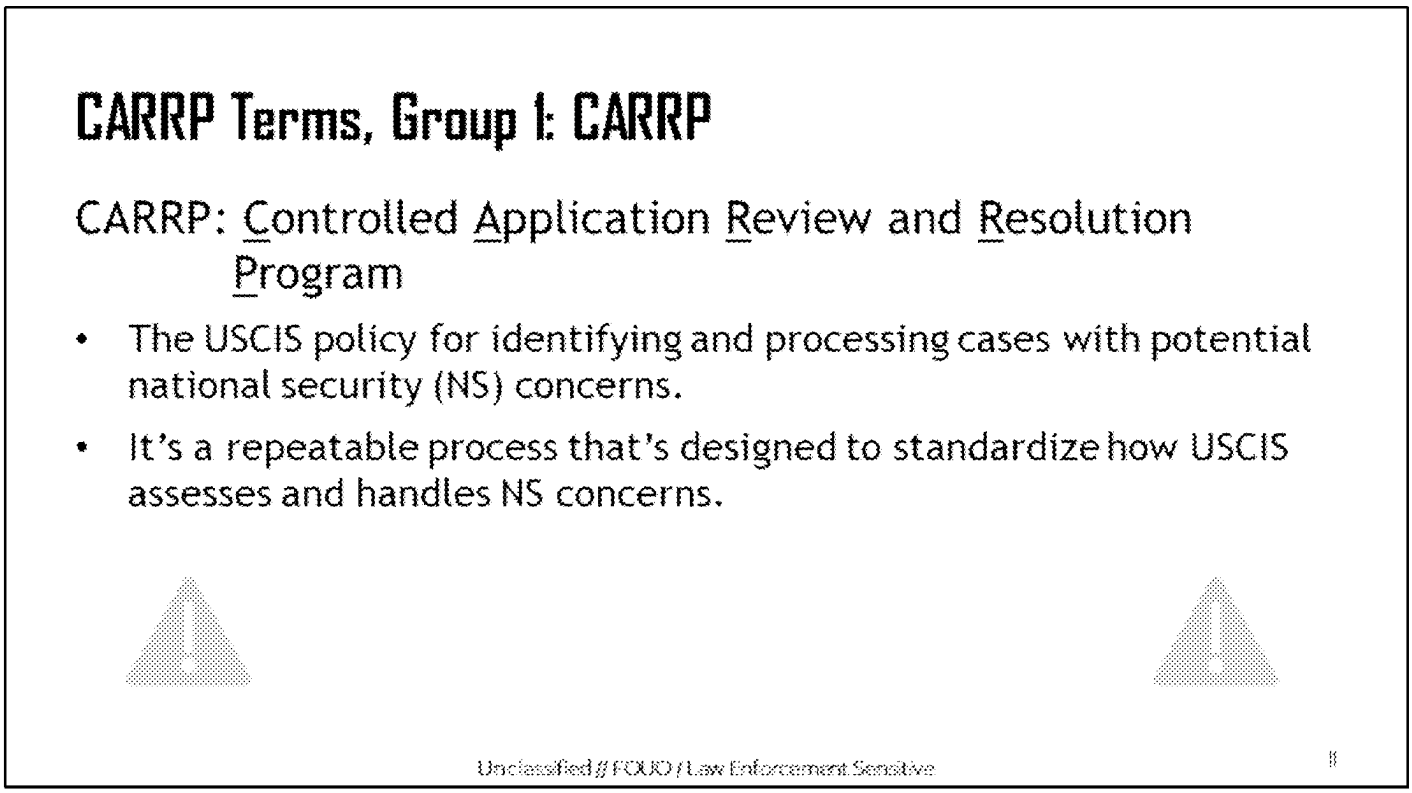


Say:

For our first group of terms, we will be talking about these USCIS-specific CARRP terms. You will see these terms repeated throughout this course. They are also the status and sub-status values you will be selecting in FDNS-DS as you work CARRP cases. For our first group of terms we have CARRP, national security concern (also referred to simply as "NS" concern), Known and Non-Known or Suspected Terrorist (KSTs and Non-KSTs,) what it means for a concern to be confirmed vs. not confirmed, and designated officer.

[Go to the next slide.]



Say:

Our first term is CARRP, which stands for Controlled Application Review and Resolution Program. CARRP comprises procedural guidance on how to handle potential national security concerns in order to ensure consistent handling of potential national security cases. It's basically a way to slow ourselves down and take some extra time to think about eligibility for the particular benefit and potential derogatory information. You can think of it as a yellow traffic light or sign – it means we're taking caution with something, and it allows us to bring additional resources into play. In CARRP we do much more than a quick TECS check!

The major point here is that CARRP allows us to recognize something in our environment which needs additional consideration and provides us the ability to fully work through any concerns there may be.

[Go to the next slide.]

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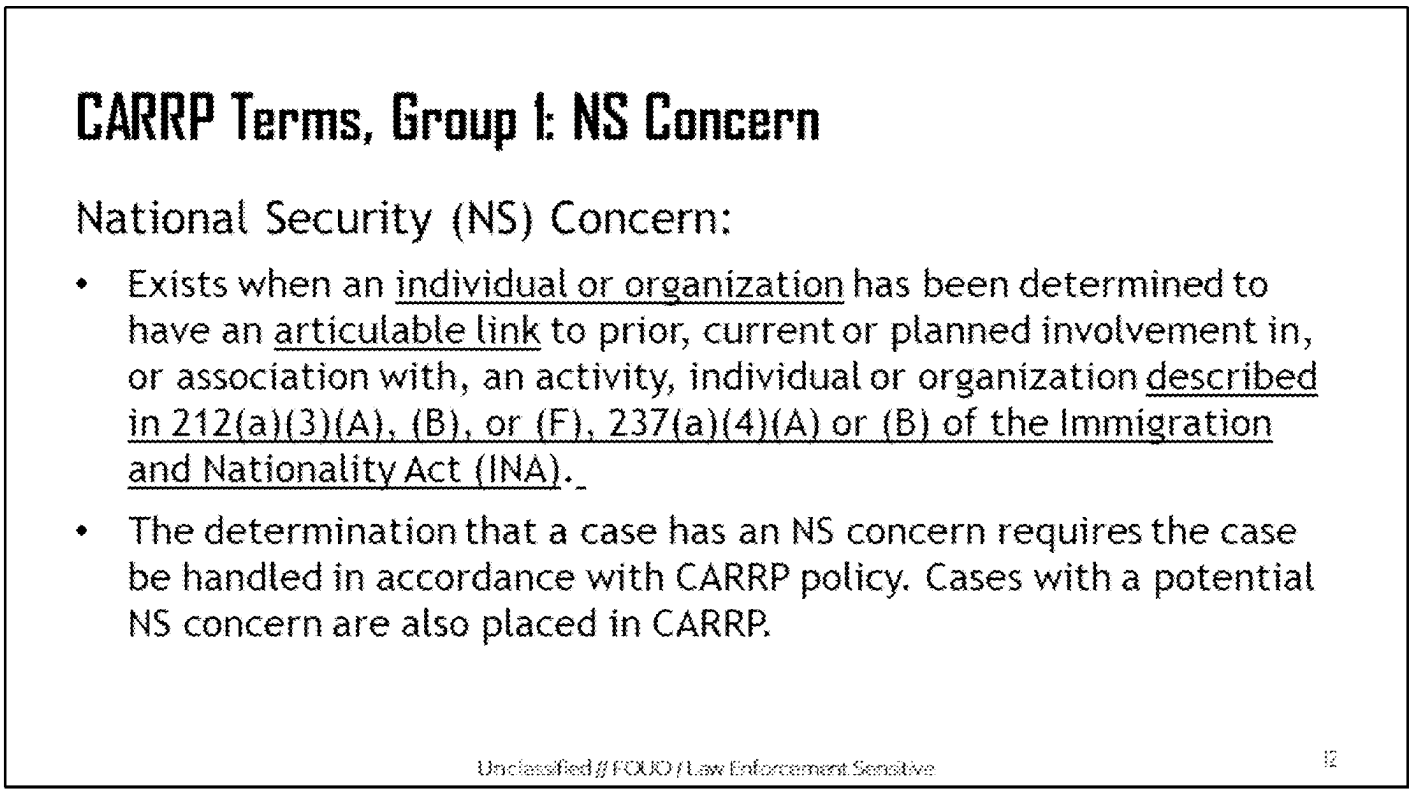


Say:

I am going to read you the definition of a National Security Concern.A national security concern exists when an **individual or organization** has been determined to have an **articulable link** to prior current, or planned involvement in, or association with, an activity individual or organization **described in 212(a)(3)(A), (B), or (F), 237(a)(4)(A) or (B) of the Immigration and NationalityAct (INA).**

There are three critical pieces to this definition: an individual, an NS ground from the INA, and the connection between that individual and that NS ground.

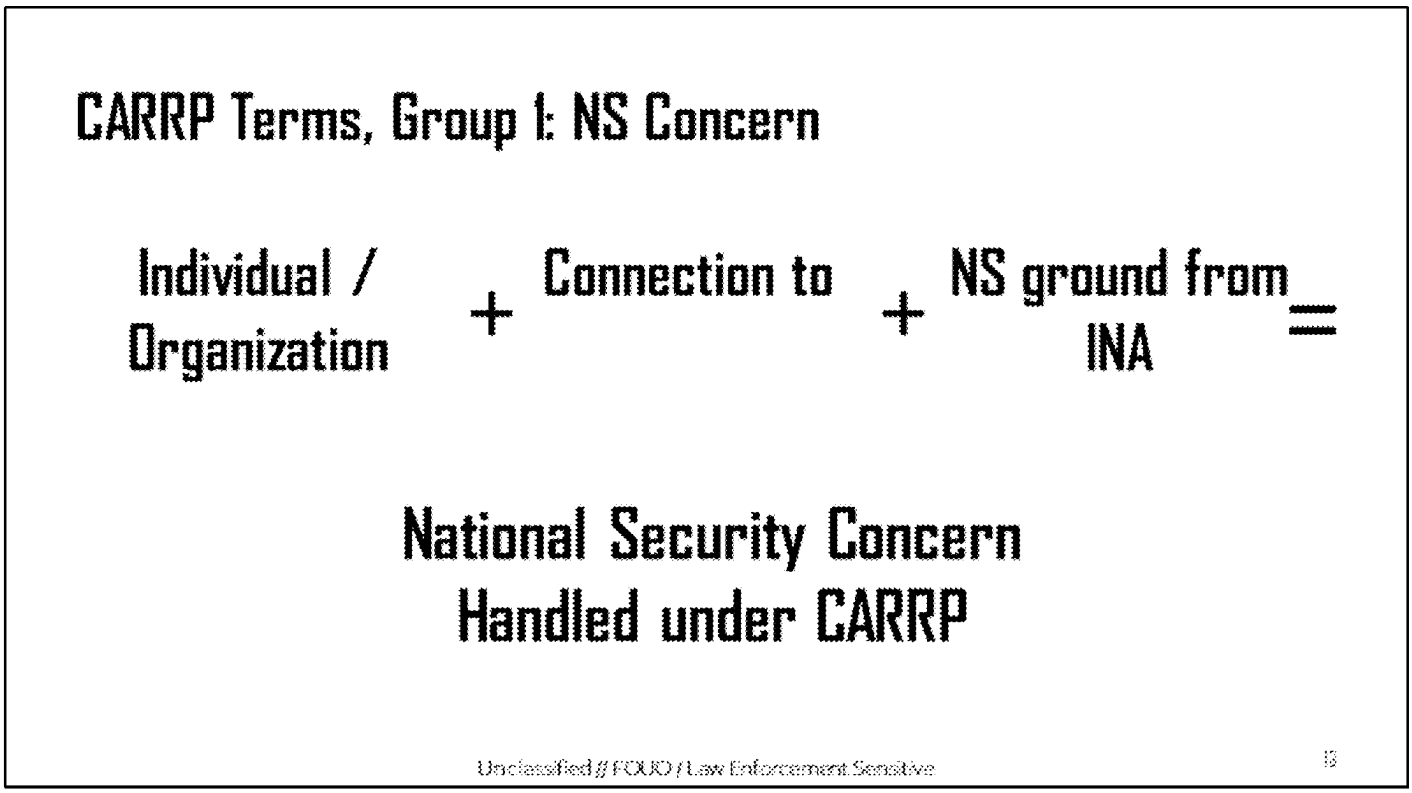
Current guidance talks about statutory versus non-statutory indicators. The statutory part of our concerns are the NS inadmissibility and removability sections from the INA. In order to have an NS concern, one of these INANS grounds in the first bullet point MUSTbe present. The non-statutory part is the connection – everything that links the person to the ground. So there's no need to distinguish between statutory and non-statutory elements of a concern, because it's built right into the definition.

There is also sometimes confusion about forms like N-400's that don't rely on

section 212 inadmissibility grounds or section 237 removability grounds for eligibility. The NS inadmissibility provisions are used for all form types, regardless of the specific eligibility criteria for that form. A final eligibility determination for a particular form is made later in the process, at the time of adjudication.

[Instructor: Don't get into the weeds here, especially on articulable link – there is an entire section later on indicators and articulable links. For more information on the distinction between statutory and non-statutory indicators, students can refer to Attachment A to the CARRP Operational Guidance.]

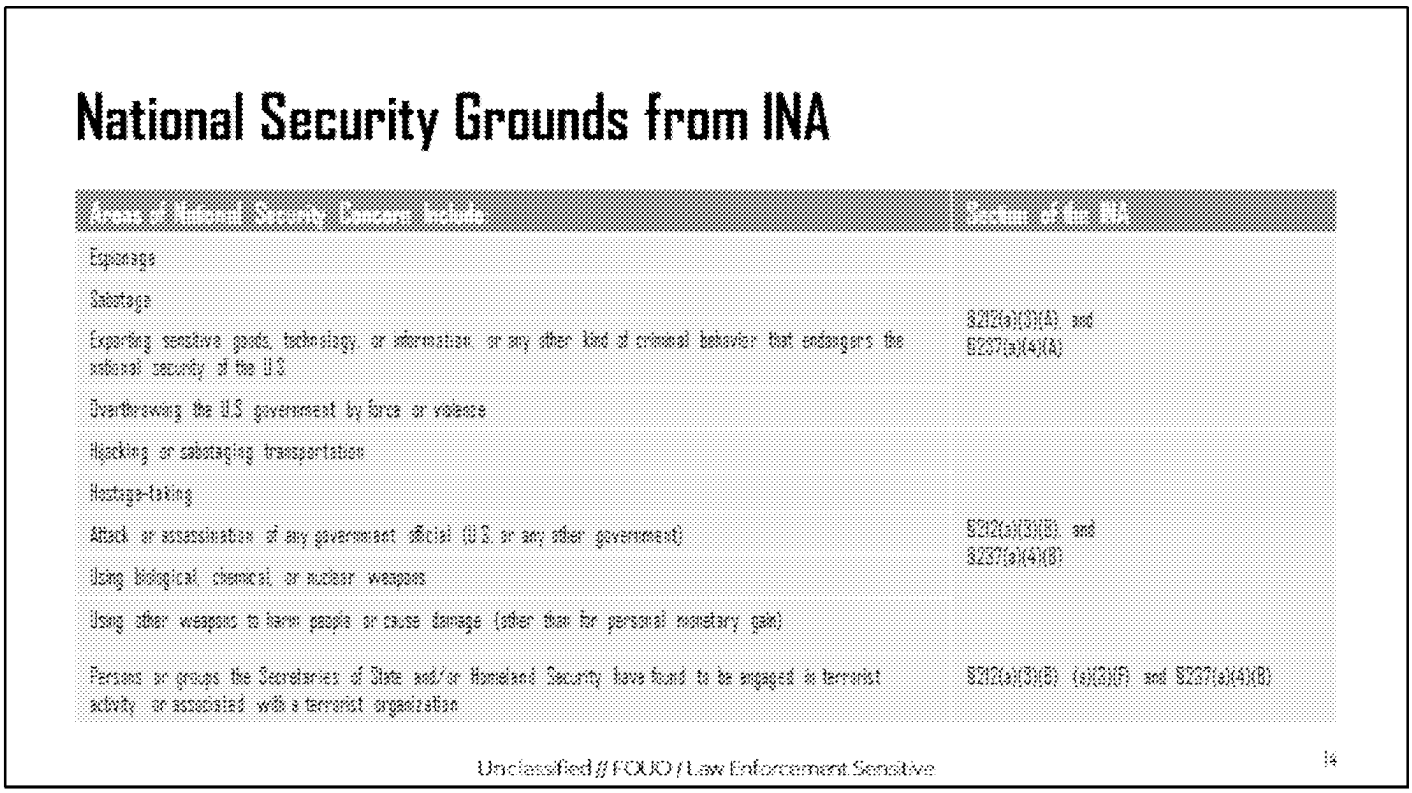
[Go to the next slide.]



Say:

For those of you who are mathematically inclined, you can break the last slide down this way. When we talk about a national security concern, these are the elements that are part of the equation. And when we have all three of these elements present, we have an **NS concern** and those are the cases we handle in CARRP. It's also important to understand that this is an additive equation. You need **all three** elements in order to equal a concern. If you are missing one part of this equation, then you do not have an NS concern. This is not the last time you will be seeing this slide.

[Go to the next slide.]



Say:

In the previous slide we talked about the NS grounds from the INA that help to complete our equation. This slide lists those NS grounds. Let's go through them.

From INA 212(a)(3)(A) we have:
- Espionage
- Sabotage
- Exporting sensitive goods, technology, or information, or any other kind of criminal behavior that endangers the national security of the U.S.
- Overthrowing the U.S. government by force or violence

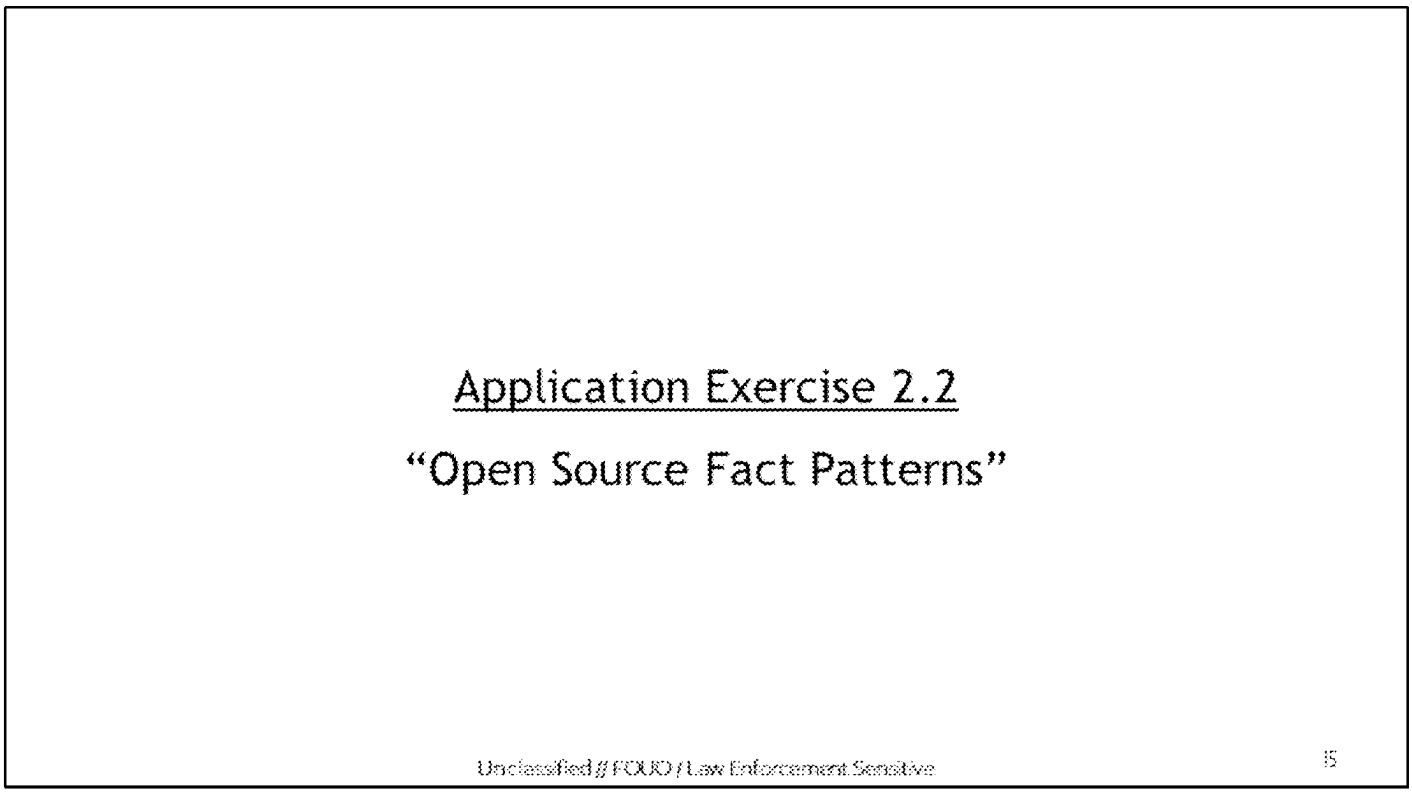
From INA 212(a)(3)(B) we have:
- Hijacking or sabotaging transportation
- Hostage-taking
- Attack or assassination of any government official (U.S. or any other government)
- Using biological, chemical, or nuclear weapons
- Using other weapons to harm people or cause damage (other than for personal monetary game)

From INA 212(a)(3)(B) and (F) we see:

- Persons or groups the Secretaries of State and/or Homeland Security have found to be engaged in terrorist activity or associated with a terrorist organization

We see section 212(a)(3) all over this slide- but this is not all of section 212(a)(3)! There are additional security-related inadmissibility grounds that don't rise to the level of an NS concern. Human rights abuses, for example, are not listed here, but are part of 212(a)(3). Drugs and alien smuggling are listed elsewhere in section 212 and are also not NS grounds. A lot of these grounds do relate to terrorism, but not all NS cases require a terrorism nexus. Please remember again these grounds help us decide if an NS concern is present – they do not mean we're going to find the person inadmissible or removable on those grounds, nor does it mean we're going to deny the benefit due to these or any other grounds. But this chart is essentially what will guide officers in their referrals. If there are sufficient indicators that one of these grounds are present, you at least need to talk to FDNS!

[Go to the next slide.]



[Instructor: "NS / Non-NS Open Source Fact Patterns" Exercise. This exercise begins to train students to consider fact patterns from a variety of sources in identifying NS grounds from the INA. Each student will be assigned an open source news article. Have the students review their article. The class discussion is based on the student being able to identify if the case should be worked in CARRP or not based on the three-element equation. The student should be able to tell you if the case should be handled in CARRP and which ground from the INA would apply. All articles should be assigned and reviewed at the same time but reviewing them with the class is divided between exercise 2.2 and 3.1 in Module 3. The articles that are more straightforward and only involve assessing whether an NS ground is present are covered in 2.2. Additional instructor notes are provided in exercise 3.1 for the remaining articles.]

Say:

Please find the article/individual that you are assigned for Exercise 2.2 on the exercises assignment sheet. You can either click on the hyperlink on the assignment sheet and open your article on the web, or you can go to the Module 2 Channel under "Exercises" and find your article under Exercise 2.2.

Link to that folder is being placed in the chat now.

Please take 10 minutes or so to read this article and assume that the subject of the article is an applicant for an immigration benefit pending with USCIS. Ignore the individuals' actual citizenship/immigration status or if they are deceased etc. Evaluate the facts contained in your article and make a determination as to whether the subject would be NS or non-NS, and if NS what ground in the INA did you use to make that determination.

When called on you will explain the fact pattern that guided your NS / Non-NS determination and highlight the ground from the INA that led you to that determination. The purpose of this exercise is to emphasize the statutory grounds of national security used in determining if a case should be in CARRP and to make the point that NS determinations are not always black and white.

Please take few minutes to read the article you were assigned and let me know if you have any questions. You will be called on randomly to discuss your individual. We will move back a slide and leave the INA grounds on the screen while you work through your article.

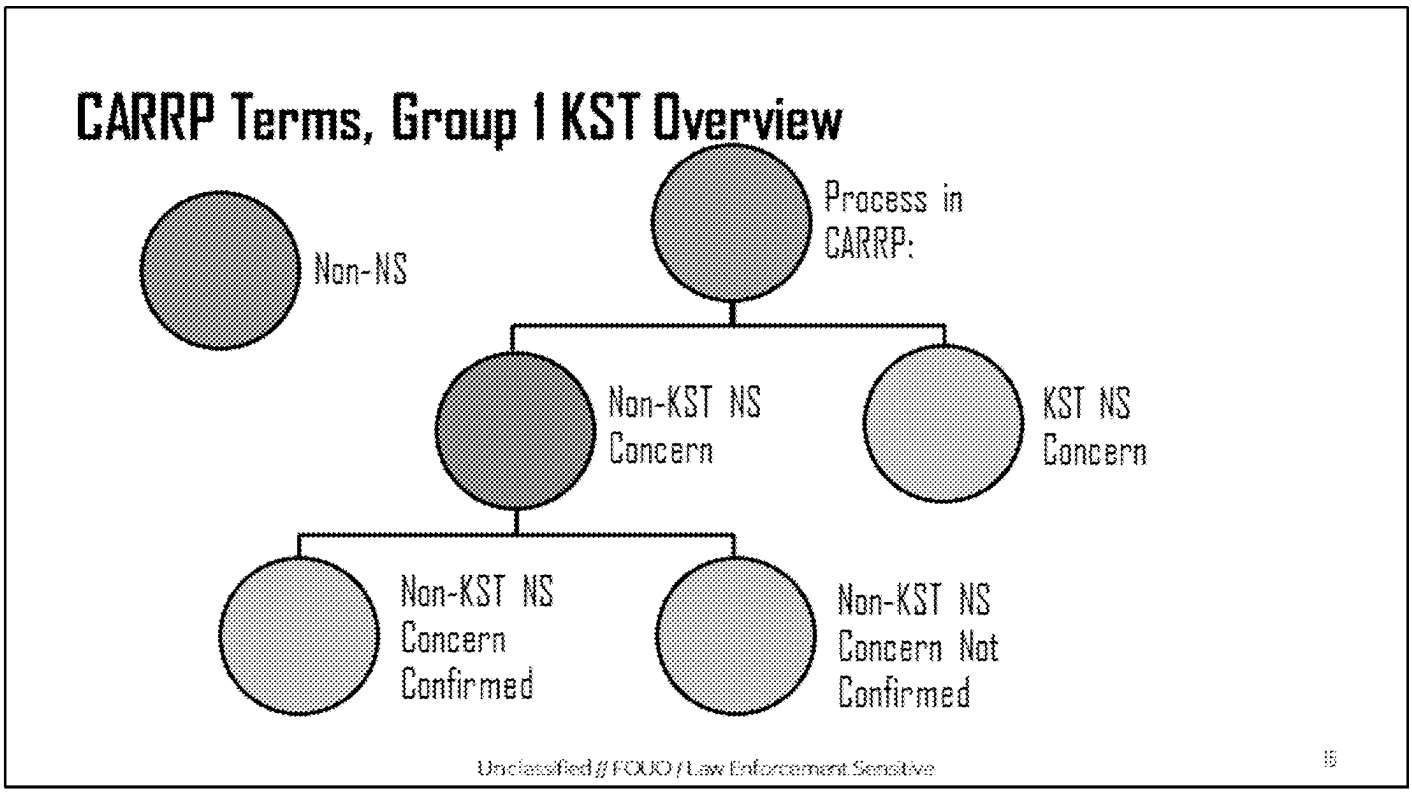
[Instructor: Pause for ten minutes to give everyone time to read their article.]

Let's get started with some of our fact patterns now.

[Instructor: Use the Answer Key to discuss the correct answers]

Okay, that completes the exercise for now. If you were not called on yet, you will be called on in Module 3 and we will give you a few minutes then to refresh your memory!

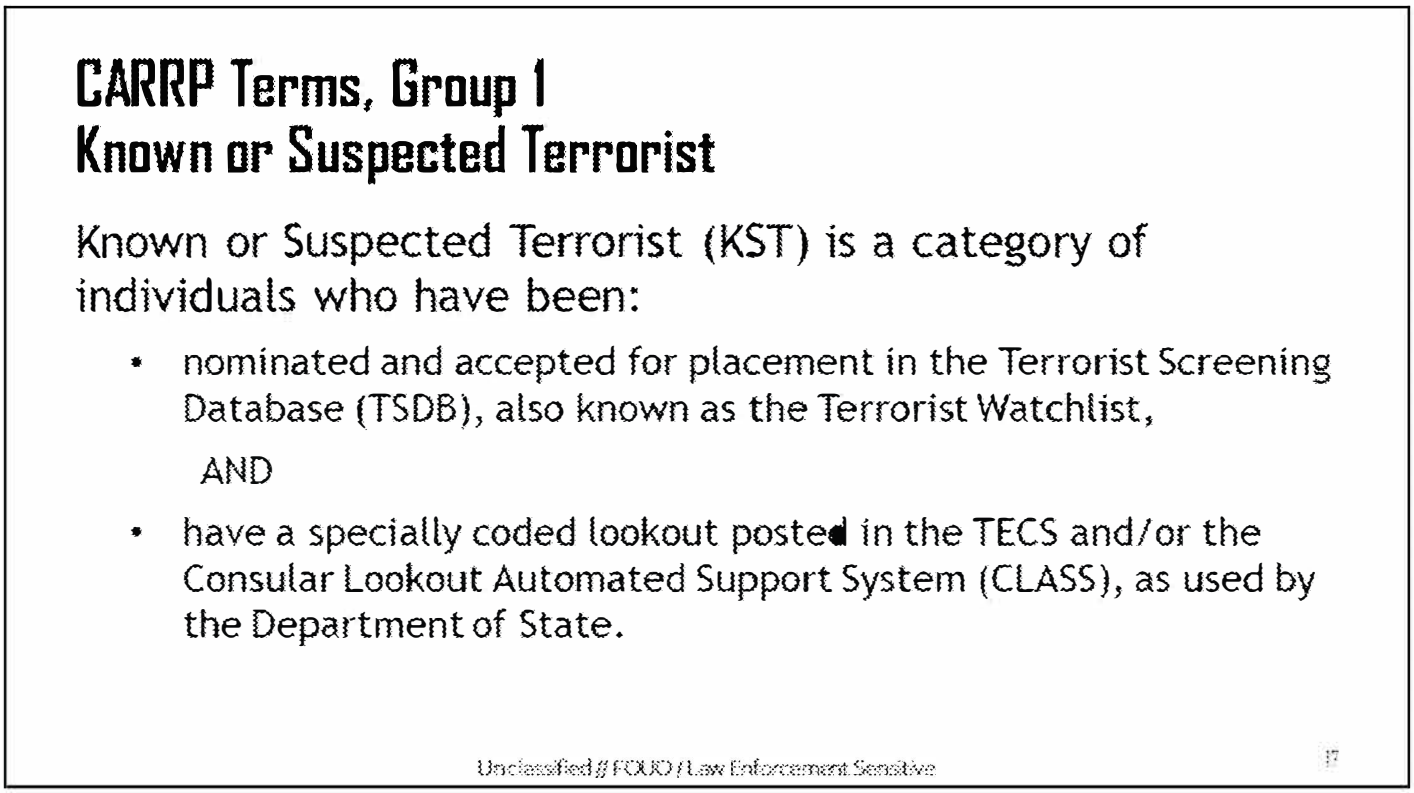
[Go to the next slide.]



Say:

This is a visualization of our first group of terms. We are going to go through the definitions of these circles and then look at this graphic again. Cases are entered into CARRP because there's a nexus to a national security concern. Non-KST and KST are two exclusive subsets of an NS concern. An NS concern must be one or the other – KST or non-KST.

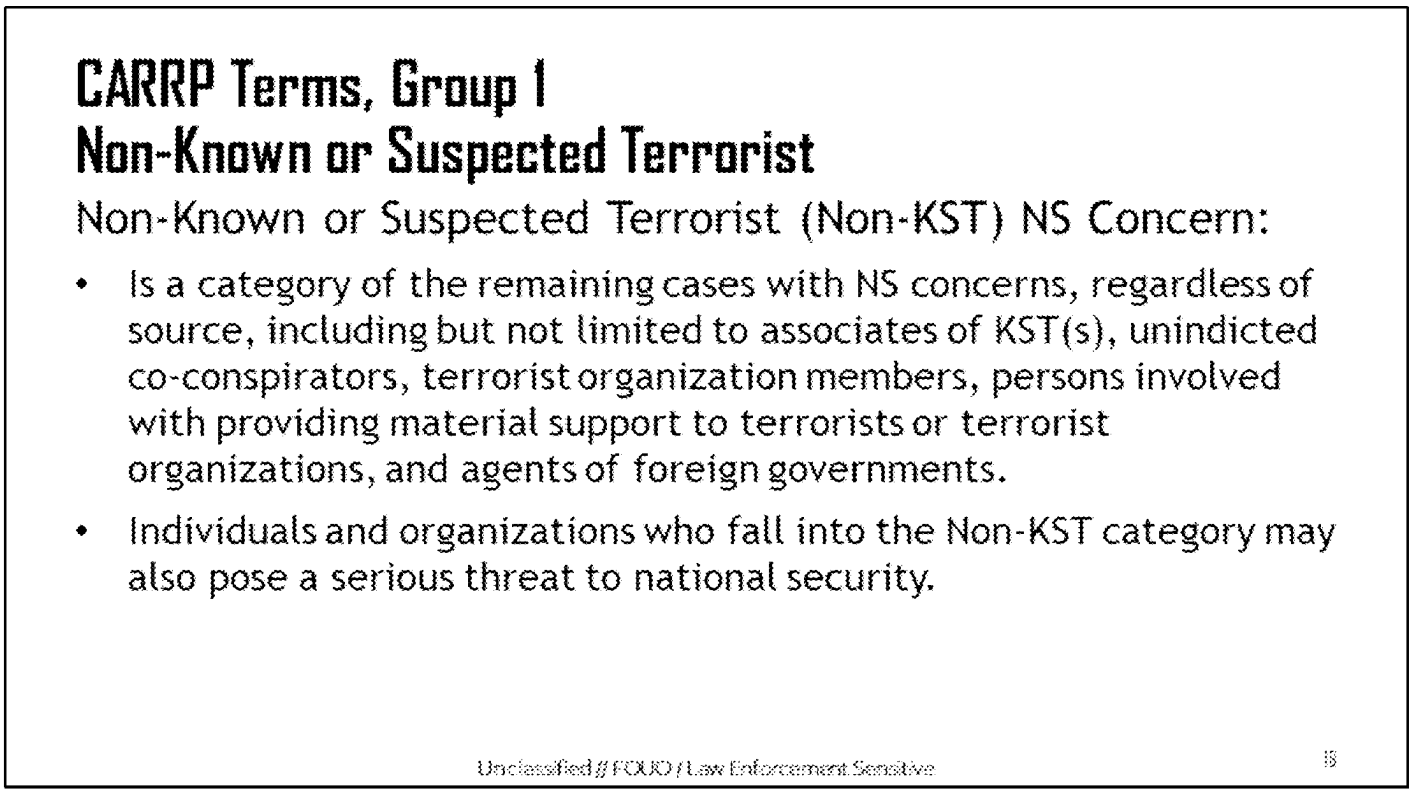
[Go to the next slide.]



Say:

A Known or Suspected Terrorist, or a KST, is a category of individuals who have been nominated and accepted for placement in the Terrorist Screening Database (TSDB), also called the "Terrorist Watchlist." This is not the same as the watchlist that you see in CPMS! All KSTs have a specially coded lookout posted in the TECS and/or Consular Lookout Automated Support System, also known as "CLASS", used by the State Department. We'll go into more detail on the TSDB and the Watchlist later on in Module 3. We will also discuss how to identify a KST when we dig into Phases 1 and 2 of the CARRP process. For the moment, just know a KST is a Known or Suspected Terrorist and is one type of NS concern.

[Go to the next slide.]

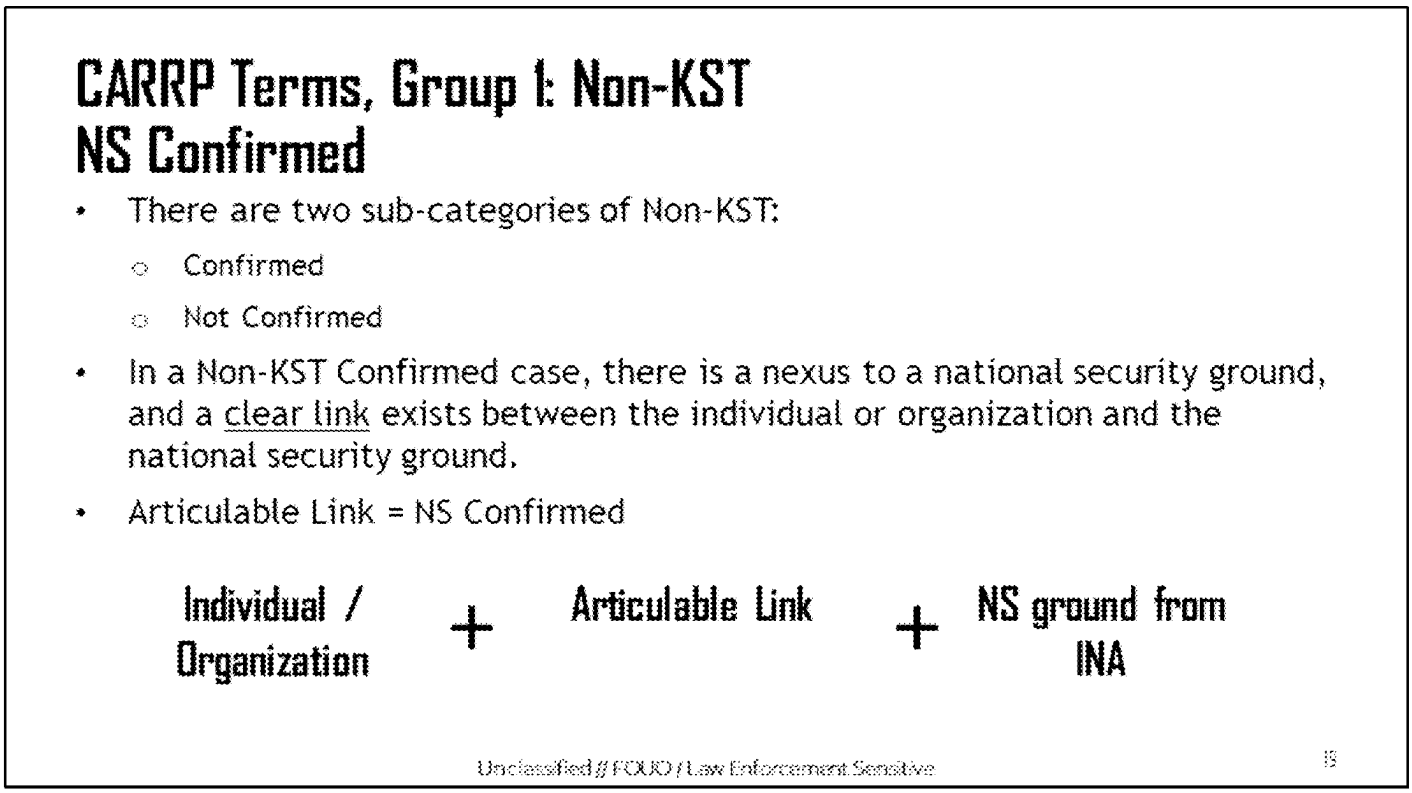


Say:

A Non-KST, or Non-Known or Suspected Terrorist, is the other type of NS concern. A non-KST is a category of the remaining cases with NS concerns, regardless of source, including but not limited to associates of KSTs, unindicted co-conspirators, terrorist organization members, persons involved in providing material support to terrorists or terrorist organizations, and agents of foreign governments. Non-KST is also a USCIS term of art. Other government agencies or law enforcement partners are not going to know what you're talking about if you call them and refer to a "Non-KST" in your discussion. The key to this is to think back to our NS grounds from the INA and realize there are more things here than just being associated with a KST. Being a non-KST can involve individuals doing any number of things that impact national security.

Also, keep in mind that a Non-KST can become a KST! It's very important to remember that Non-KSTs are not inherently "less bad" than KSTs! A non-KST concern can be every bit as serious as a KST concern, and they are handled the same way. There is no such thing as "CARRP lite" processing of non-KSTs. Even TRIG cases without available exemptions that overlap with CARRP NS grounds are treated as serious concerns. We will talk more about TRIG later in this module.

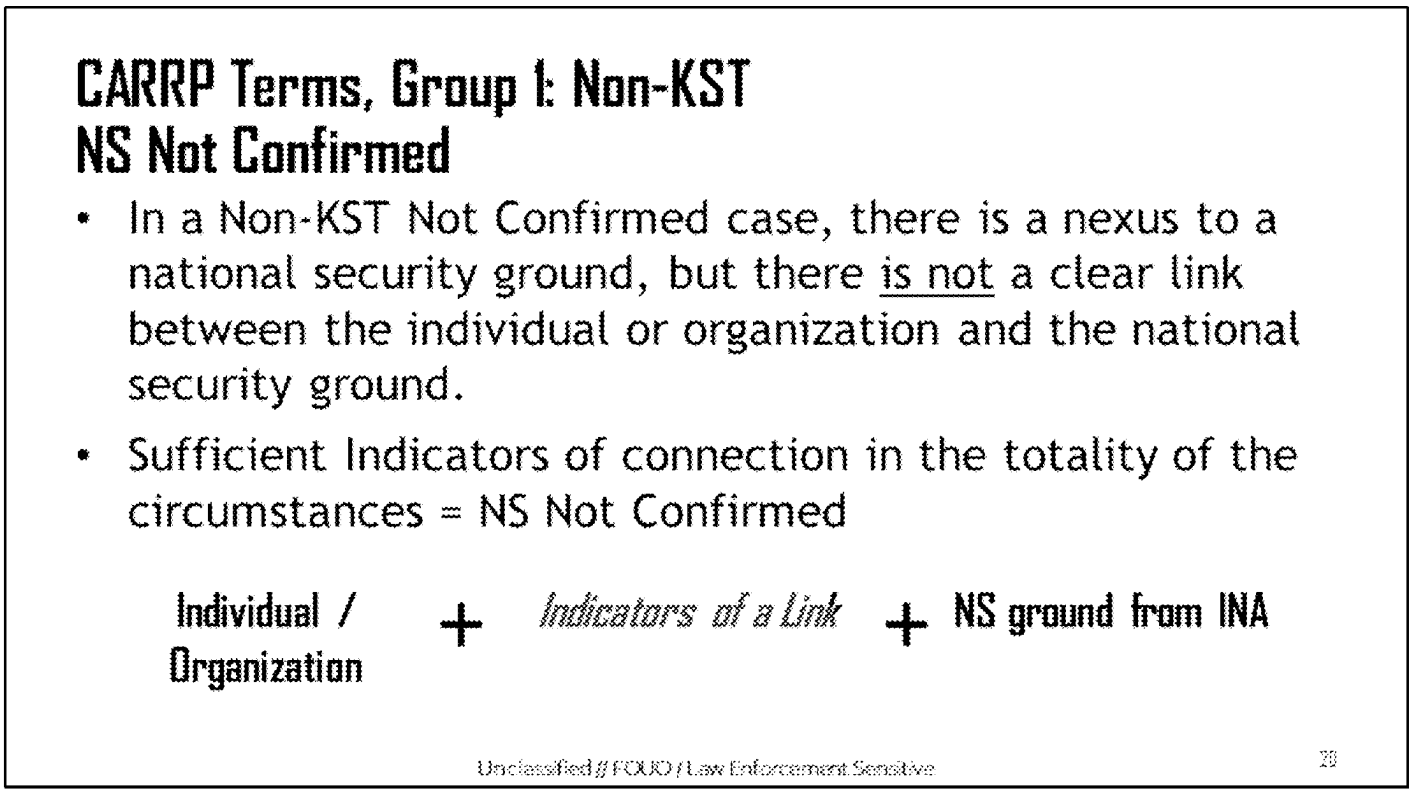
[Go to the next slide.]



Say:

There are two sub-categories of Non-KSTs – confirmed and not confirmed. The category that a subject will fall into will depend on your articulable link – the middle part of our equation. If we have a nexus to NS and we can clearly articulate a link between the person and the NS ground, then it's NS confirmed. Basically, NS confirmed is the category we are in when all three parts of this equation are clear. When we discuss what is involved in CARRP Phase 1 we will talk about exactly how to recognize if you have a clear articulable link and what to document if you have one. For IOs, or those who are familiar with how fraud cases evolve in FDNS-DS, you can think of NS confirmed versus Not Confirmed in terms of Fraud and FDNS-DS. NS Confirmed is comparable to a "Case." Whereas, NS Not Confirmed, is comparable to a "Lead."

[Go to the next slide.]



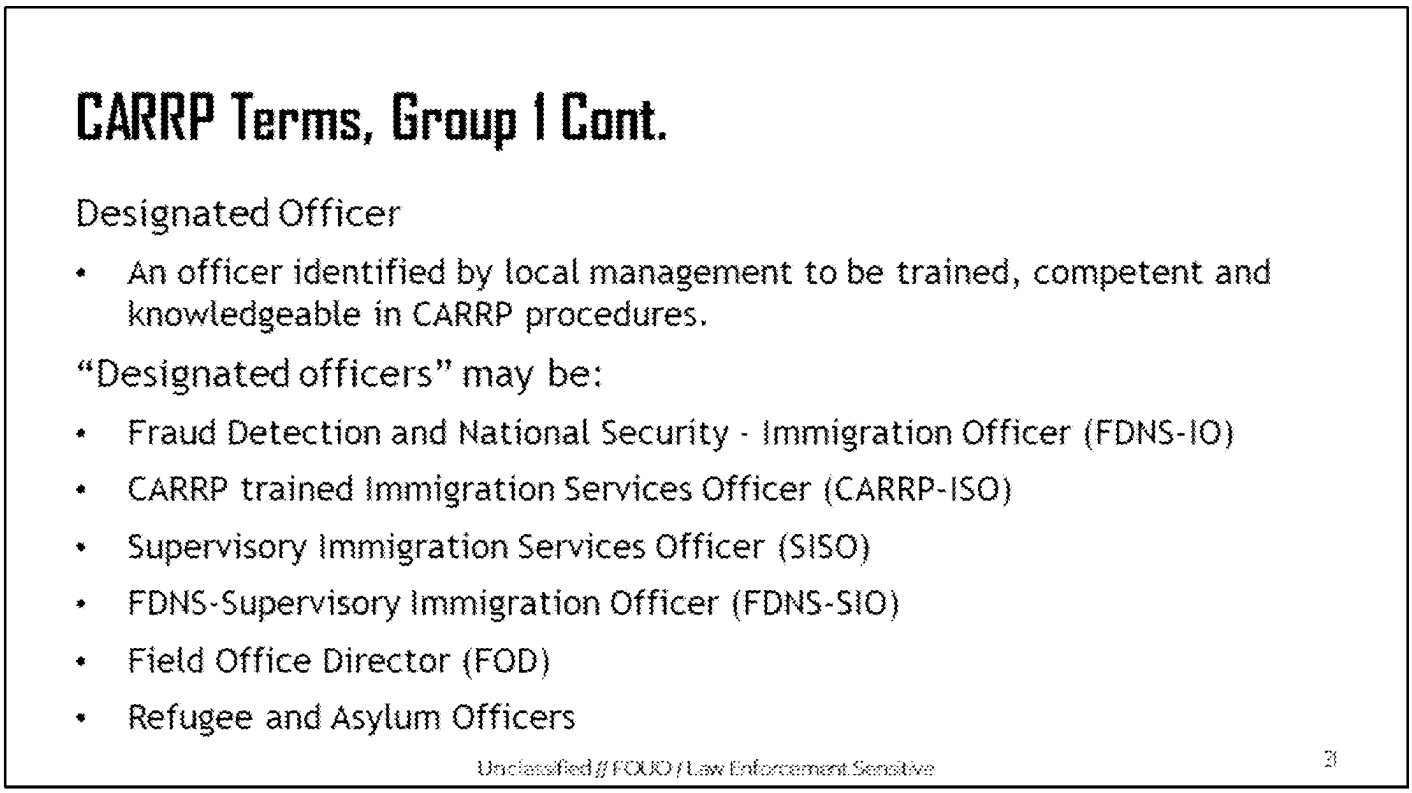
Say:

If NS confirmed means that we have a clear link between a person and an NS ground, NS not confirmed means that some part of the equation is a little fuzzy. There are sufficient **indicators** of something going on, because of travel, because of associations, because of activities, because of some behavior connected to the NS grounds – but it's not a clear connection to the INA ground. So now you may be thinking to yourselves "why we would put that in CARRP?" The reason goes back to the description of what CARRP is… it's a process for vetting and resolving NS concerns. For Non-KST Not Confirmed, there is an individual and an NS ground and sufficient indicators of a link between the two. We can use the CARRP process to build out our articulable link in Phase 1 of the CARRP process where we identify the NS concern. We will talk more about what is involved in Phase 1 later. Please note that protected characteristics, such as national origin or religion, ARE NOT indicators of an NS concern. Overall, the CARRP training, including hypotheticals and examples we will cover in other modules, will provide you with the tools to understand when sufficient indicators exist in a case ***in the totality of the circumstances*** to substantiate a CARRP referral.

Does anyone want to try to explain why we don't delineate NS Confirmed or NS Non-Confirmed for KSTs? ***[Answer: In order to be identified as a KST***

and placed on the Watchlist, the Link has already been established.]

[Go to the next slide.]

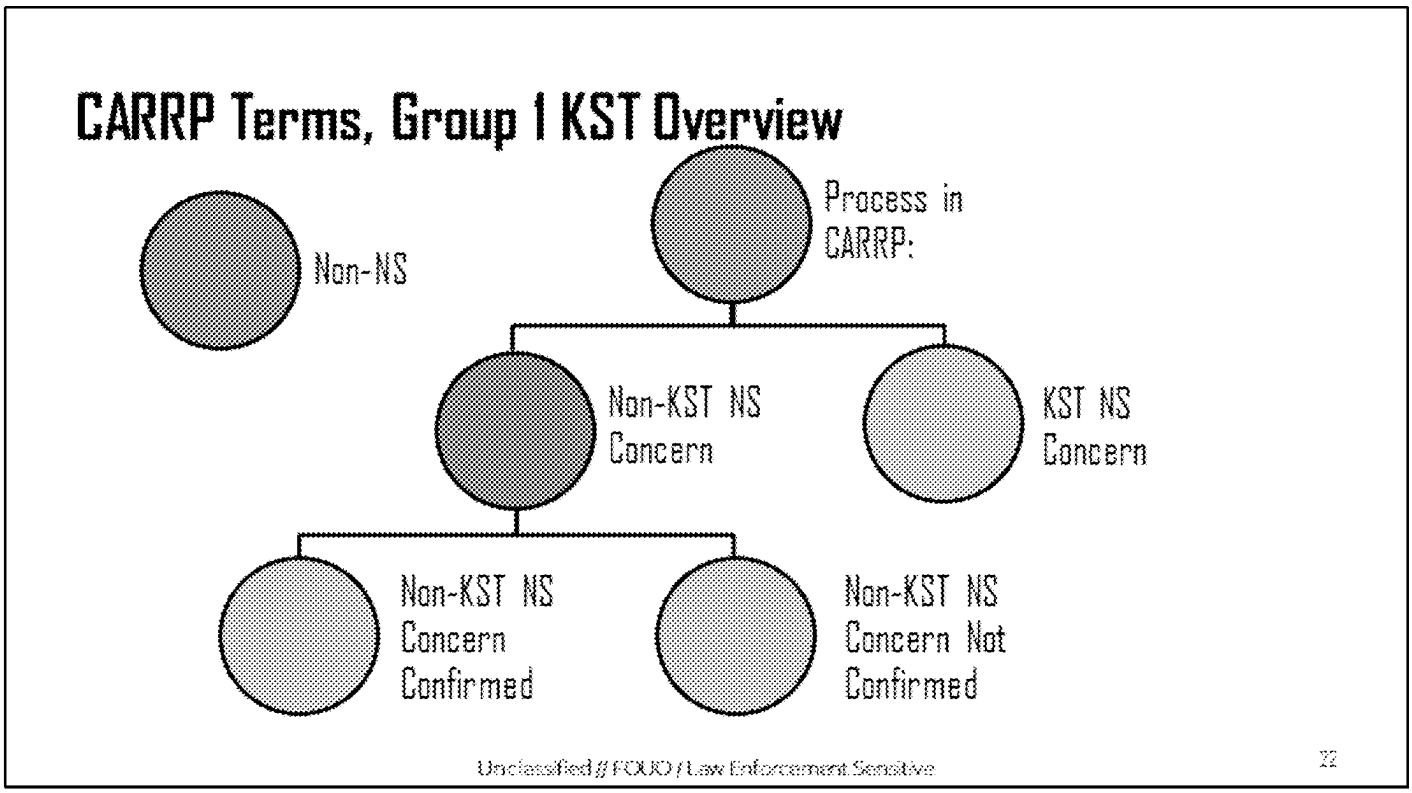


Say:

A "Designated Officer" is an officer identified by local management to be trained, competent, and knowledgeable in CARRP procedures. This is a term straight from the CARRP policy guidance. It pops up in the delineation memo of June 5, 2009, which will be covered in a few slides. Anyone can become a designated officer – FDNS Immigration Officers, Immigration Analysts, Immigration Services Officers, Asylum Officers - provided they are identified by local management and trained in CARRP. So, this shows you just how many people are involved in the CARRP process.

So… by the end of this course, you will all be designated officers!

[Go to the next slide.]



Say:

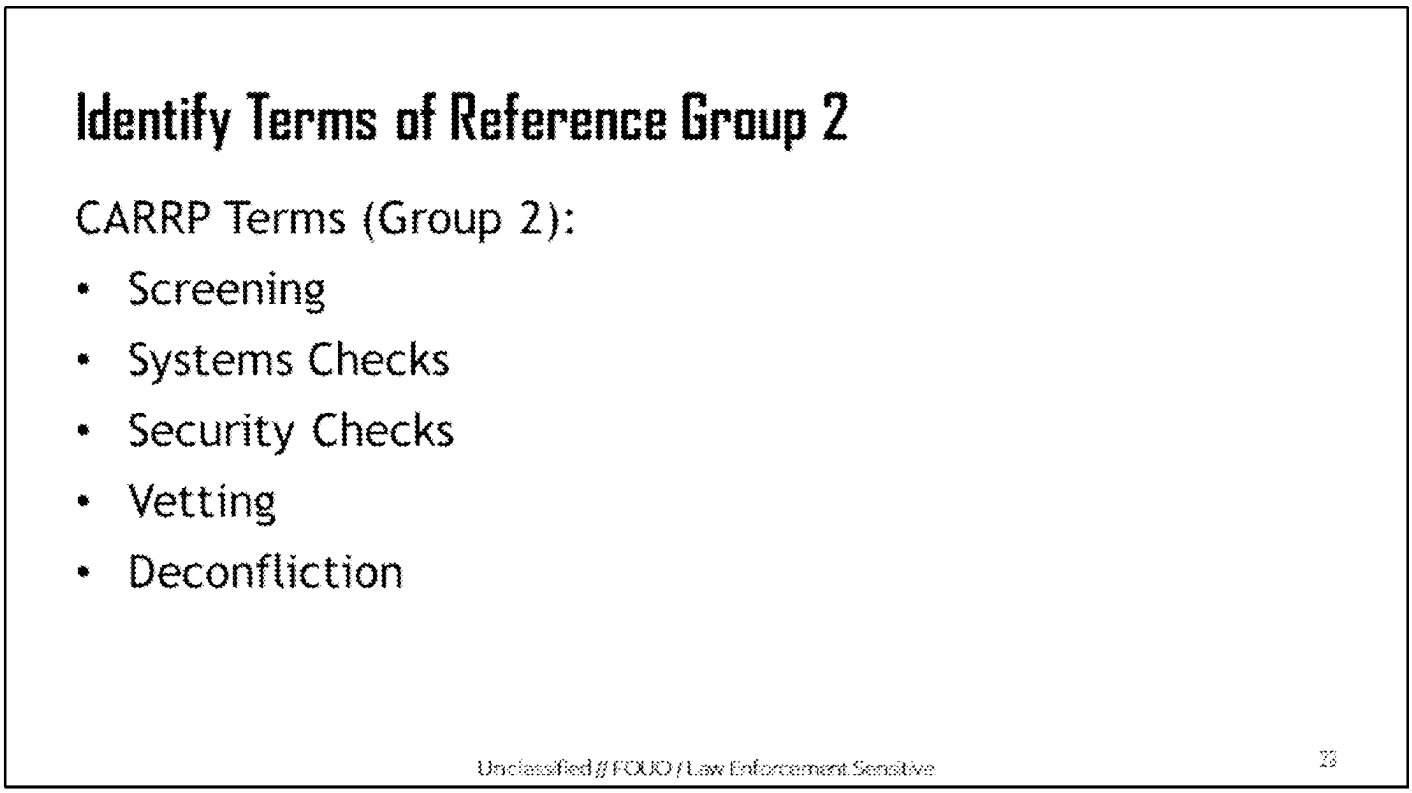
Let's return to the slide with our first group of terms. When you work CARRP as a Designated Officer, cases are entered into CARRP because there's a nexus to a national security concern. Non-KSTs and KSTs are two exclusive subsets of an NS concern. An NS concern is either one or the other – KST or non-KST. Likewise, Confirmed and Not Confirmed are the two subsets of Non-KST.

It's important to remember that a case can go back and forth from non-KST to KST and vice versa, but it can't be both categories at once. As we get into CARRP Phase 1 we'll talk about how to tell the difference between the two subsets, but for now please remember that you always have to be in one of these categories to be in the CARRP process. If a case ever becomes Non-NS, then we don't handle the case in CARRP at all. But within these categories, we expect that a case will do some bouncing around and changing. The case may go from NS Not Confirmed to NS confirmed, or from KST to non-KST. A case may even go from involving a KST to not being a national security concern at all!

Does anyone have any questions about our first set of terms? If so, please

respond in the chat box.

[Go to the next slide.]



Say:

Here's our second group of terms that you'll see throughout the course. We will talk about screening, systems checks, security checks, vetting, and deconfliction. This group of terms centers around screening and the work we do as CARRP officers.

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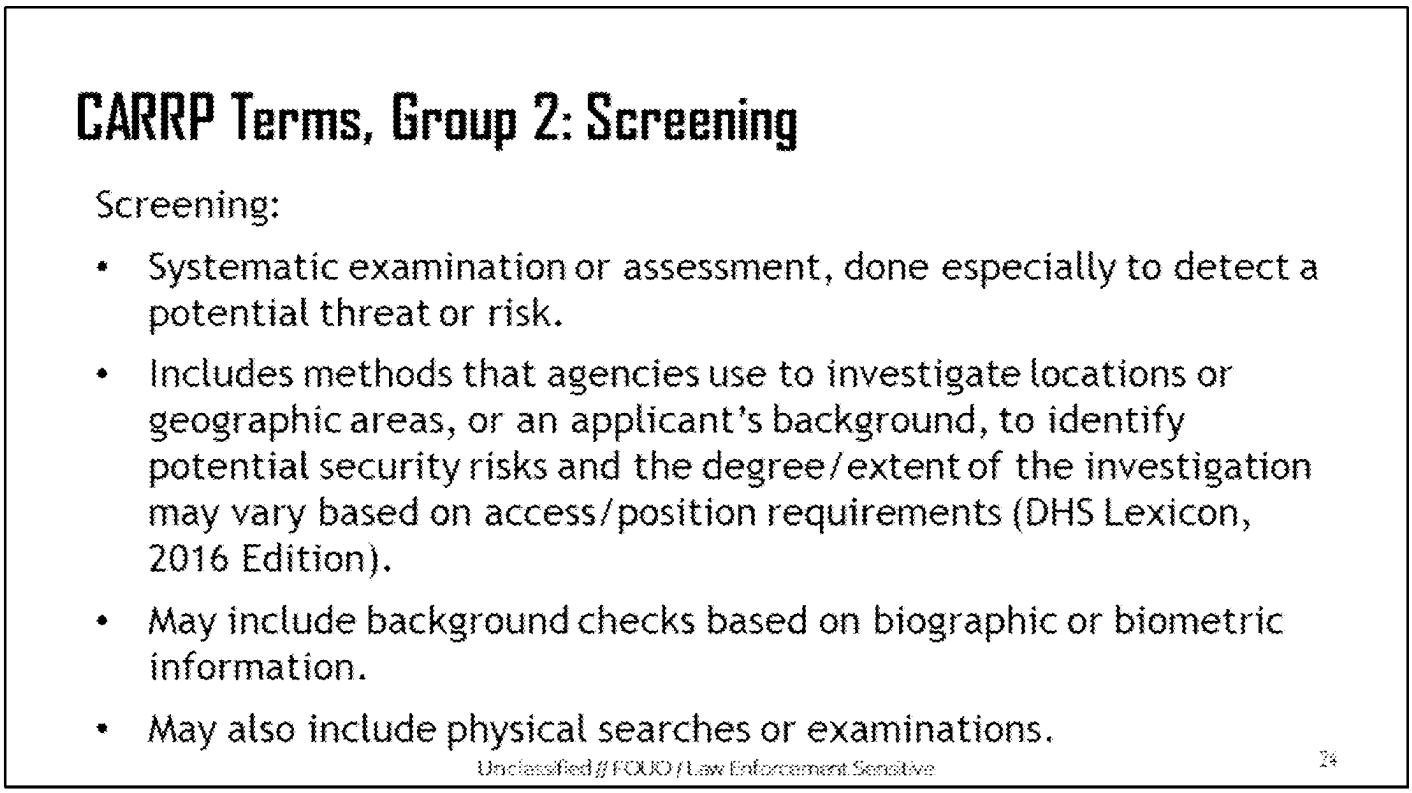

Say:

Screening is defined as a systematic examination or assessment, done especially to detect a potential threat or risk. This is the overarching process we do with CARRP, with the NaBISCOP, and with Watchlisting. It's a big, holistic way that we go about our business in order to determine risks. Screening encompasses systems checks, security checks, and vetting – it's the strategic level word here. From a USCIS perspective, "Screening" is very closely aligned with "Background Checks" – for us, they are pretty much the same thing and may be used interchangeably in this presentation. Background checks are really just one type of screening, though – and for other agencies, the distinction between them is critical. Think of the example of TSA at the airport – if they scan your driver's license and see what comes up, that's a background check and is part of the screening process. If they run your luggage through an X-ray belt, though… that's still screening, but it's not really a background check. So we can use the terms internally to mean the same thing - but be aware that, for other agencies, there may be a substantive difference.

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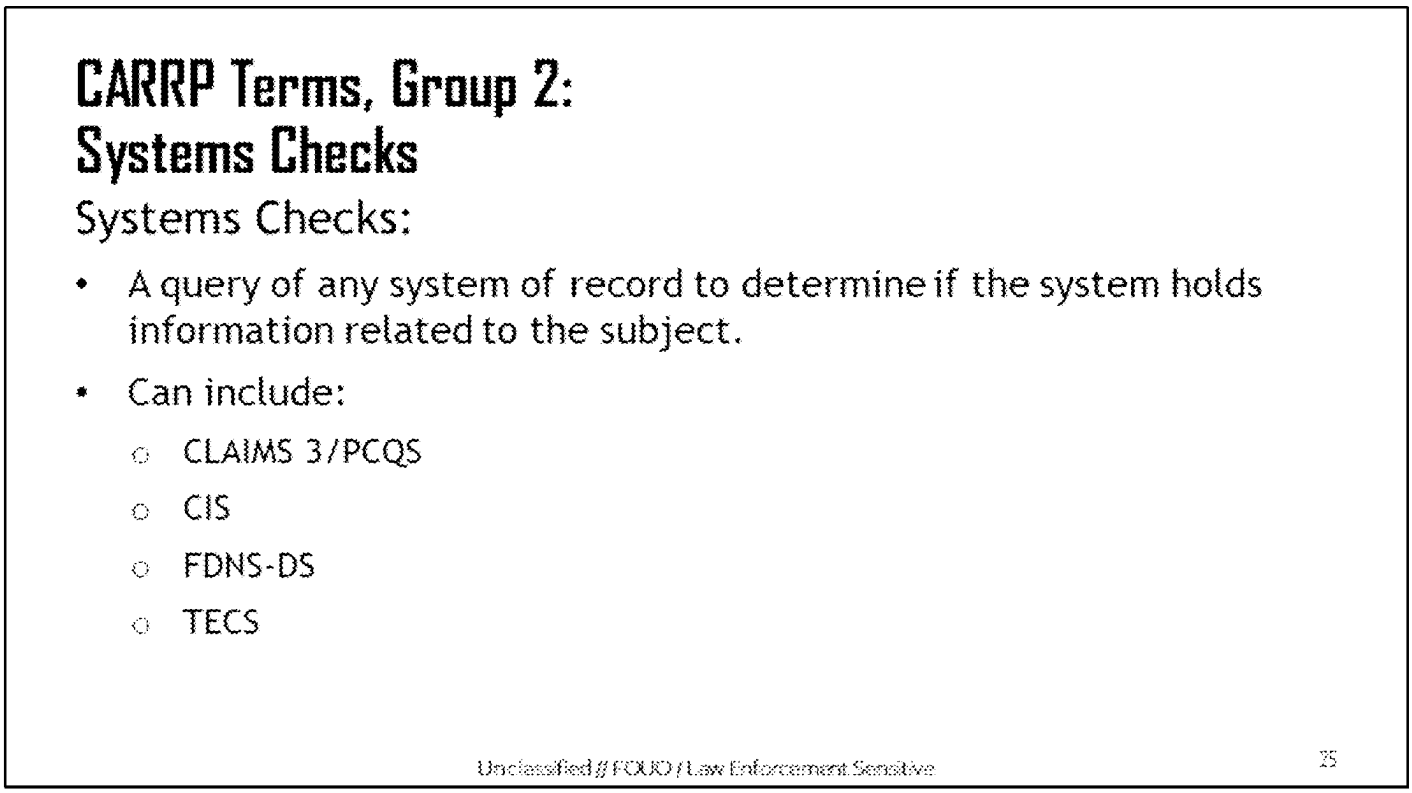

Say:

Systems checks are a query of any system of record to determine if the system holds information related to the subject. Systems checks are one of our screening tools. When you look someone up in CIS, CLAIMS3/PCQS, FDNS-DS, or TECS – those are all systems checks. You'll notice that systems checks are just the act of seeing if the system has information. There's nothing in this definition about what you DO with the information once it's discovered. It is important to understand that systems checks are a subset of screening and not the end of the process. Once you complete your systems checks there's a subtab in FDNS-DS where you will record your results and analysis for each check you perform.

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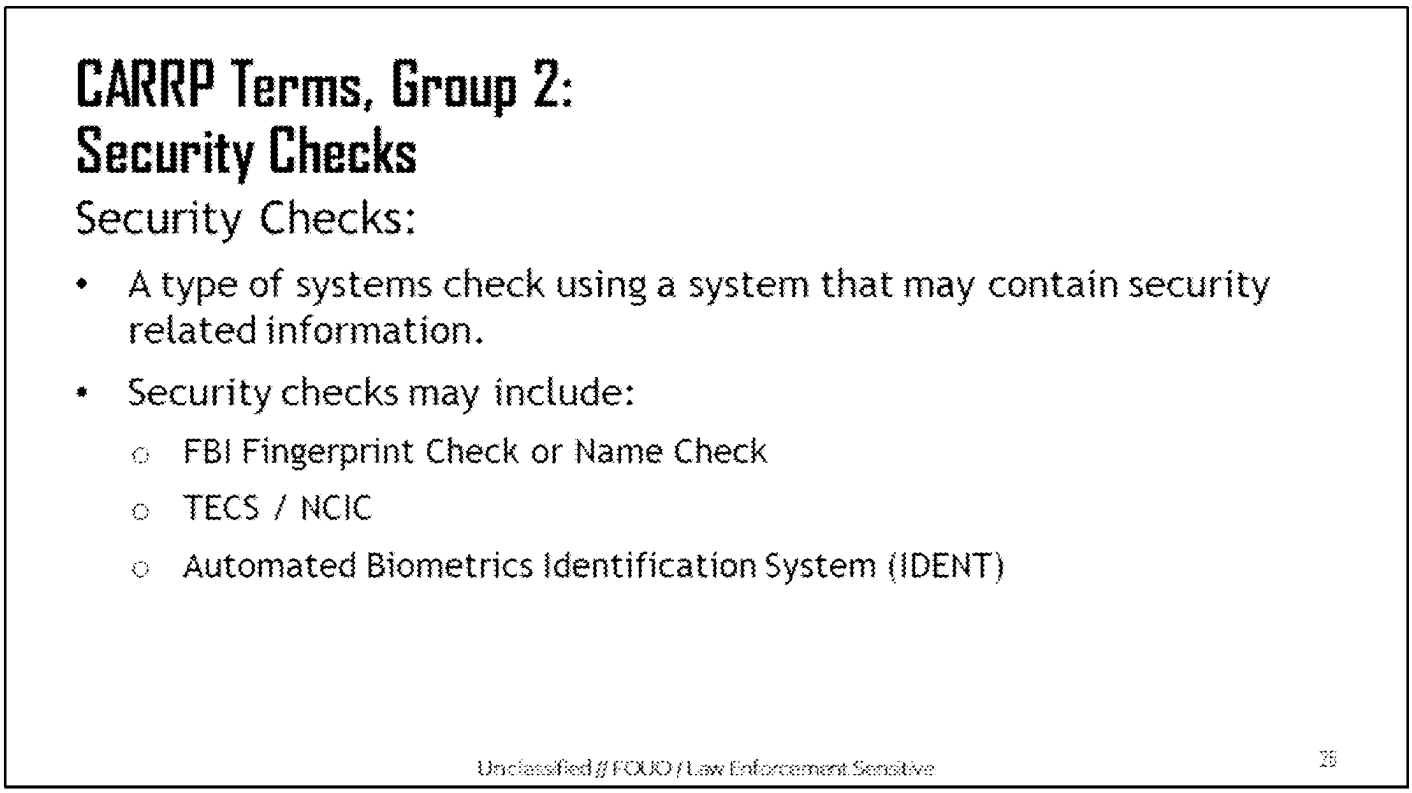

Say:

So we just defined a system check and talked about what they encompass. Security checks are a type of systems check focusing on security and are performed using a system that may contain security-related information. It's the act of looking at systems that give us security-related information about an individual. These systems can be TECS, FBI Name check or fingerprint check, US-VISIT, or looking at a RAP sheet. You can think of security checks as the pre-CARRP work. Some form of security check is done to pretty much every application we handle and they're often our first indication that we need to pull something into the CARRP process. Another way to think about security checks is when you ask for information, let's use an FBI Name Check for this example, you are essentially asking the FBI to perform a system check of all *their* relevant records and systems to see if an individual matches anything. The manner in which we run security checks and the specific things we look at are all prescribed in the NaBISCOP and component guidance.

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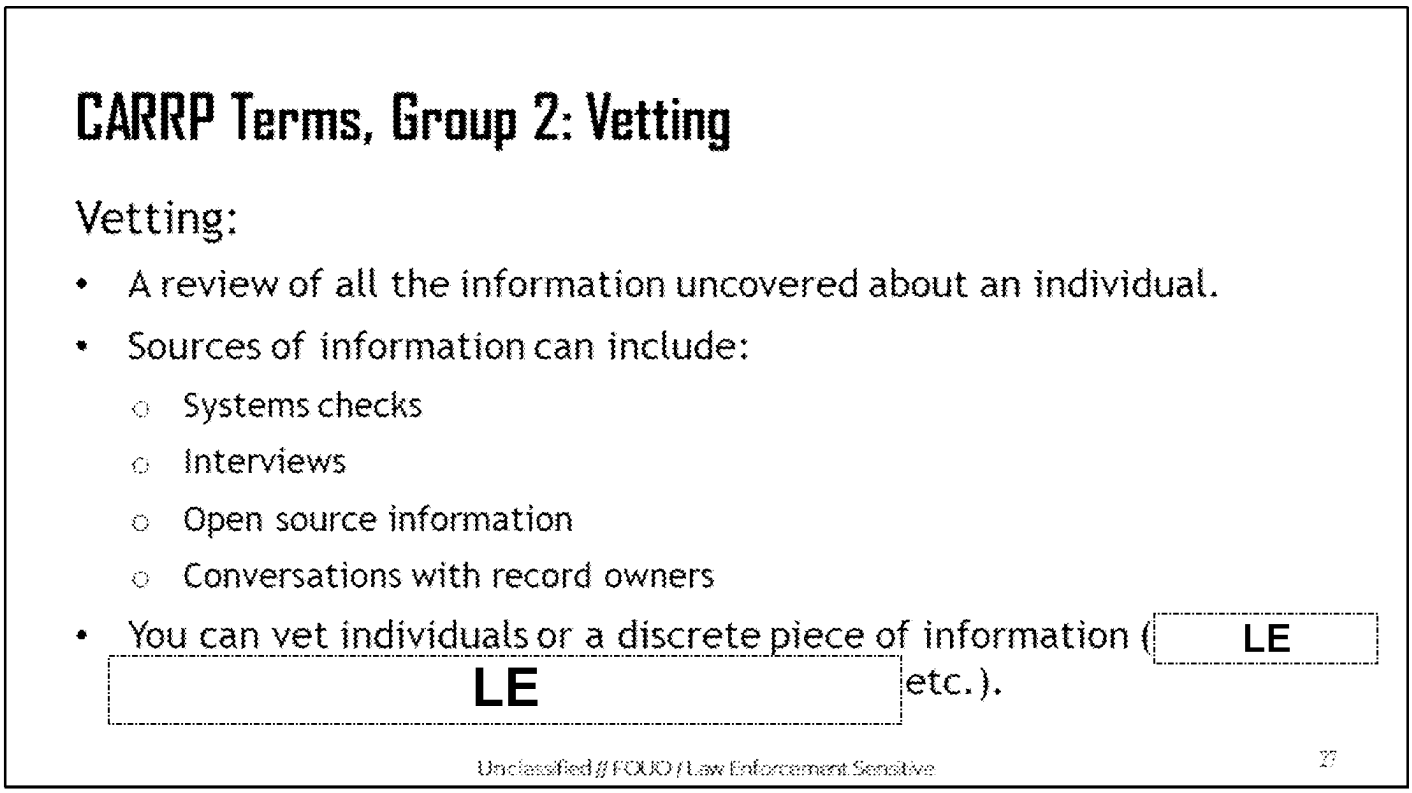

Say:

Vetting is distinct from systems checks, and usually comes after systems checks are performed. In systems checks, you locate the information. In vetting, you review, assess, and evaluate all of the information uncovered about an individual. During the vetting process you determine how a piece of information affects eligibility, and you make a decision as to whether a piece of information is national security related. So, vetting is the "thinking" portion of the process. You're leveraging systems checks, and also bringing in interviews, testimony, open source, and conversations with record owners. Additionally, you're considering the reliability and applicability of the information you have.

How many of you have called an FBI agent to ask about a TECS record? Please use the "Raise Your Hand" function if you have.

[Instructor: Please give students a moment to raise their hand and note how many of the students have contacted the FBI. Ask the class for volunteers to explain why.]

What you're doing when you speak to the FBI is vetting – you're asking the FBI agent if there's any information they have that pertains to the subject and if

it is derogatory in nature. Some examples of things you might ask about include LE

LE

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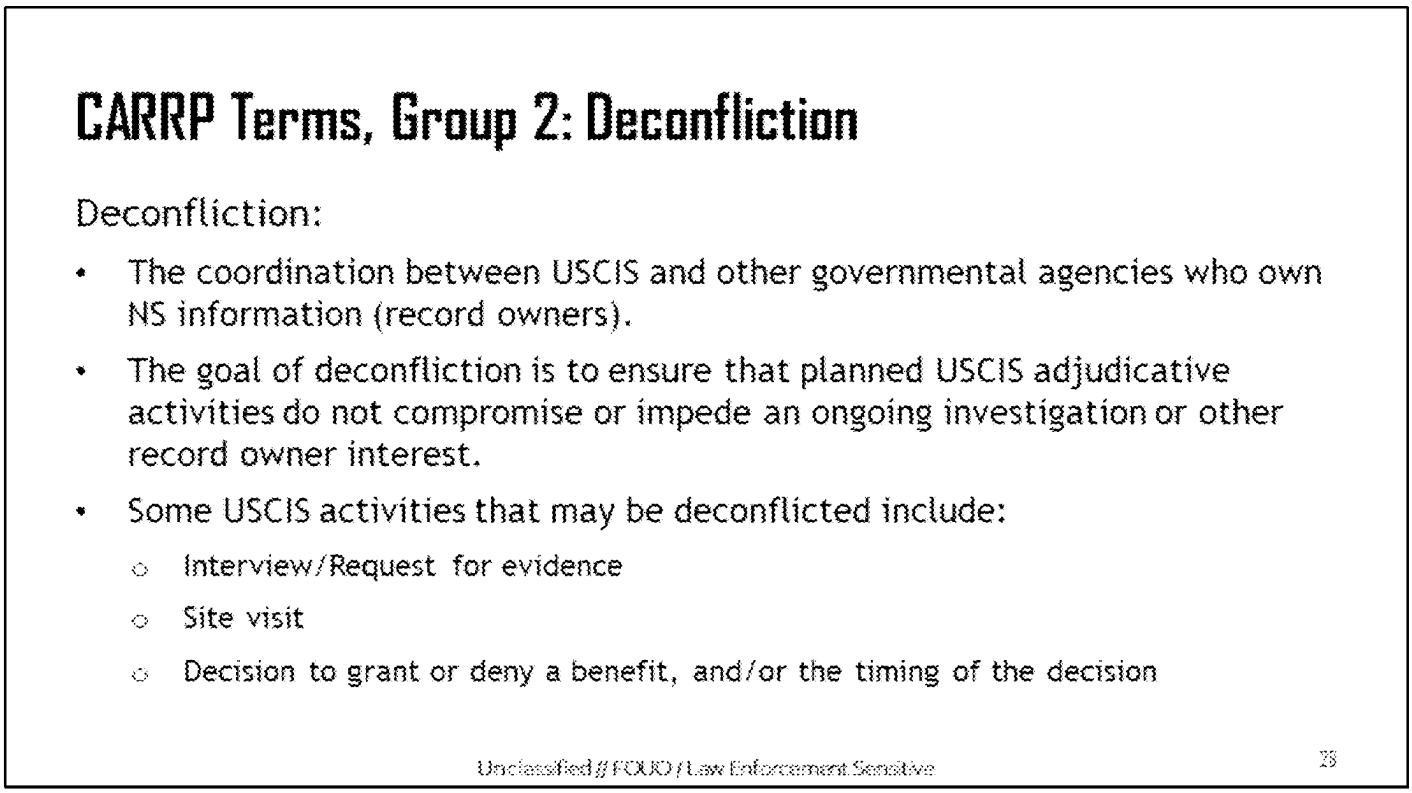

Say:

Our next term is a very important one: deconfliction. Deconfliction is the coordination between USCIS and other governmental agencies who own NS information. We call them "record owners." Deconfliction is a conversation with the stakeholders – the people who will be impacted by our actions. The goal of deconfliction is to ensure that planned USCIS adjudicative activities do not compromise or impede an ongoing investigation or other record owner interest.

Some activities that can be deconflicted include an interview,sending a Request for Evidence, conducting a site visit, adjudicating a benefit, and the timing of any of those activities.

[Instructor: The question(s) below can be posed to students as an interactive discussion. Direct students to use the chat box for their responses.]

How would the timing of a decision be relevant to a law enforcement agency (LEA)?

[Process responses in chat. Possible response below
Maybe they're about to arrest someone and if we deny an application the person

[Process responses in chat. Possible response below.
Maybe they're about to arrest someone and if we deny an application the person will leave the country.]

USCIS has a procedure for granting an abeyance on a case, which means USCIS USCIS will not take an adjudicative action if the requirements of the regulation are are met, including that an investigation is ongoing, it involves a matter that has an an impact on eligibility or discretion, and disclosure of the existence of the investigation or information relating to it would prejudice the ongoing investigation. An abeyance can be used, for instance, if our action would impact impact the work of the LEA but does not mean all work stops on a case or that an an LEA can tell USCIS not to work on a case.

Does anyone have any questions up to this point?

Let's move on to our next set of CARRP terms.

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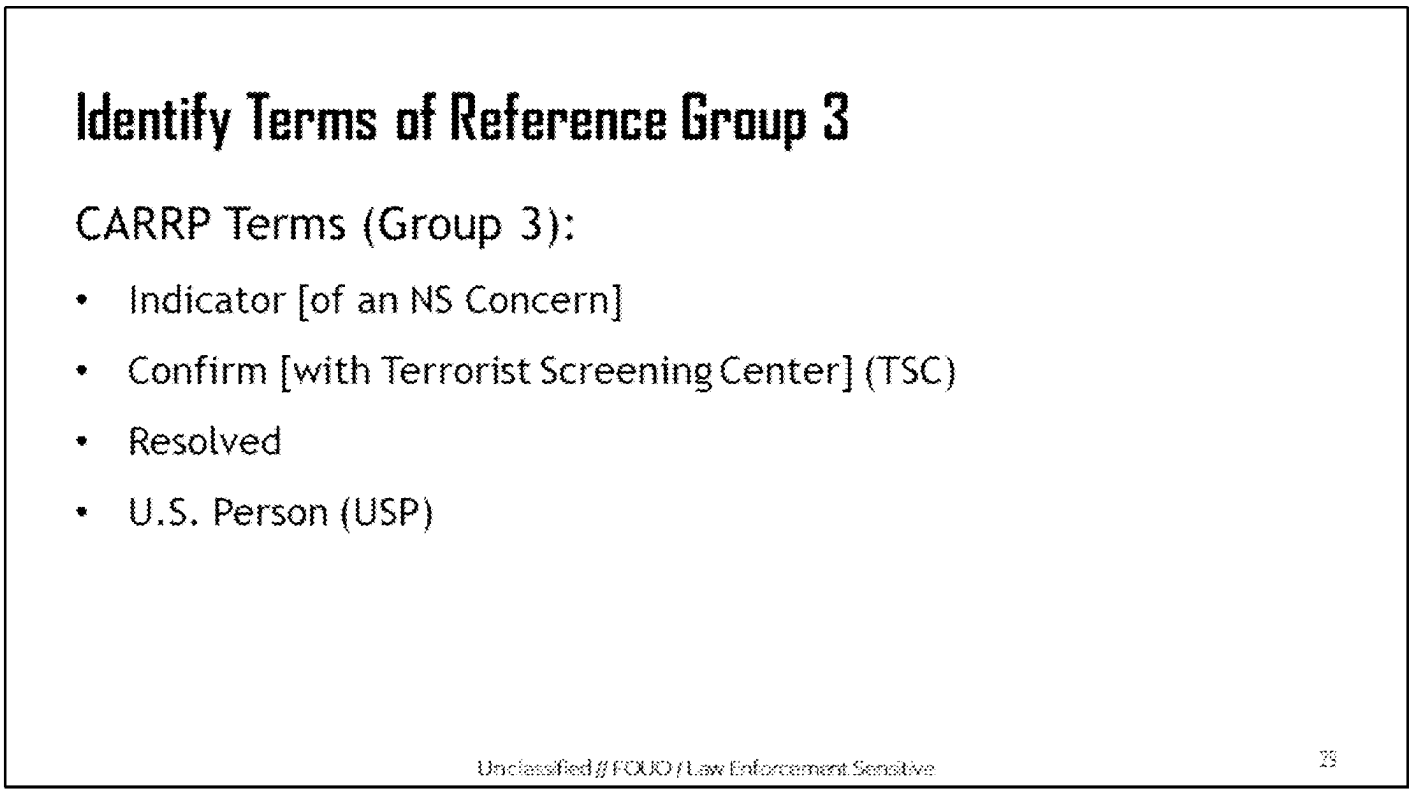

Say:

And here's our third batch of terms that we'll discuss. In the upcoming slides, we are going to discuss indicators, what it means to confirm a hit with the Terrorist Screening Center, what "resolved" means, and the definition of a U.S. person. We're going to define these terms, talk about synonyms for them, how to use them, and what they practically mean to you in USCIS.

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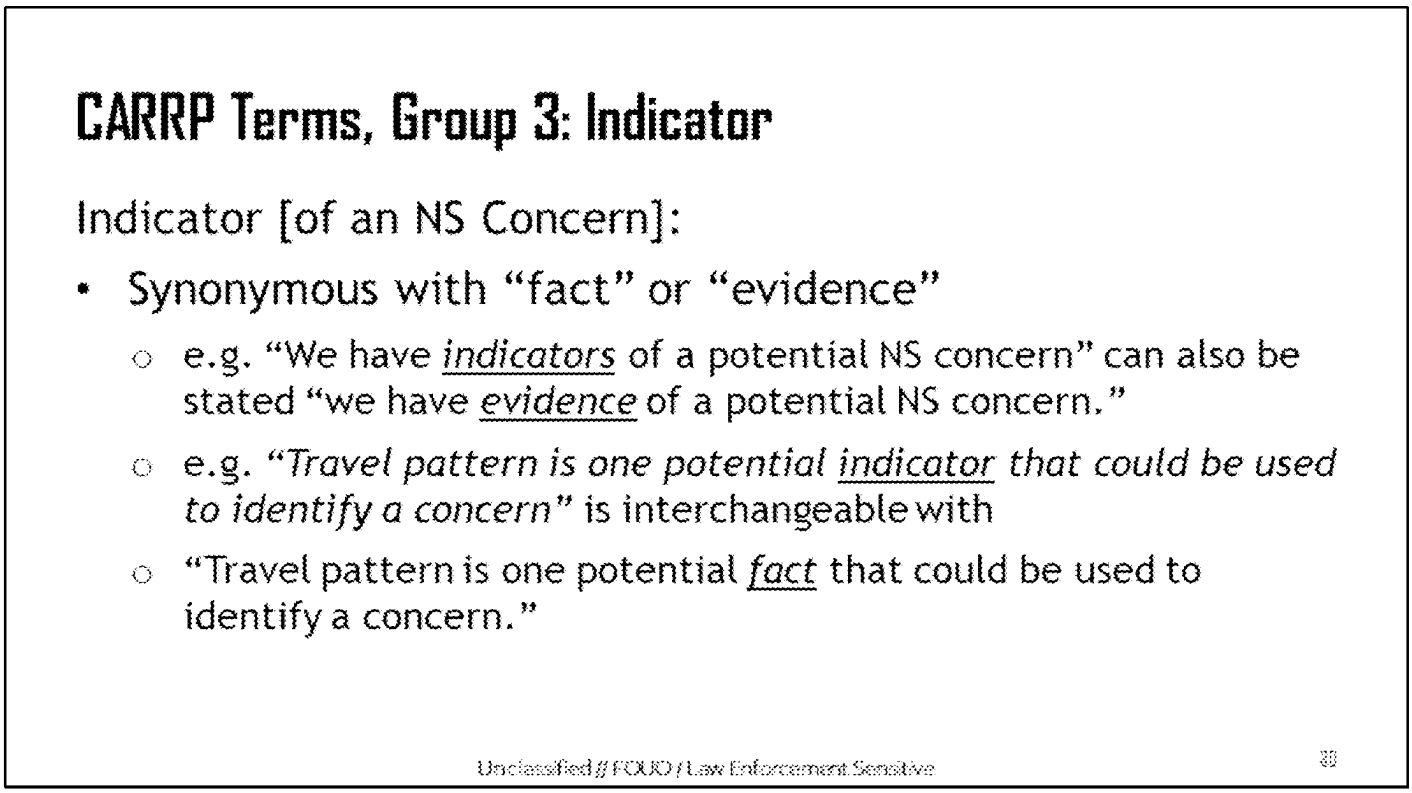

Say:

An "indicator," here in the context of an indicator of a NS concern, is synonymous with the word "fact" or "evidence." So, if we are saying "We have indicators of a potential NS concern" this means the same as saying "We have evidence of a potential NS concern."

In the sentence "Travel patterns are a potential indicator that could be used to identify a concern" the word indicator could be replaced by fact. So this is the same as saying "Travel pattern is one potential fact that could be used to identify a concern."

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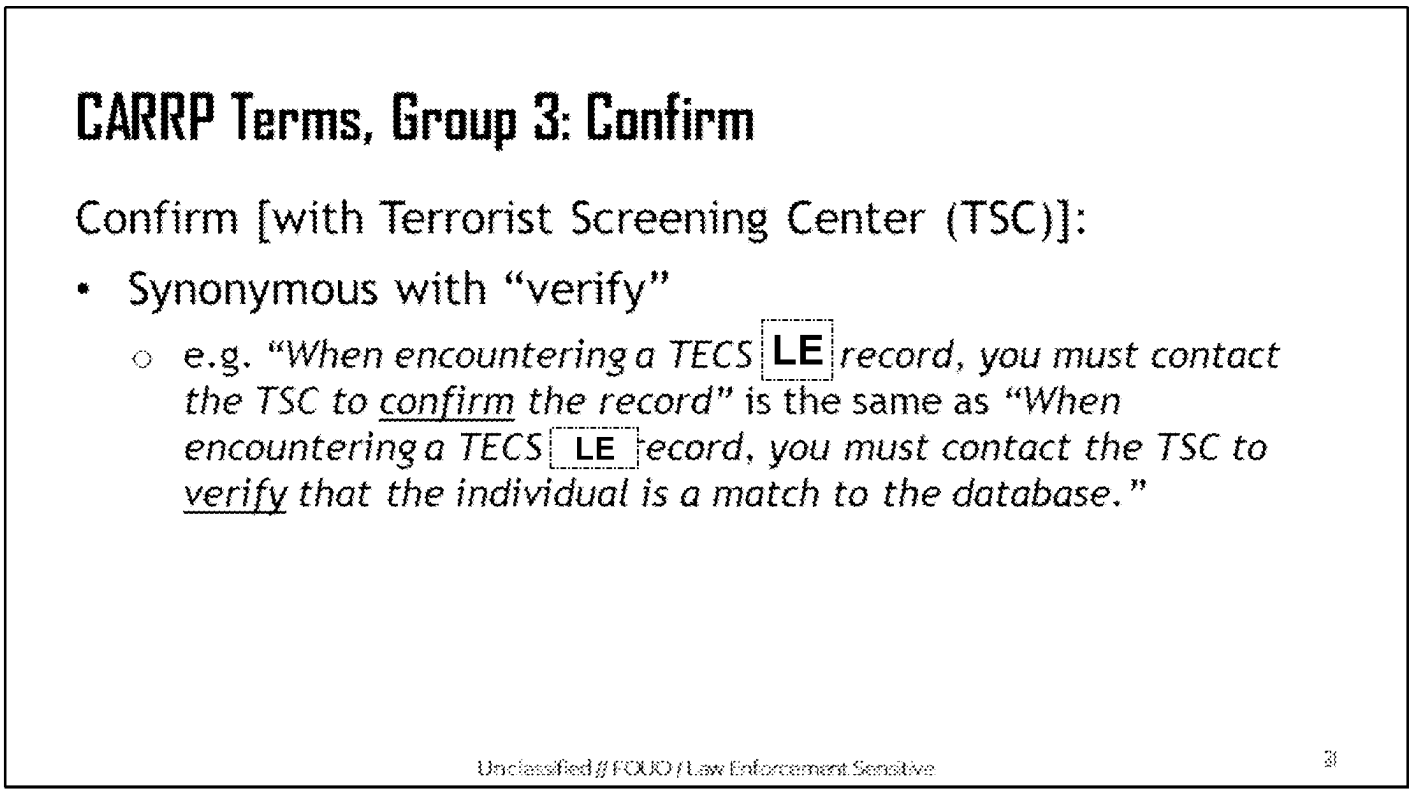

Say:

We just talked about deconfliction a few slides ago. We do not deconflict TECS records with the Terrorist Screening Center (TSC). We confirm an identity match (or mismatch). A lot of officers use the term "deconflict" with the TSC which can be confusing. But what those officers are actually saying is that they confirmed with the TSC as to whether or not the SUBJECT is on the terrorist watchlist or has a LE TECS hit. So, confirm here means the same thing at "verify." We confirm the record with the TSC, or in other words, we contact the TSC to verify the individual is a match to the database.

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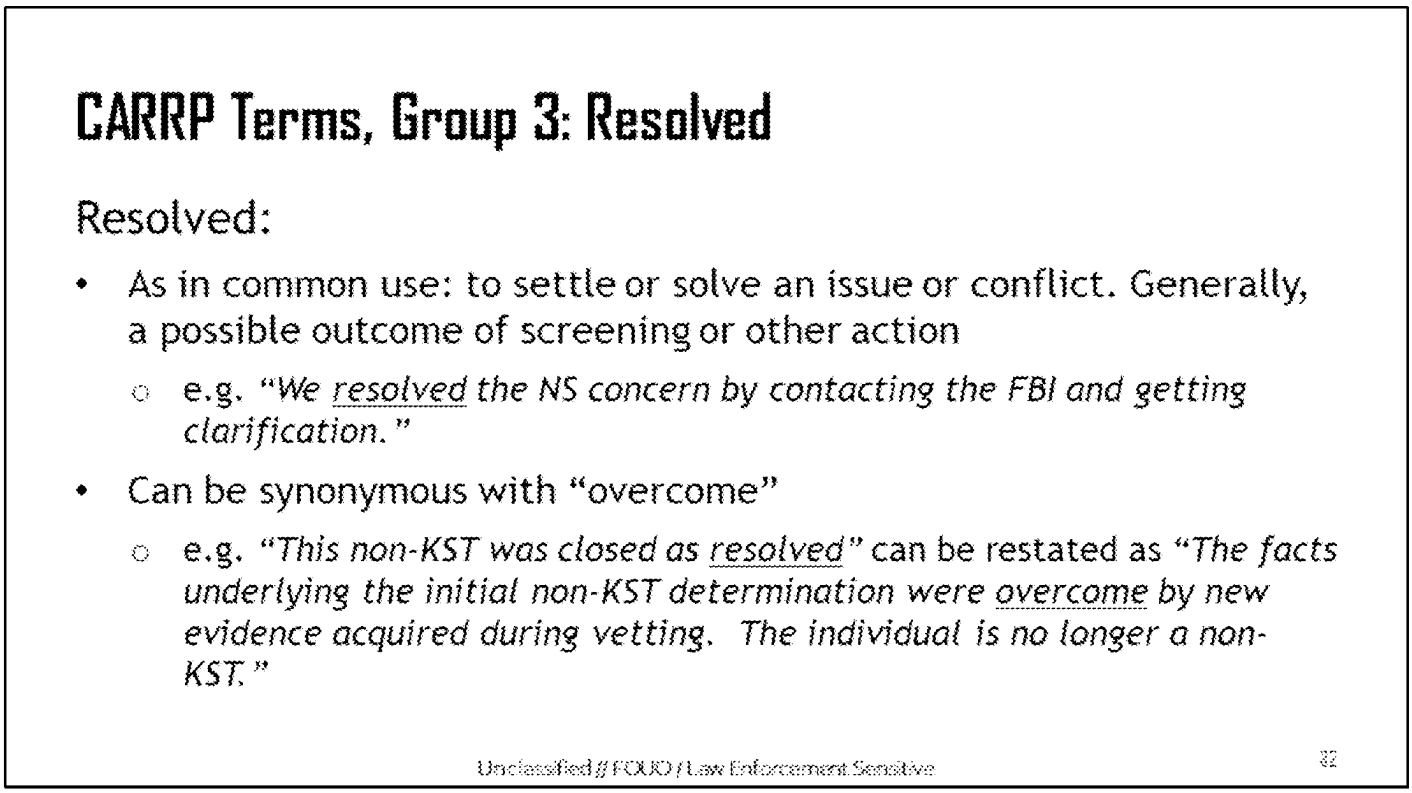

Say:

Most of us are familiar with the term "resolve" – we see it in our Resolution Memos. In common use, it means that we settle an issue, problem, or conflict. In our Resolution Memos, we see information that needs further investigation, it might or might not affect an applicant's eligibility for a benefit, it might conflict with other information we have. In those cases, we resolve the issue so that it is no longer an issue in question. So, saying that "we have resolved the NS concern" means that we were able to make the identified National Security concern a nonissue by taking some action.

We can also use the word "resolve" in the same way we use the word "overcome." Similarly, "This non-KST was closed as resolved" can be restated as "The facts underlying the initial non-KST determination were overcome by new evidence acquired during vetting. The individual is no longer a non-KST."

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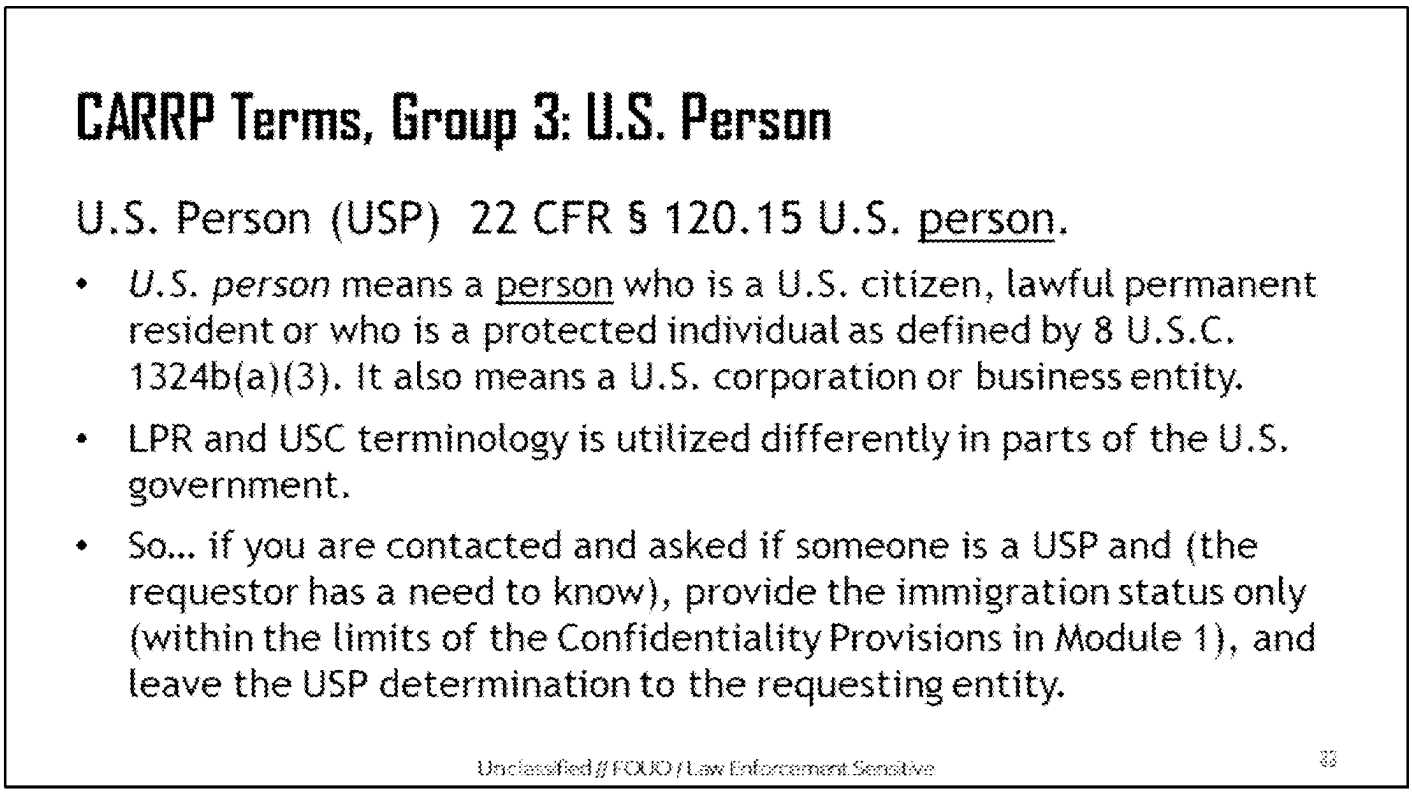

Say:

The term U.S. Person (USP) is defined in 22 CFR § 120.15. "U.S. person" means a person who is a U.S. citizen, lawful permanent resident, or who is a protected individual as defined by U.S.C. 1324b(a)(3). It also means a U.S. corporation or business entity.

Be mindful that lawful permanent resident and U.S. citizen terminology is utilized differently in other parts of the U.S. government. If you're asked by anyone if an individual is a U.S. Person… **don't** provide a response to this specific question! Just provide the immigration status (within the limits of the Confidentiality Provisions we discussed in Module 1), and let the requestor determine what that status means for the individual in question. DHS also has the Single Point of Service (SPS) to answer Requests for Information (RFIs) that originate from law enforcement. Officers can refer law enforcement officers to this service. I am pasting the link for the Single Point of Service in the chat box.

[Facilitator: Copy and Paste the SPS link into the chat: https://www.dhs.gov/publication/dhsallpia-044-dhs-single-point-service-request-information-management-tool. Also, now might be a good time to check in and see if students have any questions.]

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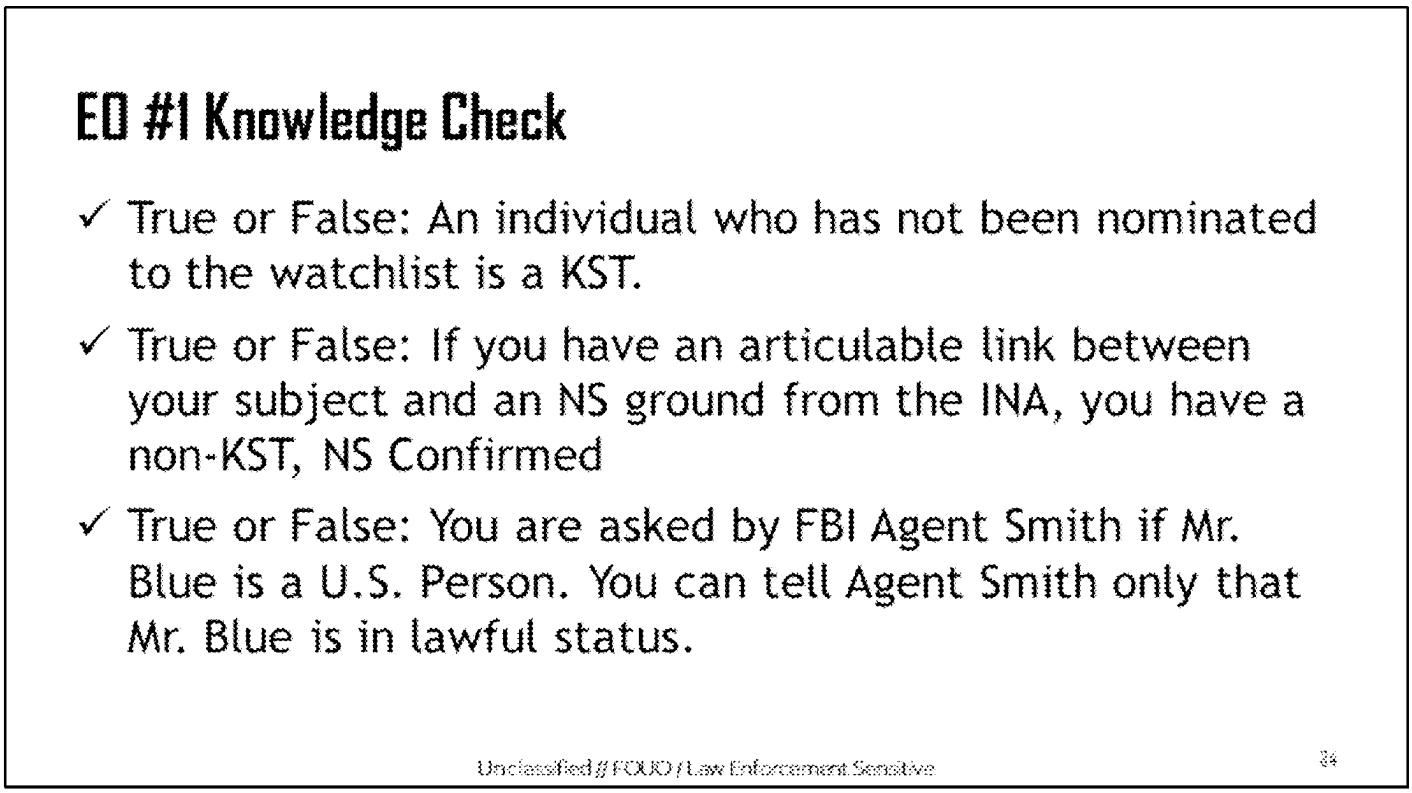

Say:

Let's do a knowledge check.

[Instructor: Randomly call on students to answer the questions one by one. The selected student can place the answer in the chat box. Process the response and add the script below.]

True or False: An individual who has not been nominated to the watchlist is a KST. ***[False. KSTs are nominated and accepted to the Terrorist Watchlist and have a*** LE ***TECS record/CLASS record]***

True or False: If you have an articulable link between your subject and an NS ground from the INA, you have a non-KST, NS Confirmed. ***[True]***

True or False: You are asked by FBI Agent Smith if Mr. Blue is a U.S. Person. You can tell Agent Smith only that Mr. Blue is in lawful status. ***[True. USCIS does not verify whether a subject is a US person. You can refer the agent to the DHS Single Point of Service for information about Mr. Blue. Moreover, before you tell Agent Smith anything about Mr. Blue, confirm that such a disclosure conforms with 8 CFR 208.6 because Mr. Blue is an asylee. If you have questions about complying with confidentiality***

provisions, speak to you chain of command and OCC]

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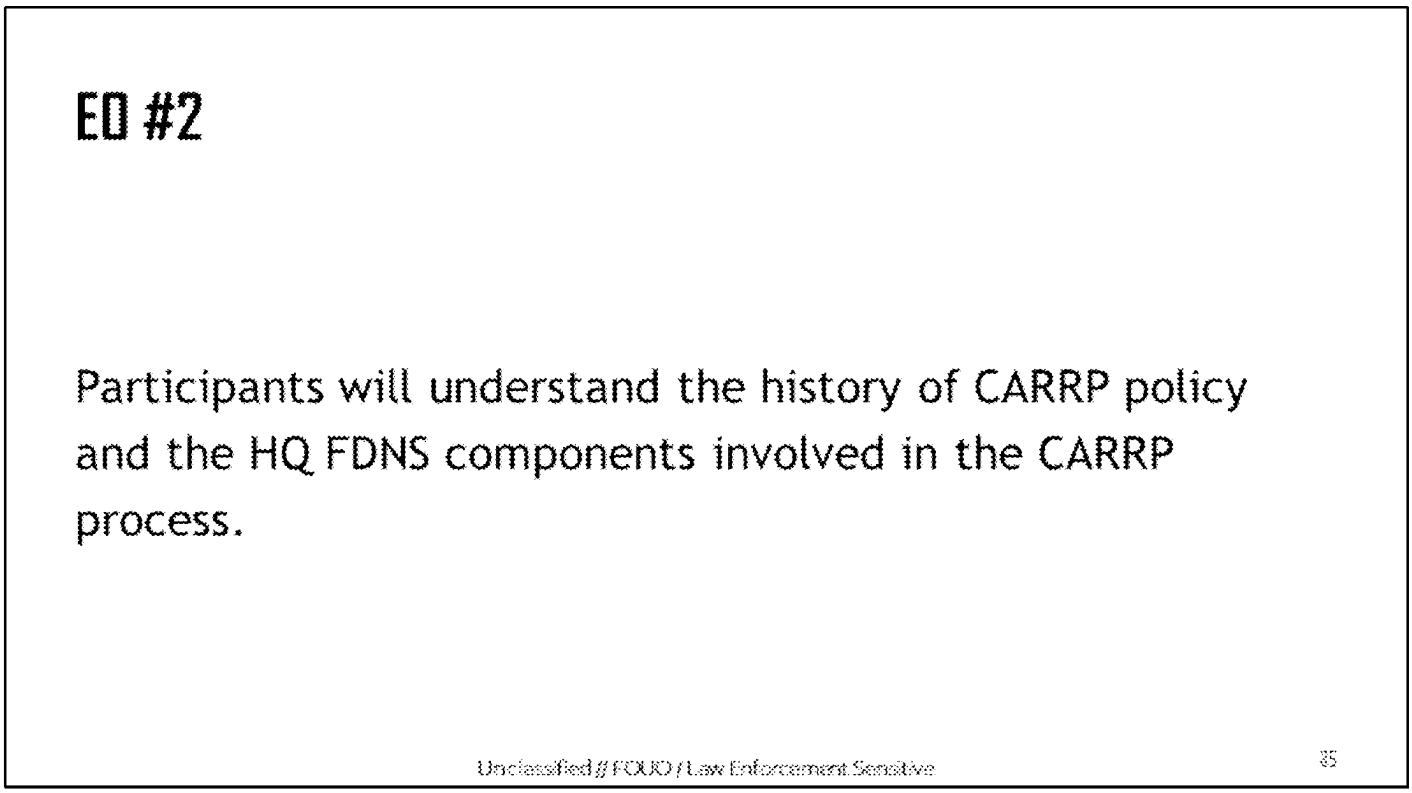

Say:

We will now move on to our next objective which is to understand the history of CARRP policy and the HQ FDNS components involved in the CARRP process.

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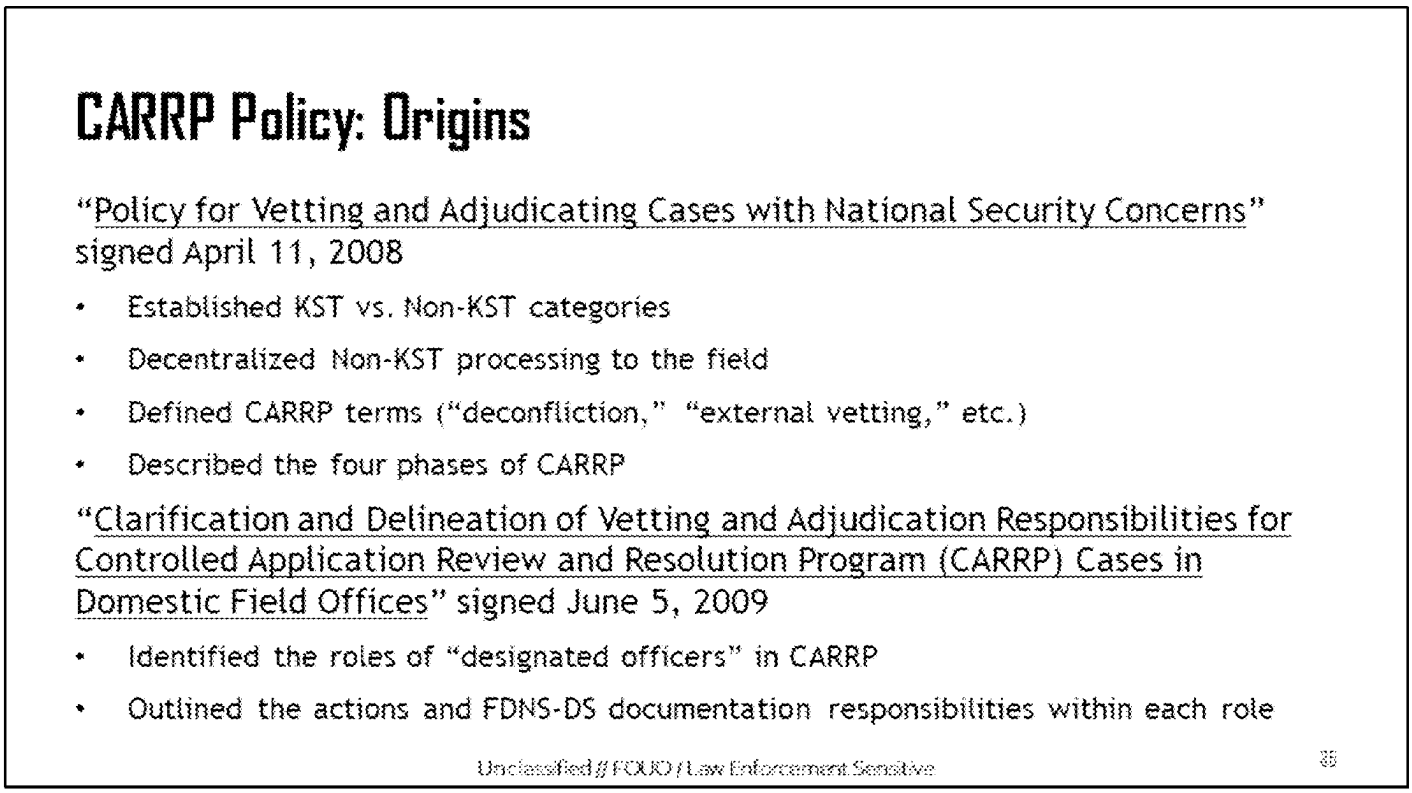

Say:

Now, let's review the history behind CARRP policy and USCIS. Think of the policy over time as a story: *How the CARRP process was born and how it has evolved*. The story begins in 2008 with a memo called "Vetting and Adjudicating Cases with NS Concerns." Prior to CARRP rolling out in April 2008, everything having anything to do with national security was sent to HQ FDNS and adjudicated by a unit called the National Security Adjudications Unit (NSAU). The 2008 memo changed all of that and brought order to NS adjudications – it defined terms, it established the 4 phases of CARRP that we use today, it mandated the use of FDNS-DS to record casework, and it defined the roles of the field and HQ in the NS process.

A little over a year later, in June 2009, another memo was released which further defined the roles in each phase of CARRP within field offices. The 2009 memo gave us the outline for this presentation – Roles, Actions, and DS responsibilities are all clearly outlined in the memo. It's important to note that just because FDNS-IOs and CARRP ISOs have different, delineated roles doesn't mean you shouldn't communicate and work closely together.

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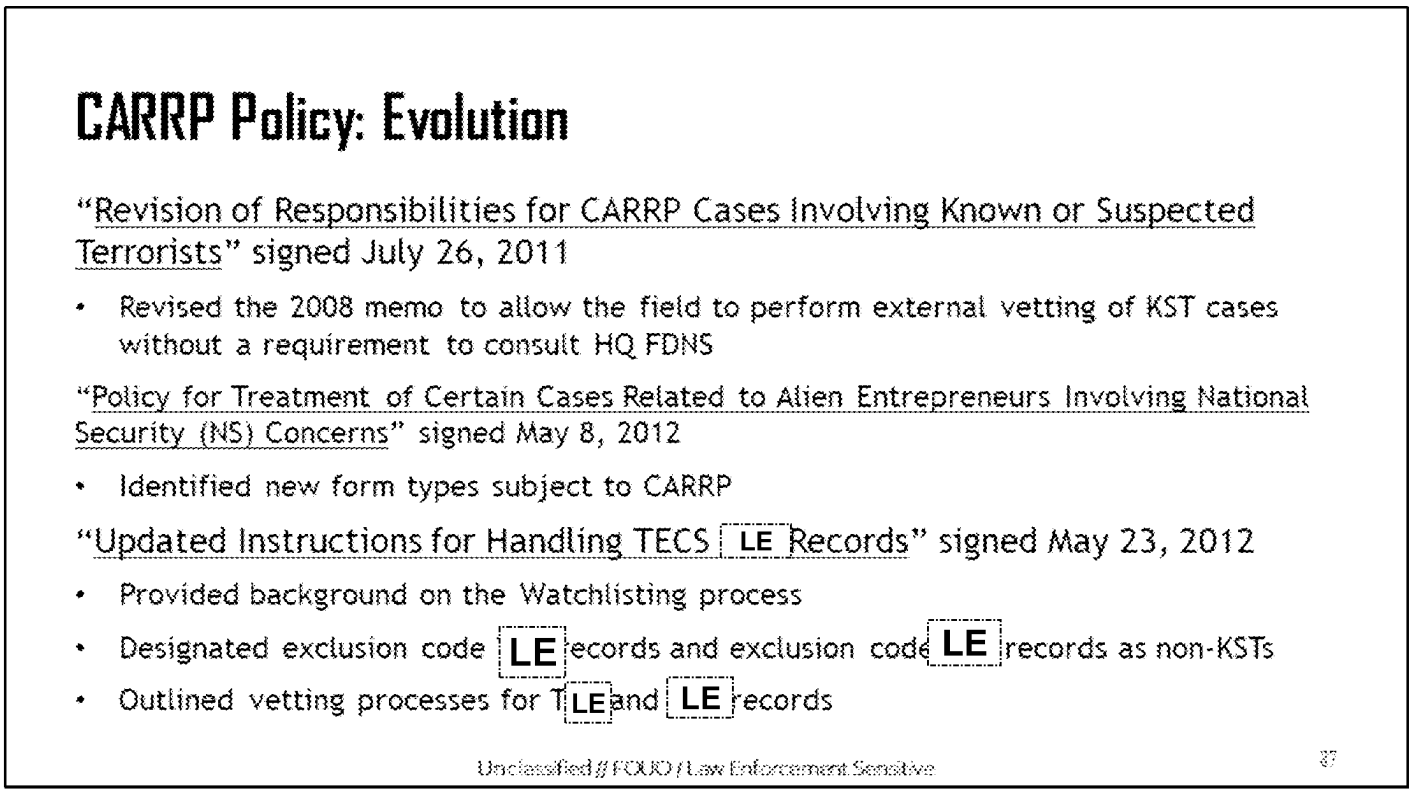

Say:

Fast-forward a little bit to 2011, where there were several changes in the CARRP world. Offices nationwide had gained great experience in working NS cases, with many field offices even having their own JTTF representatives. As a result, the field was allowed to take over external vetting in the third phase of CARRP under the memo titled "Revision of Responsibilities for CARRP Cases Involving Known or Suspected Terrorists." HQ involvement was no longer required for KSTs. This memo enabled the field to work almost every aspect of a KST case, while also providing scenarios under which you could still reach out to HQ FDNS for assistance.

The next two memos to come along were published in 2012. The first memo, titled "Policy for Treatment of Certain Cases Related to Alien Entrepreneurs Involving National Security (NS) Concerns", impacted a part of our NS equation that we haven't really touched on – the organizations or individuals who may be linked to an NS concern. With the rise in concern over the EB5 program, this memo added the following forms as being subject to CARRP:

- I-526 Immigrant Petition by an Alien Entrepreneur
- I-829 Petition by an Alien Entrepreneur to Remove Conditions
- I-924 Application for Region Center
- I-924A Supplement to Form I-924

The second memo, titled "Updated Instructions for Handling LE Records," dealt with Watchlisting issues in KST and non-KST cases. The major takeaway from this memo is that individuals with LE ECS hits with a LE or LE exclusion code are handled as Non-KSTs, not KSTs. The export of LE LE to downstream systems was initially done so LE could be examined, but also served as one way that USCIS realized non-KSTs may need to be scrutinized just as carefully as KSTs. For now, just remember that LE with LE and LE exclusion codes are handled as Non-KSTs and we'll return to this in detail later in the course.

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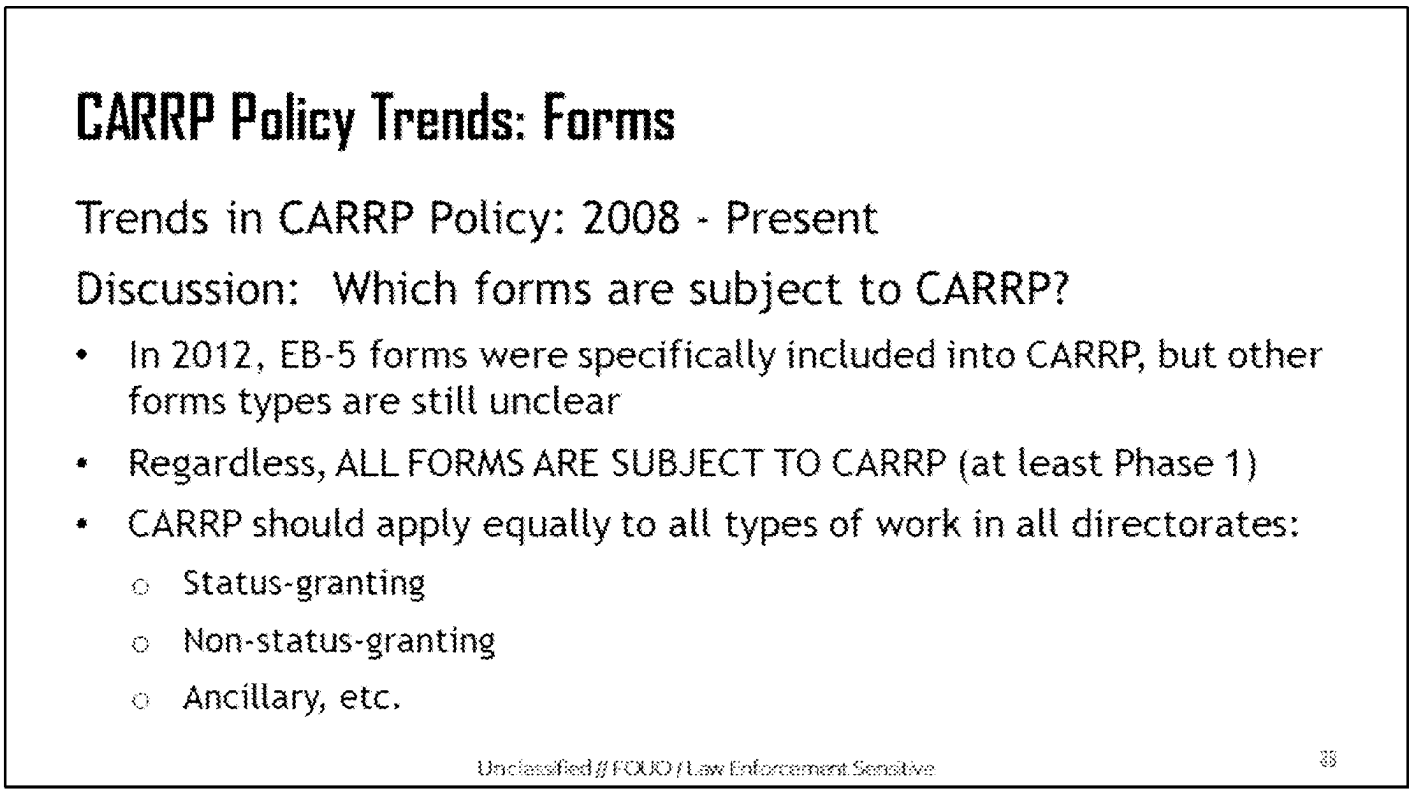

Say:

Now we're going to discuss some trends in CARRP Policy. Which form types are subject to CARRP? Please post your answers in CHAT ***[Give students a moment to respond – based on the previous slide, they should note that the 2012 memo specified that EB-5 forms are subject to CARRP – note their responses and then click to bring up first bullet]***

We know, from the 2012 memo that we just discussed, that Entrepreneurs (specifically, EB-5 applicants) are subject to CARRP. ***[click to bring up next bullet]***

All forms are subject to CARRP, or at least Phase 1 of identification.

However, to determine how extensively we will process cases we tend to try to group forms into types: status-granting, non-status granting, ancillary, etc. Some of these are fairly clear. For example, you know that an I-485 is a status-granting form as it confers permanent residency. However, for some forms or benefits, it might not be so clear.

For example:
- Is an I-751, Petition to Remove Conditions on Residence, a petition

because we don't consider admissibility - only the relationship? Does it grant status even though the applicant is technically already an LPR?

- An I-131, Application for Travel Document, is ancillary when it's filed concurrently with an I-485, Application to Register Permanent Residence or Adjust Status, but is it handled differently when it's filed as a standalone, even though it conveys the same ability to travel?
- Is an I-730, Refugee/Asylee Relative Petition, a petition when someone is abroad, but a status-granting application when someone is already in the US?
- Why do we treat N-565's, Application for Replacement Naturalization/Citizenship Certificate, differently from I-90's, Applications to Replace Permanent Resident Cards, if they both just provide documentation of an existing status?
- Would N-600's, Applications for Certificate of Citizenship, fall into the same category? How about Deferred Action for Childhood Arrivals (DACA), Temporary Protected Status (TPS), or Non-Immigrant Visa (NIV) extensions? They aren't permanent benefits, but they certainly allow a person to stay in the U.S. legally, and someone planning a terrorist attack doesn't care if they have a permanent benefit – the person may just want to have some type of legal status.

In all of those examples, it can be challenging to determine if the form is status-granting, non status-granting, or ancillary.

So, as CARRP policy evolves, the solution has been to say "everything is subject to CARRP." On every single type of form, USCIS proceeds through at least the identification phase of CARRP. We realize that there's a concern, we document the concern, and we go from there. Now that we see everything falls under CARRP, it should also be noted that some forms require more extensive CARRP processing, and some require less based on other policy and adjudicative instructions, such as the I-90 memo and the ancillary benefits memo. The major point here is that EVERYTHING is subject to at least the identification part of the CARRP process!

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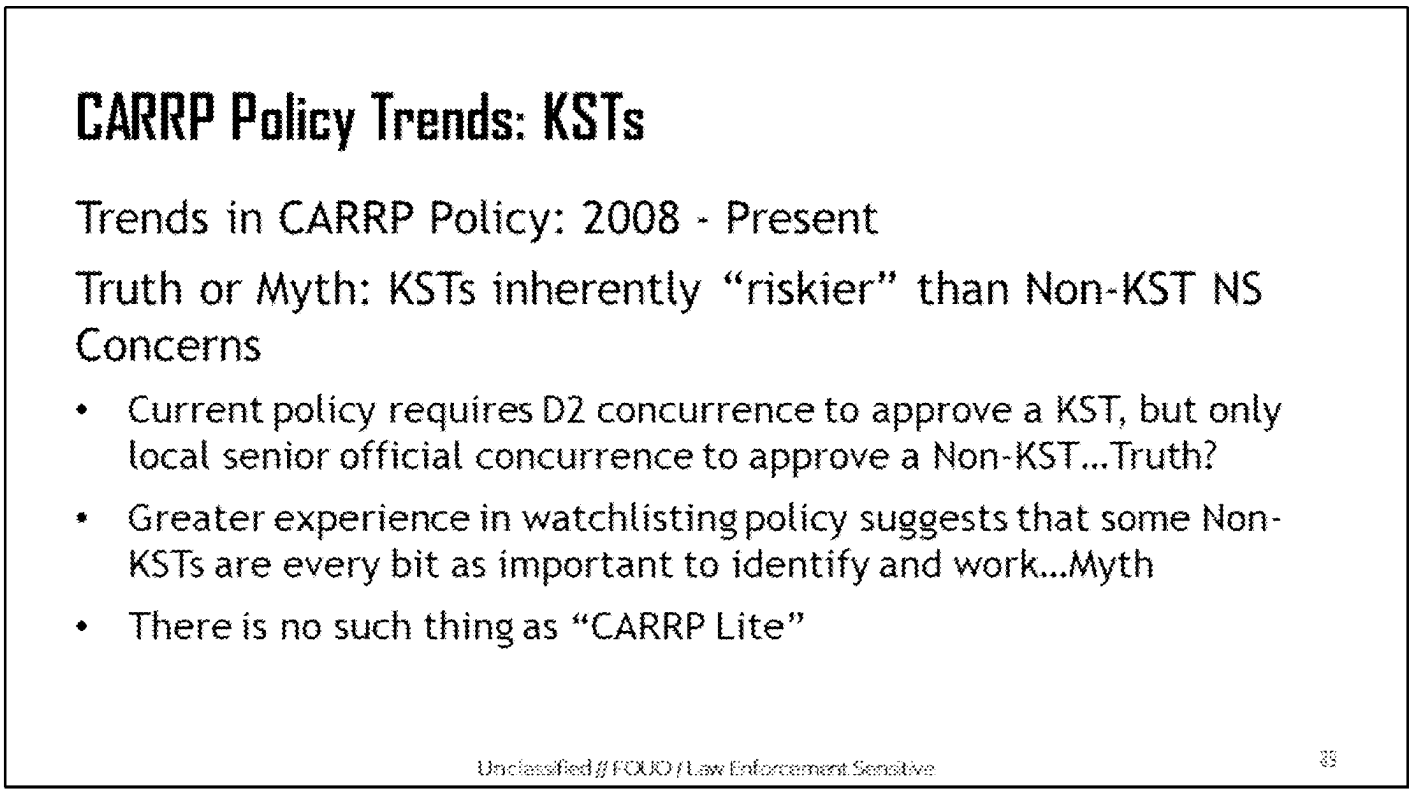

Say:

Turning back to our discussion of KSTs vs. non-KSTs. Looking at the question on the slide: What do you think? Answer in Chat
[Comment on responses you see. Note the majority opinion]

Let's take a look at some indicators ***[click to bring up first bullet]***

At first, we assumed that KSTs were inherently riskier, or at the very least, more difficult to work. That's why there are different levels of approval needed for KSTs and non-KSTs when we're going to grant a benefit. That's also why in the beginning of the evolution of CARRP, all KST work was done at HQ, while non-KST cases were worked in the field. So, that may indicate that KSTs are riskier. ***[click to bring up second bullet]***

Increasingly, there has been a realization that KSTs and non-KSTs can carry similar levels of challenge and risk. They are both NS concerns and are therefore equally significant. When we discuss the articulable link piece of our equation, we like to point out that not all NS is created equal. The division between the way a KST and non-KST is handled is not along a neat line. Greater understanding of watchlisting has shown us that interagency partners

want us to screen certain non-KSTs with the same watchlist architecture that we use for KSTs. ***[click to bring up third bullet]***

When HQ FDNS prioritizes casework, they don't give any more weight to KSTs than non-KSTs – they're all NS concerns! And, most notably – USCIS policy has shifted. While KSTs still have to be approved by the USCIS Deputy Director, the 2011 memorandum allowing KSTs to be worked in the field was an acknowledgement that both types of cases required similar resources and posed similar challenges to front-line officers.

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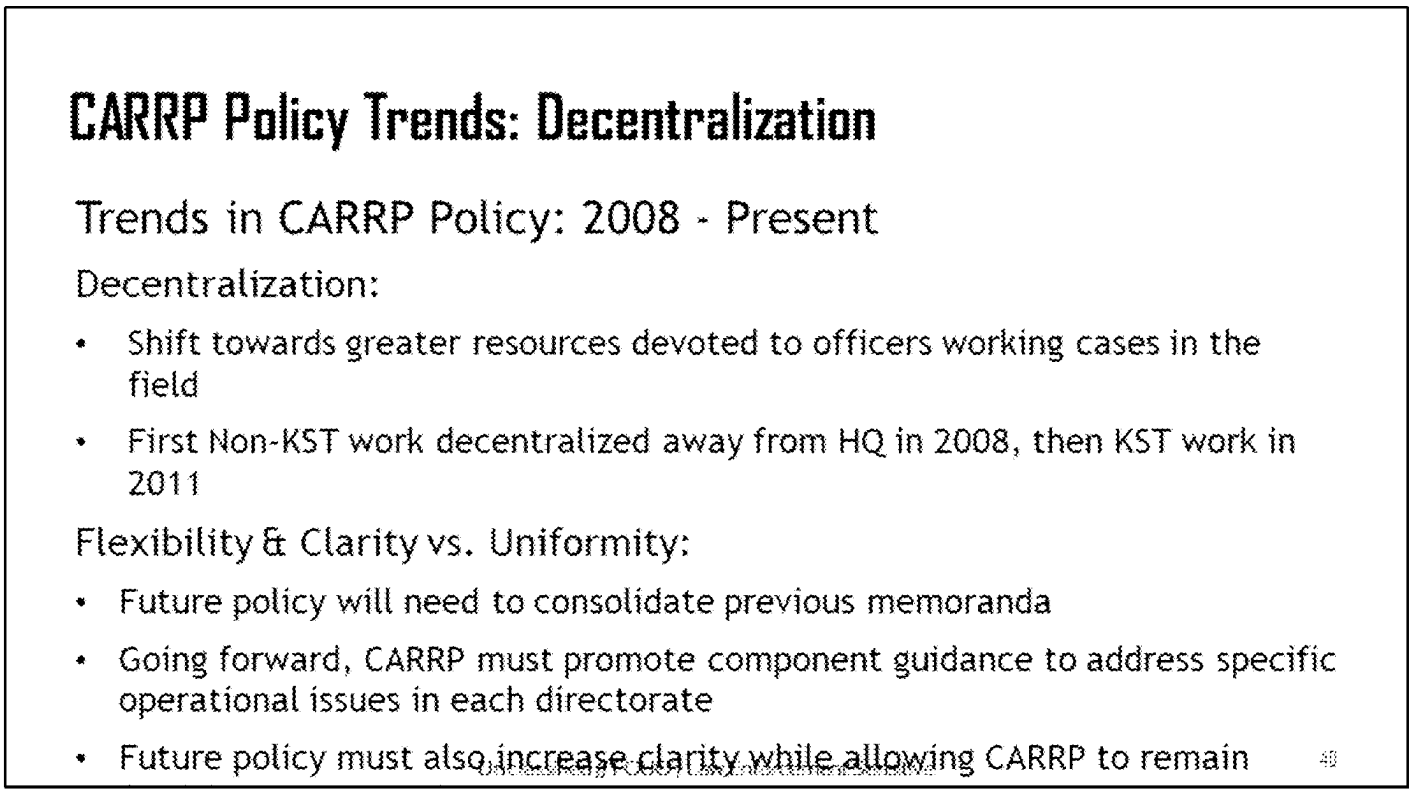

Say:

Another trend in the CARRP policy story centers around the decentralization of the process out of HQ, with less and less work taking place at the HQ level. This is due to local offices having better tools – the ability to interview, the ability to issue RFEs, and more direct liaison with local law enforcement who are the ones actually investigating subjects. Between the 2008 CARRP rollout and the 2011 update, field offices and service centers built much better relationships with local law enforcement and, for the first time, started sending detailees out to other local offices, particularly the Joint Terrorism Task Force (JTTF). Local officers also have a better understanding of your local level operating area.

Refugee officers usually know information about countries they process refugees from on a detailed, intimate level. Similarly, FOD officers know the immigrant communities, the businesses, the religious organizations, the nonprofits, that operate in their area of responsibility far better than they ever could at HQ. But there's another factor here – it also comes down to the fact that the local office is the one that has to make the decision. If an individual is vetted at HQ, ultimately, it's not their approval stamp that's going on a form – it's your CARRP ISO, your BCU ISO, your AO or your RO. Benefit decisions are made locally, so CARRP is better when it's a local process. And along with

the move towards local ownership has come more personnel and more resources – local FDNS teams are expanding and are getting more systems access, more high side check access, etc. For all these reasons, there has been a decided trend towards *decentralization* of CARRP casework over the years.

Another trend in CARRP policy evolution has focused on flexibility and clarity vs. uniformity. Similar to the initial policy rollout in 2008, HQ has an obligation to create national policy for consistent implementation. We added an extra layer of national guidance in NaBISCOP that never existed before to ensure that as we go more local, we're all still doing fundamentally the same thing. National policy and guidance are written at a high level to ensure standardization across the agency. That's also why this training focuses on national policy and guidance and things that are applicable across the board, agency-wide, on every NS case. The major point here is that while CARRP gets its uniformity from national policy and guidance, the various components work to incorporate their unique challenges and needs while still adhering to the national framework.

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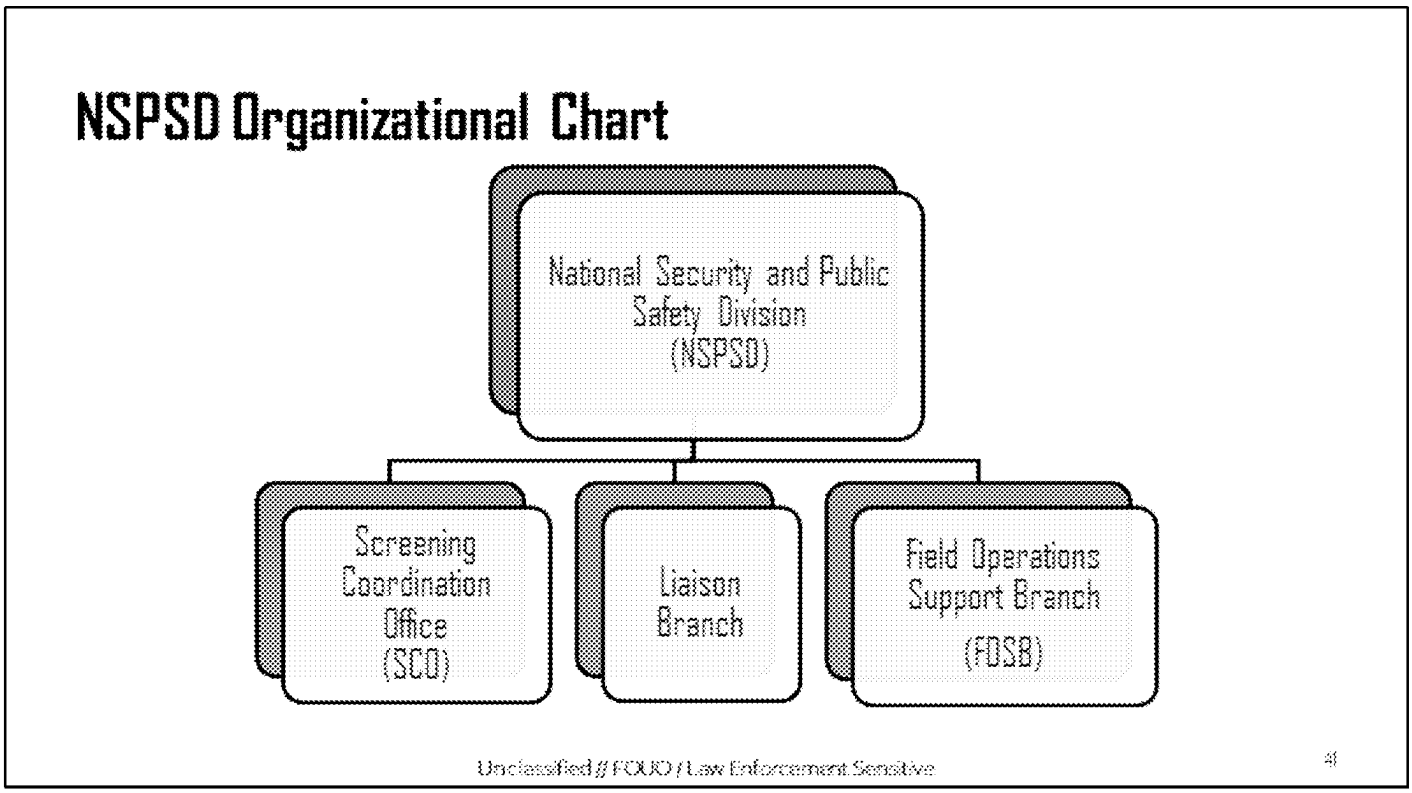

Say:

Now we are going to talk about the HQ FDNS component involved in the CARRP process- the National Security and Public Safety Division, or NSPSD. There are three branches of NSPSD that we will discuss: The Screening Coordination Office, the Liaison Branch, and the Field Operations Support Branch.

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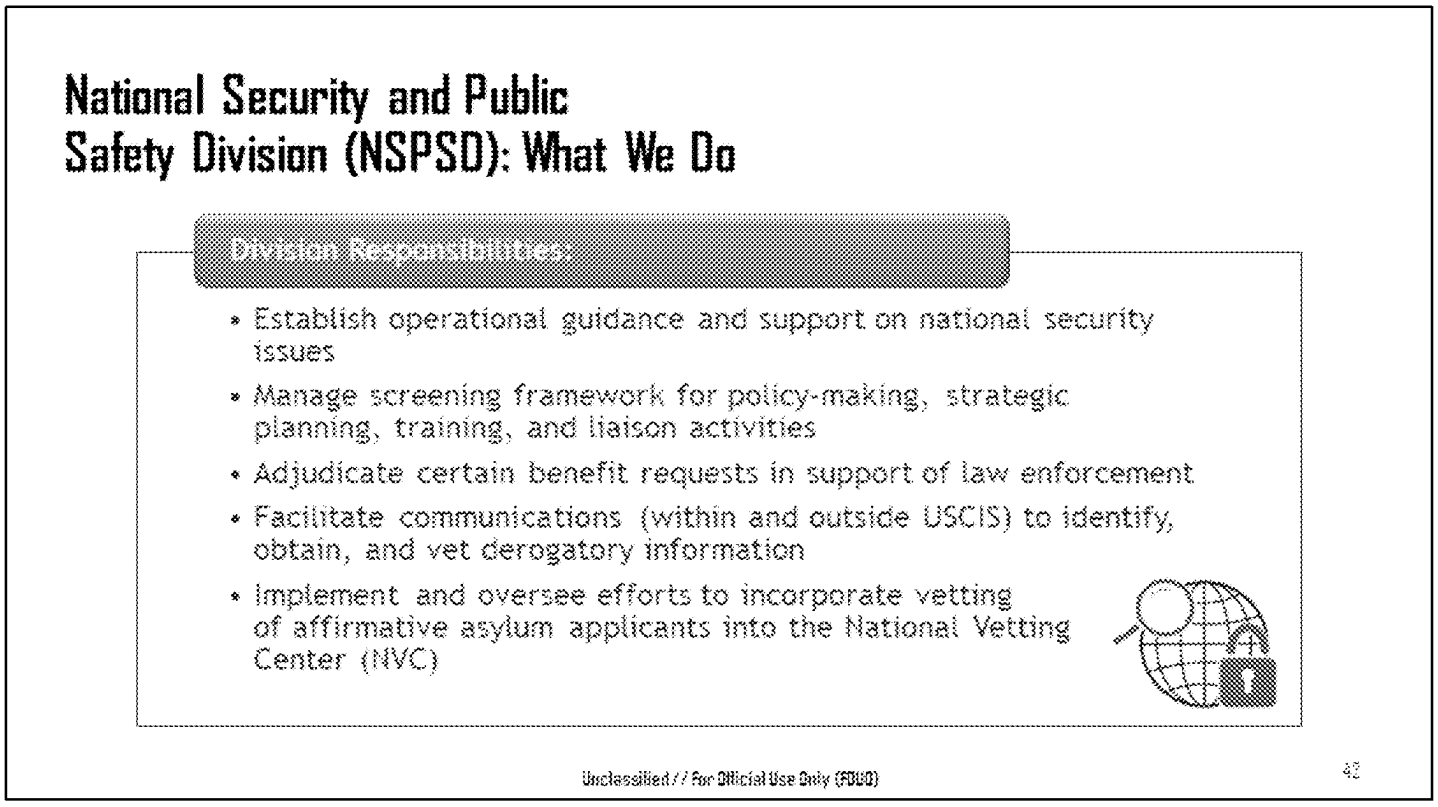


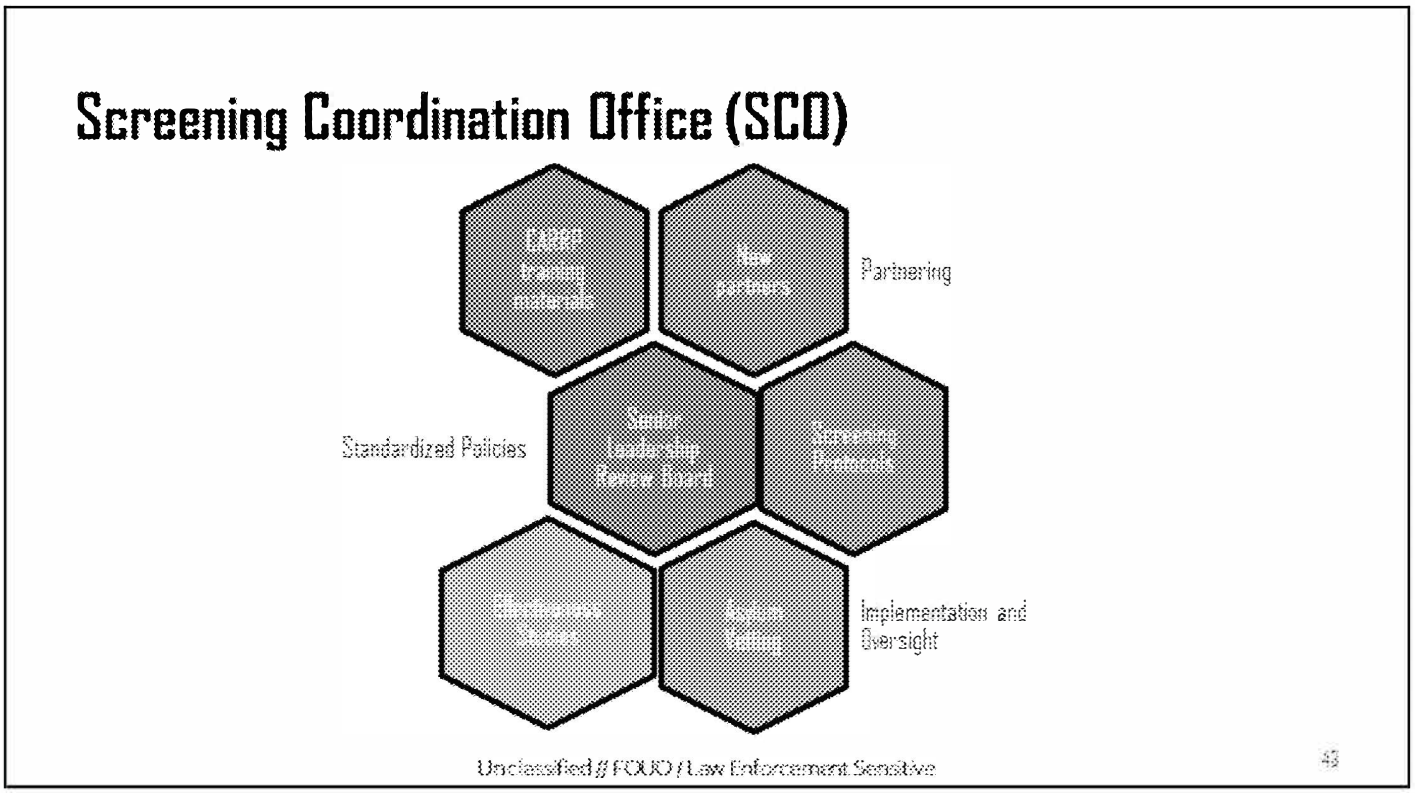
Say:

Let's take a look at National Security and Public Safety Division as a whole. As you can see, NSPSD has many responsibilities.

[Ask learners to independently review the information, pause to allow time to do so.]

Overall, the NSPSD is the knowledge hub for the creation and implementation of screening policy, the performance of background vetting, and the integration of national security and immigration expertise.

[Go to the next slide.]



Say:

The Screening Coordination Office (SCO) provides subject-matter expertise and current policy and procedure guidance for CARRP training materials, including all of our PowerPoint slides and the Studies in National Security Series that you'll see as part of this course. They also co-chair the Senior Leadership Review Board Working Group, which prepares CARRP cases for Deputy Director review. SCO studies and evaluates current practices and improves the quality, effectiveness, and efficiency of national security programs.

The SCO oversees and maintains screening protocols and establishes the overarching screening framework with standardized policy priorities and objectives. Some policy memos that have been written by the SCO include:

- TECS Record Creation SOP
- Procedures for IDENT fingerprints
- Uniform TECS Guidance describing when to query persons affiliated with an applicant or beneficiary, such as roommates, family members, or associates
- FinCEN Referral Guidance governing when to query FinCEN based on an LHM referral

The SCO also identifies new screening opportunities and partners, including

implementation and oversight of agency efforts to vet affirmative asylum applicants at the National Vetting Center (NVC). Other pilots and studies conducted by the SCO include:

- FBI Name Check Study Update assessing the cost-effectiveness of the Namecheck program
- I-539 studies to assess the utility of biometrics and NCTC screening on a nonimmigrant change of status population
- Immigration Application Screening Pilot to gauge the utility of NCTC screening of N-400 applicants

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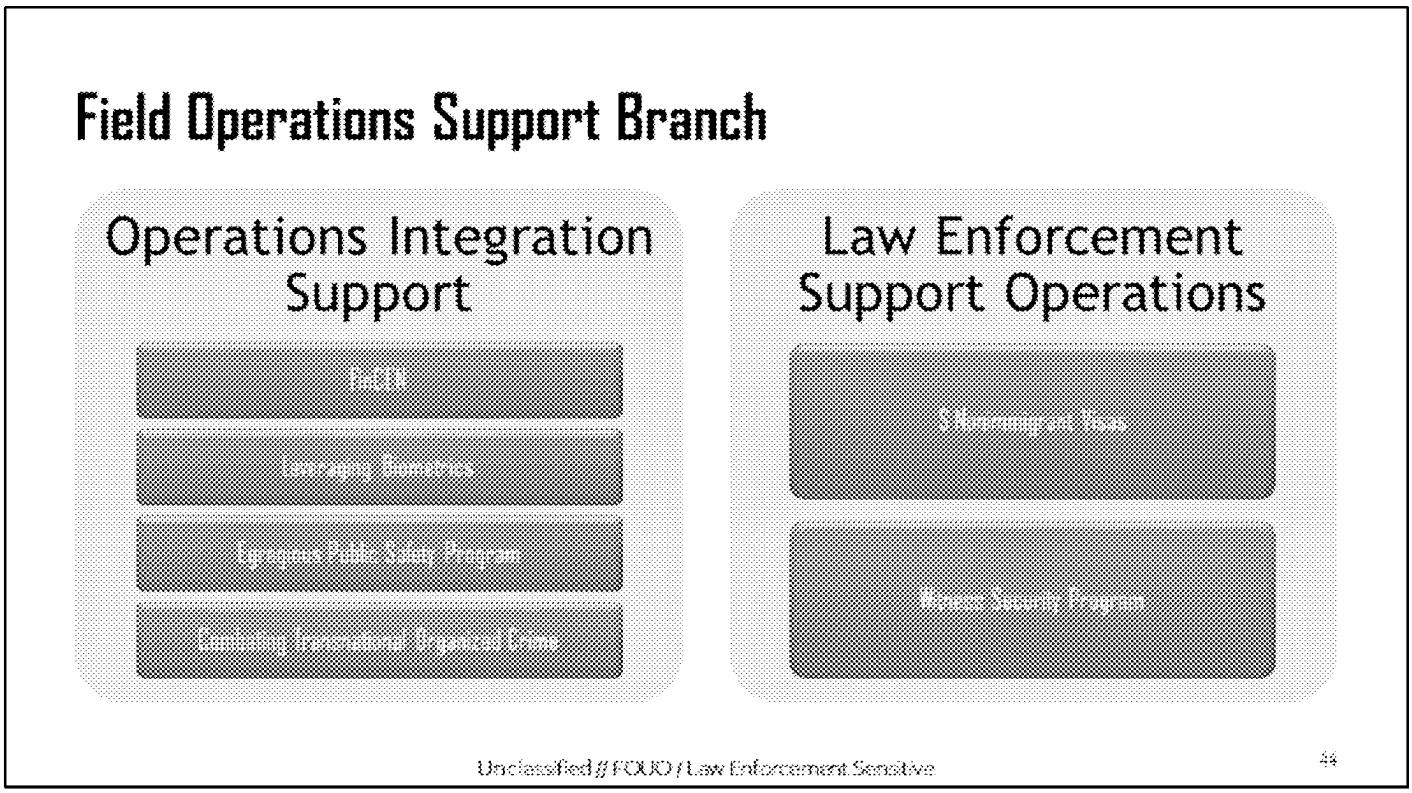

Say:

The Field Operations Support Branch consists of two sections: Operations Integration Support (OIS) Section and Law Enforcement Support Operations (LESO) .

The Operations Integration Support Section facilitates information sharing on security, intelligence, and public safety issues.
In addition to being responsible for responding to requests submitted by field personnel for information from the Financial Crimes Enforcement Network (FinCEN), OIS is focused on four primary program areas:

- Leveraging Biometrics to Detect Immigration Fraud
- Collaboration with Immigration and Customs Enforcement – Enforcement Removal Operations ERO
- Support to International Initiatives
- Combating Transnational Organized Crime (CTOC)

The Law Enforcement Support Operations section is responsible for administering law enforcement related immigration programs. It should be noted that this entire branch used to be called LESO but later changed to Field Operations Support. So, if you see LESO on documents it could be referring to the newly created Field Operations Support Branch.

The Law Enforcement Support Operations Branch (LESO) administers two law enforcement based-immigration programs, S-Nonimmigrant Visas and the Witness Security Program.

S-Nonimmigrant Status:

- S-nonimmigrant status is initially requested by a federal or state Law Enforcement Agency (LEA) via Form I-854, which is then certified by the local U.S. Attorney, the requesting LEA HQ, the Attorney General (delegated to the Assistant Attorney General for the Office of Enforcement Operations, Criminal Division, OEO), and then forwarded to FDNS HQ for adjudication.
- The Assistant Attorney General (OEO) must certify that the alien's presence in the United States is required and certifies the significance, importance, and worthwhileness of the alien's assistance to law enforcement. This certification is non-reviewable.
- Using Form I-854, Inter-Agency Alien Witness and Informant Record, the Assistant Attorney General also certifies the alien's criminal history and any inadmissibility waivers required under Section 212 of the INA.
- USCIS holds the final discretionary authority to approve or deny the request for S-nonimmigrant classification.
- S-nonimmigrant status is granted for a period of 3 years with NO possibility for extension.
- There are two types of S-nonimmigrant status

An S-5 is an alien witness or informant in a criminal matter.

An alien may be classified as an S-5 alien witness or informant if the alien:

- Possesses critical reliable information concerning a criminal organization or enterprise;
- Is willing to supply, or has supplied, such information to federal or state LEA; and
- Is essential to the success of an authorized criminal investigation or the successful prosecution of an individual involved in the criminal organization or enterprise.

An S-6 is an alien witness or informant in counterterrorism matter.

An alien may be classified as an S-6 alien counterterrorism witness or informant if the alien:

- Possesses critical reliable information concerning a terrorist organization, enterprise, or operation;
- Is willing to supply or has supplied such information to a federal LEA;
- Is in danger or has been placed in danger as a result of providing such information; and

- Is eligible to receive a reward under section 36(a) of the State Department Basic Authorities Act of 1956.

Processing S-nonimmigrant applications:

- The Form I-854 and accompanying documents must include the agency's reasons for seeking the cooperation of the alien and the alien's past, present, and/or future assistance.
- Spouses, married and unmarried sons and daughters, and parents of an alien witness or informant of S-5 and S-6 nonimmigrants when accompanying, or following to join must be included on the principal alien's request for an S nonimmigrant visa.
- Only 200 people may be admitted in S-5 status each year, and only 50 may be admitted in S-6 status each year.
- The LESO officer is responsible for reviewing the A file(s) for completeness and requesting additional information or waivers if necessary.

LESO also adjudicates or facilitates the adjudication of immigration benefits requested by an alien in the U.S. Marshals Service Witness Security Program, or WSP. WSP participants' cases are usually unclassified but require special handling procedures to protect the identity of the person and family members.

Witness Security Program:

- US Marshall Service relocates cooperating witnesses and gives them new legal identities, financial assistance, and immigration assistance.
- LESO adjudicates immigration benefits requested by aliens in the program, I-765s Employment Authorization, I-854s, I-485s, and I-90s.
- LESO facilitates various applications I-130/I-485, I-90s, I-751, N-400 and N-600s (application for certificate of citizenship)

LESO is in the process of completing Standard Operating Procedures (SOPs) for adjudication and facilitation of the applications shown below:

- I-854, Inter-Agency Alien Witness and Informant Record
- Updating I-130/I-485, Petition for Alien Relative & Application to Register Permanent Residence or Adjust Status cases
- I-90, Application to Replace Permanent Resident Card
- I-751, Petition to Remove the Conditions of Residence
- Updating N-400, Application for Naturalization cases
- N-600, Application for Certificate of Citizenship

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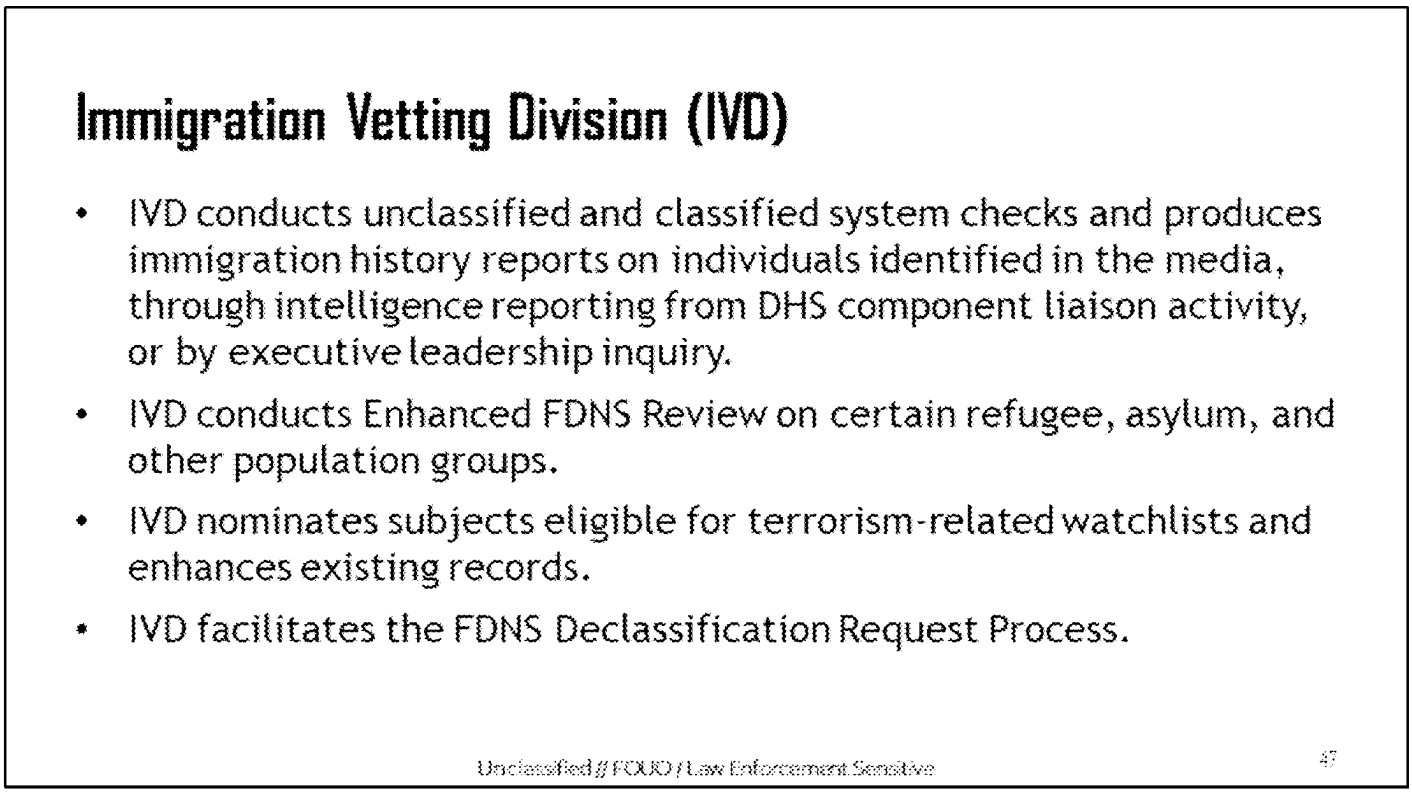

Say:

IVD also conducts unclassified and classified system checks and produces immigration history reports on individuals identified in the media, through intelligence reporting from DHS component liaison activity, or by executive leadership inquiry. They also conduct Enhanced FDNS Review on certain asylum, and other population groups and nominates subjects eligible for related watchlists and enhances existing records.

Finally, IVD facilitates the FDNS Declassification Request Process. There's an titled "Standard Operating Procedures for Requesting Declassification of Security Information for Use in Adjudications" and in later modules we will those high-side checks in more detail.

Does anyone have any questions up to this point? How is everyone's BINGO looking?

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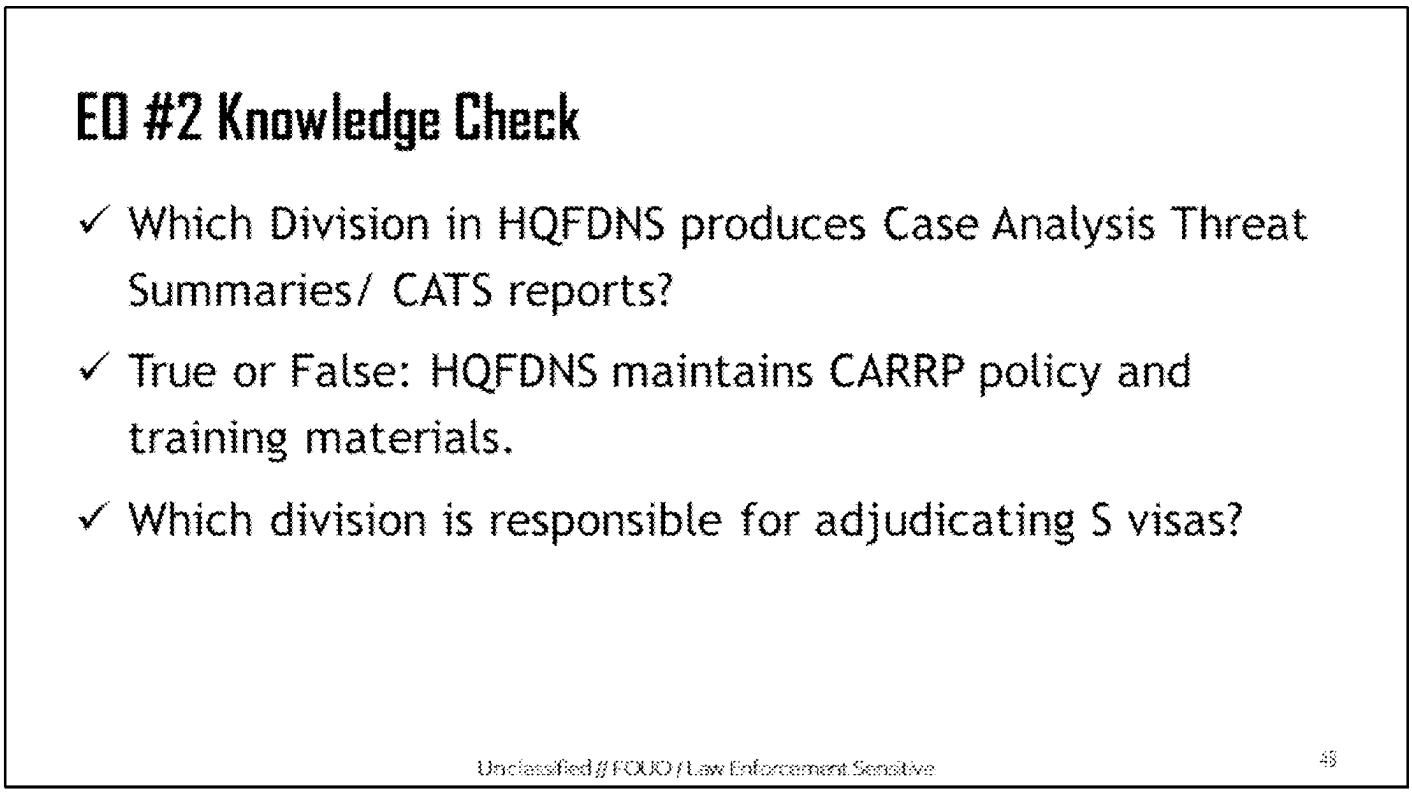

Say:

Let's do a knowledge check.

[Instructor: Randomly call on students to answer the questions one by one. The selected student can place the answer in the chat box. Process the response and add the script below.]

Which Division in HQFDNS produces Case Analysis Threat Summaries/ CATS reports? ***[Immigration Vetting Division]***

True or False: HQFDNS maintains CARRP policy and training materials. ***[True]***

Which division is responsible for adjudicating S visas? ***[Law Enforcement Support Operations (LESO)]***

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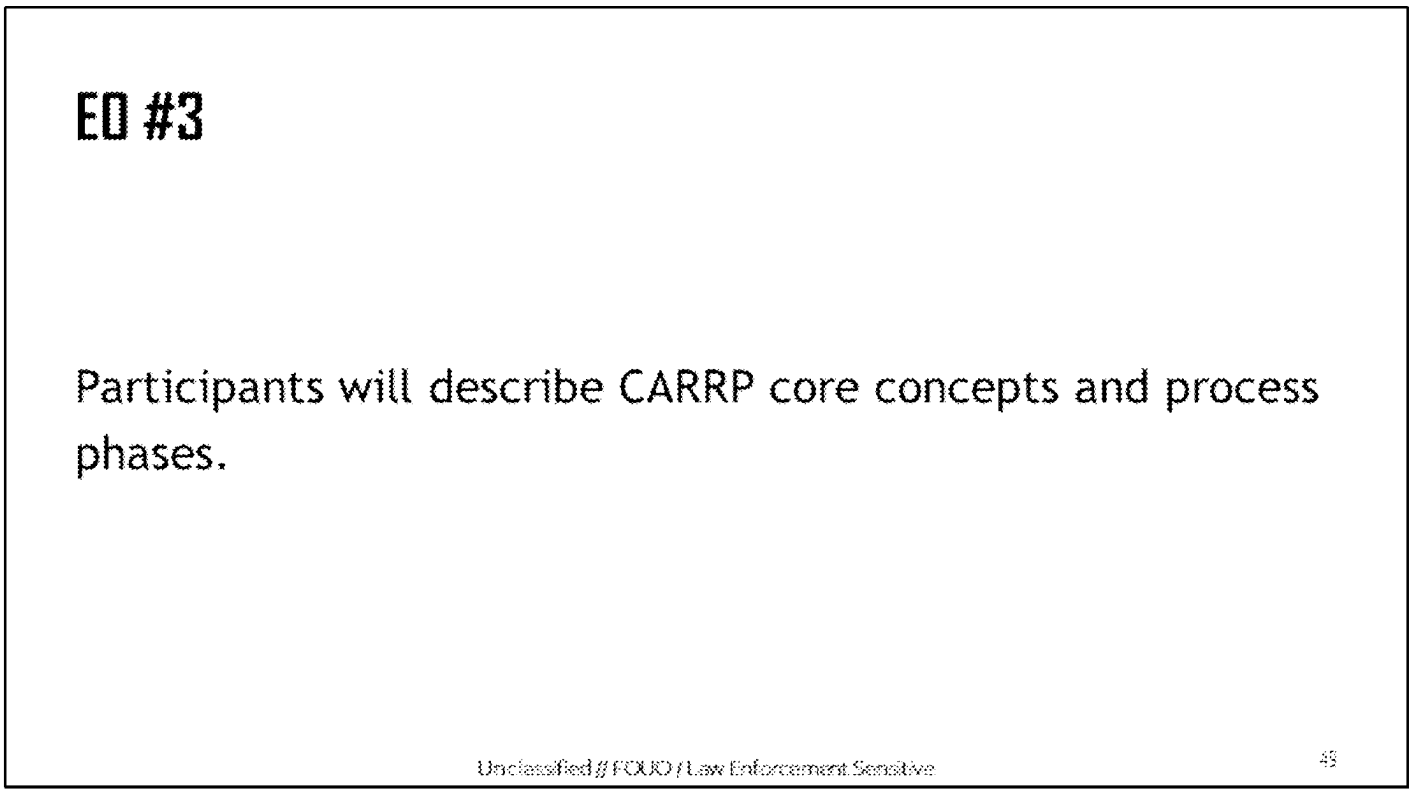

Say:

Now we are going to move away from our discussion of CARRP policy and HQ FDNS and talk about the core concepts and process phases of CARRP.

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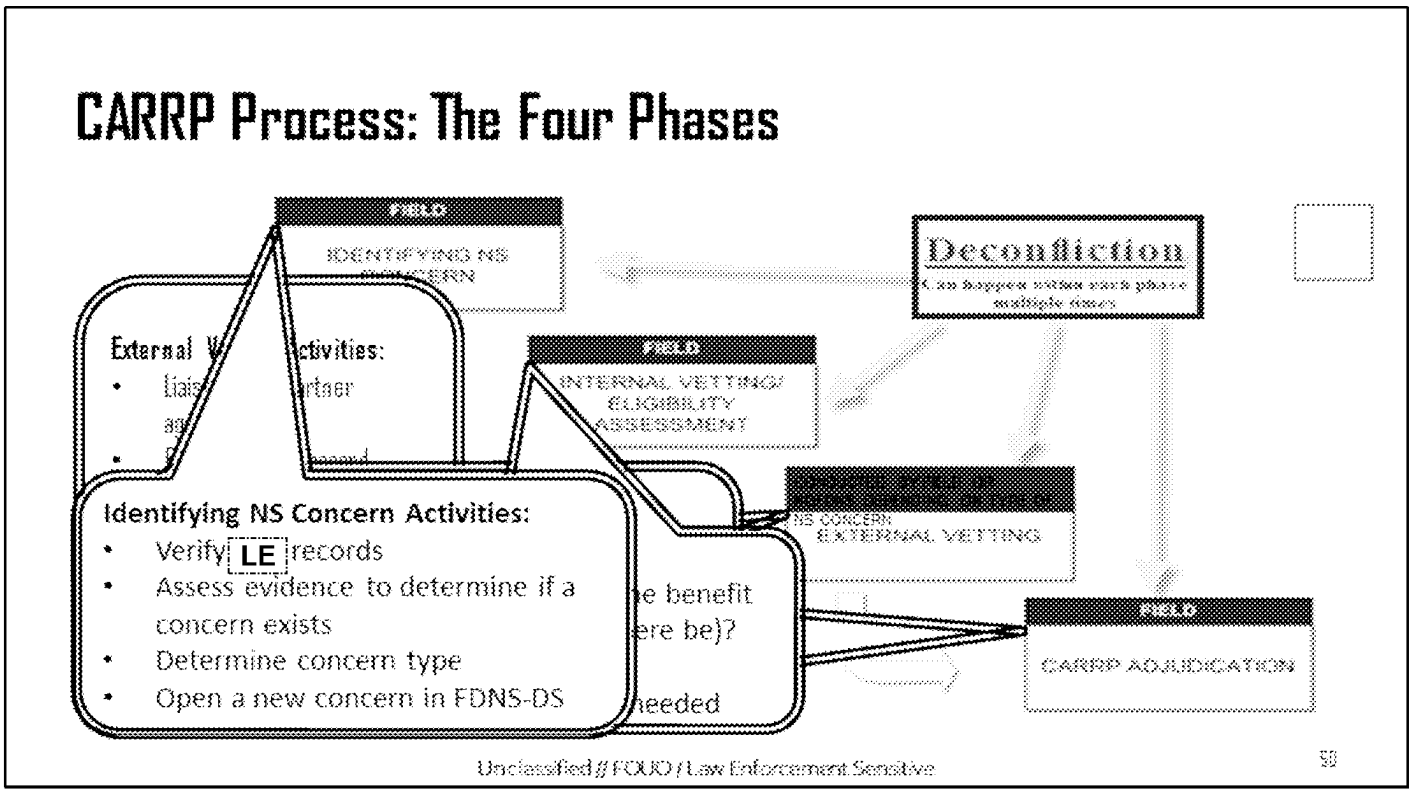

[Instructor: This slide builds on each click. Provide examples of some of the activities that happen in each phase, but don't get bogged down in great detail because you are going to go through them in later modules.]

Say:

This chart is your 50,000 foot overview of the CARRP process. We will reference this four-phase process for the rest of this Module and we will do a deep dive into each Phase in Modules three through five of this course.

There are 4 phases in the CARRP process. ***[Click to expand the Identify bubble.]*** In Phase 1, we **identify** the NS concern. You can see some of the steps here.
[Click to expand the Internal Vetting bubble.]

Phase 2 is when we **internally vet** the concern and eligibility,
[Click to expand the External Vetting bubble.]

In Phase 3, we **vet with external partners**, and
[Click to expand the Adjudication bubble.]

Finally, we arrive at the **adjudication** phase.

Note that deconfliction will happen at each and every phase of the process.

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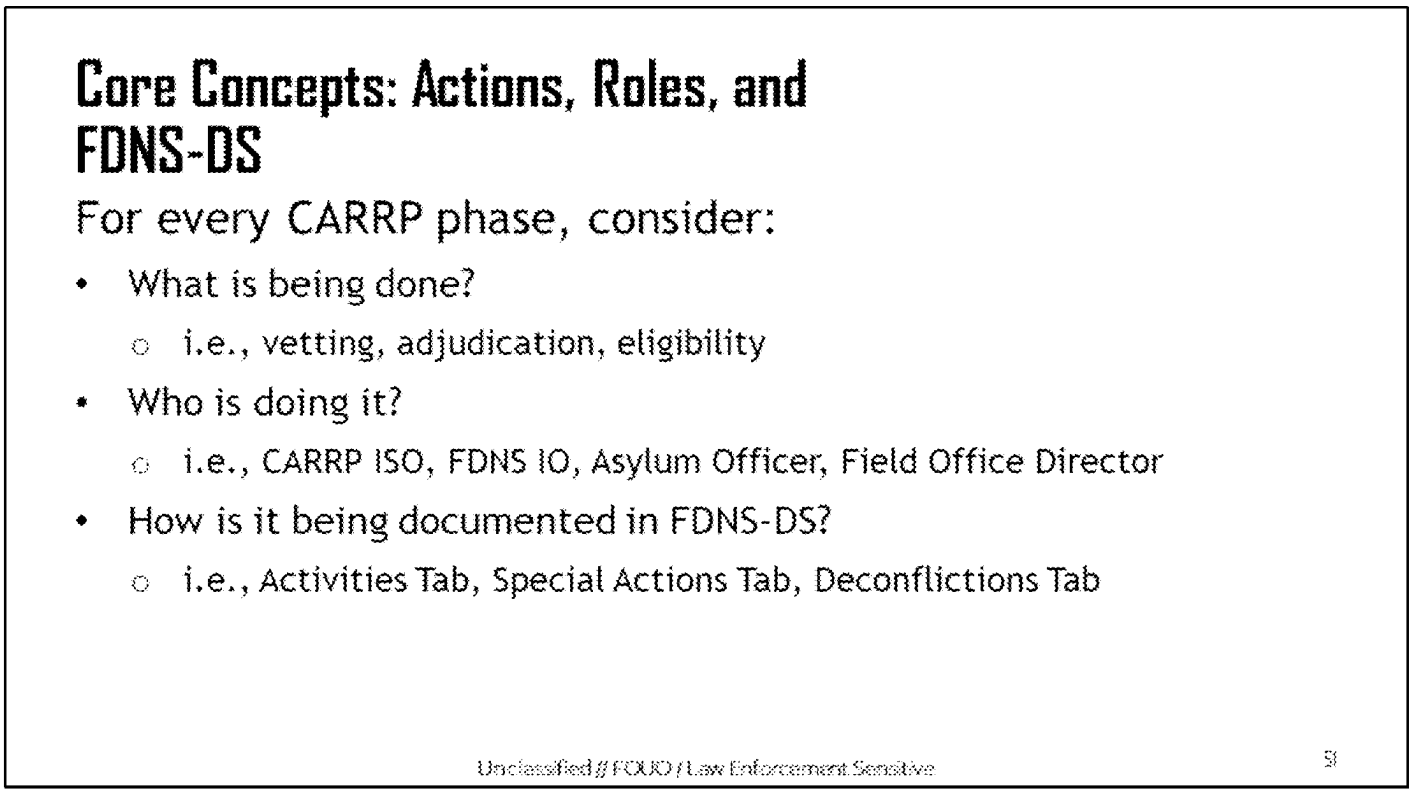

Say:

Later in the course, we will get into more detail breaking down each phase. We will ask you to think about the following:
- What gets done in each phase
- Who does it
- How is it documented

You'll hear me talk about action, role, & DS. Action is the "What" - the things that are going to be done. Role is "who" is doing the things. DS is the "how" we are documenting everything in FDNS-DS. Each phase has designated activities that are performed, designated roles for each individual in the process, and specific data entry points in FDNS-DS.

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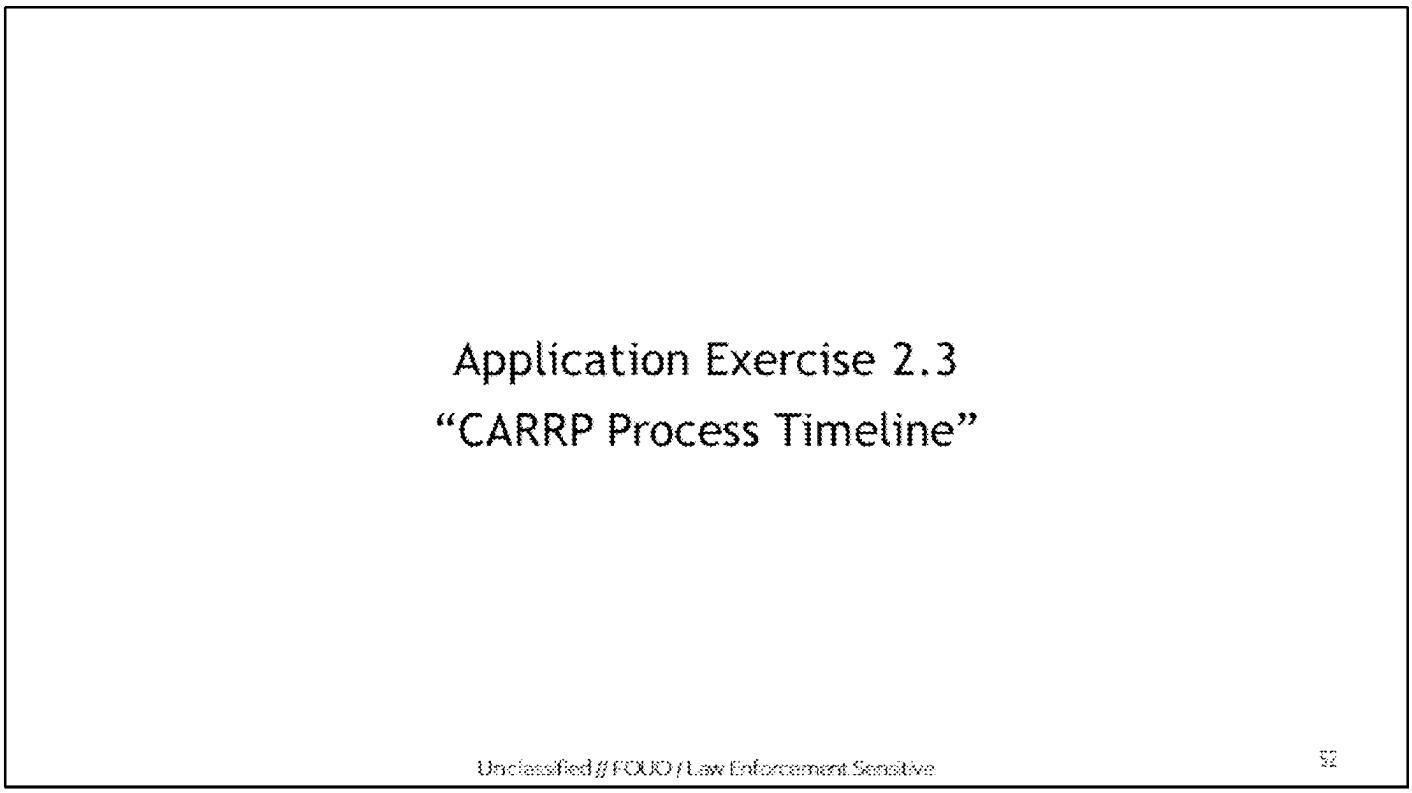

[Instructor: This activity is called "CARRP Process Timeline." Students will have a worksheet with 10 activities listed. Their job is to put the activities in the order that they would occur in the CARRP process. You'll review the correct answers with the class. If possible, leave either the KST or non-KST CARRP processing flowchart on the screen when completing this activity.]

Say:

Please go back to the Module 2 Channel under Exercises, and select Exercise 2.3. This is another PDF that you will download and work on. The worksheet lists 10 activities that would advance a CARRP case through the process and an action that the designated officer would need to take. Your job is to determine the correct order of events and build a timeline until the CARRP case is adjudicated. So, take about 10-15 minutes and determine the order of events from 1 to 10. We will discuss the results when you are finished.

[Instructor: Give the class 10 minutes to arrange the order of the process timeline. Use the Answer key in the Facilitator channel. Once time is up, review the responses in the Chat. .]

Hopefully this exercise helped you to see the non-linear nature of CARRP and

the collaboration between IO's and ISO's.

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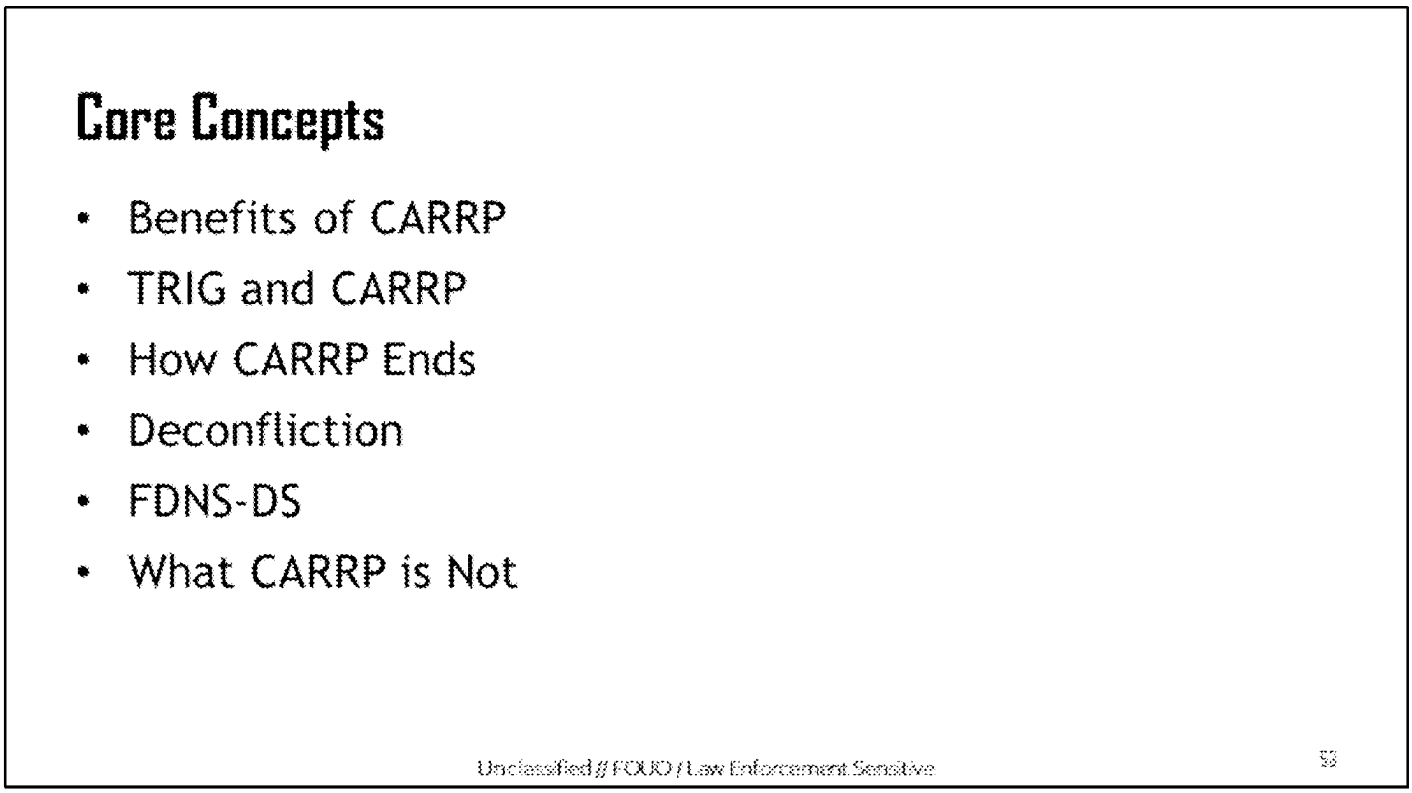

Say:

In the Core Concepts section of this module we will discuss some of the overarching topics which are important to our 50,000 foot view understanding of CARRP, before diving into what happens in each of the phases. We will now talk in more detail about the benefits of the CARRP process, the interaction between TRIG and CARRP, how CARRP ends, deconfliction, how we document in FDNS-DS, and finally, what CARRP is NOT.

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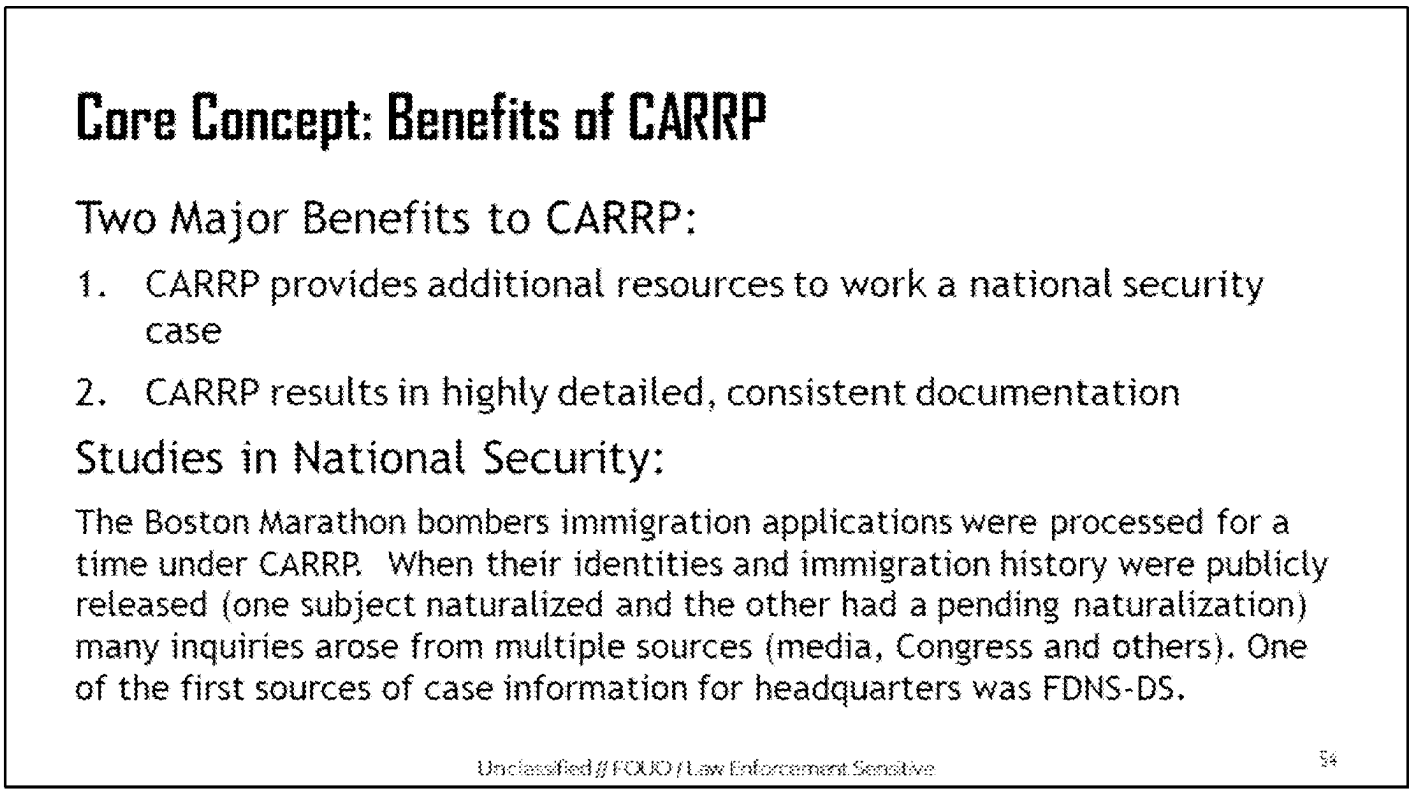

Say:

There are two huge benefits to the CARRP process. First, you are able to bring in more resources – time, systems, personnel, experience, etc. Second, everything is documented in high detail (in FDNS-DS).

Throughout this course there is a recurring segment called "Studies in National Security" that will illustrate (with stories) why we do some of the things we do. The first story or "study" is about the Boston Marathon Bombing, why thorough documentation is important!

Immigration applications filed by the brothers were processed for a time under CARRP. When their identities and immigration history were publicly released (one subject naturalized and the other had a pending naturalization) many inquiries arose from multiple sources (media, Congress, and others). One of the first sources of case information for HQ FDNS was FDNS-DS. This was due in large part because HQ was unable to immediately obtain the A-files. The A-files were needed to support law enforcement with addresses, contacts, etc. so FDNS-DS was the best source of immediate information HQ could access.

We also needed to evaluate USCIS performance – did we do everything we

were supposed to do as an agency? How did one of the brothers naturalize? It was determined that one of the brothers had previously been vetted through the CARRP process. A Congressional review and report of our actions as an agency regarding that specific case ended up being positive. It showed that we have a standardized way to examine, assess, and handle national security threats uniformly.

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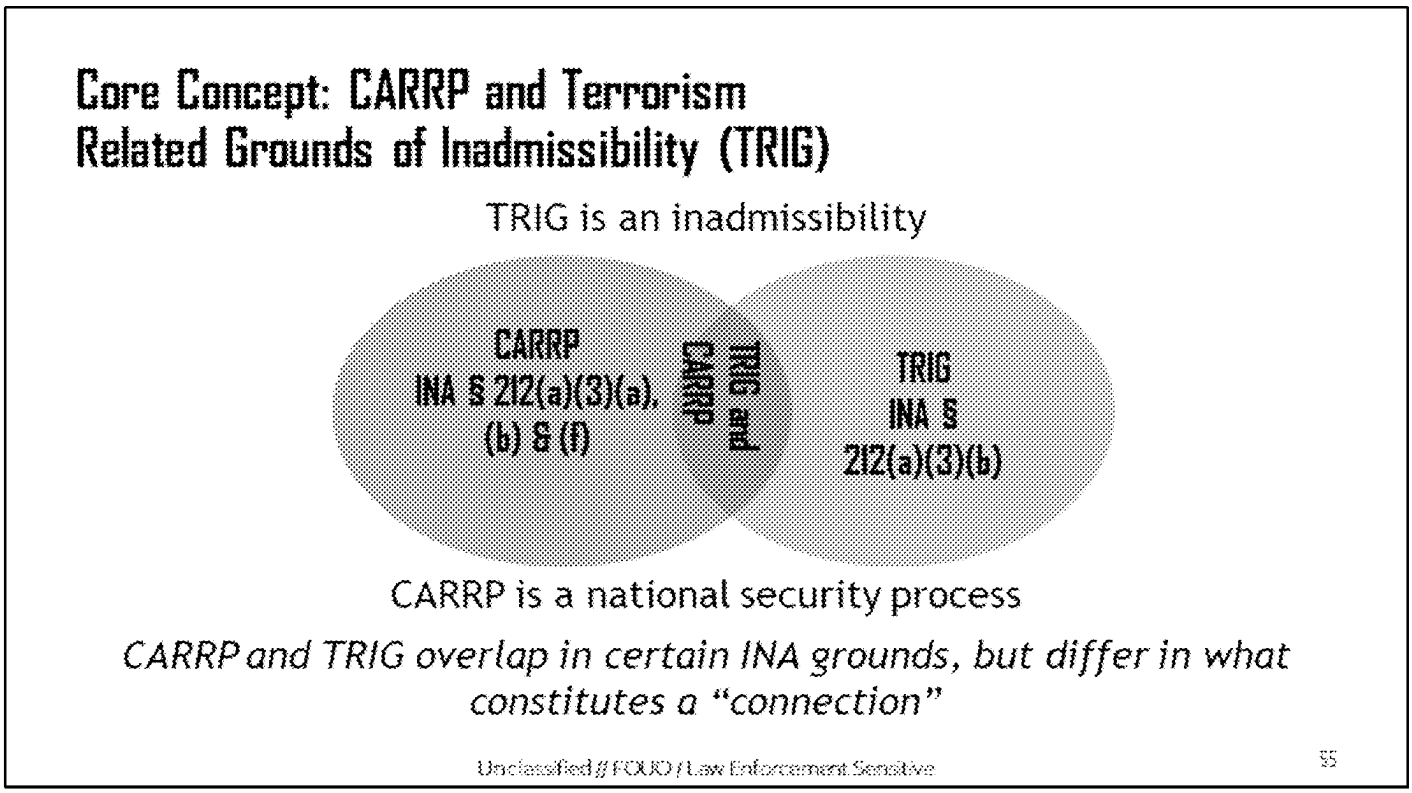

Say:

We just defined what CARRP is and how it interacts with other programs. Now we will take a brief detour and talk about what CARRP is not. This is a simple chart with an incredibly important message. As many of you probably know, TRIG stands for Terrorism Related Grounds of Inadmissibility. CARRP and TRIG are not the same thing, but there is overlap in many cases. Some cases with TRIG concerns may fall into CARRP, like terrorist activities or membership, but they are fundamentally different things.

TRIG refers to specific ~~an~~ inadmissibility grounds – it is purely an application of the law. CARRP is a national security program – it is a consistent handling process for cases with potential or actual national security concerns. It is possible to have a case in CARRP with no TRIG concerns. Similarly, it is possible to have TRIG concerns but not be working a case in CARRP. It's also possible to resolve a CARRP issue but still have a TRIG issue AND it's possible to get an exemption for TRIG but still work a case in CARRP.

Examples of TRIG but not CARRP (if an exemption is granted):

- If the subject worked in a hospital and cared for everyone who came in, and some of those patients were government soldiers and others fighting against the government

- If the subject was a refugee in a camp, and the camp leaders came around and collected a small "tax" on each household, and the subject knew that the "tax" went to pay people to bring supplies over the mountains to the rebels fighting in the subjects home country.
- If the subject gave a ham sandwich to a terrorist at gunpoint under duress

Examples of CARRP but not TRIG
- If the subject stole classified information from a foreign entity and gave it to another foreign entity
- If the subject exported centrifuges to Pakistan

Examples of cases that involve TRIG inadmissibility grounds and CARRP concerns:
- If the subject owned a condo and leased one room to a guy they knew was planning a terrorist attack. It's TRIG because they provided material support to a terrorist. It's CARRP because they were closely associated with someone who posed a threat to national security.
- Someone who ran arms between the CIA and Mujahidin in Afghanistan in the 80's. We may be able to resolve the NS concerns, or we may also be able to get a TRIG exemption. But at first blush, it doesn't matter who the person was working on behalf of or supporting – it's both a TRIG inadmissibility and a case that would be handled under CARRP.

Think about these points which will help us as we go through the next slide:
- CARRP vs. TRIG – "ride together." Duress exemption allows for providing material support, soliciting members or funds, or receiving military training from a Tier I or II orgs – that would still be a CARRP case.
- The definition of kidnapping includes a purpose – to compel a third party to action or inaction as a condition for safe release.
- TRIG includes incitement to terrorism with an intention to cause death or serious harm – so this is a good candidate for CARRP as well.
- TRIG includes people that ARE members, as in currently, or in the present tense. CARRP is not limited to present membership. If the person used to be in a terrorist organization, that is handled under CARRP.
- TRIG applies to a spouse or child of a person who would be inadmissible under TRIG if the relevant activity occurred within the last 5 years and the spouse or child should reasonably have known and has not renounced the activity. CARRP is once again more expansive. We likely don't care if 5 years have passed, they've renounced, or if we can immediately demonstrate that they didn't reasonably know. [redacted] are automatically watchlisted, and if uncovered through testimony, file review, etc., they should also be referred for CARRP processing.

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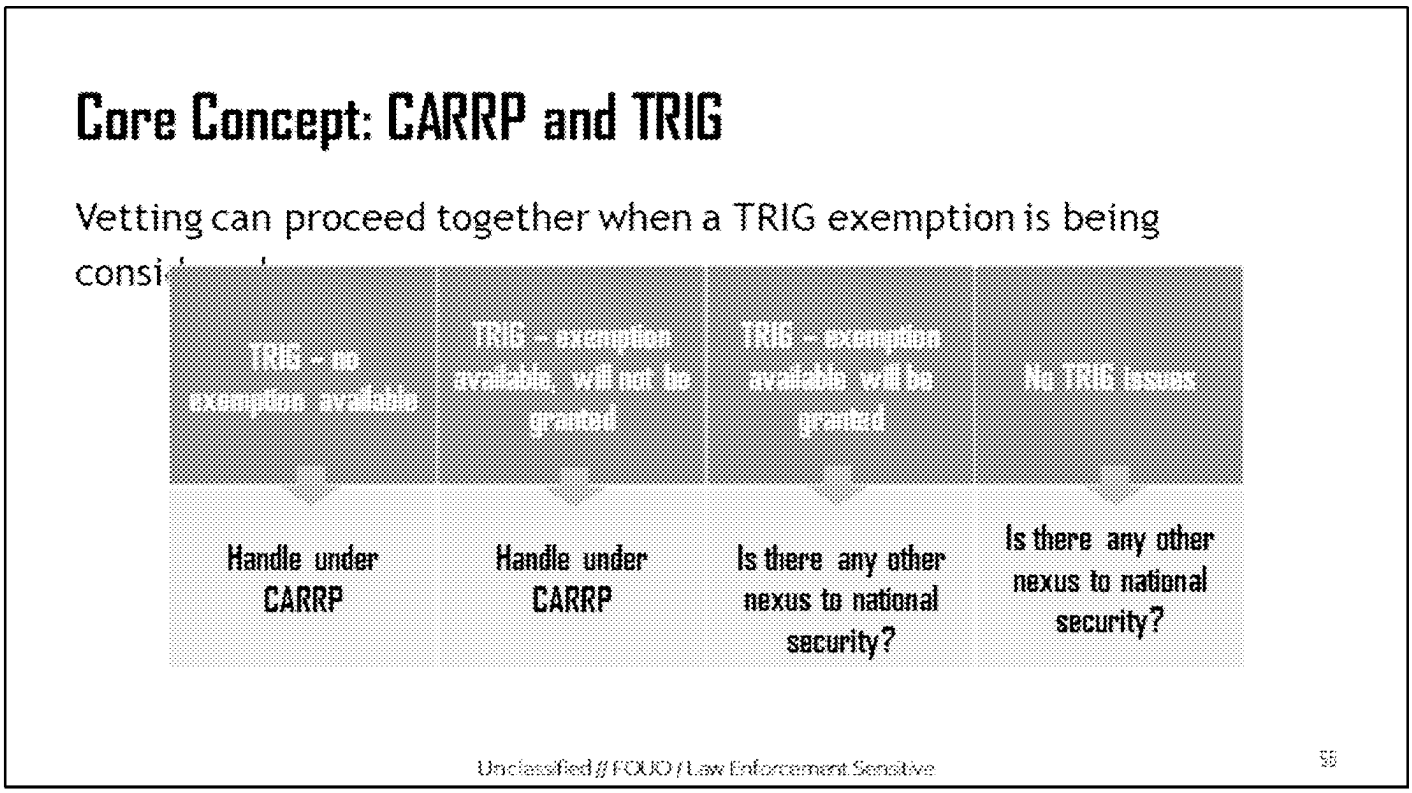

Say:

This chart explains how to proceed with cases that potentially involve CARRP and TRIG.

Guidance tells us that if there's TRIG and there's no exemption available, we handle the case under CARRP. An example of this would be an applicant who knowingly rents a condo to a terrorist. It's likely we won't find additional derogatory information in vetting – there may be no other NS ground besides the TRIG concern. There may also be no one to deconflict, and it's also entirely possible that many will be resolved as non-NS fairly quickly (with or without exemption). For example, we know now that there is a medical exemption for TRIG, but there hasn't always been. If a doctor in a hospital treated an Al Shabaab fighter, the case would have been placed on a TRIG hold before an exemption was available. But it would probably have been pretty easy to close out the CARRP case as non-NS.

Policy also tells us that if there's an exemption that won't be granted, we handle the case under CARRP. This could be a Kurdish Democratic Party contact. Let's say there's a group exemption available for the organization he was associated with, but we're not going to grant him the exemption because we think he is involved in other national security related activities. So the case

would be placed in CARRP.

If you know that the exemption is going to be granted, then there's no requirement to process under CARRP. An example of this is an applicant who gave a sandwich to a terrorist at gunpoint under duress. It seems pretty clear that the applicant qualifies for an exemption. And we know that there's probably not a nexus to a national security ground, so there's no requirement to put the case in CARRP.

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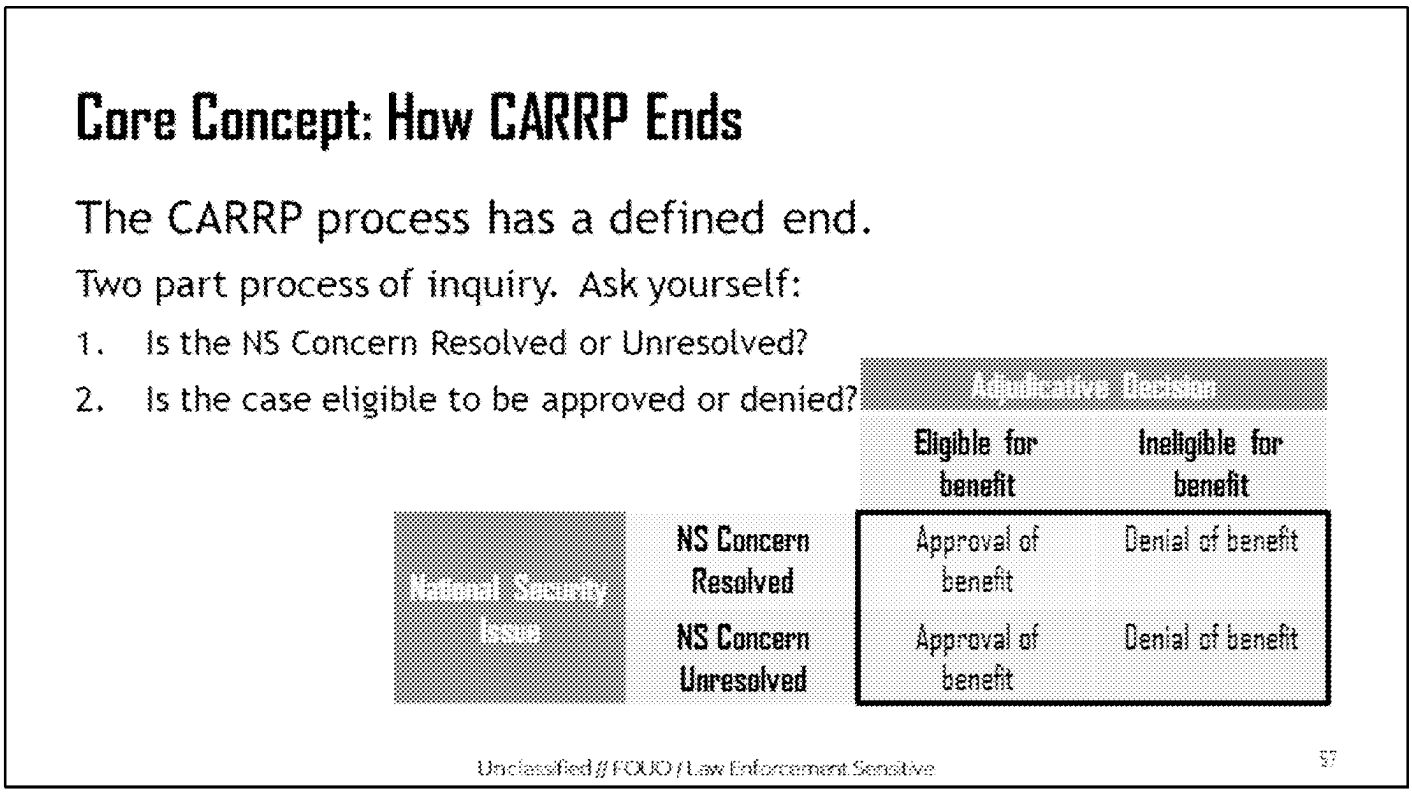

Say:

As a process, CARRP has a beginning, and it should have an end. As an agency, we need to develop a better understanding of when to end the CARRP process, and how to closeout NS cases. We've seen that it's a broad cycle which oftentimes goes around and around… so where is the end?

CARRP ends when the NS concern is resolved or we adjudicate the benefit. So, there are four potential outputs from those ends. The left hand column (under eligible for benefit) requires a determination as to whether the NS concern can be resolved – that's the purpose of CARRP in a nutshell. In the upper left hand box, resolving the NS concern enables adjudication, if the subject is otherwise eligible. It's this outcome that demonstrates CARRP is a not a denial program. Many, in fact the majority of Subjects do emerge from CARRP cleared of any concerns. In the entire right hand column it doesn't really matter if we resolve the concern if the individual isn't eligible in the first place (although we may encounter the applicant again through another application at some point and then have to re-open the NS Concern). If someone is ineligible due to an unlawful entry, we aren't going to ask FBI about their investigation into the subject. If the benefit is going to be denied, it doesn't matter if the subject is on the watchlist or not.

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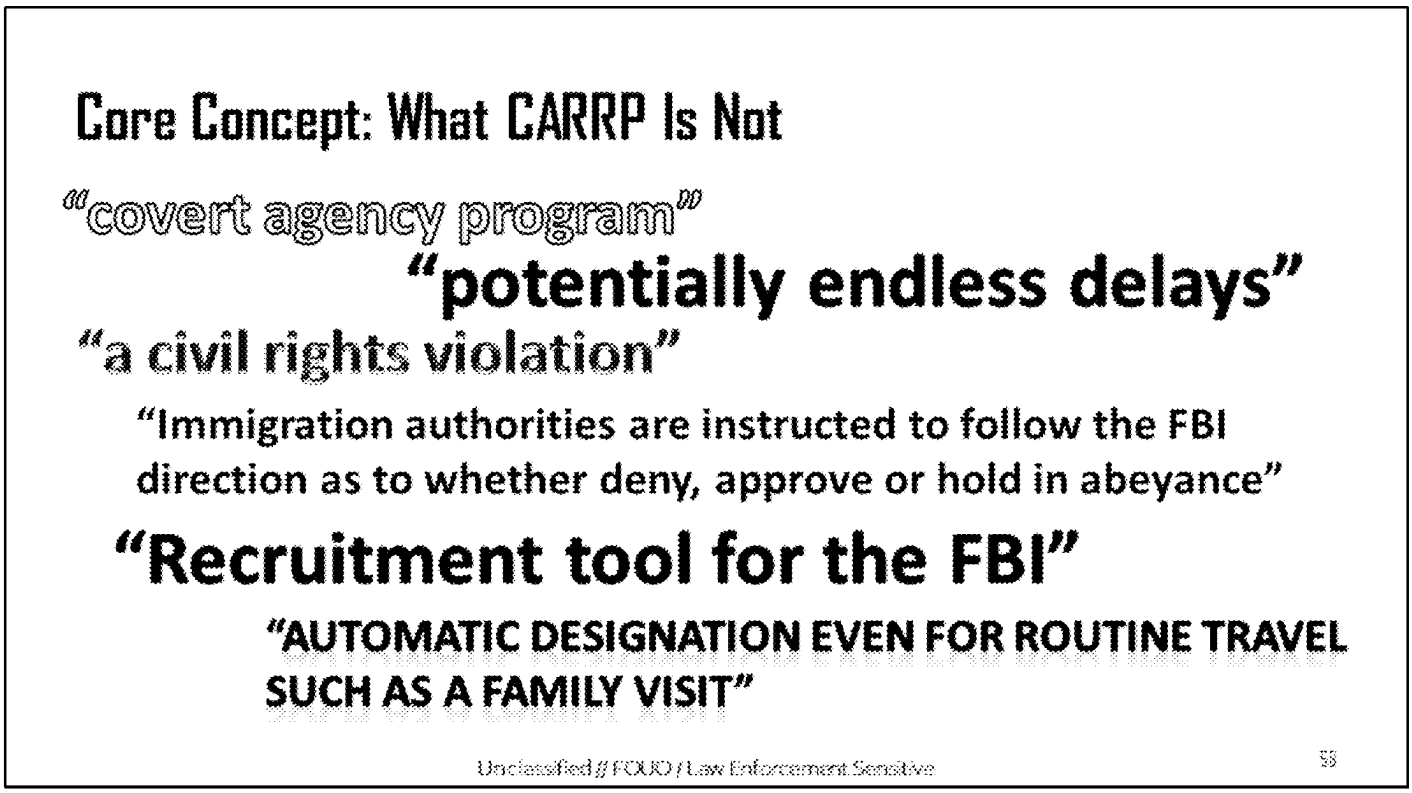


Say:

There's a lot of information in the public domain about CARRP, and most of it isn't good. However, even when we do our jobs right, there are many misconceptions that persist.

We've already touched on a couple of these misconceptions. CARRP is not:

- A covert agency program designed to deny cases.
- Potentially endless delays – we've already covered the process *should* end and the different ways it can- and throughout the rest of this course we'll talk about how to get there.
- Follow FBI direction – did we talk about that during deconfliction? At any point did we say to follow whatever the FBI's direction was?
- An automatic designation even for routine travel. We'll talk more about indicators, particularly travel, as we get into identifying concerns.
- But what about CARRP being a "civil rights violation?" Why would that be an accusation? CARRP is not a discriminatory program. As we said before, religion and national origin are not indicators of a potential NS concern.

Pay attention in the identifying concerns section of the course not just about what the indicators are, but also where USCIS gets its information from, and what people we are likely to be alerted to based on what checks we perform.

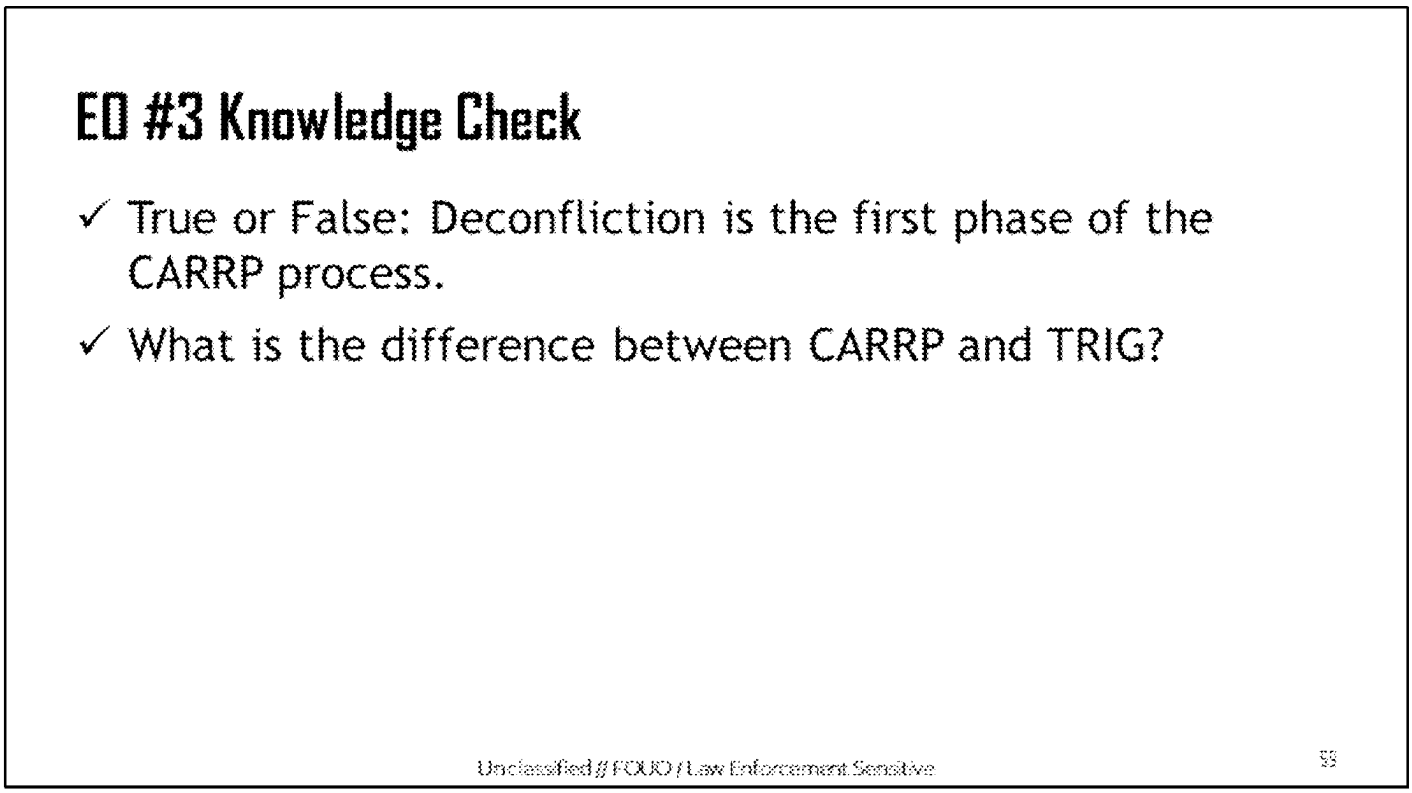
Please keep these in the back of your head as we go through the curriculum, because by the end of this class, you're going to be able to intelligently refute every one of these and describe what the process actually does.

[Instructor: This might also be a good time to pause to recap and check in the students.]

[Go to the next slide.]

All quotes are from the following three sources:

1. *Yesenia Amaro, "Little-known law stops some Muslims from obtaining US citizenship," Las Vegas Review Journal, April 16, 2016, http://www.reviewjournal.com/news/little-known-law-stops-some-muslims-obtaining-us-citizenship.*
2. *Talal Ansari and Siraj Datoo, "Welcome to America – Now Spy on Your Friends," BuzzFeed News, Jan. 28, 2016, http://www.buzzfeed.com/talalansari/welcome-to-america-now-spy-on-your-friends#.bbpxAJBZq.*
3. *Pasquarella , Jennie. 2013. Muslims Need Not Apply: How USCIS Secretly Mandates the Discriminatory Delay and Denial of Citizenship and Immigration Benefits to Aspiring Americans. American Civil Liberties Union of Southern California.*



Say:

Let's do a knowledge check.

[Instructor: Randomly call on students to answer the questions one by one. The selected student can place the answer in the chat box. Process the response and add the script below.]

True or False: Deconfliction is the first phase of the CARRP process. ***[False. Deconfliction is not a process phase. Deconfliction will happen at each and every phase of the process.]***

What is the difference between CARRP and TRIG? ***[Terrorism Related Inadmissibility Grounds are grounds of inadmissibility in the INA. CARRP is a process for vetting and adjudicating cases.]***

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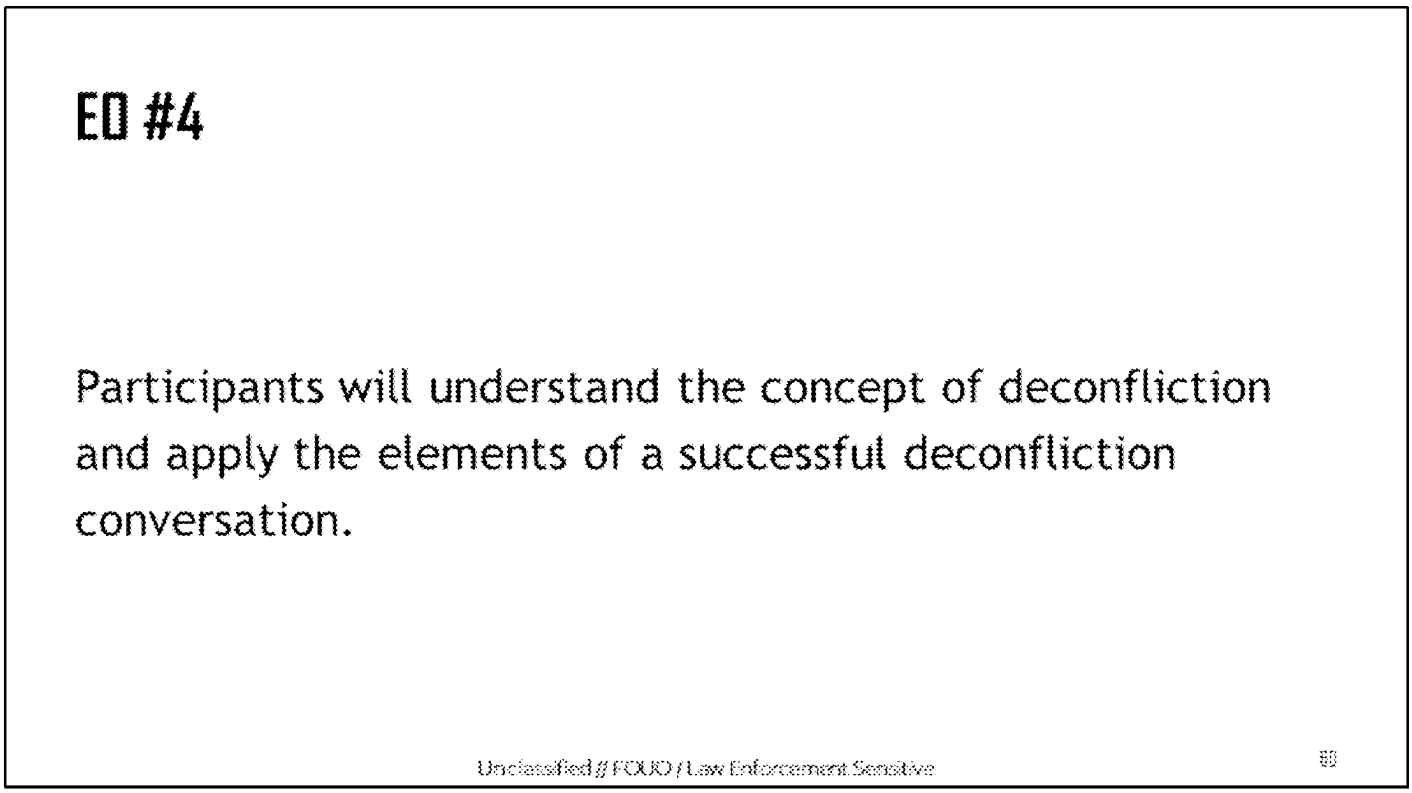

Say:

Now we are moving on to our next objective which is to understand the concept of deconfliction and apply the elements of a successful deconfliction conversation.

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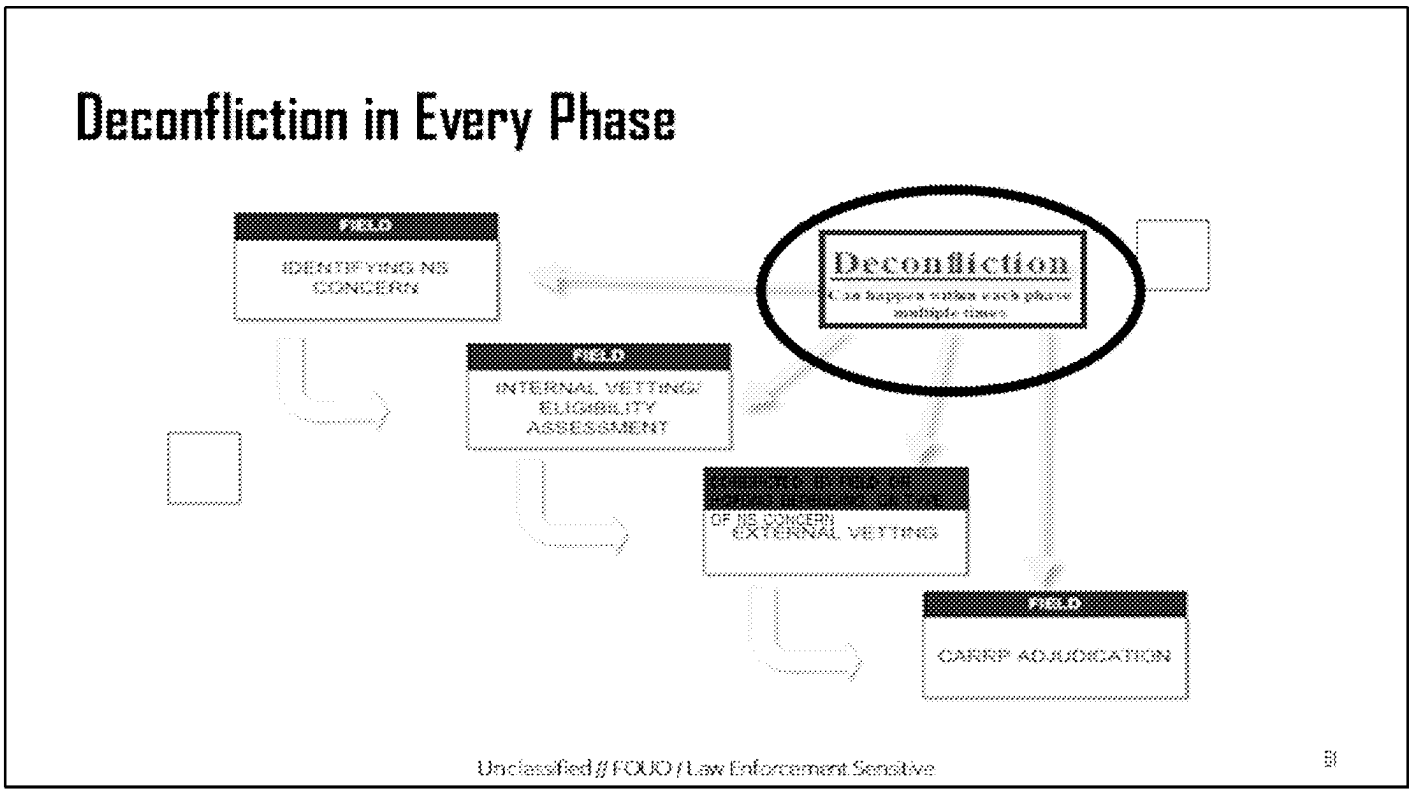


Say:

Let's talk about deconfliction because deconfliction applies to EVERY phase.

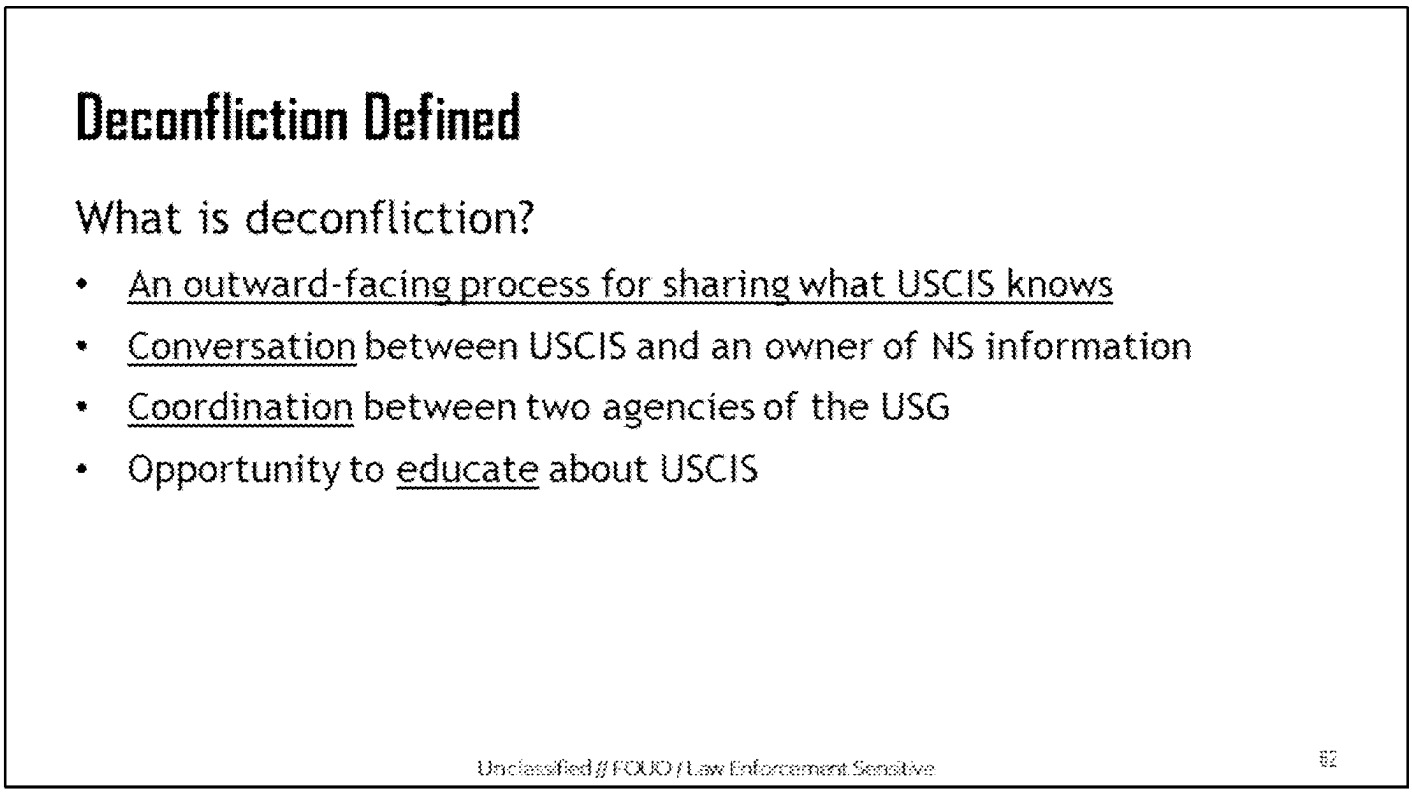
[Instructor: Ask students the following question to assess their knowledge.]

Why is deconfliction done during all CARRP phases?

[Instructor: Have them post their answers to the chat and call on one or two students to explain their reasoning to the class.]

We talked earlier about the types of activities we want to deconflict: site visits, interviews, etc. We want to make sure that taking these actions won't impede the work being done by our law enforcement partners. An adjudication may come in CARRP Phase 4, or Phase 2. A site visit or interview may be part of Internal vetting in Phase 2, or External in Phase 3, or Adjudication in Phase 4. This is why deconfliction happens in every phase Also, remember that there could be an abeyance request throughout the lifecycle.

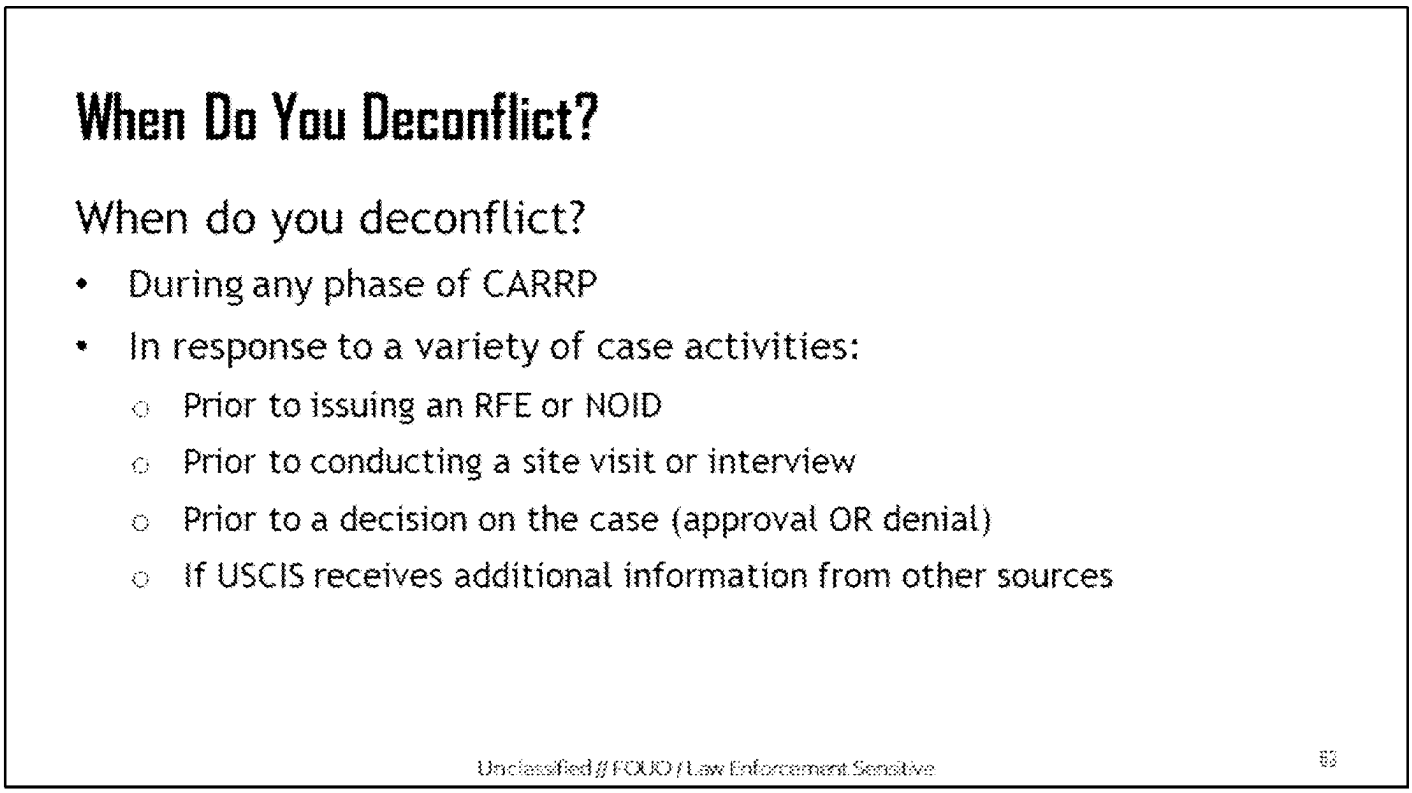
[Go to the next slide.]



Say:

Deconfliction is outwardly oriented – it's USCIS sharing information with others. This is in contrast to vetting, which we'll talk more about later where USCIS is trying to obtain information. Deconfliction involves a conversation between USCIS and the owner of NS information. It's important during these conversations to also build rapport with the owners of the NS information. Deconfliction also involves coordination with another agency to discuss what activities both sides are planning. This is your opportunity to educate the other agency about USCIS.

[Go to the next slide.]



Say:

There are no requirements for the number of times you have to deconflict, but best practice suggest some instances where it might be in USCIS interest including:

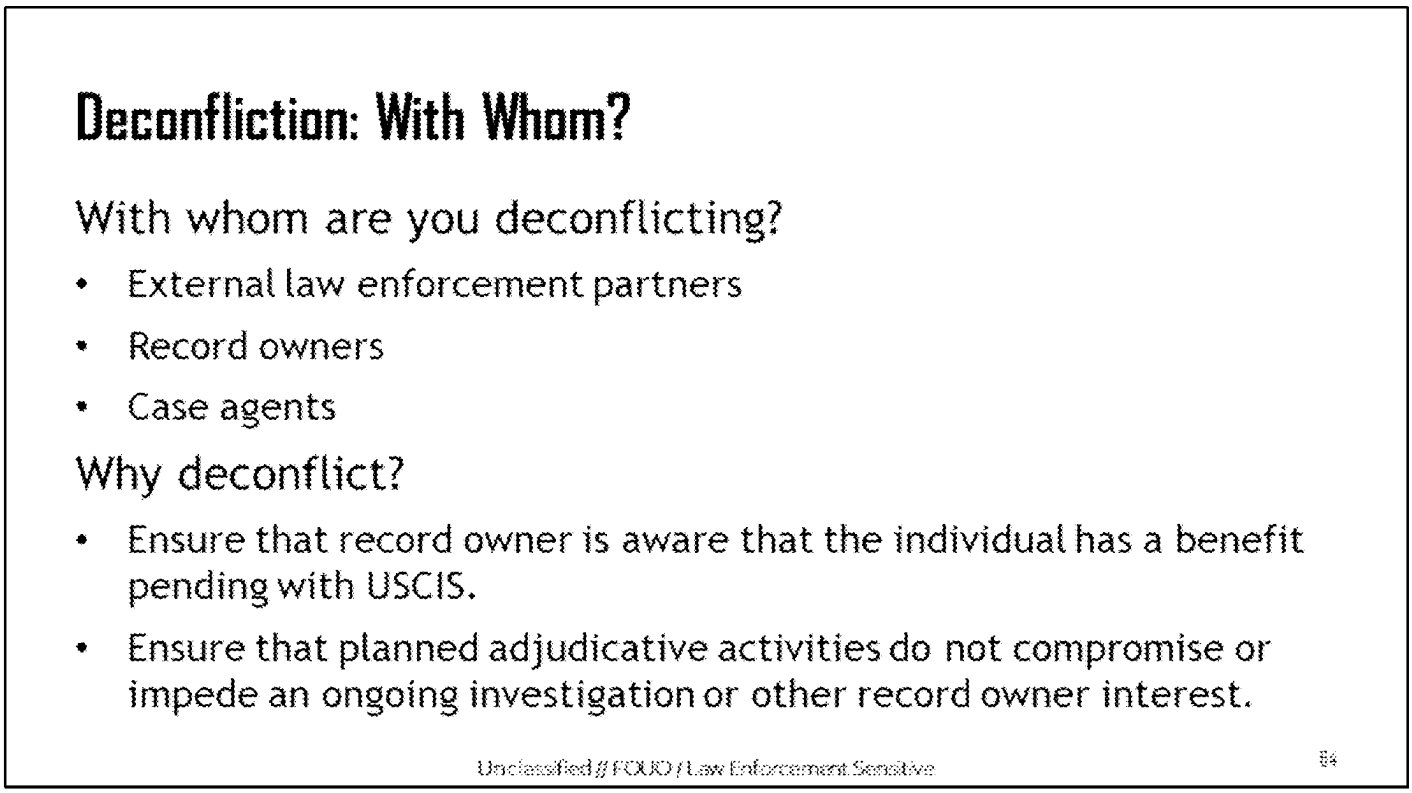
- Prior to issuing an RFE or a Notice of Intent to Deny (NOID).
- Prior to conducting a site visit or interview This gives the LEAa chance to submit questions to ask. Keep in mind that if they do so, the questions must be material to the immigration benefit!
- Prior to a decision on the case (approval OR denial). This gives the LEAa chance to request an abeyance.

Also, if USCIS receives additional information from other sources, we might want to deconflict again.

[Instructor: The question below can be posed to students as an interactive discussion. Direct students to use the chat box for their responses.Answer will be discussed on the next slide]

"Who do you think you will be deconflicting with?"

[Go to the next slide.]



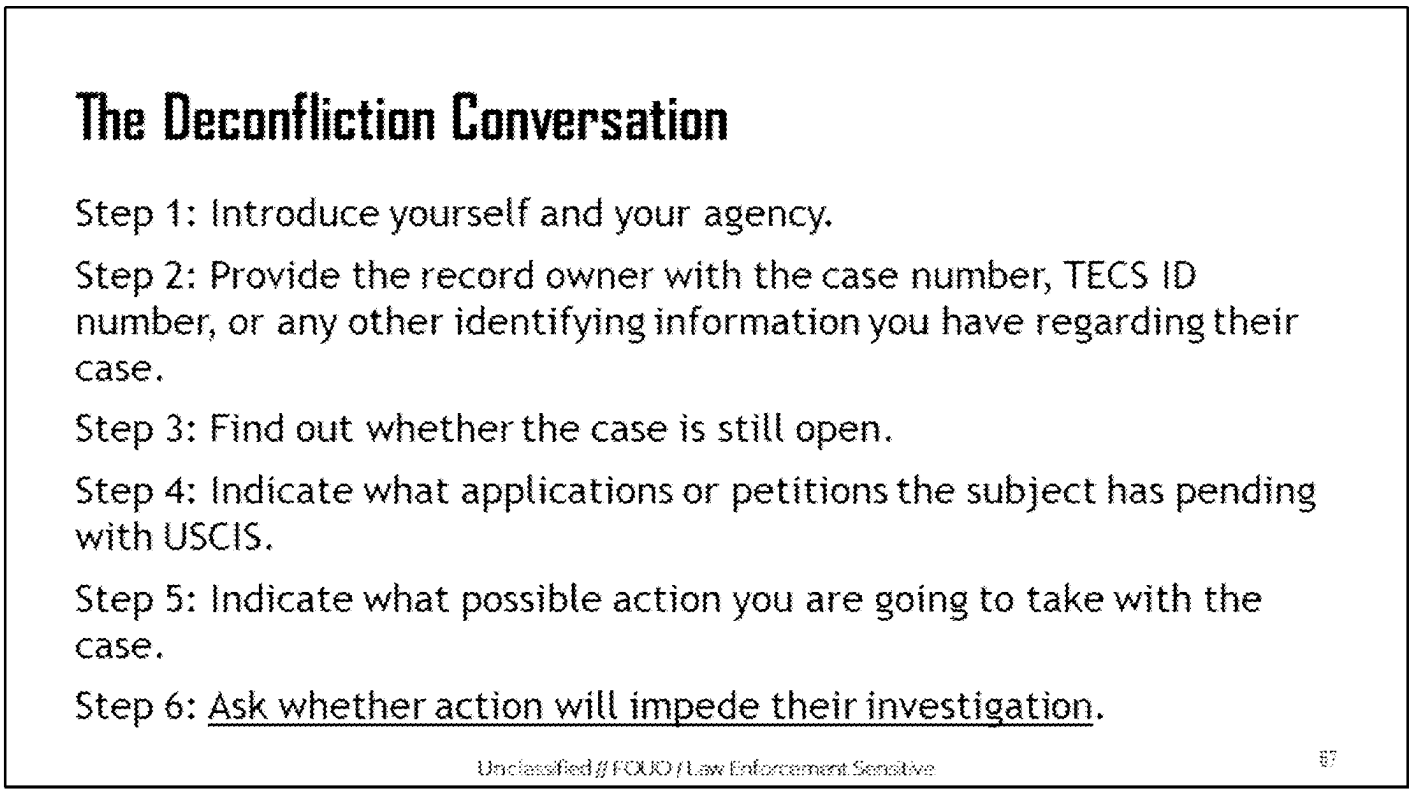
Say:

So who do we generally deconflict with? Mainly external law enforcement partners, record owners, and case agents. We deconflict with the FBI / JTTF when they own records or are investigating, but if they are not involved, there is no requirement to deconflict with them. For example, what if there's a namecheck from the FBI with no FBI POC and the result does LE LE ? Deconfliction with the FBI is not required in this case. We would want to deconflict with LE We deconflict with ICE when they are involved in a case, but there is no requirement to deconflict with them otherwise. FDNS officers are allowed to work directly with other law enforcement.

And who do we NOT deconflict with? We don't deconflict with the Terrorist Screening Center (we will talk more about this later). And generally speaking, we do not deconflict with the Central IntelligenceAgency (CIA).

Why do we deconflict? We want to ensure that the record owner is aware that the individual has a benefit pending with USCIS.And we want to ensure that planned adjudicative activities do not compromise or impede an ongoing investigation or other record owner interest.

[Go to the next slide.]



Say:

Let's look at the steps in our deconfliction conversation with a record holder.

Step 1: Introduce yourself and the agency. Remember that the record owner might not be familiar with USCIS or what we do. Take this time to educate them and remember to define acronyms and terms.
Step 2: Provide the record owner with the case number, TECS ID number, or any other identifying information you have regarding their case.
Step 3: Find out if their case/investigation is still open. This might sound a whole lot like external vetting where we are getting information about the NS concern itself… but it's not.
Step 4: Indicate what applications or petitions the subject has with USCIS. Remember that you may need to educate them about the various immigration benefits and the implications of approving them.
Step 5: Indicate what possible action you are going to take with the case.
Step 6: This is the main point of the deconfliction conversation! Ask whether that action will impede their investigation. You ask this question every time you deconflict!

[Go to the next slide.]

Deconfliction Sample 1

SA Johnson,

U.S. Citizenship and Immigration Services (USCIS) is currently reviewing an application for lawful permanent resident status for ABCDEFGHIJKLMN (DPOB: 1/1/74 - Oceana). Immigration officers from USCIS are planning to conduct a site visit to the address Mr. ABCDEFGHIJKLMN provided on his application: 123 Broadway Drive, Washington, DC. I am writing to ensure that this site visit for the purpose of processing the pending immigration application will not impact your current investigation into Mr. ABCDEFGHIJKLMN (TECS record LE).

Please confirm that a USCIS site visit will not affect your investigation. I am available to answer any questions on this matter.

Say:

Deconfliction doesn't only need to be over the phone. This is an example of a deconfliction email sent to an ICE agent.

[Instructor: Read Email on Slide]

[Instructor: The question below can be posed to students as an interactive discussion. Direct students to use the chat box for their responses.]

What are some key identifiers in this e-mail?

[Process responses in chat. Be sure the points below are highlighted.

- ***It spells out the acronym USCIS***
- ***It provides enough information to identify the person. Would I need to encrypt this email because of PII?***
- ***It also states specifically the action that is being deconflicted – a site visit.***
- ***And finally, it asks our big question – Does this impact your investigation?]***

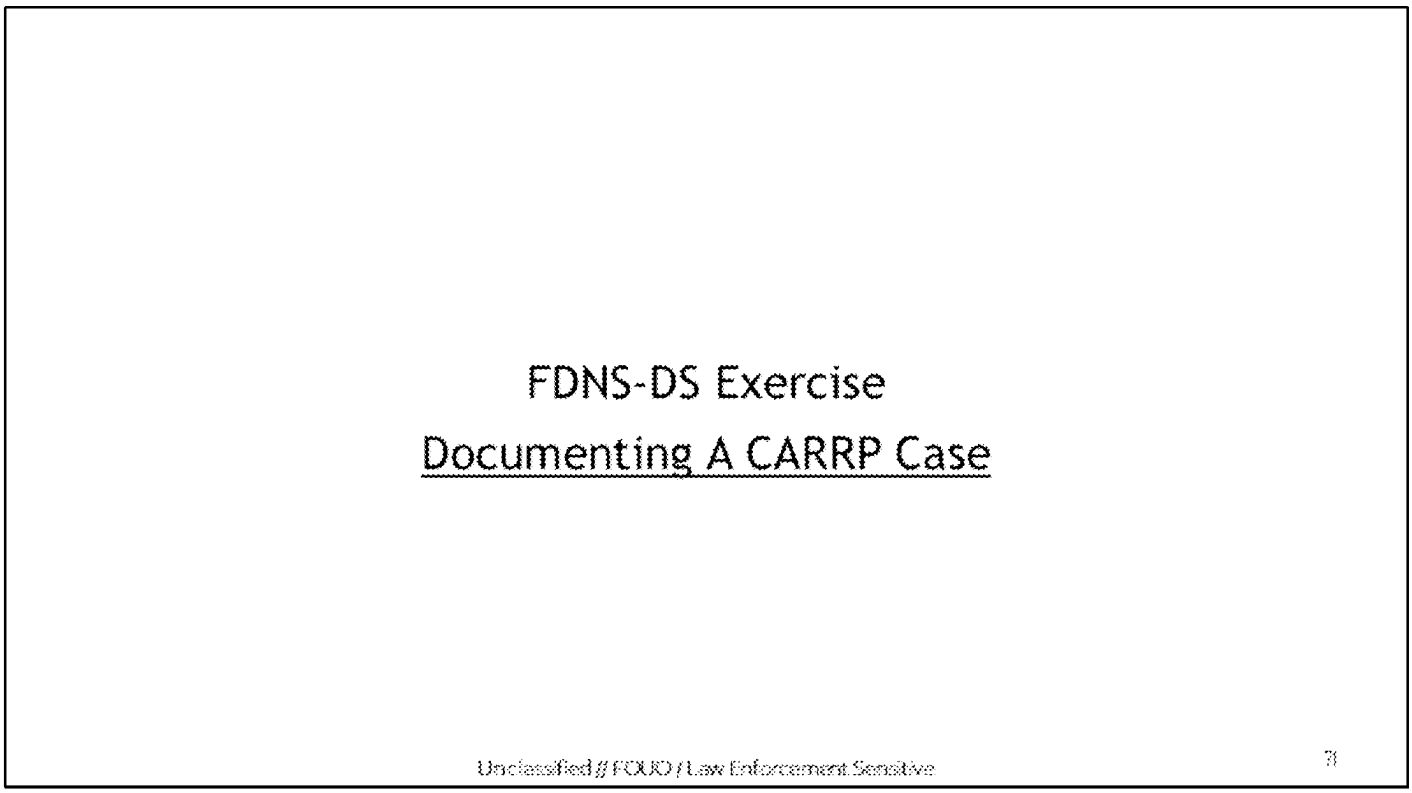
[Go to the next slide.]

investigation?]

[Go to the next slide.]

[Go to the next slide.]

[Go to the next slide.]

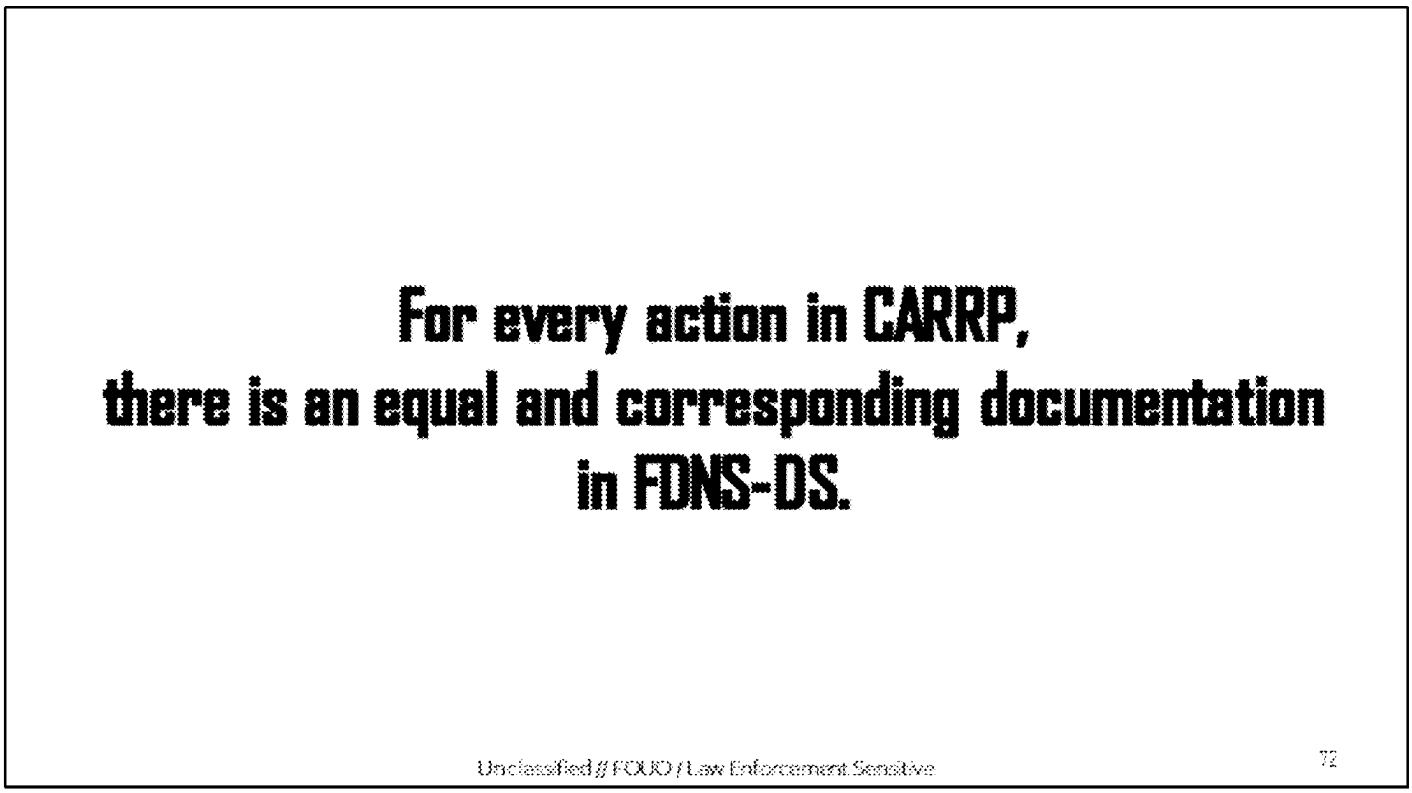


[Instructor Note: The next few slides will re-emphasize what the class learned and applied to their FDNS-DS records on Day 1.]

Say:

For the next few slides we are going to talk about how you document a CARRP case in FDNS-DS.

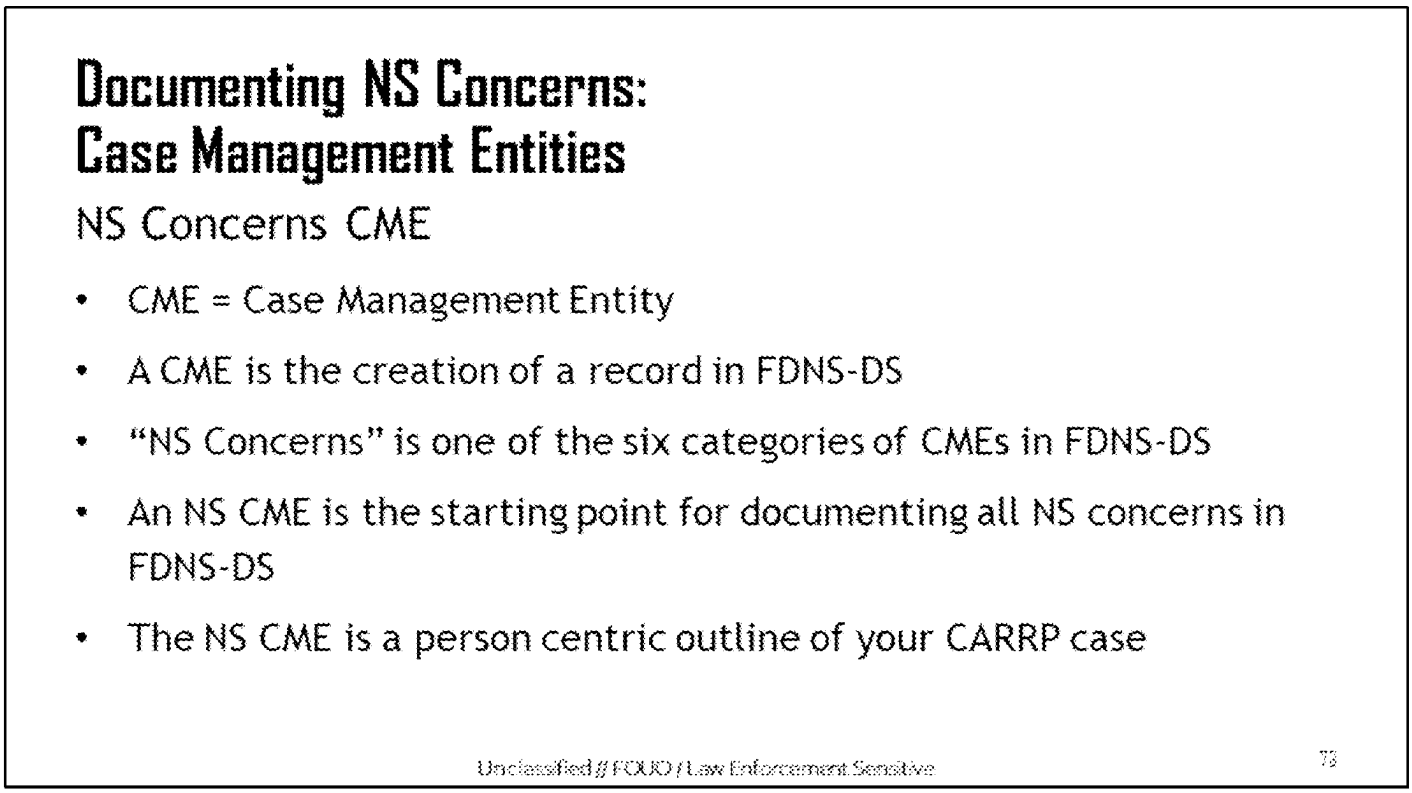
[Go to the next slide.]



Say:

For every action in CARRPthere is an equal and corresponding documentation in FDNS–DS. And most of the time, the documentation in FDNS–DS needs to be in more than one place. For example, we always update the synopsis with any significant case action we are taking and then we must also update the corresponding subtab with the information and lastlythe activities subtab to document our time. It's much easier if you copy and paste one comment into all three fields. Remember that if something isn't documented in FDNS–DS, it's like it never happened!

[Go to the next slide.]



Say:

CME stands for Case Management Entity which is the creation of a record in FDNS–DS. The CME created for CARRP cases is an "NS Concern." An NS CME is the starting point for documenting all NS concerns in FDNS–DS and is a person–centric outline of your CARRP case.

[Go to the next slide.]

Documenting NS Concerns: FDNS-DS Screen Tabs

- The major, top-level tabs in FDNS-DS are referred to as "Screen Tabs"
- The "Screen Tabs" are divided into CMEs and Additional Tabs

LE

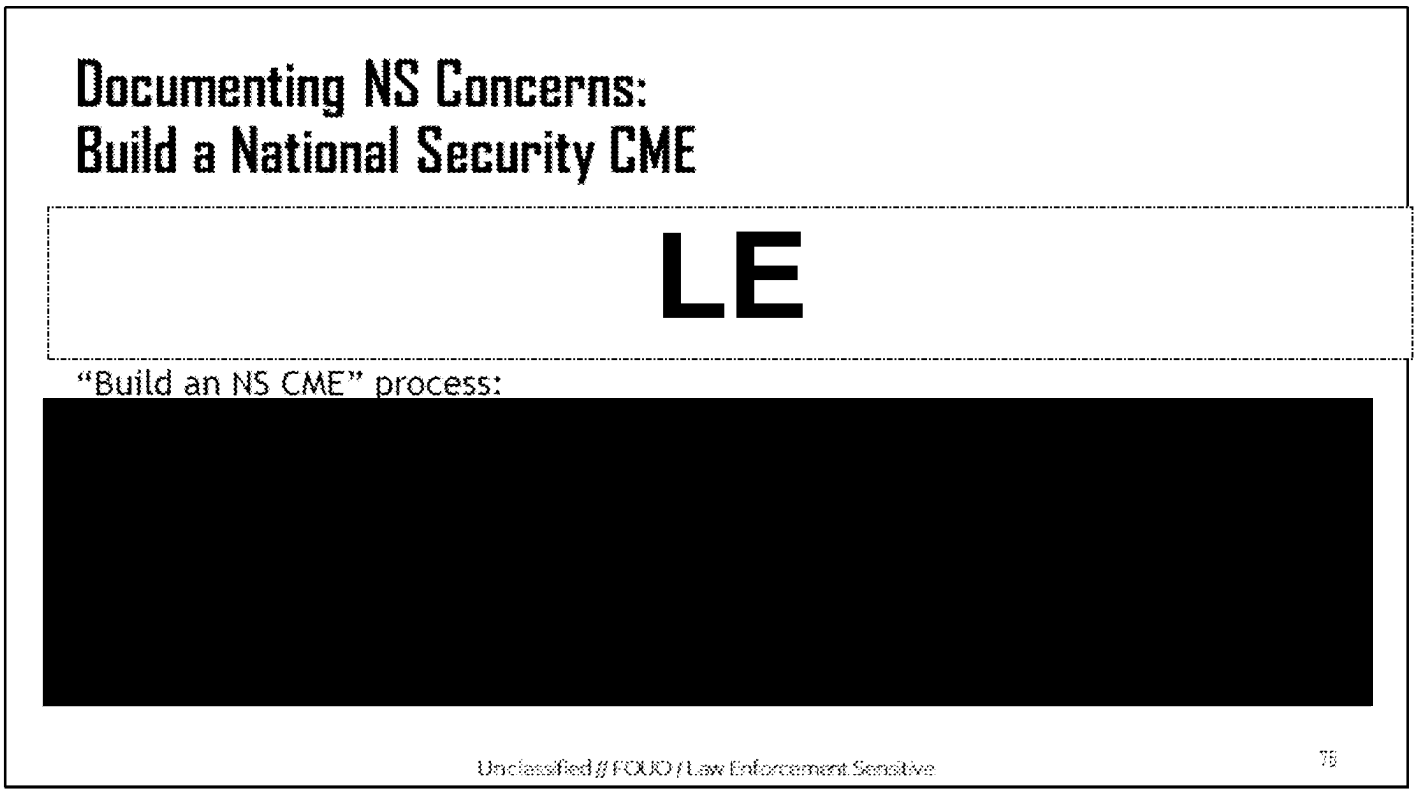
Unclassified // FOUO / Law Enforcement Sensitive

74

Say:

[redacted]

[Go to the next slide.]



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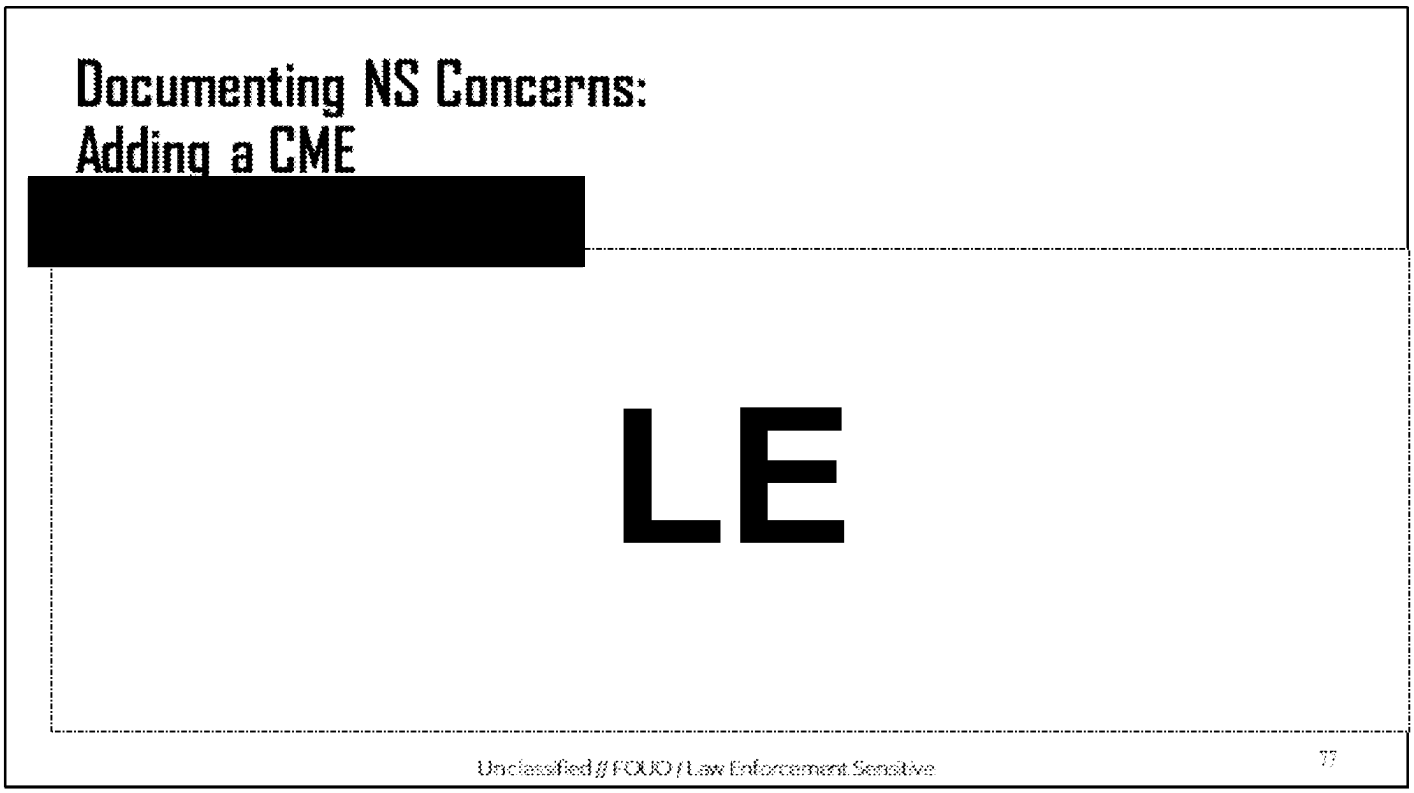

Say:

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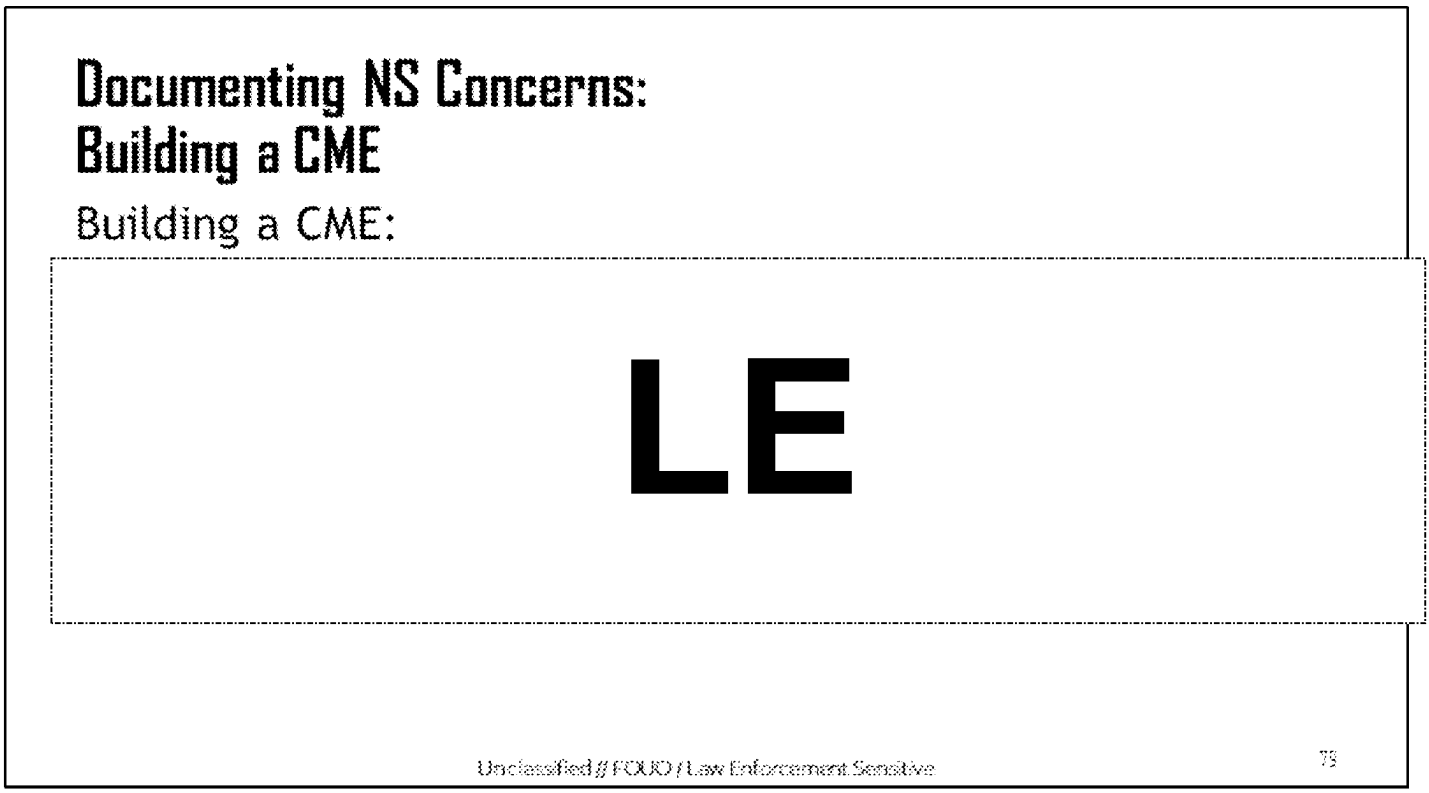
This slide contains mock data used for training purposes only.

Documenting NS Concerns: CME Naming Convention

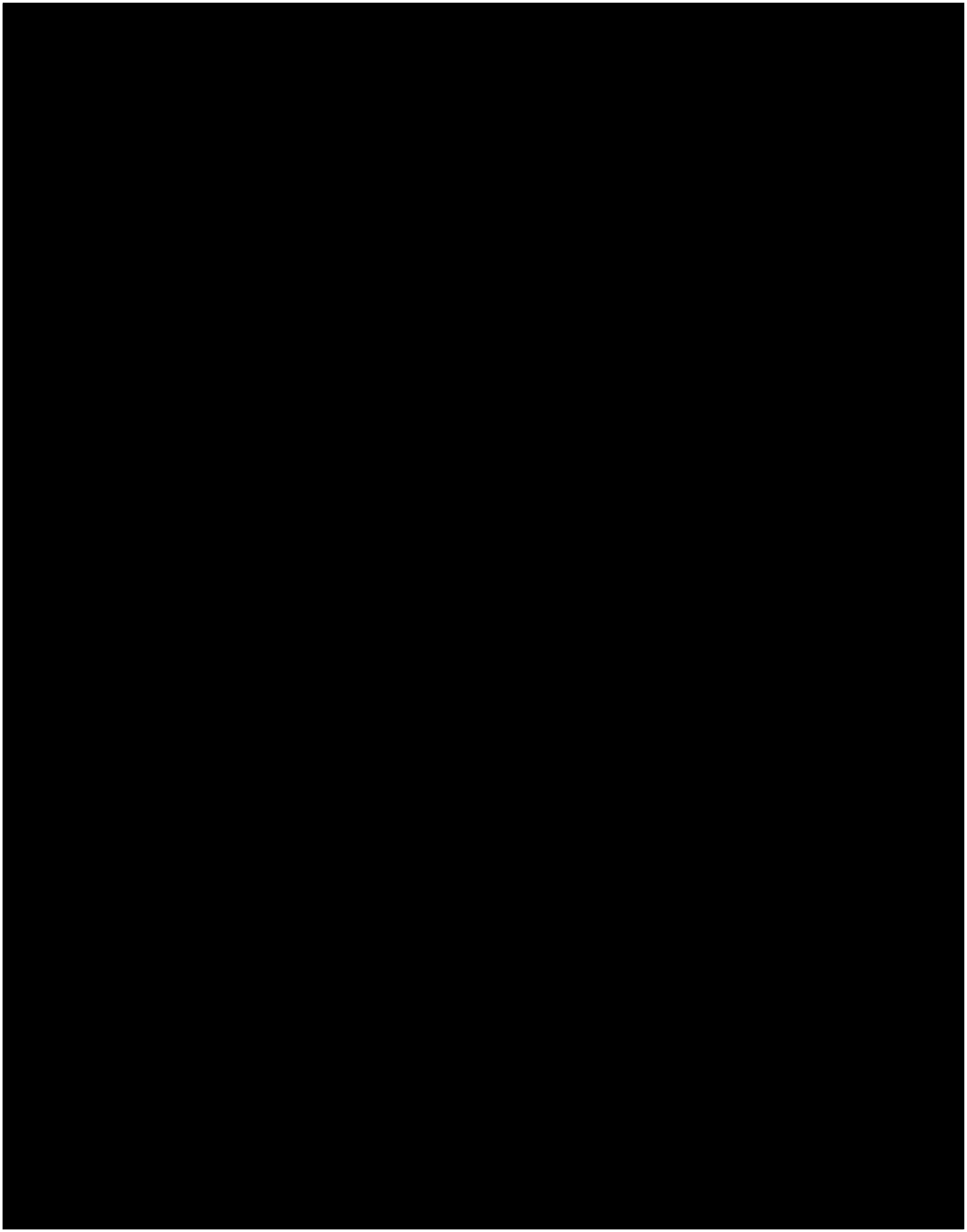
NS Concern CME Naming Convention:

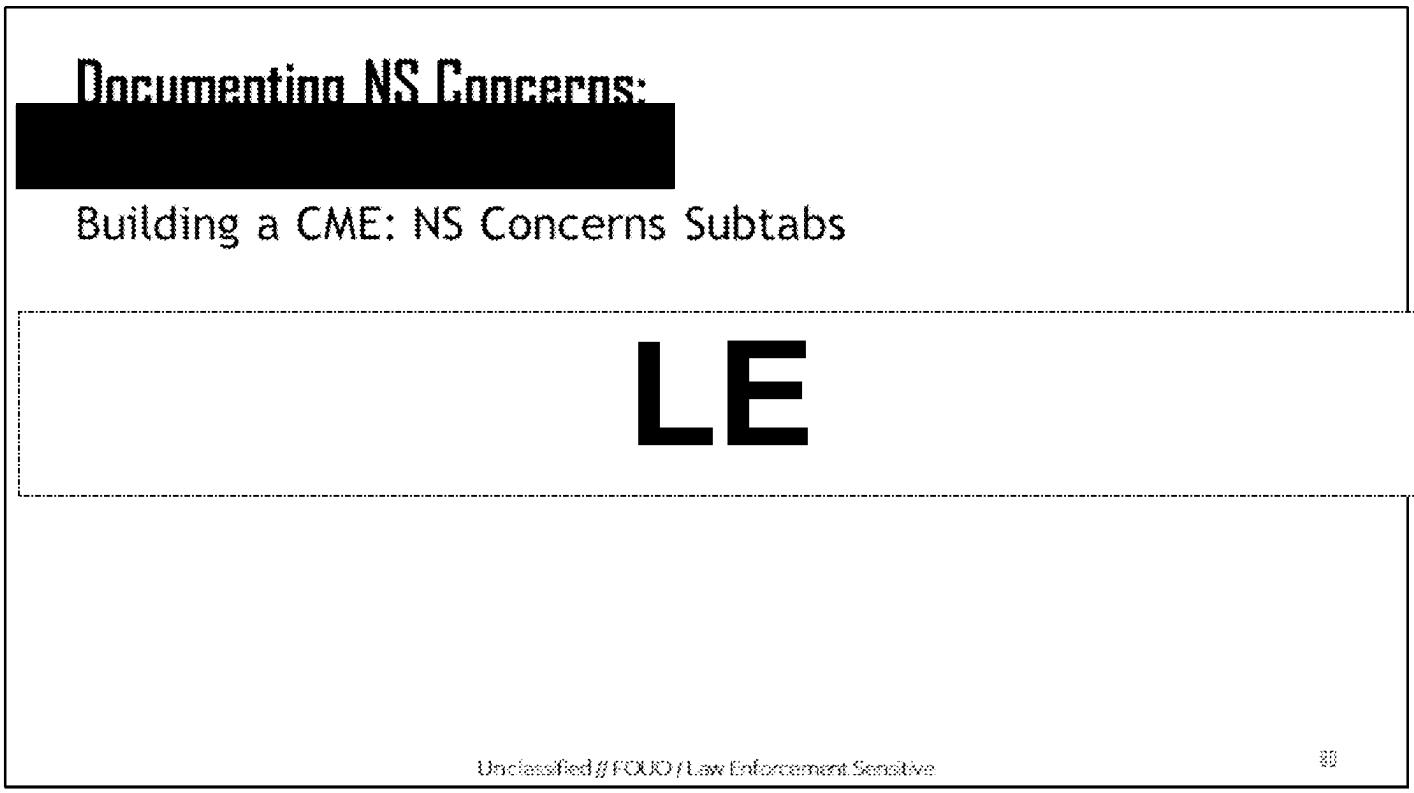
[Go to the next slide.]



Say:

[redacted]



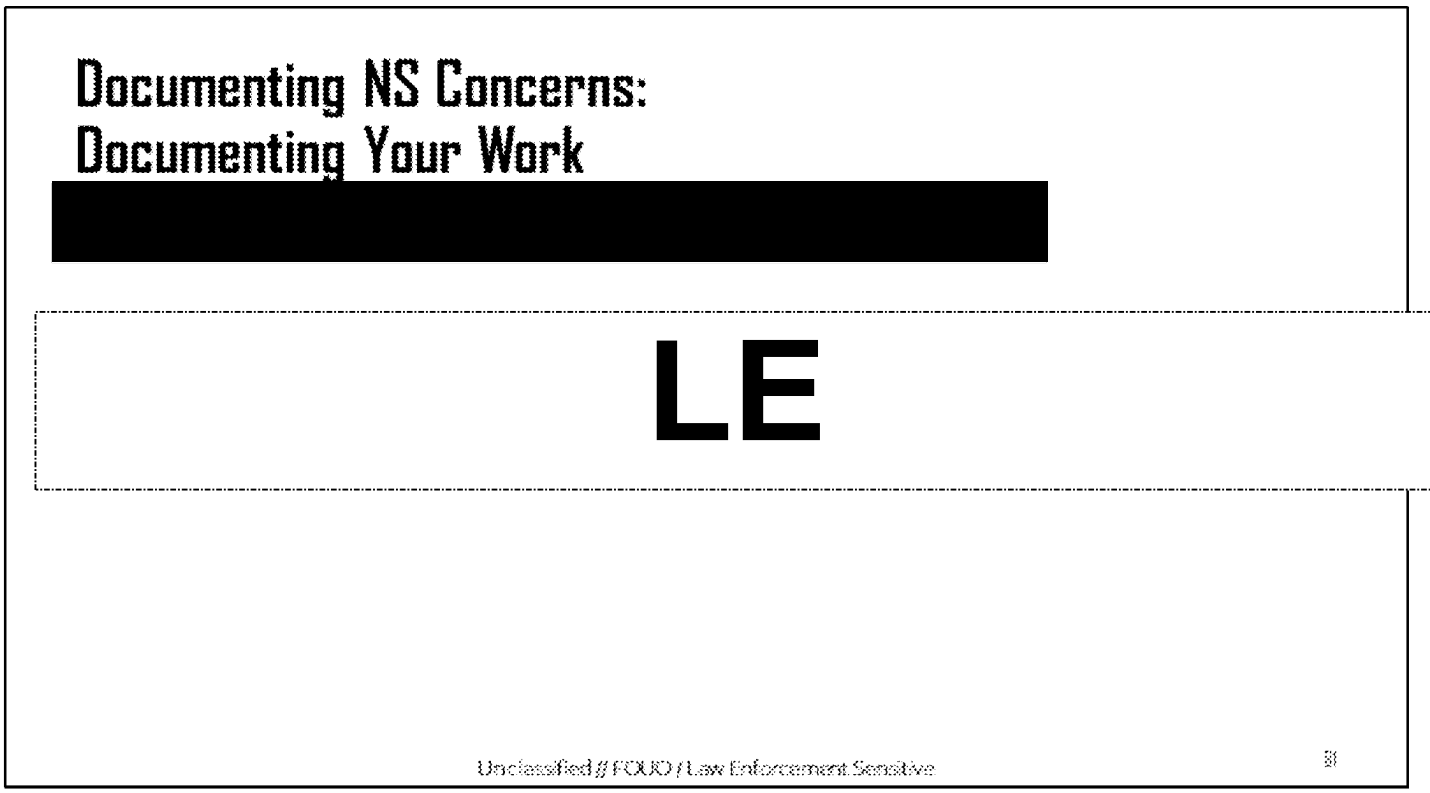


Say:

[redacted]

[Go to the next slide.]

This slide contains mock data used for training purposes only.



Say:

[Go to the next slide.]

This slide contains mock data used for training purposes only.

Say:

Let's go ahead and create an NS CME in the FDNS-DS training environment. I will paste a link in the chat for those who need it. Also, I am going to paste the link for a cheat sheet on creating a new NS CME in the chat box.

[Facilitator: Paste this link in the chat box for the FDNS-DS training environment:https:/[redacted]

Paste this link in the chat box for the cheat sheet on creating a new NS CME within FDNS-DS:
https:/[redacted]

This is a cheat sheet for creating a new NS CME and can be used as a guide for out next in-class exercise. Please login to the FDNS-DS training

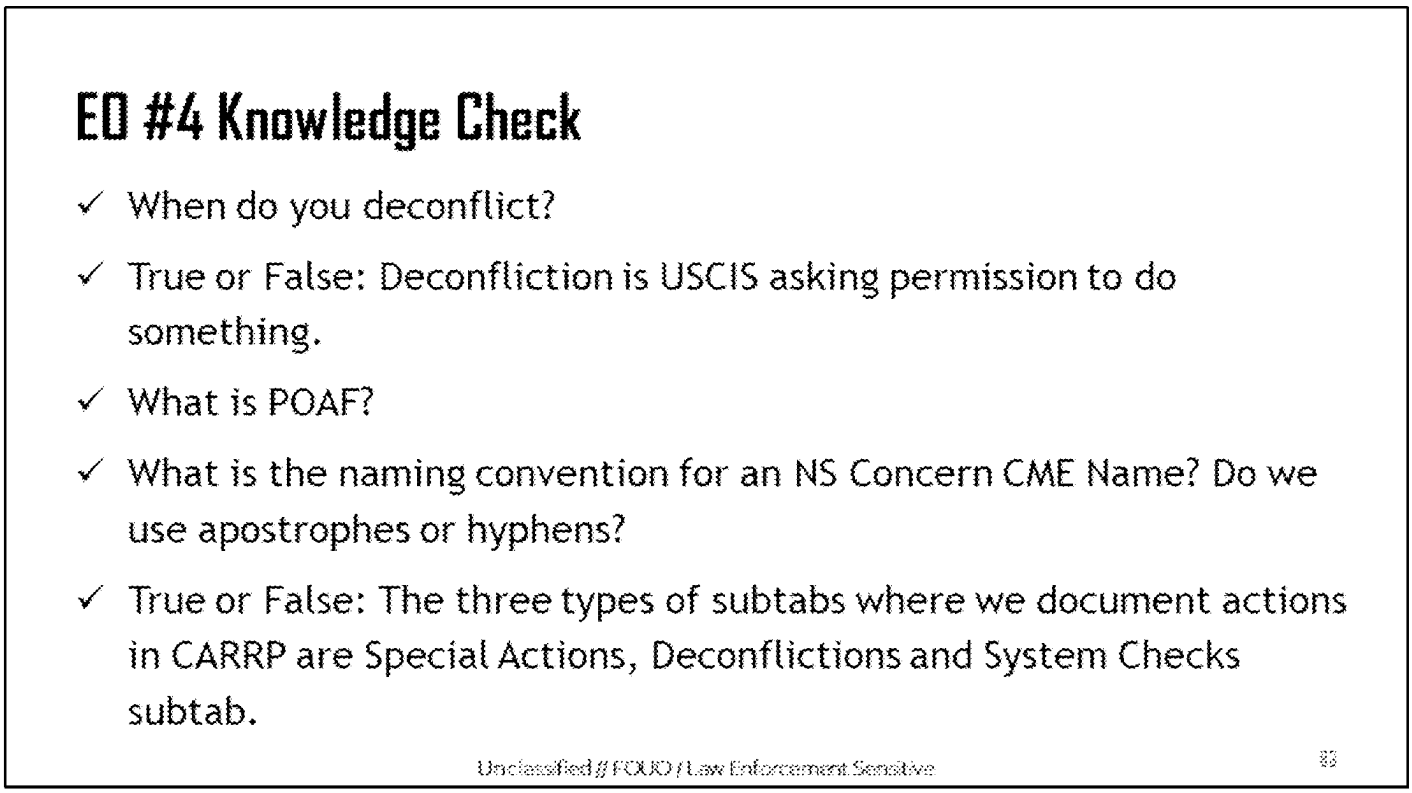
environment now. The recommended browser for FDNS-DS is Google Chrome. The system has also been tested on other browsers such as Microsoft Edge and Internet Explorer, which have both been found to be acceptable. If the training environment won't load, you may have to clear your cache.

[Instructor: The steps for clearing the cache in Microsoft Edge are below:
a. Click the three-dot ellipsis in the upper right of the browser
b. Open the Settings Menu (the last in the list)
c. Click Clear Browser Cache

The steps for clearing the cache in Google Chrome are below:
a. Open Developer Tools (Ctrl + Shift + I)
b. Click Network Tab
c. Check "Disable Cache" check box]

[Instructor: Please refer to the FCPTP practical guide for instructions on how to facilitate this exercise.]

[Go to the next slide.]



Say:

Let's do a knowledge check.

[Instructor: Randomly call on students to answer the questions one by one. The selected student can place the answer in the chat box. Process the response and add the script below.]

When do you deconflict? ***[During any phase of CARRP]***

True or False: Deconfliction is USCIS asking permission to do something. ***[False]***

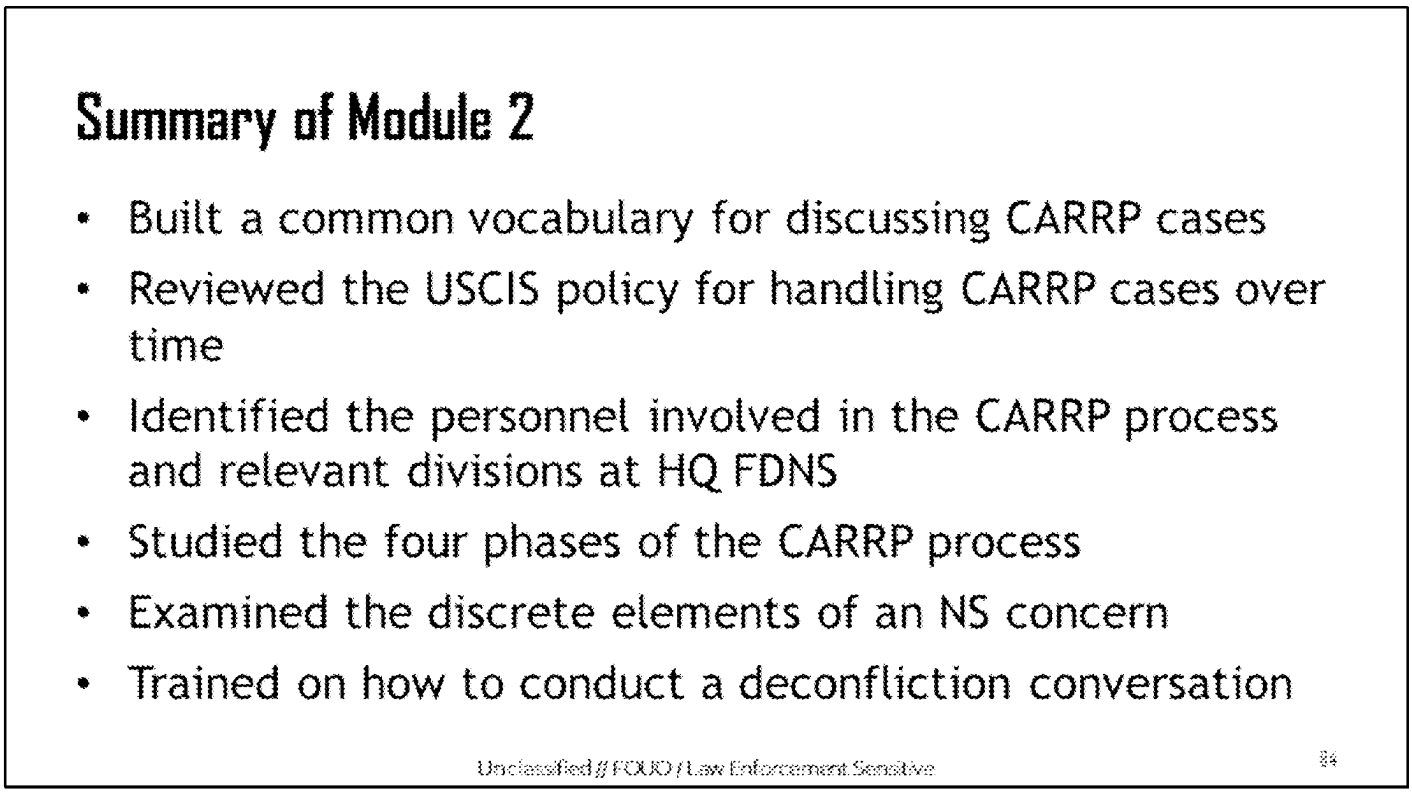
What is POAF? [redacted]
must be queried

What is the naming convention for an NS Concern CME Name? ***[For NS***
[redacted]

Do we use apostrophes or hyphens? ***[No]***

[redacted]

[Go to the next slide.]



Say:

To summarize this module let's review what we talked about. We talked about key terms and building our CARRP vocabulary for discussing cases. We reviewed CARRP policies and discussed how they have changed over time. We identified the personnel involved in CARRP and the HQ divisions that will aid you along the way. We studied the four phases of the CARRP process and examined the elements of a NS concern. And finally, we talked about how to conduct a deconfliction conversation.

Are there any questions from Module 2, or anything you would like clarification on?

Okay, for our last activity of the module, please put in the chat box something new that you learned today!

[Go to the next slide.]

About this Presentation

- Author: HQ FDNS National Security and Public Safety Division (NSPSD)
- Date of last revision: September 2020
- This presentation contains no sensitive Personally Identifiable Information (PII).
- Any references in documents or text, with the exception of case law and open source content, relate to fictitious individuals.

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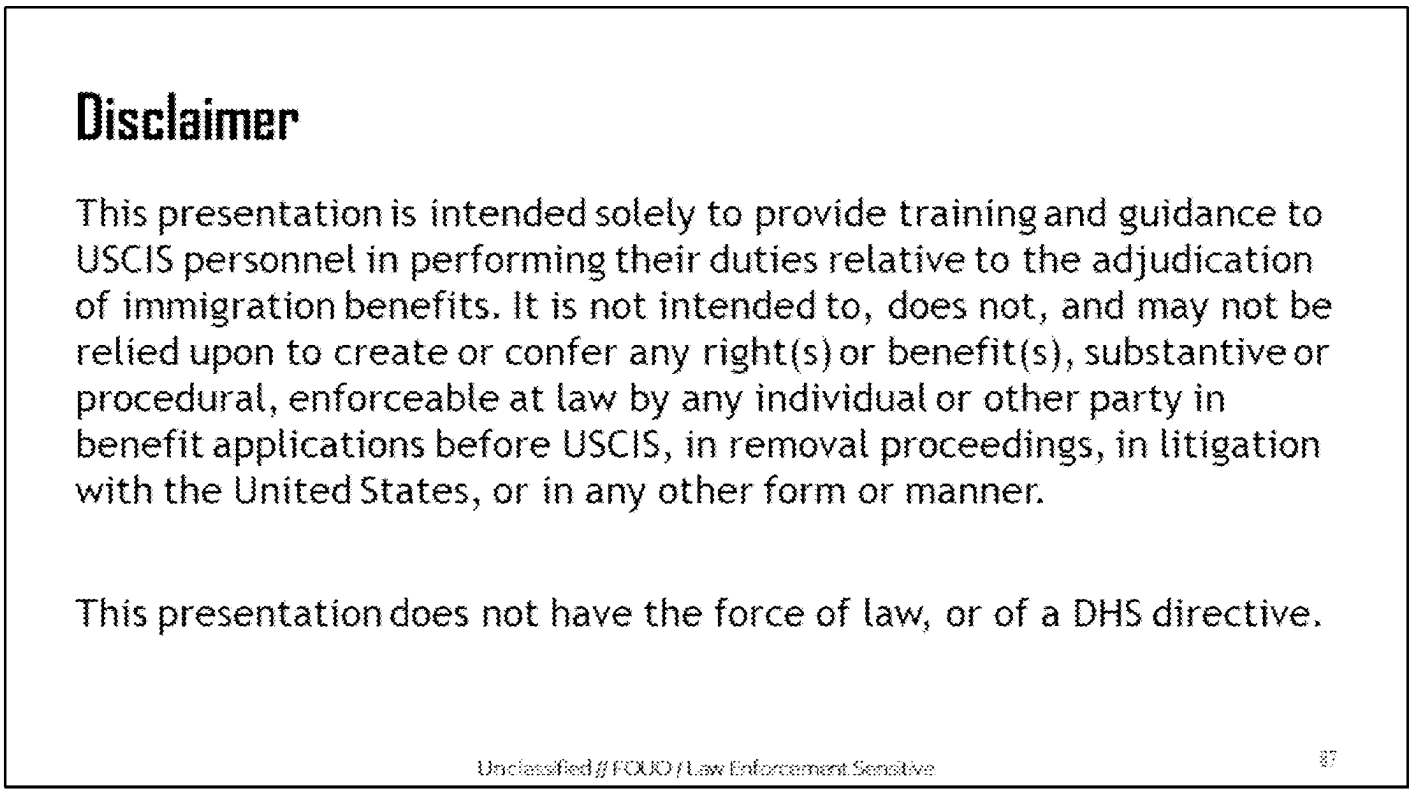

[Instructor: Unless already done so in Module 1, read this slide to students in its entirety. Otherwise, remind students of the disclaimer.]

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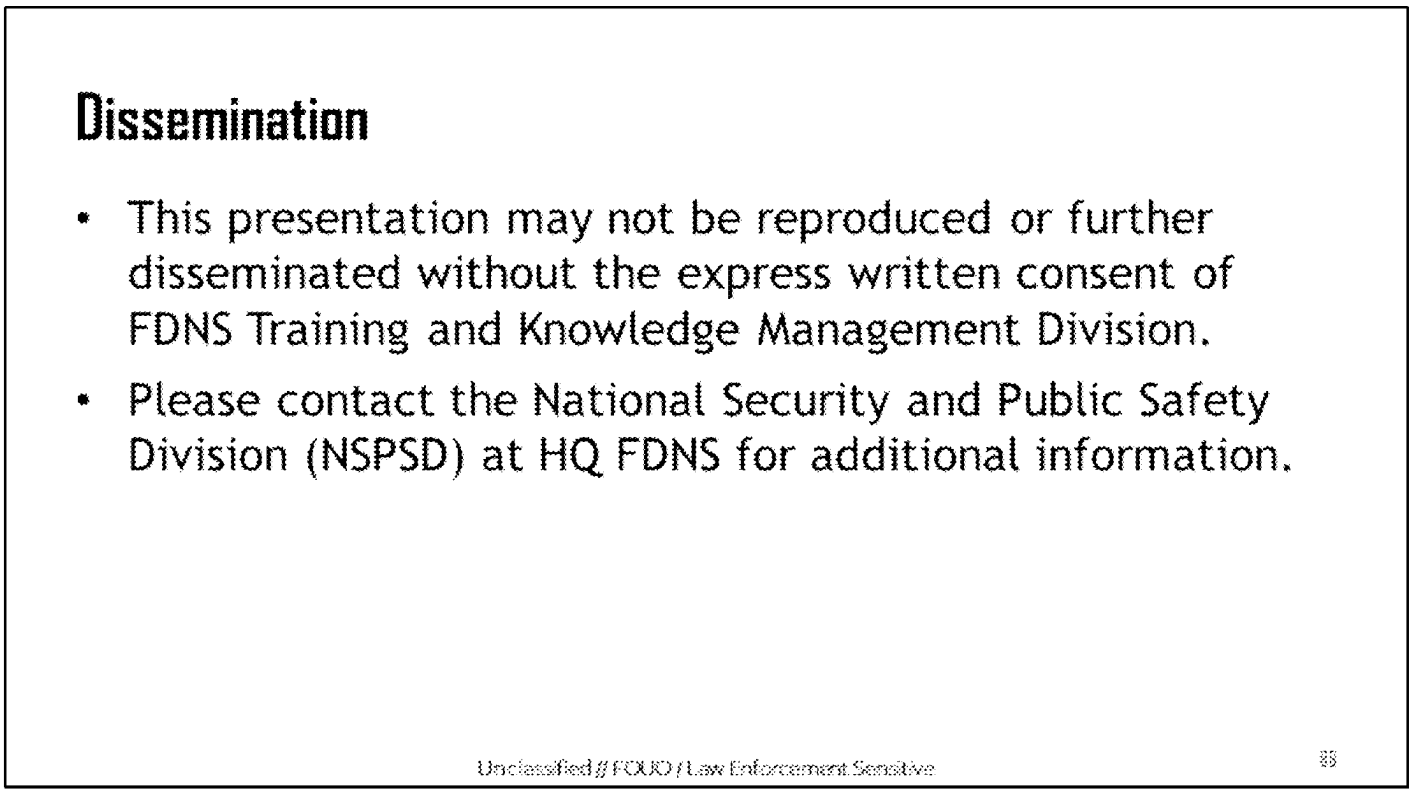

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