

**Exhibit 8**  
**-- Filed Under Seal --**



# Controlled Application Review and Resolution Program (CARRP)

 **Determining Eligibility and Vetting  
National Security Concerns**

**National Security and Public Safety Division**

Updated December 2017

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## About this Presentation



- Author: HQ FDNS National Security and Public Safety Division (NSPSD)
- Date of last revision: December 2017
- This presentation contains no sensitive Personally Identifiable Information (PII).
- Any references in documents or text, with the exception of case law, relate to fictitious individuals.

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## Vetting and Eligibility



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- Review the systems used for vetting.
- Discuss form-specific areas of ineligibility and the importance of continuously assessing eligibility.
- Describe the collaboration between ISOs and FDNS IOs.
- Discuss good interview techniques.
- Identify lines of inquiry for interviews or RFEs.
- Examine the role and function of the JTTF.
- Consider law enforcement and headquarters resources that may help resolve a concern.

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We're going to take vetting and eligibility together in this module

The vetting that we do should be directed towards supporting an adjudication

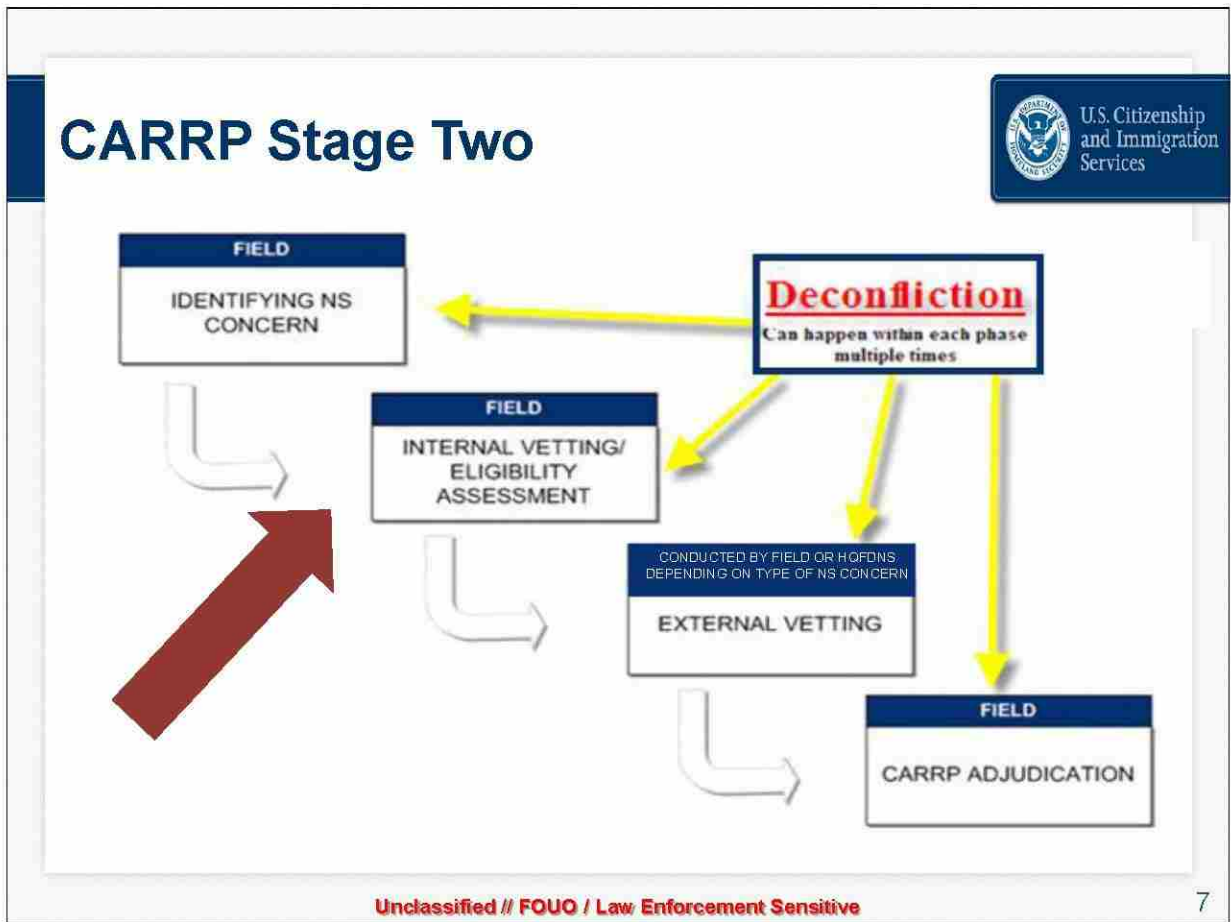
One way or another, USCIS has to render a decision

And remember, from here on out, everything we're doing is based on the premise that there is an NS concern

If there ever ceases to be an NS concern, the case is no longer CARRP and we can adjudicate normally

So in this section, we look at:

- 1) whether an individual is eligible at all, before any vetting is done
- 2) what internal vetting needs to be done to build a picture of the individual and their immigration history
- 3) what external vetting needs to be done to learn about the nature of the concern
- 4) what do we do / what are we looking for with all of this vetting?



We will now move to stage II of CARRP which is Internal vetting and eligibility assessment.

Note that deconfliction can happen at any stage.



## Stage II Roles



### Roles and Responsibilities

CARRP Phase II- consists of two elements (Eligibility assessment and Internal vetting)

- Eligibility Assessment is typically performed by CARRP ISOs (adjudications personnel). RAIO FDNS IOs proceed directly to internal vetting.
- Internal Vetting is performed by everyone involved in the CARRP process.
  - FDNS IOs, CARRP BCU ISOs, perform systems vetting.
  - CARRP ISOs in the field office may conduct an interview.
  - Adjudications and FDNS may jointly prepare a case history.

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There are two parts of CARRP Phase II

Eligibility Assessment

Internal Vetting

Eligibility assessment is done by ISOs and Asylum officers because they have the adjudications expertise in inadmissibility grounds

Remember that not all FDNS officers have a background in adjudications or immigration law

Internal vetting is done by anyone and everyone

This phase in particular has to be a collaboration between FDNS and adjudications

So as we proceed through this section, we'll look at what adjudication personnel do first and then look at what vetting personnel do.

## Internal Vetting / Eligibility Toolbox



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### Tools for internal vetting / eligibility:

- Form-specific factors
- Fraud concerns
- Questionable Items
- Timeline
- Assessment
- Systems checks
- Interview
- Request for Evidence
- Case Summary



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## Eligibility Assessment



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### Purpose

To ensure that valuable time and resources are not unnecessarily expended externally vetting a case with a record owner when the individual is otherwise ineligible for the benefit sought.

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# Eligibility Assessment



## In practice...

The eligibility assessment is done in two parts:

1. Initial, *prima facie* review
2. Detailed joint file review

## Key questions:

1. Is the individual clearly disqualified for the benefit on some ground unrelated to the NS concern? (*pre-vetting*)  
**- versus -**
2. Is the individual still eligible? (*post-vetting*)

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Eligibility assessment gets done up front, shortly after the case is referred

The practice has evolved in two directions:

There's an upfront early review to see if the applicant is eligible for the benefit

Then there's the continuing assessment based on vetting results and collective case factors prior to the final decision.

# Eligibility Assessment Goals



## CARRP as a Process (with a defined end)

That end can be one of four outcomes:

		Adjudicative Decision	
		Eligible for benefit	Ineligible for benefit
National Security Issue	NS Concern Resolved	Approval of benefit	Denial of benefit
	NS Concern Unresolved	Requires senior official or SLRB concurrence	Denial of benefit

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If the initial assessment by adjudications finds a clear ground of ineligibility, we conduct deconfliction and required system checks.

Even though we haven't resolved the NS concern (or done very much work on it at all) we've reached the end of the process via a final adjudication.

Additional points:

Should we deconflict if we're going to deny based on the initial eligibility assessment? YES

We've identified a connection to an NS ground in 212 or 237... aren't all of these cases ineligible? SORT OF BUT NOT REALLY

A "connection" for the purposes of starting our CARRP process isn't the same as a statutory ineligibility, but also...

Our initial eligibility assessments have to be based on information that's readily available to use

Aren't people just going to refile? PROBABLY, BUT...

It depends on why they're being denied

And they won't necessarily again immediately

A lot can happen with an NS Concern between our decision and them refiling

They could get removed; any investigations could be closed so there's no derogatory information when they refile; the additional investigation time could result in an arrest that makes future USCIS decisions easier, etc.

# Eligibility Assessment



## Key elements of the Eligibility Assessment

- Should highlight identified inconsistencies and questionable items to be pursued
  - “Applicant has two SSN’s”
- Should state the grounds that were considered
  - “Reviewed the N-400 for GMC and attachment to the Constitution. Applicant appears *prima facie* eligible at this time.”
- Should suggest directions for vetting
  - “Request additional information about applicant’s travel history to address potential physical presence ineligibility.”
  - “Request information about xxxxxxxxxxxx charity.”

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The actual assessment is done by ISOs or AOs

Adjudications personnel have the best sense of potential ineligibilities

They are also the people who will do the interview

There are two things the ISO or AO should incorporate into the A-file:

Actual eligibility assessment

Timeline

(These can be combined on one document).

Make sure to point out items that the vetting personnel may be unfamiliar with

Think back to the fictitious instances of self-reporting – make sure to flag anything that is unknown or unfamiliar

The assessment should not:

Just state the applicant “appears eligible” - List out what grounds were considered and what evidence is needed!

Rely on the NS grounds to say someone is ineligible

Are we going to deny based on the NS grounds? NO – we very rarely use the NS grounds in a denial, in court, etc.

Need to leverage some other statutory ineligibility



## Practical Exercise: Sample Eligibility Assessment

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### Major Points:

Eligibility grounds that were considered are highlighted in yellow

Residency and physical presence

Potential communism ties

LPR for 5 years

Other facts warranting vetting are highlighted in green

There are a couple of organizations for FDNS to look into

Highlighted a potential inconsistency with education RE: dissolution of the USSR

Results of security checks are clearly listed

This is a pretty good eligibility assessment – it was also probably not the initial assessment – it was updated as vetting progressed

So the initial eligibility assessment is a starting point and we add to it as new facts are learned that could impact eligibility

Just like our overall CARRP process is a game of chutes and ladders, even within stages, we see a lot of stopping and starting and circling back to the beginning to reconsider things

The next section looks into some of the specific elements we just saw in the sample eligibility assessment

## Form-specific Factors



### How does USCIS consider Ancillary & Non-Status Granting Benefits when NS concerns are a factor?

- Consider information on prior forms in eligibility assessment.
- Consider the validity of the underlying status.
- Consider any underlying petitions.
- Do not focus only on the current benefit!

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Transition: One of the points in our sample eligibility assessment was form-specific considerations

Our sample happened to be an N-400 application, but all of our forms have their own specific requirements that we consider when evaluating eligibility

Turning first to ancillary benefits:

Why do ancillary benefits go in FDNS-DS? - So we can use the information on them during our eligibility determinations

Ancillary benefits and petitions and things are adjudicated quickly without resolving the NS concern, but...

They ask many of the same questions as I-485s and N-400s

Therefore, we want to compare answers between the forms as part of our eligibility determination

Example: on an ancillary I-131, do you have to list where you're traveling to and why?

Example: on an ancillary I-765, do you have to list where you're working?

Example: on an I-140, could you have submitted supporting docs like a resume?

Major Point: Don't focus only on the current benefit when determining eligibility... it's a comprehensive look at case factors.



## Form-specific Factors



### Adjustment of Status based on Asylum-Eligibility

#### factors to consider

- Adjudicate in accordance with § 8 C.F.R. 209.2 NOT INA §245!!
- Eligible to apply for adjustment one year after grant.
- Must be admissible.
- Continue to be a Refugee, or spouse/child of one.
- Not firmly resettled.

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Some questions to ask applicant to find out if they continue to maintain their status would be:

- Have you returned to your country since grant of Asylum?
- Do you have any plans of returning?
- Are you afraid of returning, or have conditions materially changed?
- Have you traveled outside of the US since your asylum grant? If so, where to? How long did you stay? Do you have any status there?

Forum shopping – does the address on the form match where they filed?

Note: some inadmissibility grounds do not apply, while others can be exempted

## Form-specific Factors



### Adjustment of Status based on Refugee-Eligibility factors to consider

- Adjudicate in accordance with INA 209 NOT INA 245!!
- **Must apply for adjustment one year after admission to the US as a refugee under INA 207**
- Admission has not been terminated
- Physically present **in the United States** for at least one year
- Found to be admissible
- **Continues to be a refugee or spouse/child of one**
- **Not firmly resettled**

\*\*\* Refugee adjustment may not be denied based on discretion.

- may only deny based on certain grounds of inadmissibility.

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Note that not all inadmissibility grounds which normally apply to 245 adjustments apply to refugee adjustments, also that there are waivers available for these grounds.

Review testimony – was the claim based on being arrested? What was the arrest for? Did they indicate on the I-485 that they have never been arrested?

Review family – where are they? Is the spouse / children still abroad? Where?

Example: Afghani whose wife is still in Pakistan keeps traveling to Pakistan and claims his children were born in Pakistan – RFE for birth certs to see if the family is actually still in the country of claimed persecution

## Form-specific Factors



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### N-400-Eligibility factors to consider

- Failure to provide true and complete information during his N-400 interview with regard to trips abroad.
- Failure to disclose all addresses where the applicant resided during his N-400 interview.
- False claims – many employment applications ask if the applicant is a USC
  - Police, Fire, Military
- Claiming disability on an N-648 related to military service but no evidence of service on any prior applications
- Failure to respond to request for evidence (N-14) application may be summarily denied pursuant to 8 CFR 103.2(b)(13).

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INA 318 issues – can we go back and look at the LPR grant? YES

## Questionable Items



### Examples of Questionable Items to consider

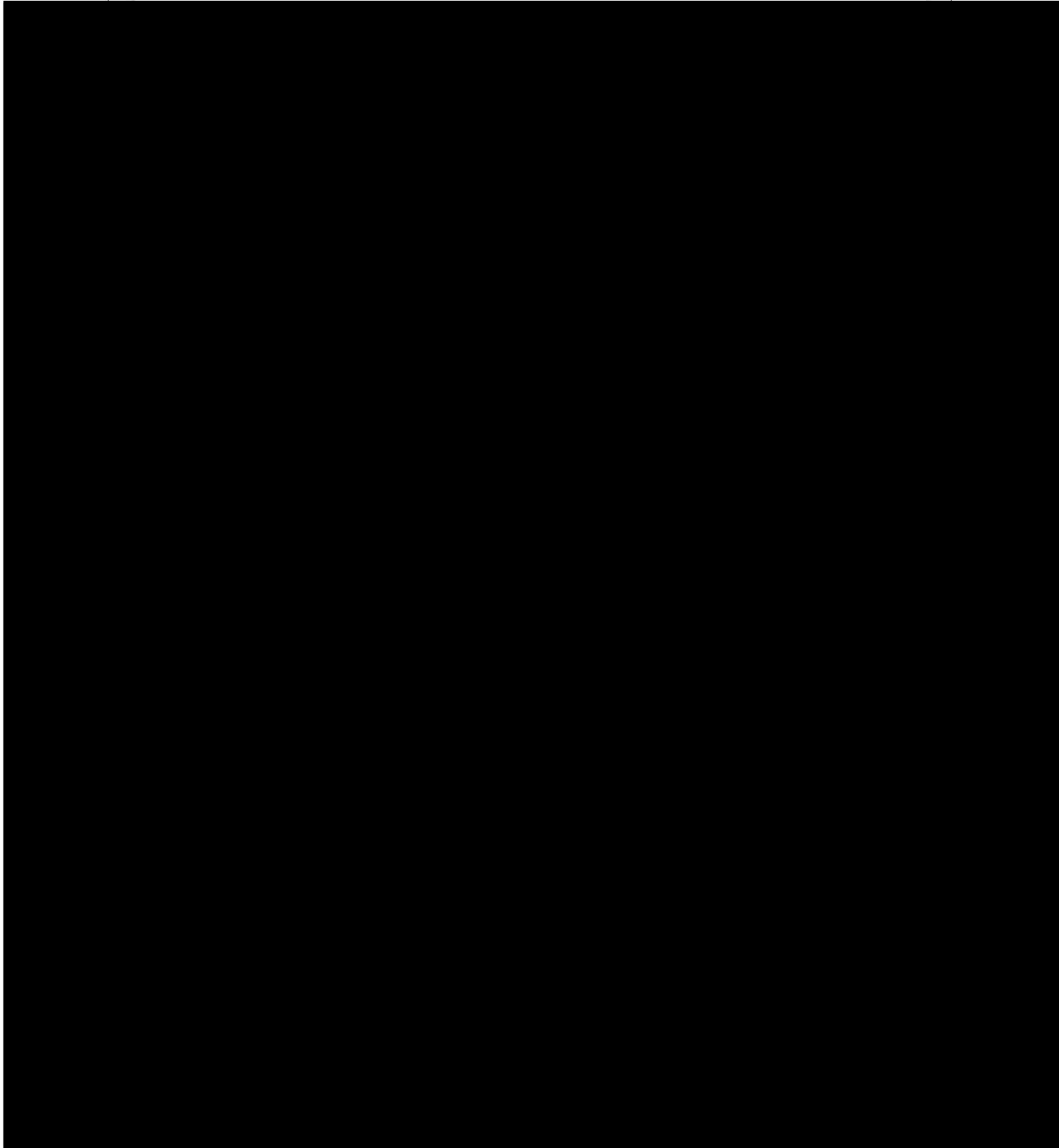
Transition: Our eligibility sample also looked at questionable items, we scrutinize what doesn't seem to make sense  
This is one of the ways that the eligibility assessment guides vetting  
And then, as vetting further investigates some of the questionable items identified, those answers are used to update the assessment to determine if the applicant's eligibility has changed

Major Point: This slide shows examples of some questionable things that we could look into in the internal vetting stage  
Note that these items are about the applicant and their history – there's nothing directly related to the NS concern


# Fraud in NS Cases



## When Fraud Meets NS







**Handout:**  
**Sample Visual Timeline**

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How about this as an example?  
Is it helpful or not?

## Timelines



### Building a timeline- a tool in CARRP processing

- Chronological sequence of events that enables the viewer to quickly understand temporal relationships
- Should include the following:
  - Applicant's name, Alias, DOB, COB, COA, SSN#, and A#.
  - All visas / applications / petitions
  - Employment history
  - Education history
  - Encounters with law enforcement, including arrests
  - Organization affiliations
  - Military history
- Place all elements in the same chronology – do not break up into sections

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Transition: the other major element of the sample eligibility assessment we saw was the timeline

A timeline can be part of your eligibility assessment and can be useful for highlighting the questionable items or things that you want FDNS to pursue in vetting

The last bullet says to place everything chronologically... why?

Sometimes timelines will be broken up by section, as they are on an application

There will be a section listing employment dates, a section listing education, etc.

But part of the goal of a timeline is to understand temporal relationships

Those relationships aren't limited to category

Major Point: Your timeline should help a reader to understand how all elements of a persons history are connected

Therefore, it's often better to use one chronology of everything instead of sectionalizing

That way, a reader can see where travel overlaps with employment, where address history overlaps with education, etc.



## Timelines



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### Sample Immigration Timeline

- Form I-485 Filed on 04/01/2004, (Receipt Number MSC-XXXXXXXXXX)
- Form I-130 Filed on 04/01/2004, (Receipt Number MSC-XXXXXXXXXX)
- Interviewed: No
- FBI Name Check Results: [LE] (DATE)
- FBI FP Results: [LE] (DATE)
- 11/17/2002 Admission into the United States with new visa
- 09/12/2003 Admitted into the United States as a visitor for pleasure
- 01/25/2004 Married Jane Doe, a USC
- 04/25/2004 Form I-765 submitted and approved (expires 04/24/2005)
- 05/10/2005 Form I-765 submitted and approved (expires 05/09/2006)
- 06/08/2008 Form I-131 filed (Advanced Parole)
- 06/08/2008 Form I-765 submitted and approved (expires 06/07/2009)

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Transition: now that we've talked about what should be in a timeline and why it's a valuable tool, let's look at some examples

This is an example of a simple chronology

It's fairly brief (and ugly) and far from exhaustive

But it's one way of getting immigration history, background check records, and other elements into one presentation



# Application Exercise 5.1

## “Building an Immigration Timeline”

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Transition: This exercise demonstrates the value of a chronological timeline by leveraging the N-400 that we looked at during the indicators exercise

Have students review the N-400 application from the indicators exercise

Instruct students to develop a timeline

After 10 minutes, ask one student to walk through the timeline and highlight anything they learned that was non-obvious when just reading the form

Put up the complete timeline on the screen and walk through any missed points.

Have the class save their timelines as a Word document. Then the instructor will have the class login to FDNS-DS and show them how to attach their Eligibility Assessment timelines to their FDNS-DS NS

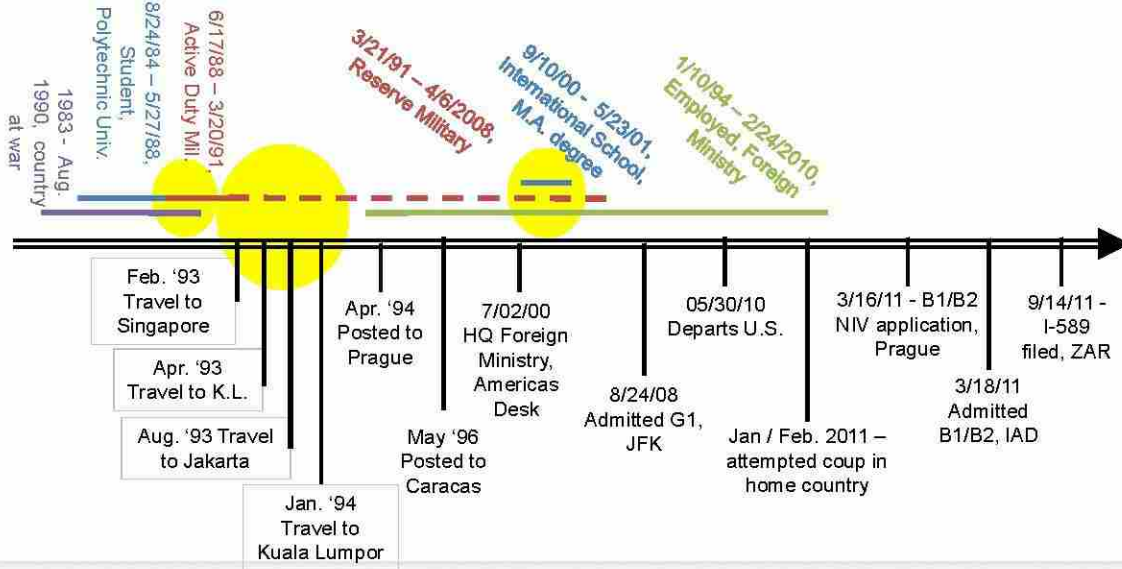
Concern records

Also show the class how to enter an activity for the time it took to create the Eligibility Assessment. Have them add an activity to their FDNS-DS records.



# Timelines

## Sample Immigration Timeline



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# Interviewing



## Interviewing 101

- Best practices
- Before the interview
- Questioning
  
- *Discussion:* What is the longest interview you've conducted?
  
- *Discussion:* What is the procedure in your office for interviewing? How much time do you have to prepare? How is OCC involved? Who else is involved?

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Instructors: this slide outlines the upcoming interview section – the discussion questions can be answered now, or students can think about them during the interview slides and discuss them at the end of the section

# Interviewing



## Best Practices:

- Videotape the interview (not applicable to RAIO cases)
- Use a semi-structured format
- Prepare primary questions and follow-ups in advance
- Evaluate any questions from an LEA
- Clear questions through local OCC
- Interview in pairs
- Always place the applicant under Oath
- Take a sworn statement (preferably typed)
- Consider who should interview

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### Videotaping:

Each office may have different policies

Familiarize yourself with the camcorder prior to the interview and do a practice

Capture entire body, not just face shots!

### Semi-structured interview

Prepare both the initial question you're going to ask and follow up questions

If an LEA has asked for questions to be inserted, find a place where they fit naturally into the dialogue

You cannot ask questions provided by an LEA that has NO bearing on the eligibility requirements for the benefit being sought

Clear all of the questions with your local OCC and supervisor ahead of time

Interview in pairs

One primary person interviews, the other takes notes / writes down questions to go back to

If your office usually has AOs or ISOs interview, it may be worth it to have the second officer be an FDNS IO

Who should interview?

Is it going to be adversarial?

Are there participants (lawyers, interpreters, etc.) who are known to any of the adjudicators?

Are there adjudicators in your office who are better at rapport building? Who are more sympathetic? Who have a particular background or experience that could be useful?

Think about what approach is going to work best and what officer is best suited to conduct the interview

You want the first interview to be the only interview

Be prepared and go in with a plan so you can avoid having to call the applicant back

# Interviewing



## During the Interview:

- Build rapport
  - Ensure you are familiar with the applicant's case
  - Begin informally to place the applicant at ease
  - Advise him of the process
  - Ask about his trip to the office – commute, parking, etc.
  - Ensure proper pronunciation of the applicant's name
  - Know something about where he is from
  - Ask about family if they are present in the office, or a trip the applicant took that you're interested in

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## Interviewing



### During the Interview:

- Do not let the applicant, or his/her attorney take over the Interview
- Listen and maintain eye contact
- Look for non-verbal cues
- Do not interrupt the applicant– give him an opportunity to fully answer questions being asked

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If the attorney takes over the interview, stop and remind the attorney of their role in an administrative interview

If you need to take a break and review your notes prior to ending the interview do so. Ask the applicant to go back to the waiting room while you review all documents to make sure you didn't miss anything.

Offer the applicant (or attorneys or interpreters, etc) breaks – let them use the restroom – if you can, offer water or something similar

# Interviewing



## Questioning:

- Ask open ended questions
- Start general at first then narrow down to more specific topics

## Compare:

Example 1 – “Have you ever served in the military? Which branch were you in? When did you join? Why did you choose the Navy?”

Example 2 – “Did you join the Spanish Navy in 1987?”

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Starting general and narrowing down your questions gives the applicant room to elaborate and explain more fully  
Another example:

“Have you ever donated money any organization? Have you ever given anyone money, including family or friends?” vs.  
“Have you ever supported anyone trying to overthrow of the US government?”

The first line of questioning is likely to get more information and not close off a line of questioning that we want answers to

Also, these are an example – in an actual interview, you're not going to string questions together like that  
Ask questions one at a time and wait for a response



## Interviewing



### Questioning:

- Look for gaps of time in statement
- Don't make assumptions
- Pay attention to phrasing of questions and answers

### Compare:

Example 1 – “Have you ever been to Australia?”

Example 2 – “Have you ever served in Australia?”

Example 3 – “Have you ever taken a trip to Australia?”

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Another example:

“Have you ever donated money any organization? Have you ever given anyone money, including family or friends?” vs.  
“Have you ever supported anyone trying to overthrow of the US government?”

The first line of questioning is likely to get more information / allow the applicant to disclose more

Another example:

If you ask if someone participated or was involved in the Vietnam War, and the answer is “I was never in the military,” that's not an answer to the question you asked

It could be a truthful response, or it could be omitting some non-military form of participation

# Interviewing



## Questioning:

- Let the applicant provide information, then follow up with additional questions as necessary
- Clarify unclear statements and inconsistencies
- Do not read an applicant's responses back to them

## Compare:

Interviewer – “Have you ever been stopped or interviewed by law enforcement?”

Applicant – “I talked to them outside my house.”

Follow-ups – “Who did you talk to? Did you talk to them anywhere else other than your house? Was it one time, or several times?”

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Instead read the question that the applicant has already answered on the form “have you ever been arrested, indicted, etc.”

Phrase the question differently to ask about other encounters

Follow up on things that you don't fully understand

## Interviewing



### Questioning:

- Recap, recap, recap
- Make sure you fully understand every answer
- Restate testimony in chronological sequence (as opposed to topical area)

# Interviewing



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## Deep Dive - RAIO Officers and Interviewing

- RAIO officers may identify NS concerns pre-interview, during the interview, or post interview.
- RAIO work focuses on the interview to establish eligibility - as a result, the interview also plays a significant role in identifying NS concerns based on specific lines in inquiry relating to the NS grounds.
  - During refugee interviews, ALL applicants, regardless of age, are asked specific questions about bars to admissibility
  - During asylum interviews, only applicants and dependents age 14 or older are specifically questioned about bars to admissibility

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## Tools for Vetting-Interview



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### Post-interview

Compare interview responses with application, supporting documents, systems checks and open source information:

- Is applicant's testimony consistent with his/her Application/Petition?
- Is it supported by documentary evidence?
- Was the applicant provided with an opportunity to clarify any inconsistencies?
- Was the applicant's testimony detailed?
- Was the applicant confronted on all outstanding issues?
- Did you ask the applicant the same question several times during the interview to double check his or her answer?
- Is there a need for an RFE?
- Did you learn anything new that can be shared with law enforcement?
- Does law enforcement have anything new to add to the record?

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# **Studies in National Security:**

## **Interview Techniques: What to ask and How to ask it**

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Review the Interview Techniques Studies in NS  
Emphasize techniques from page 1 and semi-structured topics from page 2

# Requests for Evidence



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## Requests for Evidence (RFE)

- What can you RFE for? (a non-exhaustive list)
  - Affidavits
  - Employment Records
  - Tax Records
  - Bank Statements
  - Transcripts
- Why are RFEs useful in a CARRP case?
  - They are applicant-provided information
  - They are unclassified

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- RFE must be relevant to the benefit sought

## Internal Vetting



### What is Internal Vetting?

- The process of obtaining relevant information in furtherance of an adjudication and to explore the nature of an NS concern. ***Focus is on applicant eligibility for the immigration benefit.***
- Consists of DHS, open source, or other systems checks; file review; interviews; and other research, ***but does not include vetting with outside agencies.***

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Internal vetting is geared toward developing information to help with the adjudication and eligibility assessment (remember – vetting is not simply running systems checks – it involves evaluating the information and understanding its impact)

It relies heavily on what is revealed in immigration systems and by internal USCIS resources

Upon completion of required internal vetting, if the NS concern remains, the officer must evaluate the result of the vetting and determine any relevance to adjudication, obtain any additional relevant information (e.g., via a request for evidence, an interview, and/or an administrative site visit), and determine eligibility for the benefit sought. Adjudication of a case with a NS concern focuses on thoroughly identifying and documenting the facts behind an eligibility determination, and, when appropriate, removal, rescission, termination, or revocation under the Act.



## Tools for Vetting-Systems



### Internal Vetting Systems (a non-exhaustive list):

- Central Index System (CIS)
- CPMS
- CLAIMS 3
- CLAIMS 4
- EARM
- ELIS
- FDNS-DS
- TECS
- ADIS
- ATSP
- IDENT
- ACCURINT / CLEAR
- CCD

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Use these tools to run down the questionable items the adjudicator flagged

Where does the person live? Is it an actual address?

Compare addresses in open source with the address history the applicant provided

Do an image search of the address – is it an actual residence?

Is the residence in line with income and family size?

How many people did the applicant claim live in the residence?

## Tools for Vetting: Addresses



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### Sources for address history:

- Applications / petitions, including:
  - Current filing address
  - G-325, other supplemental collection forms, & Affidavits of Support
  - AR11 filings
  - Questions within an application asking for a list of previous addresses
- Commercial databases
- Other U.S.G. benefit applications
  - Social security
  - Welfare
  - Housing assistance

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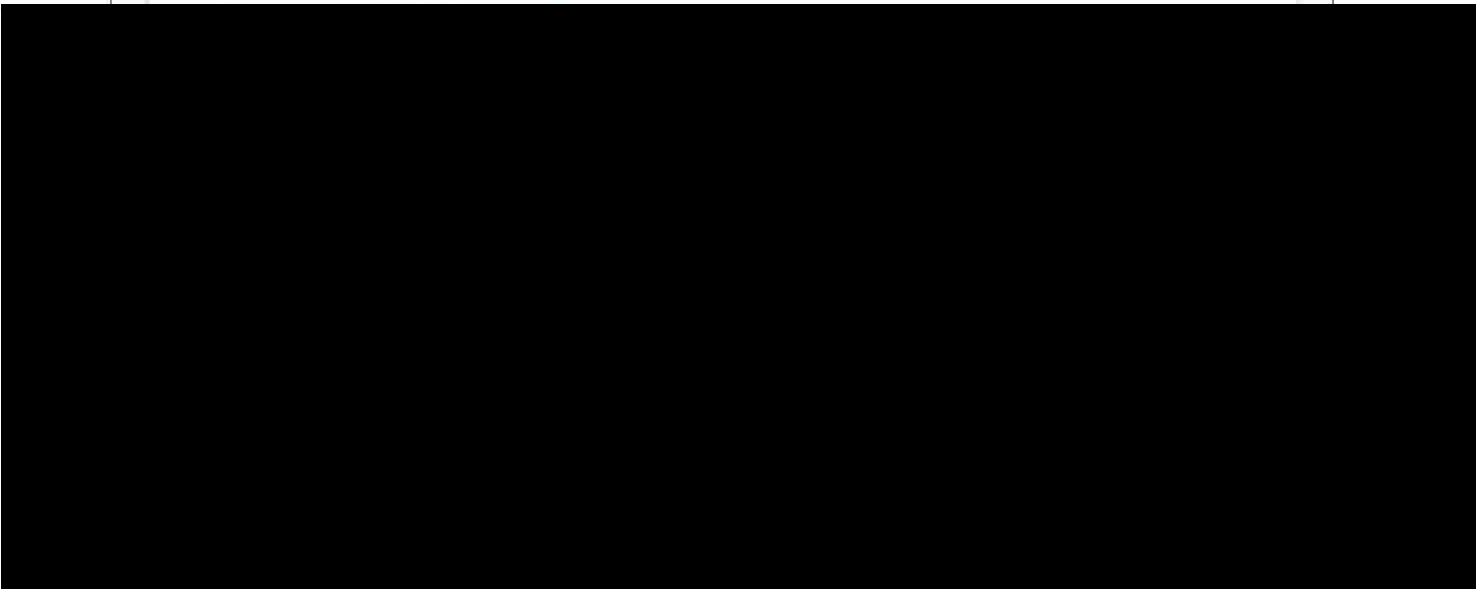
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# Tools for Vetting: Addresses



(Not so obvious) places to look for addresses



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# Tools for Vetting: Addresses

## Sample address comparison:

TECS Address Query Result	Address	LE Reported Dates of Residence	Accurint Reported Dates of Residence	CLEAR Reported Dates of Residence	NOTES
No Results Found	LE				
No Results Found					
No Results Found					



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Major Point: This is the level of detail that we need to get to with CARRP cases

This is something HQ FDNS prepared for a case

There were actually more queries after this into the addresses that family members who we knew were coming to visit the SUBJECT listed on their visa applications and encounters with CBP

It turned out that in this case, the address line of inquiry didn't lead anywhere – the SUBJECT was very consistent in how she listed address

There was also no derogatory information on the address themselves

But this is the thought process and the type of answers that are needed in CARRP

## Considerations - When Subject is of a National Security Concern



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- What is subject's background?
- Immigration History?
- Travel History?
- Source of Income?
- Occupation?
- Associates/friends/co-workers?



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In Phase 2, you know that an individual is a national security concern  
Therefore, the goal is to develop more information about the individual

# Internal Vetting Roles



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## Component differences in roles

- Service Centers → don't interview at all (even though they're ISOs)
- Field offices → may interview during Stage II or other times  
→ may use CARRP ISOs, FDNS IOs, or both
- RAIIO - Asylum Officers and Refugee Officers → Interview every applicant. The Interview may occur before, during, or after the discovery of the NS concern, as some NS concerns are identified at interview or within supplemental interview documents.

\*\*\* Depending on the form type, an interview may be appropriate earlier or later in the process (*think N-400 application*)

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Important disclaimer up front: all three components do this differently

We talk about interviewing as part of Stage 2 because it's a logical fit – the interview is one of our immigration specific, internal vetting tools

However – if you know you have a CARRP case, you may not want to interview in Stage 2

You may want to complete all your vetting first

CAUTION: N-400 Applications

You may want to be careful of starting a clock on the adjudication of naturalization applications.


N-400s have to be adjudicated within 120 days of the interview

You may want to consult with local counsel because once a naturalization interview takes place, USCIS is mandated by statute to complete adjudication of the N-400 within 120-days of the interview. So be careful of starting a clock on the adjudication

# Internal Vetting Roles

## Roles

- Internal vetting can done by ANY designated officer
- Eligibility assessment is within the purview of adjudications personnel
- SCOPS → ISOs working in the BCU perform internal vetting
  - ISOs working in the BCU conduct the eligibility assessment
- FOD should be eligibility assessment → responsibility assessment → Therefore, CARRP ISOs and FDNS IOs share for internal vetting & the eligibility assessment
- RAIO → internal vetting identified → In Asylum offices, AOs and FDNS IOs perform depending on when the NS concern is



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Instructors: highlight another similarity between RAD and domestic offices

In field offices, ISOs should build the eligibility assessment up from its preliminary review to direct the vetting done by FDNS IOs

In RAD, ROs should consider what information they need from HQ when referring a case to CARRP

In both cases, adjudications personnel are identifying pieces of information they need – more background on a group, looking into inconsistent testimony or facts, etc.

## Tools for Vetting-Case Summary



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### Topics for completion after internal vetting:

- Do you have the complete name and all aliases of the applicant?
- Do you have all applicable addresses that relate to the applicant?
- Have you prepared a case Timeline that documents travel, employment, education, military history etc.?
- If applicable, have you prepared an Eligibility Assessment?
- Have you reviewed in its entirety the associated application (s) or petition(s)
- Are the interview notes complete and accurate?
- Have you documented the derogatory information at issue that needs to be explored by the designated

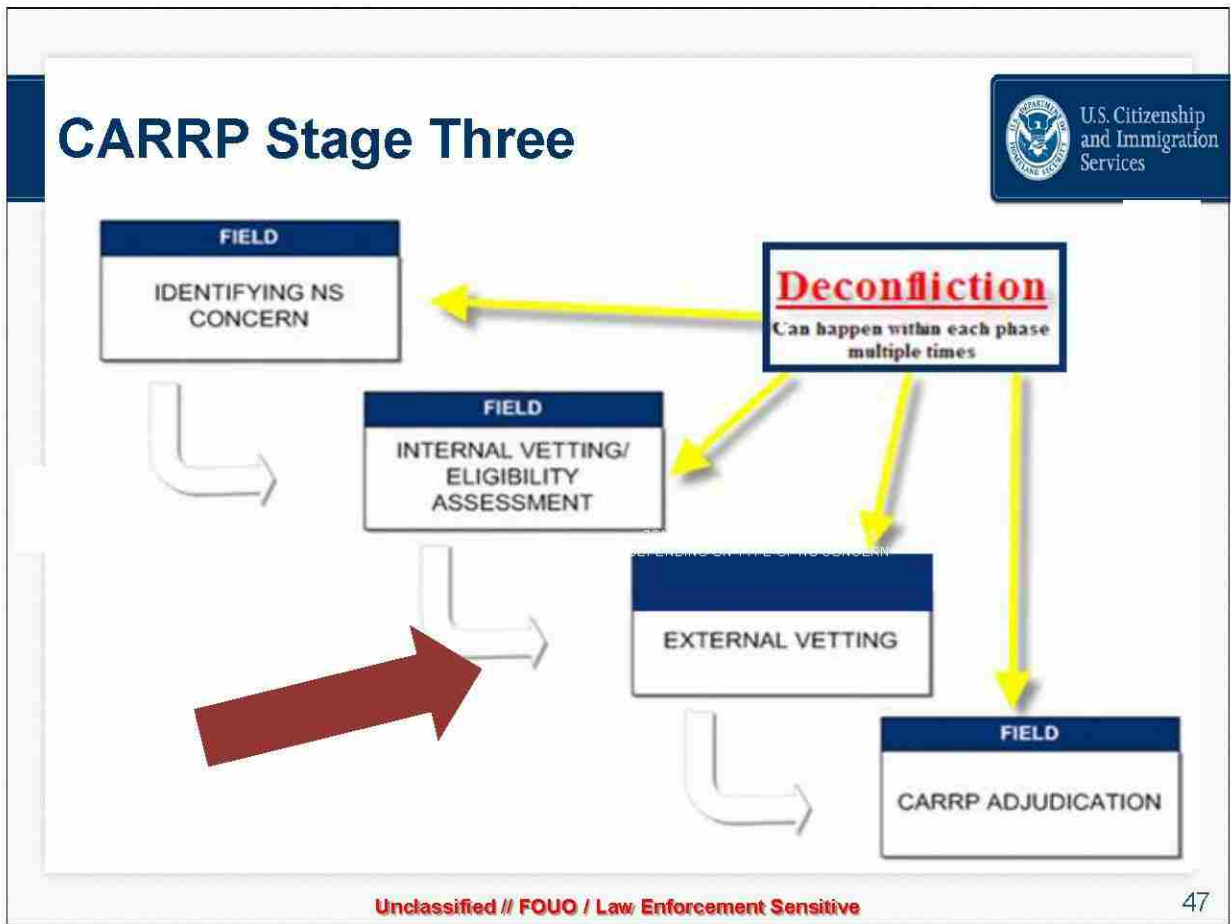
CABPD Officer

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When drafting a case summary, make sure you note everything you can find in your summary. Also, as you are drafting the summary, you may want to consider items you want to ask during an interview or documents you may need subject to provide per a RFE.





The third stage of CARRP is external vetting.

# External Vetting



## What is External Vetting?

- The process of obtaining additional information ***regarding the nature of an NS concern*** and its relevance to the individual from a non-USCIS source such as an external agency or record owner.
- Consists of ***inquiries to record owners*** in possession of the NS information to identify:
  - Status and result(s) of any ongoing investigation.
  - The basis for any prior investigation and reason for closure.
  - Information that may be relevant in determining eligibility and removability (when applicable).

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External Vetting is CARRP Stage 3

You can see the difference between external and internal vetting in the very first bullet on the slide

External vetting is less focused on adjudication and more focused on the national security issues

It involves going beyond USCIS resources and reaching out to record holders, talking to case agents, asking WHY an individual is the subject of an investigation

Clearly, there is overlap between internal and external vetting – you can develop NS information during internal vetting and you can develop adjudication or eligibility information during external vetting

But when you ask yourself why those are two distinct steps in the CARRP process, think of what the goal is, what you're trying to develop and the tools you're using to do it – that's the difference

## External Vetting Roles



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### Roles and Responsibilities:

- In FOD, external vetting is primarily the work of FDNS IOs
- In SCOPS, external vetting is performed by ISOs assigned to the CARRP BCU
- In RAIO:
  - FDNS IOs perform External vetting for Asylum. Where classified system checks are required, HQ FDNS performs vetting and produces Case Analysis Threat Summaries (CATS)
  - The Screening, Vetting and Program Integrity (SVPI) unit in RAD assists with external vetting for refugees. SVPI is comprised of FDNS IOs and Refugee Officers
  - HQ International Ops (and some IO officers in the field) perform external vetting for overseas offices

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# External Vetting Toolbox



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## Tools for External Vetting:

- **Systems & Queries**
  - Open Source
  - Low Side (unclassified)
  - Classified system checks
- **Contacting Law Enforcement**
  - Questions to ask
  - What to do when... 3<sup>rd</sup> party NS concerns
  - What to do when... there is no record owner
  - What to do when... vetting **LE**



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So this is our external vetting toolbox

External vetting differs from internal vetting in that we're looking more at the NS concern than at the immigration history / status of the individual

And instead of operating primarily within USCIS, we're reaching out to other entities

But it is a lot more complicated than simply picking up the phone and calling an ICE agent who entered a TECS record

So our tools for vetting are essentially the things we're going to do – who are we calling, what systems are we using and generally, what information are we looking for

# External Vetting Tools



## Low Side Query Capability

- All USCIS officers are permitted to query:
  - TECS on affiliated persons when there is an articulable, rational connection between the case and the subject of the query
  - TECS archived records
- FDNS personnel are permitted to query NCIC III when:
  - A case is referred to FDNS due to links or a likely connection to criminal activity which warrants further investigation; or,
  - There is a reasonable suspicion of fraud which may be referred to ICE; or,
  - When an individual has been determined to be involved with current or planned terrorist activity.
  - See [Revised Guidance for Accessing NCIC III – March 18, 2012](#)

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This is where there are some differences between FDNS IOs versus AOs and ISOs

However, there are other resources available even within the systems we routinely use

Everyone can query affiliated persons, such as:

Other people likely to be present at a site visit

Lawyers

Preparers

Business associates (co-investors of an EB-5 project, other people named in a SAR with the subject)

Everyone can (and are actually required to in NS cases) query archived records

Archived records are not routinely queried in batch TECS

Archived records are supposed to be for investigations / lookouts that have been closed and are no longer considered relevant by the LEA record owner

However, if we're digging for every single thing we can find in an NS case, there could be something useful there

## External Vetting Tools



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### Open Source Systems: Not social media, but...

- Unless you are participating in an approved social media pilot, USCIS officers are otherwise currently not authorized to use social media when researching applicants, but...
- You can still learn a lot on the internet from sources like open source sites, blogs, or search engines may link you to social media sites, but they are not in and of themselves, social media
- So what can you find?
  - An applicant stated that he had attended a event. Searching for the event revealed a list of speakers, how much the entrance fee was and where it was held (different from where the applicant claimed)
  - One subject had a Wikipedia page where she bragged about being the first female member of a terrorist organization (warning: be careful about using Wikipedia as a source, but this could be a lead to further evaluate)
  - In the articulable link examples, how did we know that Bob was part of the TPWP and that the TPWP was unconnected to the PWP?

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In addition to our standard suite of systems, there's the plain old basic Internet  
Wiki Leaks is NEVER permissible; even from a home computer if you work for the USG.

# External Vetting Tools

## Low Side Systems: The World Beyond TECS

System	Owner	Information
Homeland Secure Information Network (HSIN)	DHS	Nationwide Suspicious Activity Reporting Initiative shares SARs with potential terrorism links; intelligence reporting disseminated to state and locals; tips and leads to law enforcement
Law Enforcement Enterprise Portal (LEEP) & N-DEX	FBI	Criminal justice records; gang information; terrorism threat streams; intelligence reporting; INTERPOL notifications
CLEAR / Accurint	Commercial	Address history; licensing information; associate information

A list of additional resources is available on the FDNS Connect Page:  
[http://\[REDACTED\]](http://[REDACTED])



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Moving past even Google, there are many more things you can gain access to

None of these require you to be an FDNS IO

Request a LEEP account at [www.CJIS.gov](http://www.CJIS.gov)

There are a million potentially useful websites out there for everything from:

Pilots licensing

School accreditation

Charities and non-profits registered with IRS

Addresses and phone numbers

Public records

There is a ton of information out there – become familiar with what you can access!

The FDNS Connect page has a link list of additional resources

# External Vetting Tools



## High Side Systems: Not Just for HQ

System	Owner	Information
<b>LE</b>		

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There are plenty of systems that you have access to from your office or your JTTF detail location – you don't always have to come to HQFDNS for assistance.

All of these systems are available on HSDN

HQFDNS CPIA has access to 14 classified systems for assisting the field with their RFAs



# External Vetting Tools

## Classified Systems: Not Just for HQ



System	Owner	Information
<b>LE</b>		

Email the FDNS-NSB mailbox and include your HSDN email address [REDACTED] to receive a link list with websites and access instructions for these systems

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Even more HSDN!



# **Application Exercise 5.2**

## **“Systems Concentration”**

### **(FOBTP classes only)**

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## External Vetting Tools



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### Preparing to Contact a Record Owner:

- Identifying information: TECS ID, ORI, Subject Name, etc.
- What can you tell the LEA about the subject or about USCIS?
  - Adjudication process
  - Benefit type
  - Last known address
  - Who's sponsoring the subject (if anyone)
- What do you need to get out of the call?
- Do you have secure communications if necessary?
  - Know how to use your STE / Viper line
  - Know your classified email address

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OK, so you've done all of your digging in systems

Now it's time to contact the record owner

Be familiar with the immigration status, pending applications and the NS Concern

Have readily available any ORI, TECS ID, or case record numbers

Develop Lines of Inquiry – Identify areas to explore with record owner prior to initiating discussions

Be Prepared to Share Information, to the extent possible

Considerations include Privacy Act, VAWA, legalization, asylum, etc.

## External Vetting Tools



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### Record Owner Contact Best Practices:

**DO**

Send an email from your [uscis.dhs.gov](mailto:uscis.dhs.gov) address identifying yourself, then follow up with a call

**DON'T**

Use immigration jargon or acronyms

– FDNS, CIS, LHM, ASC, FDNS-DS, SISO

– I-129, bene, service center, non-confirmed

**DO**

You may get more information from a secure call than you can on an unclassified line

**DON'T**

Ask if the LEA knows anything “relevant to adjudication”

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Speak in layperson's terminology (no immigration jargon)

Educate about USCIS's role

Be polite, respectful and understanding

Be Prepared to Elevate the Discussion – When necessary

Don't ask for anything relevant to adjudication – LEA's don't know what's relevant – they're relying on you to tell them that!

## External Vetting Tools



### What kinds of questions should you ask a record owner?

- External vetting may involve a network of people, not just the applicant
  - If the applicant is the spouse of a KST, what do you have to know about the actual person who is the KST?
  - If the applicant is an associate of a KST, what do you have to know about the relationship?
  - If the applicant is a member of an organization, what do you have to know about the organization?
- Go beyond “is there an investigation?”
- Remember that vetting is not the same as deconfliction- Vetting is gathering more details and facts pertaining to the nature of the NS Concern.

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Often times, FDNS IOs conduct deconfliction and external vetting at the same time during the initial conversation with the record owner. It makes more sense to conduct these activities at the same time even though the goals of the activities are distinct and we must record the activities separately in FDNS-DS. Deconfliction is meant to ensure that USCIS planned activities won't impede the LEA investigation or activities and external vetting is asking WHY the applicant is a target of NS investigation and gathering information on the nature and type of the NS concern.

## External Vetting Tools



### Request all relevant information about:

- Aliases
- Family relationships
- Residences within or outside the U.S.
- Membership or involvement with organizations
- Military Training
- Foreign Travel
- Occupation
- Specialized Education

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When conducting external vetting you are not limited to questions regarding the investigation, you may also find out what biographical information the record owner may have on your subject. LEA's may know something that USCIS doesn't such as an alias, travel related, associates, etc.

## External Vetting Tools



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### Asking about investigations:

- Is your investigation open or closed?
- What is the nature of your investigation?
- Is there any nexus to national security?
- If the investigation has been closed, why was it closed?
  - Was it because the subject moved to a new jurisdiction?
  - Was that jurisdiction notified regarding interest in subject?
  - Was it because the agent retired/left the job?
  - Was it because the subject was cleared, and there were no national security concerns found?

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Be sure to get the final disposition from the record owner if the case is closed. A lot of times, even if the case is classified, the disposition isn't and you can cite it in the BCAA with permission.

## External Vetting Tools



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### Asking about criminal activity:

- Has the applicant been detained or arrested?
- Has the applicant been charged with a criminal offence?
- Is there an expectation that the applicant will be charged?
- Are there any other matters not relevant to the current criminal investigation?
- Are court documents, arrest records, or charging documents available for the applicant?

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## External Vetting Tools



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### Documenting the conversation:

- Take detailed notes, including case agent name / position / agency (\*pay attention to classification when writing notes)
- Ask for an email or written correspondence relating to the conversation
- Make sure the notes / emails are available to other officers
- Remember that A-files may be subject to FOIA
- Use FDNS-DS to document communication
  - Load typed or scanned notes as an attachment
  - Enter case agent information in contacts
  - Document vetting conversations in the special actions sub-tab
  - Don't forget the activities and deconflictions sub-tabs

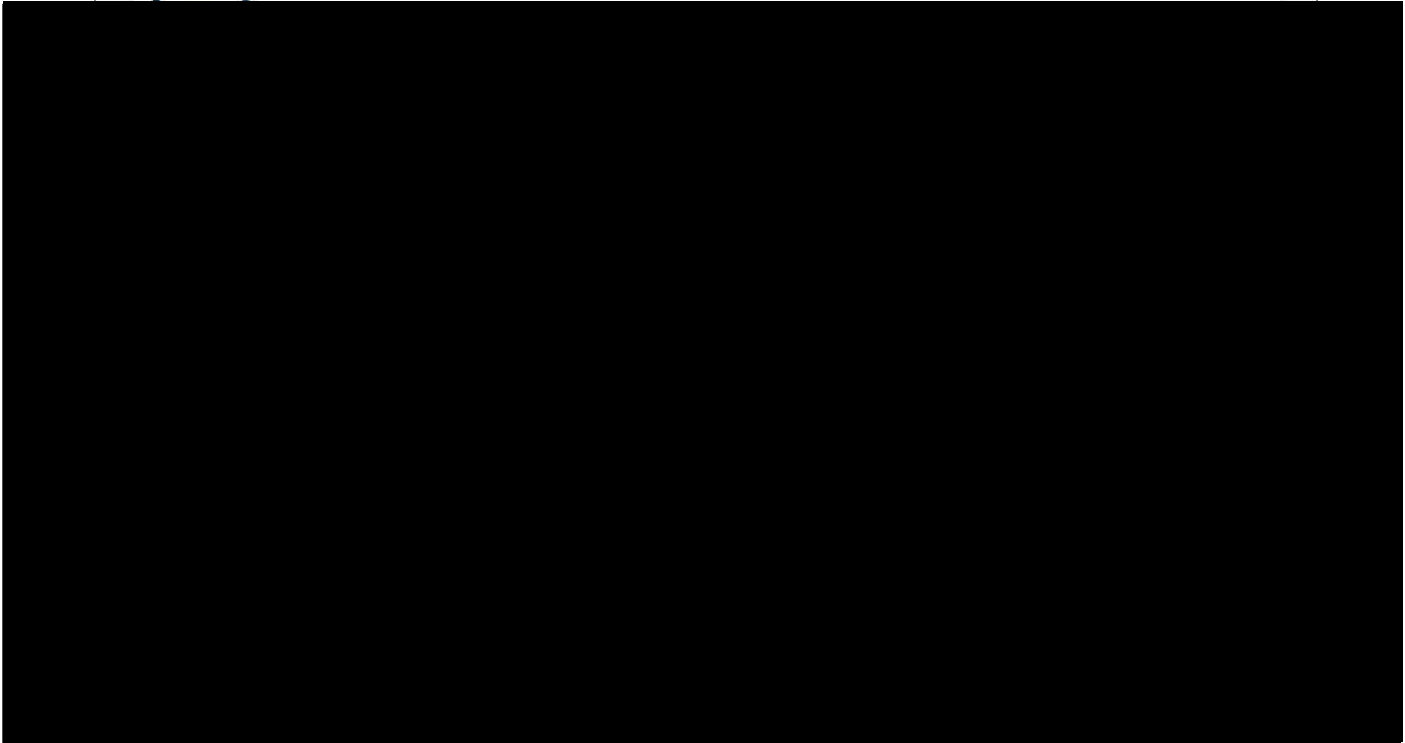
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## Vetting NS Concerns on 3<sup>rd</sup> Parties



What to do when... the concern pertains to a 3<sup>rd</sup> party

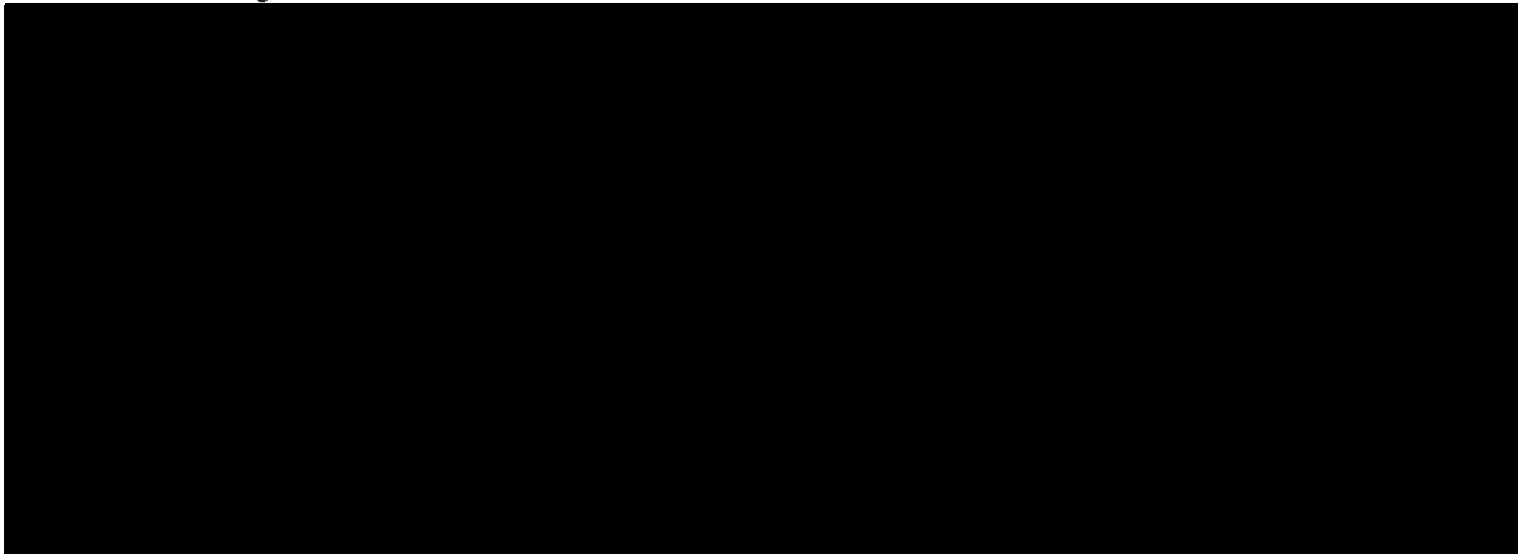




# **Studies in National Security:** **Vetting NS Concerns on 3<sup>rd</sup> Parties**

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Review "Vetting" document with students



## External Vetting Tools



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### What to do when... there is no record owner

- If there is no identifiable record owner:
  - External Vetting is **NOT** required if there is no identified record owner.
  - If the applicant is denied a benefit based on the Non-KST NS Concern identified through interactions with the subject or by other means, the officer **must** enter a record into TECS for future reference by law enforcement.
- There is an unresponsive record owner:
  - Contact the record owner's office and ask for the duty agent
  - For ICE, contact: **LE** and ask to be put in touch with the case agent or local office supervisor
  - Request that your supervisor contact the case agent's supervisor

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- So, we just talked about the best case scenario

- You had a clear POC, you reached out, they responded, it was a productive experience

- What happens if that's not the scenario?

If there is no record owner, you are not required to externally vet

Are there strategies you might want to pursue anyway? Yes!

If it's **LE** are you going to look at the record, think that you're not allowed to call the NTC on **LE**, decide there's no record owner and send the case back to adjudications? No!

## External Vetting Tools



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### What to do when... vetting **LE** records

- **LE** TECS records do not contain record owner contact info
  - A **LE** means that the record was entered by TSC, but USCIS does not vet with the TSC; USCIS vets with the FBI or whatever the nominating agency is
  - The 'Point of Contact' listed in the record is the **LE** but USCIS does not vet **LE** with the **LE**
- Therefore, KST vetting begins with the local Joint Terrorism Task Force (JTTF) FBI.
- In all identified NS cases, the JTTF must be contacted before requesting HQ assistance
- Also before requesting HQ assistance – verify the current status of the **LE** to ensure it has not been removed

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**LE** are a particular type of not "immediately known" or easily identifiable record owner case

If you're vetting a KST case, start with the JTTF because your POC or someone at the JTTF will have access to **LE** and can look up the record owner

If you're vetting a non-KST but the record owner is unresponsive or unidentifiable and **LE** or the duty agent phone aren't working, go to the JTTF

If you're going to request HQ assistance, make sure you've tried to vet with the JTTF first

## External Vetting Tools



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### More LE vetting

- LE can be put in... and taken out... and put in again
- Run TECS to confirm the presence (or absence) of the LE
- If the LE has been removed the CARRP NS concern type will be changed to either:
  - Non-NS (No NS indicators or remaining nexus to NS) or
  - Non-KST (NS concern remains unresolved)
  - Although the LE is removed this **does not** completely resolve the NS concern
  - You must still determine if other derogatory information exists
  - Ask LEAs / JTTF about other potential areas of concern
  - Weigh other evidence present
- If the LE was removed, **TECS must be checked at the time of final adjudication** and the results printed and put in the A-file.

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The last slide said make sure you contact verify that the LE is still there before requesting HQ assistance

Why would we say this?

Because LE can be entered and also removed

How would we find this out?

LEA told us they were going to take the person off the watchlist, we so were looking for it to disappear

Some other benefit was filed and we ran TECS for that

We were preparing to ask for HQ assistance

It's a good practice when working KST concerns to periodically ensure that the subject remains on the watchlist

If that LE does get removed, do not automatically make the case non-NS

You must consider other areas of concern

If the case does become non-NS and is referred for adjudication because the LE was removed, at the time of adjudication you must run TECS again, print the results, and put them in the A-file.

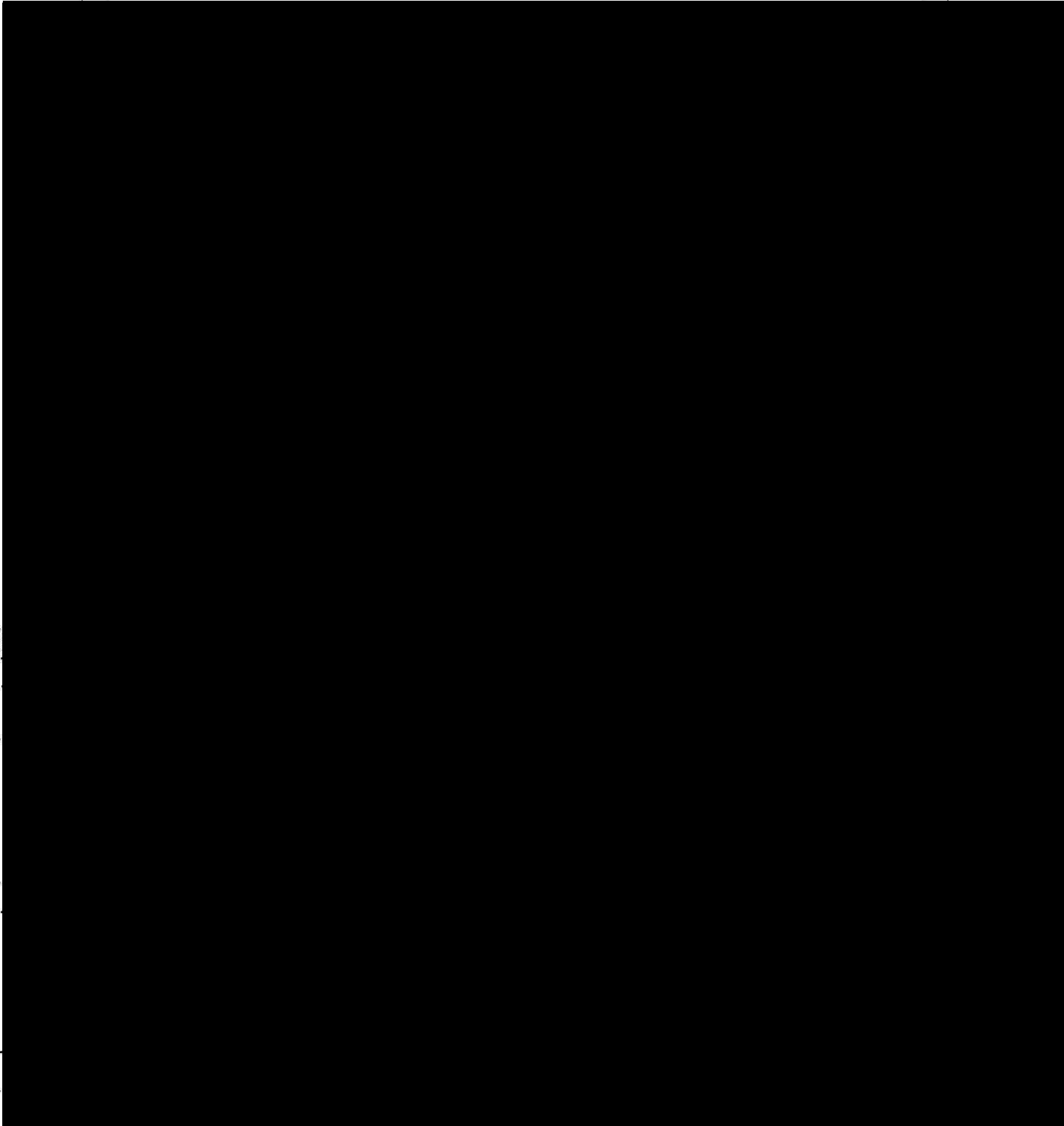
Why? Because LE can disappear... and reappear

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# External Vetting Tools



Should **LE** be Removed?





# Handout: Link Analysis Chart

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# Vetting and Deconfliction



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## Deconfliction with no identifiable record owner

- *The goal of vetting* is to develop information which assists an officer in rendering an adjudicative finding. *The goal of deconfliction* is to share information with LEA partners
- Therefore, even if there is no record owner, deconfliction may still be warranted
- If the individual relating to the **LE** record is in the U.S., deconflict with **LE** covering the jurisdiction where the person resides
- If the individual relating to the **LE** is overseas, review the **LE** record to determine who nominated the individual and why
- Consider if an individual with a **LE** residing overseas has any connection through their immigration filing to a person in the U.S.

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We just saw that vetting is not required if there is no record owner

But what about deconfliction? **LE** it's intelligence information rather than investigative information.

Disclaimer: always contact Terrorist Screening Center to confirm that the **LE** relates (technically not deconfliction but always a useful reminder)

**LE** records can help you determine why the record was entered (what derogatory information exists, if the **LE** and who entered it.

The local FDNS liaison to **LE** should be able to assist with this.

**LE**

Also consider if there are any US-based individuals associated with the **LE** living abroad (a petitioner, sponsor, spouse, employer, etc.). If there are US-based persons associated with the individual who has the **LE** in the area the US-based person resides (especially when the US-based person / org. itself has a **LE** record or other potential NS concerns).

Remember that deconfliction is intended to share relevant information:

**LE**

## Joint Terrorism Task Force (JTTF)



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Services

### Role of The JTTF:

- Established in the 1980s
- FBI is the lead agency
- Serves three main purposes:
  - Prevent terrorist attacks;
  - Respond to and investigate terrorist incidents or terrorist-related activity; and
  - Identify and investigate domestic and foreign terrorist groups and individuals targeting or operating within the United States.
- <https://www.fbi.gov/investigate/terrorism/joint-terrorism-task-forces>

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So **LE** don't really have record owners

**LE**

## Joint Terrorism Task Force (JTTF)



U.S. Citizenship  
and Immigration  
Services

### Participating in The JTTF:

- Federal, state, and/or local agencies may be members
- Over 100 JTTFs throughout the U.S.
- The National JTTF (NJTTF) located in McLean, Virginia includes representatives from a number of other agencies
- USCIS has a full-time representative on the National JTTF (NJTTF)
- Many USCIS field offices also have representatives on their local JTTFs

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## Joint Terrorism Task Force (JTTF)



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### Permanent JTTF Members:

- Air Force Office of Special Investigations
- Bureau of Alcohol, Tobacco, Firearms, and Explosives
- Central Intelligence Agency
- Customs and Border Protection
- Defense Criminal Investigative Service
- Department of Interior's Bureau of Land Management
- Diplomatic Security Service (within DOS)
- Federal Protective Service (within ICE)
- Immigration and Customs Enforcement
- Internal Revenue Service
- Naval Criminal Investigative Service
- Postal Inspection Service
- Treasury Inspector General for Tax Administration
- U.S. Border Patrol
- U.S. Park Police
- U.S. Army
- U.S. Marshall Service
- U.S. Secret Service

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# Handout:

## USCIS JTTF Detailees

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# **Application Exercise 5.3**

## **“A Conversation with Law Enforcement”**

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## External Vetting Toolbox



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### Vetting to an end:

- Inconsistencies
  - Money
  - Travel
- When **LE** are removed
- Lead vetting
- HQ involvement in vetting



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Differentiating from what we just looked at, these are techniques for external vetting with an end / possible case closure in mind

What are the ends? – resolve the NS concern, or adjudicate the benefit

In the last section, we covered who you're talking to, what systems you're querying and a little bit of the types of information you're looking for

This section will cover what to do with the information

How to recognize things that are out of place and

How to go even further down the rabbit hole investigating those things

Please keep in mind that at this point, we still have an individual who appears eligible for a benefit and we still have an NS concern that we have not been able to resolve

So what do we do?

# External Vetting



## How CARRP ends:

		Adjudicative Decision	
		Eligible for benefit	Ineligible for benefit
National Security Issue	NS Concern Resolved	Approval of benefit	Denial of benefit
	NS Concern Unresolved	Requires senior official or SLRB concurrence	Denial of benefit

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We looked at this chart way back in the overview – it's our only ways to end CARRP

So, throughout vetting, with each new fact we get, we're considering if the individual is still eligible and if there is still an NS concern

If there's no more NS concern, or if the person is clearly ineligible, there's an easy end to CARRP

The challenge comes when the individual seems eligible, but we've done enough vetting to know that we're probably not going to be able to resolve the concern, i.e.

The LEA isn't closing their investigation

The person isn't coming off the watchlist

It's impossible to refute that they're connected

So what do we do?



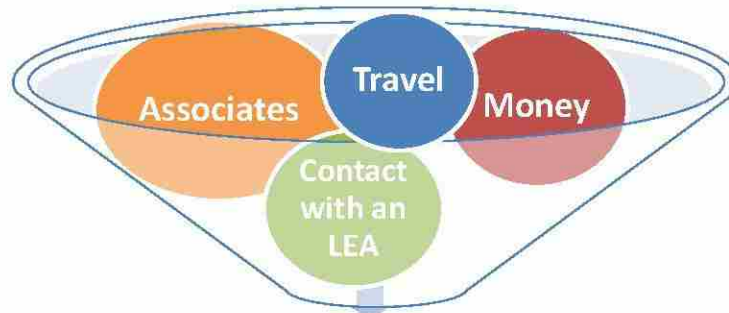
# External Vetting Techniques



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## Look for Inconsistencies

- At a certain point in CARRP, there is a shift from looking for general information to focusing on particular elements of a case



- Once the NS concern is established, the goal is to achieve an outcome: Determine if the NS concern is resolved or unresolved and make an Adjudicative determination relating to the benefit.

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This focus can take a lot of forms – this training happens to focus on inconsistencies in money and travel as two of them  
Did they travel somewhere they didn't tell you about?

Are they moving money somewhere or receiving money from somewhere that they failed to disclose?

This is vetting with a purpose – we're not asking for general information any more

What is the purpose? Resolve the concern, or deny the case

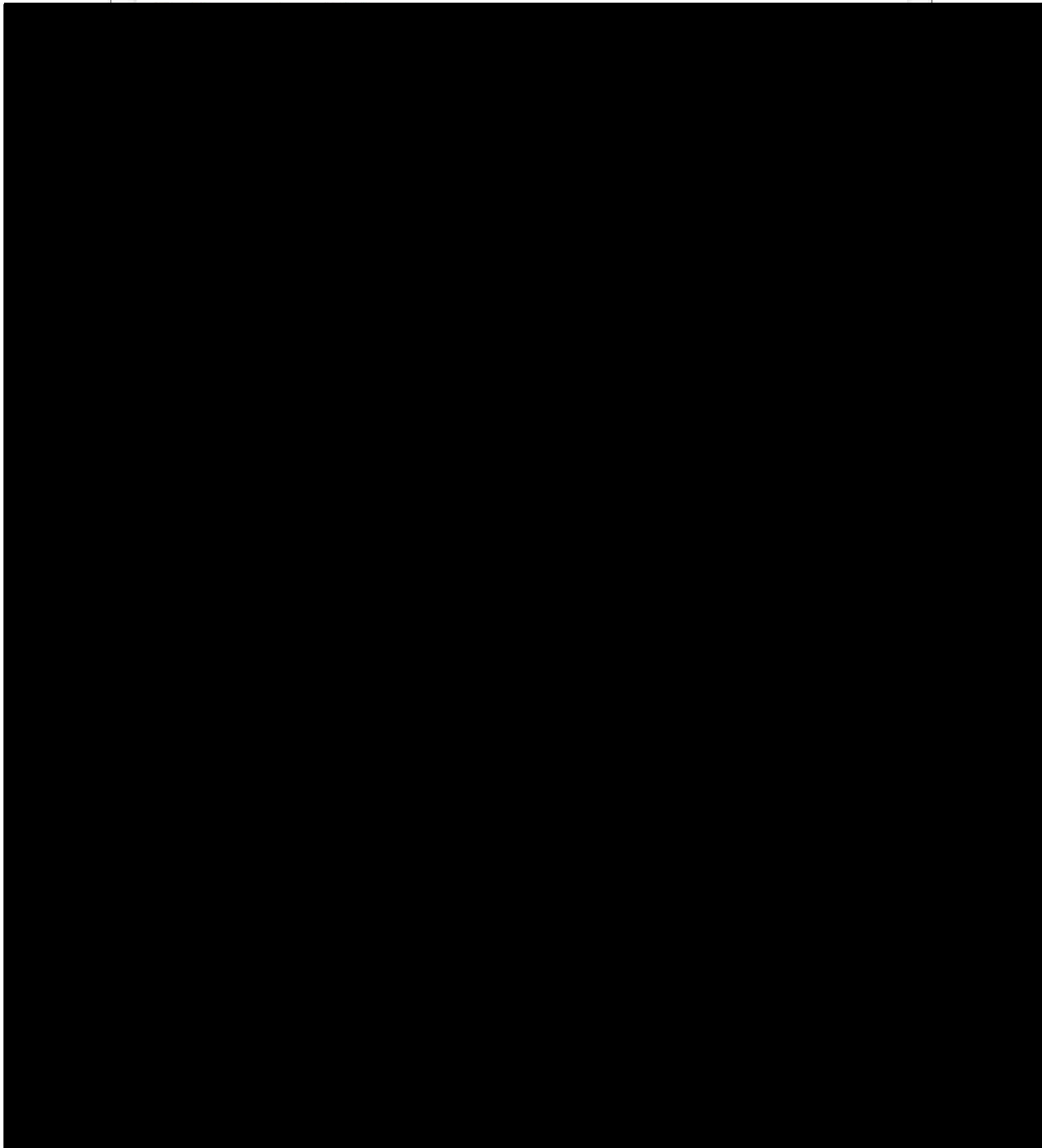
How do Articulate link and indicators factor back into our discussion at this point in the process?

With articulable link, we had a lot of evidence that there was a concern upfront – if we haven't found anything to conclusively disprove it yet, now we're focusing on what can allow us to adjudicate the benefit

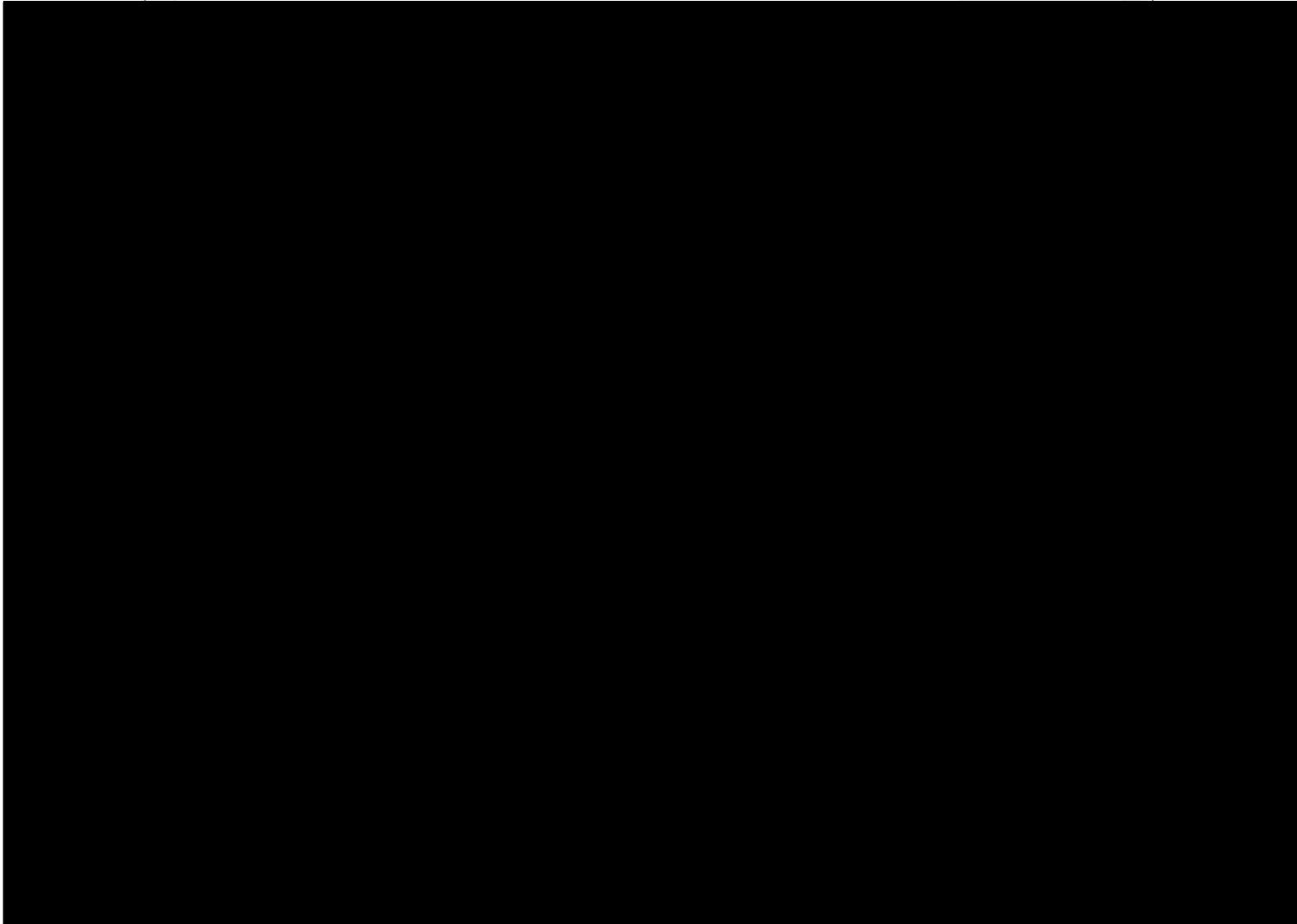
With indicators, we still might be on the fence about the concern, so we're vetting to resolve the concern or determine whether an articulable link exists

But either way, we're focusing on one or just a couple of factors by this point

# External Vetting Techniques



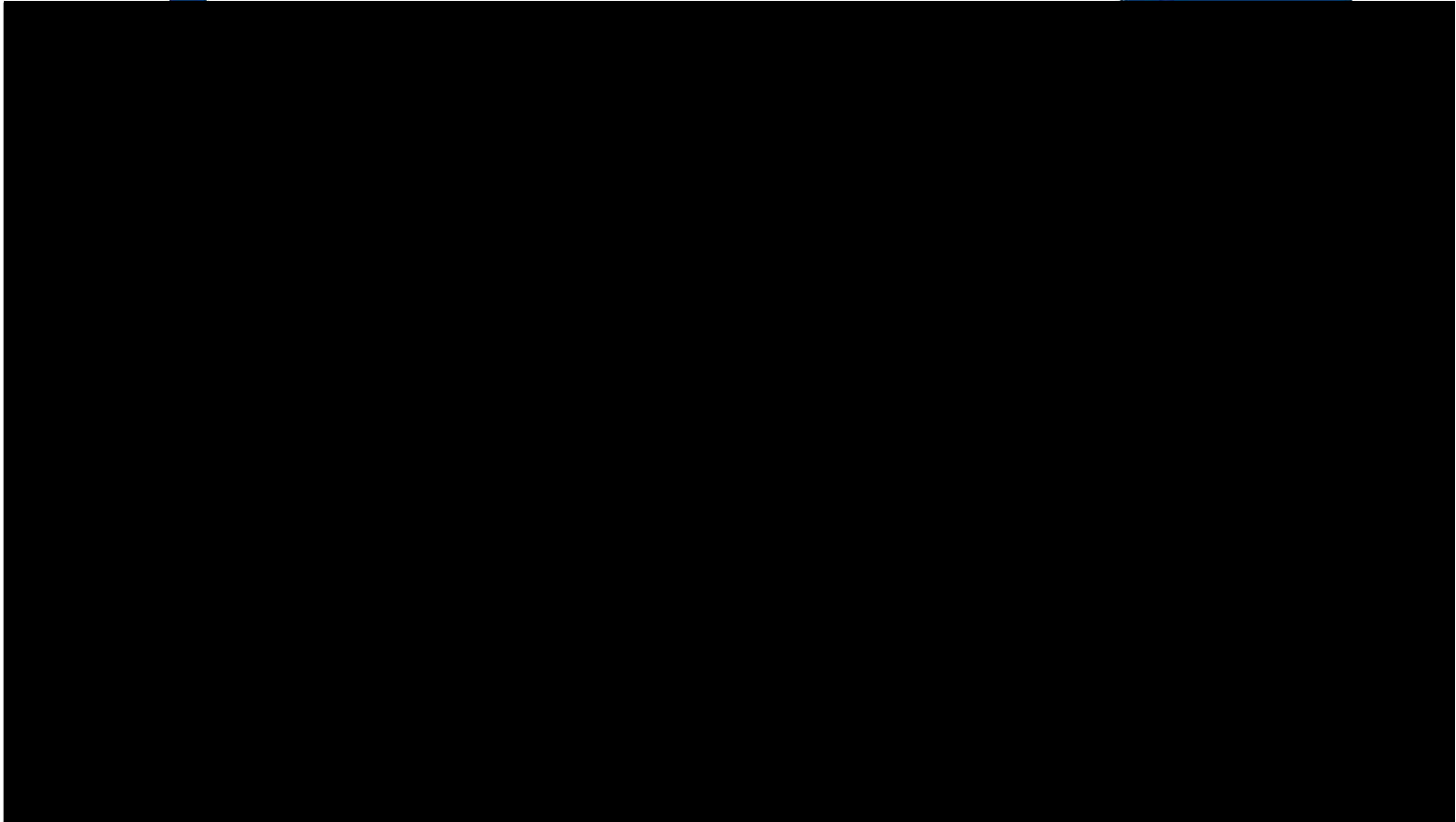
# External Vetting Techniques



# External Vetting Techniques



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# External Vetting Techniques

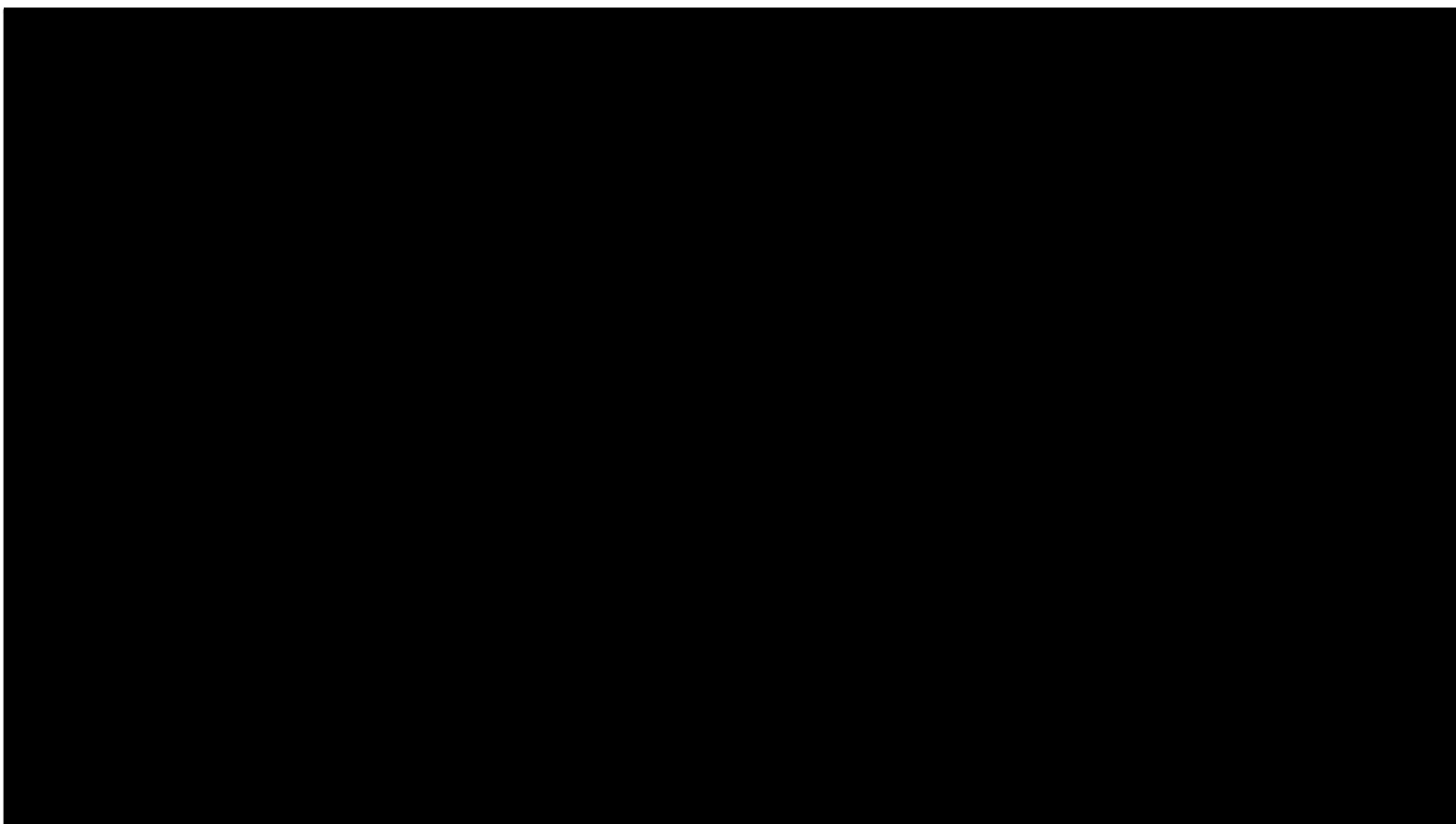


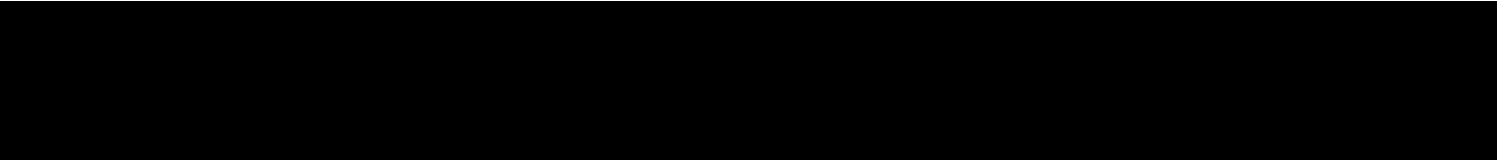
## Follow the Travel

Potential Indicators of Suspicious Travel:



Potential Indicators:





\*\*\* These are all just indicators... they are a single fact that suggests there may be something worth looking deeper at

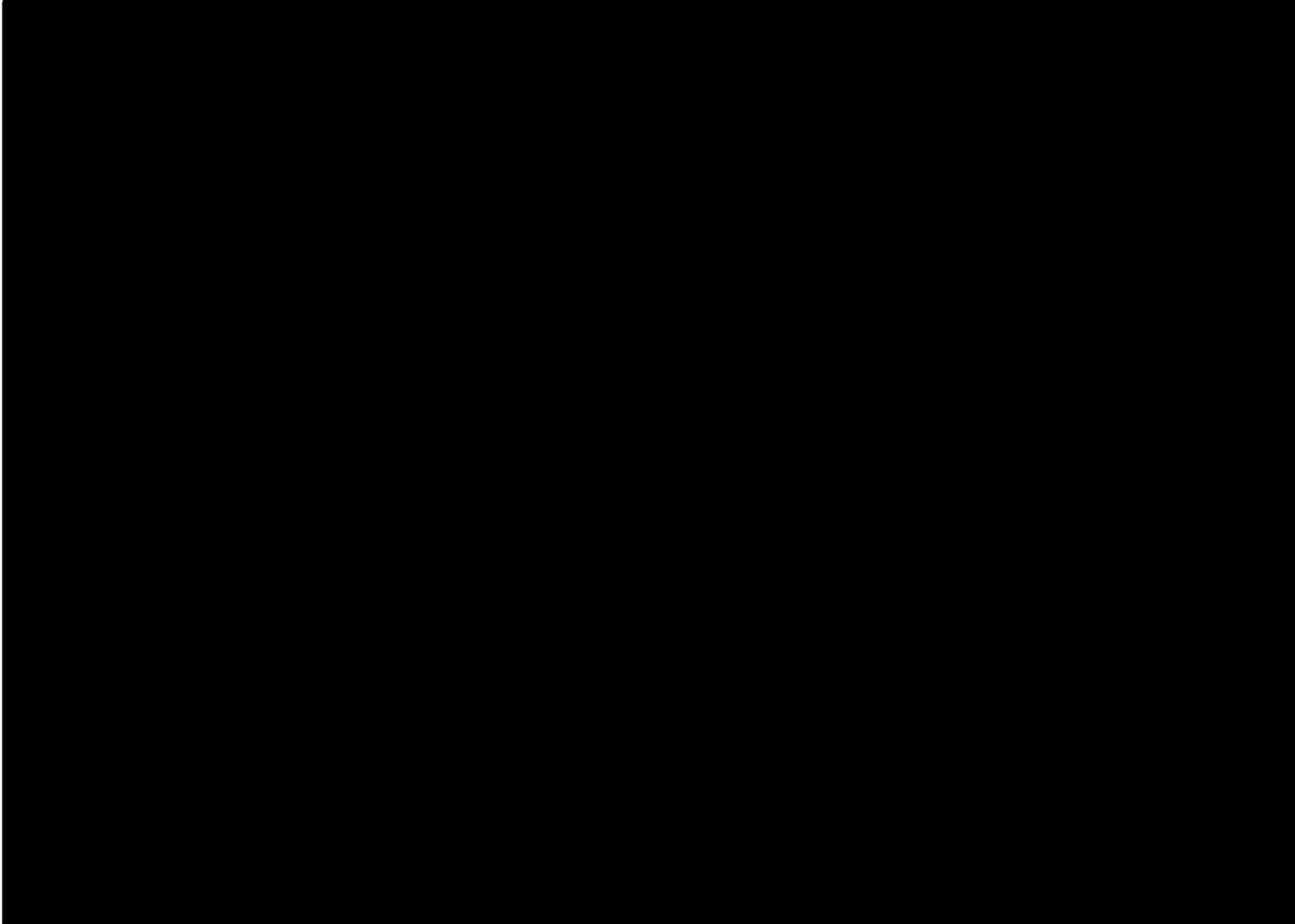
\*\*\* This is not an exhaustive list

\*\*\* Just because someone did something on this list does not mean they're an NS concern... there are plenty of valid reasons for doing any of these things

# External Vetting Techniques



## Follow the Travel



## External Vetting



### Lead Vetting

Premise: Near the end of CARRP vetting, an NS concern has been well established, i.e.:

- USCIS has confirmed that the individual remains on the watchlist
- USCIS has confirmed that there is an open investigation pertaining to a national security ground
- USCIS has confirmed that the individual is associated with another person who is a KST
- USCIS has confirmed that the individual is a member of an organization that is related to a national security ground

Question: **What do we do next?**

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If we've confirmed our NS concern, we don't really want to approve, so what do we do?



# External Vetting



## Lead Vetting

- Lead Vetting is the act of building a separate evidentiary basis for a decision
- Lead Vetting may be used when:
  - Facts needed to substantiate a decision are classified
  - Facts needed to substantiate a decision require special permissions from the record owner
  - Facts needed to substantiate a decision are subject to privacy or information sharing restrictions
- In plain language – lead vetting is reaching a decision utilizing multiple modes or avenues, where in the end the ultimate decision remains the same.

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Towards the end of the vetting process, we know we have a person

And we know that we don't want to approve him because he is an unresolved NS concern

And we also know that whatever facts lay in between – we probably can't use in a decision

So we use parallel construction to build a new path from the starting point (our person) to the ending point (we need to deny them)

We've already tried to attack the first part of this and demonstrate that the concern can be resolved

Now we're going to try to find a way to deny using only facts that we can disclose / leverage in a decision

In other words, we're going to end up in the same place, but we're going to blaze a new trail to get there

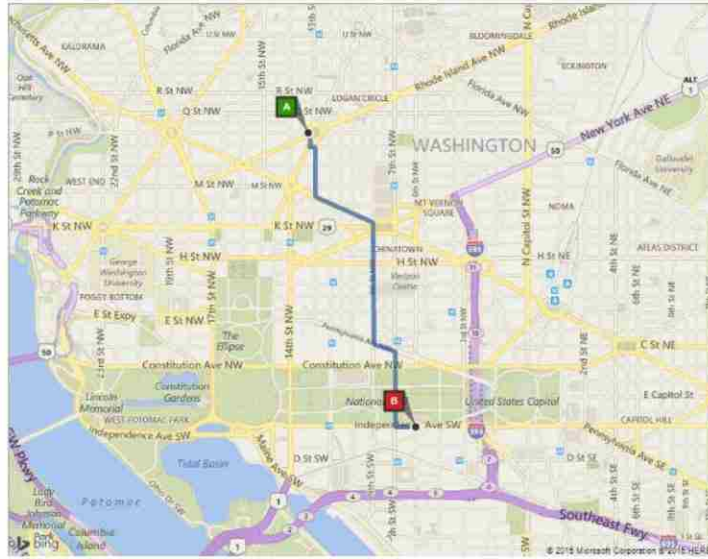


# External Vetting

## Lead Vetting


For example...

But what if my car is old and doesn't do well on the highway, so I tell my map to avoid highways and Space Museum on the National Mall. I still know where I live (Point A) and I still know where I'm going (Point B), but I'm going to take a different path to get there



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Same start point, same end point, different route for getting there just by saying I need to avoid highways

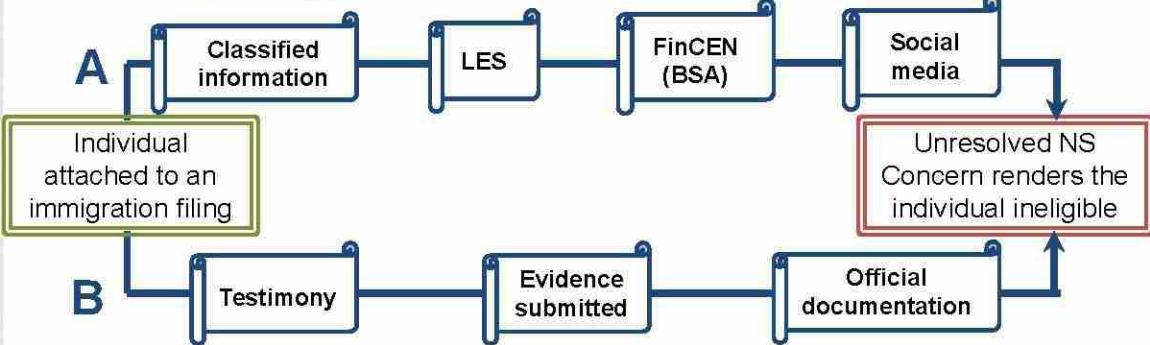


# External Vetting

## Lead Vetting

*In an immigration context...*

- Path 'A' was our initial vetting that confirmed an unresolved NS concern
- Path 'B' is our parallel route to develop different evidence from sources that can be cited to support a decision



```

graph TD
    A[A] --> C1[Classified information]
    C1 --> C2[LES]
    C2 --> C3[FinCEN (BSA)]
    C3 --> C4[Social media]
    C4 --> E[Unresolved NS Concern renders the individual ineligible]
    
    B[B] --> C5[Testimony]
    C5 --> C6[Evidence submitted]
    C6 --> C7[Official documentation]
    C7 --> E
    
    I[Individual attached to an immigration filing] --> C1
    
    style I stroke:#f0f0f0
    style E stroke:#f0f0f0
  
```

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For our NS cases, lead vetting is the same thing

Same beginning, same end – it's how you get there that changes

Instead of avoiding highways, we're avoiding classified material, or things that could compromise an investigation, or things we don't have permission to use

There are all kinds of things USCIS finds in our vetting that come from sources that we're not going to cite in a decision

We're not going to cite classified information in a decision

We're not going to cite anything without permission from our partners

We're not going to cite anything that could compromise an investigation

We're not going to cite anything from social media (when we have access) or commercial databases

Instead, we're going to use things the applicant provides

Official documentation (passport, birth certificate, etc.)

Testimony in the interview

Other things from their A-file

\*\*\* Disclaimer – FDNS is not currently authorized to use social media! \*\*\*

# External Vetting



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## HQ Engagement Glossary



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The point of this slide is that all of these things are intertwined

Case Analysis Branch (CAB) is the operational unit that does the work. They are the part of HQFDNS NSPSD that does classified system checks, outreach to the field, declassification and assists with turning CIA information (often classified) into something the field can use (interview questions, lines of inquiry, denial grounds, etc.)

The SLRB is the HQ body that reviews unresolved, approvable NS cases

Since the SLRB is an HQ body, HQ has to prep cases to be presented

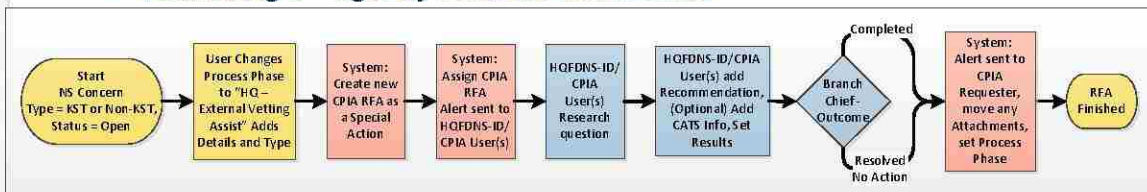
That prep involves a lot of coordination with council, additional vetting, working with the field to make sure everything that could have been done actually was done, etc.

# External Vetting



## Requests for Assistance (RFA's)

- Submitted when information is needed from HQ (that hasn't already been provided via prioritization)
- What information can you RFA for?
  - High side checks
  - Contact information for unknown record owners
  - Declassification
  - Coordination with the Intelligence Community
  - Retrieving 3<sup>rd</sup> agency referrals from LHMs



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## External Vetting



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### Requests for Assistance (RFA's)

- Submitted when information is needed from HQ (that hasn't already been provided via prioritization)
- What information can you RFA for?
  - Classified system checks
  - Contact information for unknown record owners
  - Declassification assistance
  - Deconfliction (if possible) and External Vetting w/the Intelligence Community
  - Retrieving 3<sup>rd</sup> agency referrals from LHMs

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## External Vetting



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### RFA Step-by-step

1. Change the Process Phase in the CME to "HQ – External Vetting Assistance"
2. Create a new Special Action within the NS concern CME; then select Special Action type - "CPIA (RFA)"

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# Handout: CATS Form

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# External Vetting



## Vetting Breakdown

<u>What You Do</u>	<u>What HQ Does</u>
<ul style="list-style-type: none"> <li>• Contact with known record owners</li> </ul>	<ul style="list-style-type: none"> <li>○ Assistance with locating unknown record owner contact information</li> </ul>
<ul style="list-style-type: none"> <li>• Background checks in unclassified (and limited classified) system checks</li> </ul>	<ul style="list-style-type: none"> <li>○ Suite of classified system and background checks</li> </ul>
<ul style="list-style-type: none"> <li>• BCAA documenting systems checks and findings</li> </ul>	<ul style="list-style-type: none"> <li>○ CATS documenting findings</li> </ul>
<ul style="list-style-type: none"> <li>• Review classified information for applicability to a decision</li> </ul>	<ul style="list-style-type: none"> <li>○ Declassification assistance</li> </ul>

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# etting and Eligibility



## CARRP Stages 2 & 3 Recap

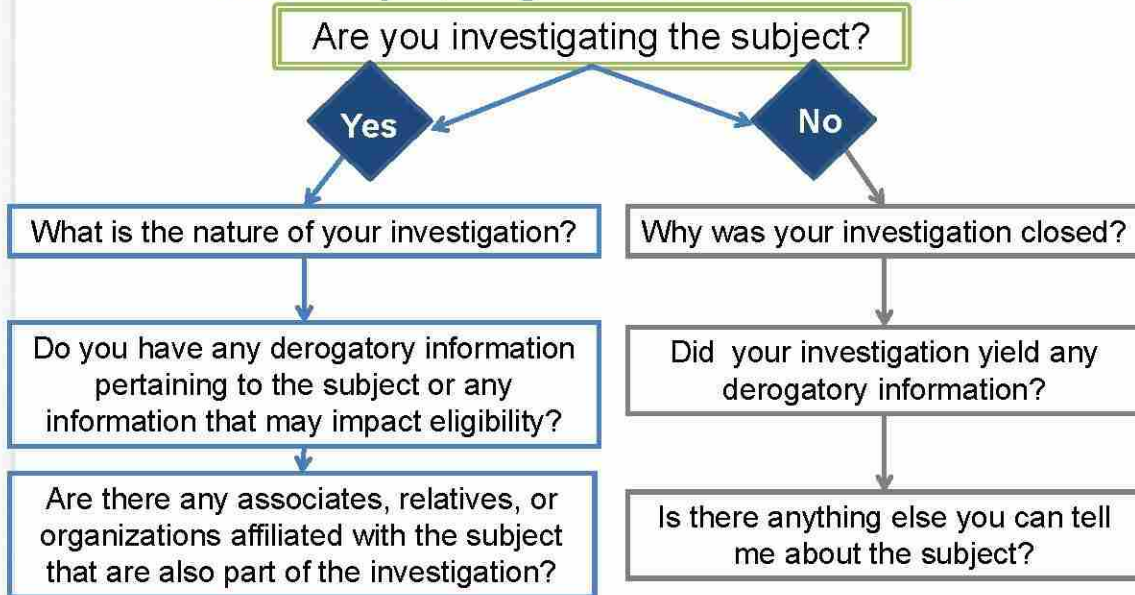
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## Stages 2 & 3 Recap



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### Externally Vetting with Law Enforcement



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Remember some of our key questions with law enforcement

If the investigation is closed, please remember to ask why / get the final disposition

Do not assume just because there is a TECS record or a positive namecheck that there is an open investigation

Do not assume that the LEA has derogatory information

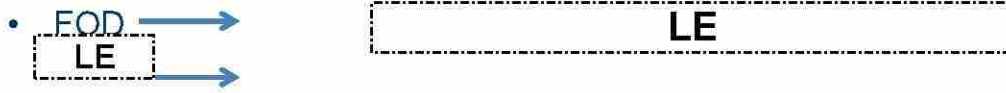
These conversations are actually not too dissimilar – the goal of both is to get any information that may be available



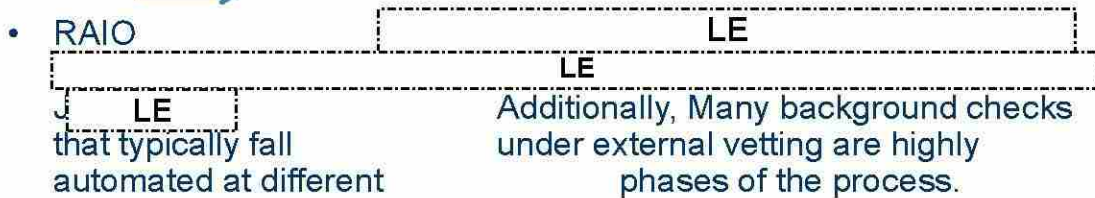
## Stages 2 & 3 Recap

### Roles

- Supervisors play a substantial role in elevating concerns to HQ
- SCOPS → ISOs working in the BCU perform external vetting  
 → ISOs working in the BCU contact law enforcement



FDNS IO have much more local contact with law enforcement



## Stages 2 & 3 Recap



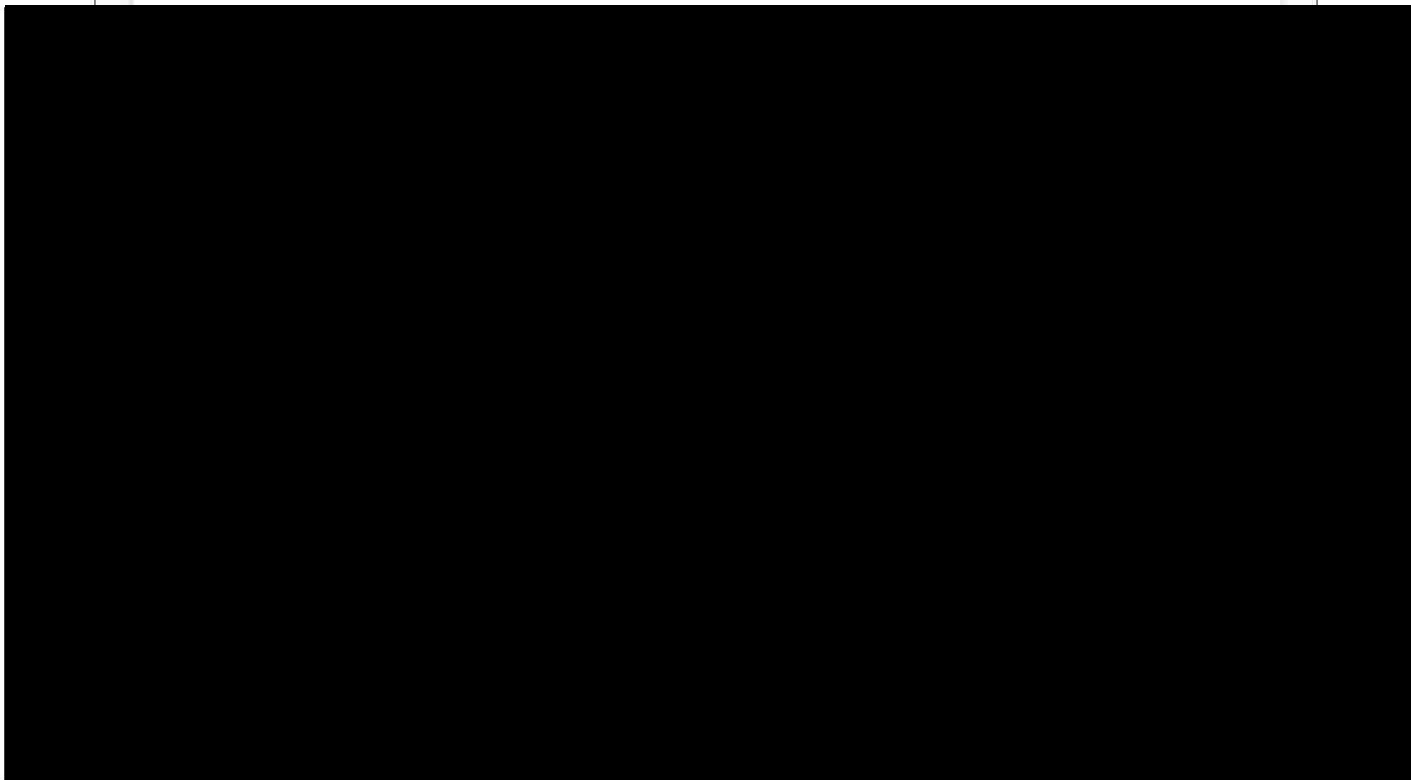
### Roles

- Internal vetting & the eligibility assessment can done by ANY designated officer
- Process phase changes require supervisory approval
- SCOPS → ISOs working in the BCU perform internal vetting  
→ ISOs working in the BCU conduct the eligibility assessment
- FOD → Interviews are generally conducted by ISOs  
internal → CARRP ISOs and FDNS IO's share responsibility for vetting & the eligibility assessment
- RAIO → Officers perform internal vetting and assess eligibility through interviews

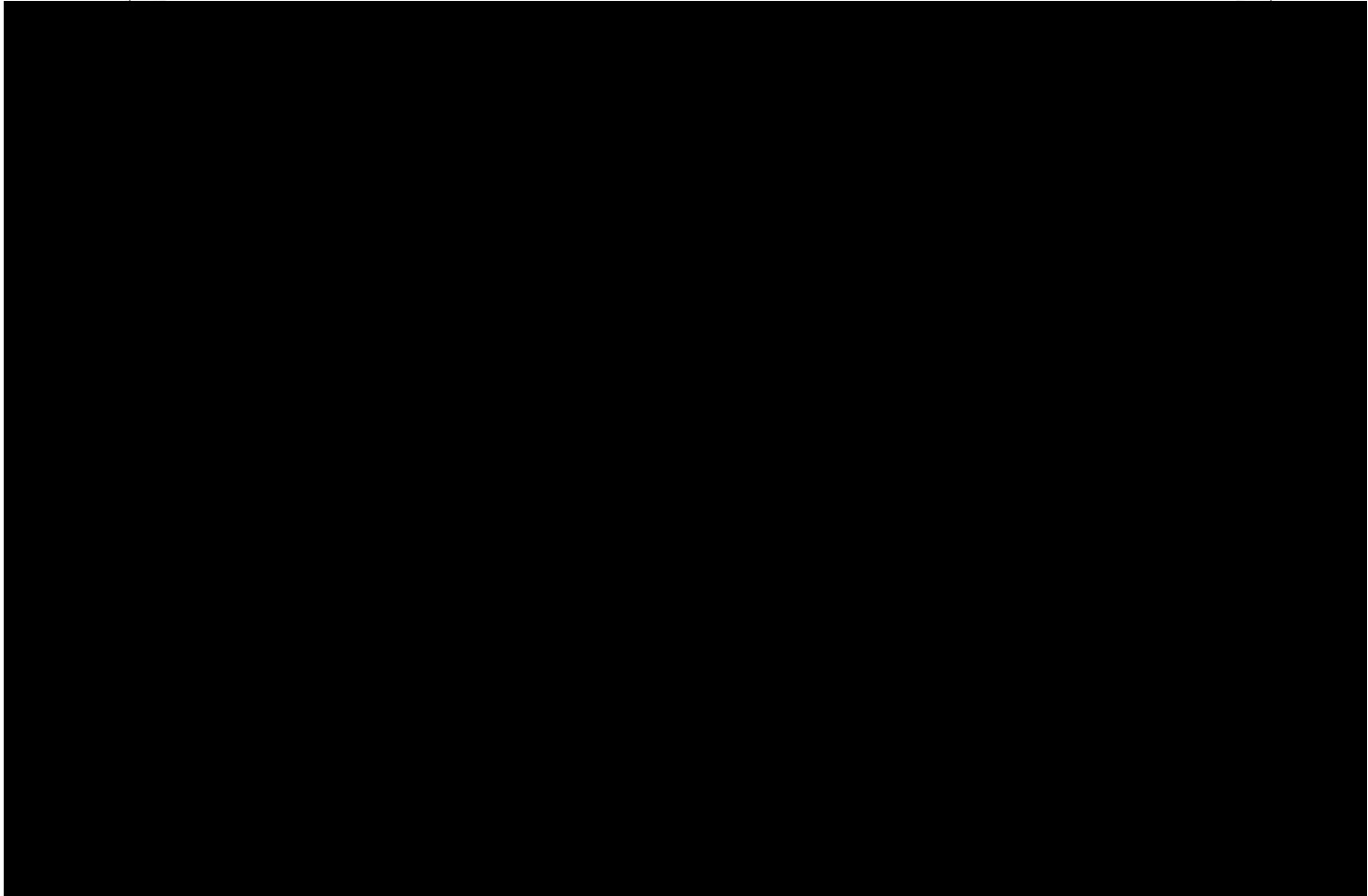
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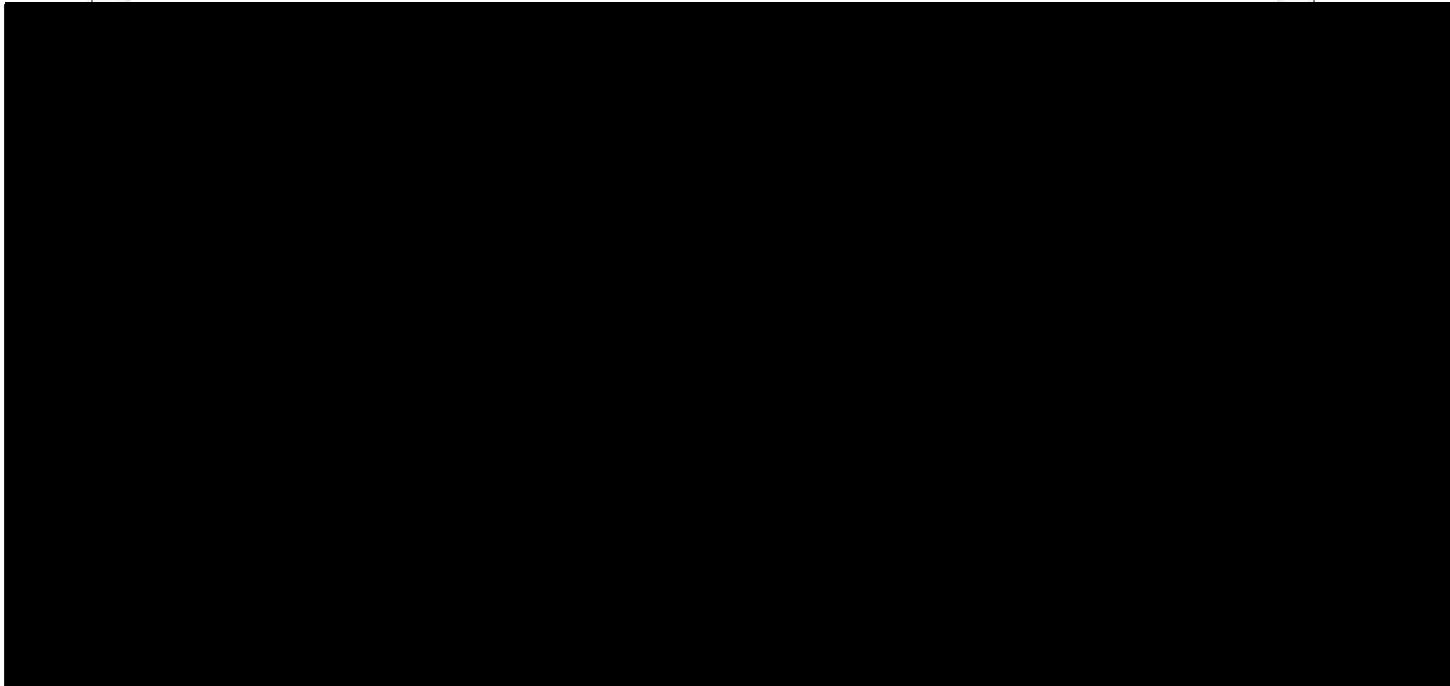
## Stages 2 & 3 Recap



## Stages 2 & 3 Recap



## Stages 2 & 3 Recap



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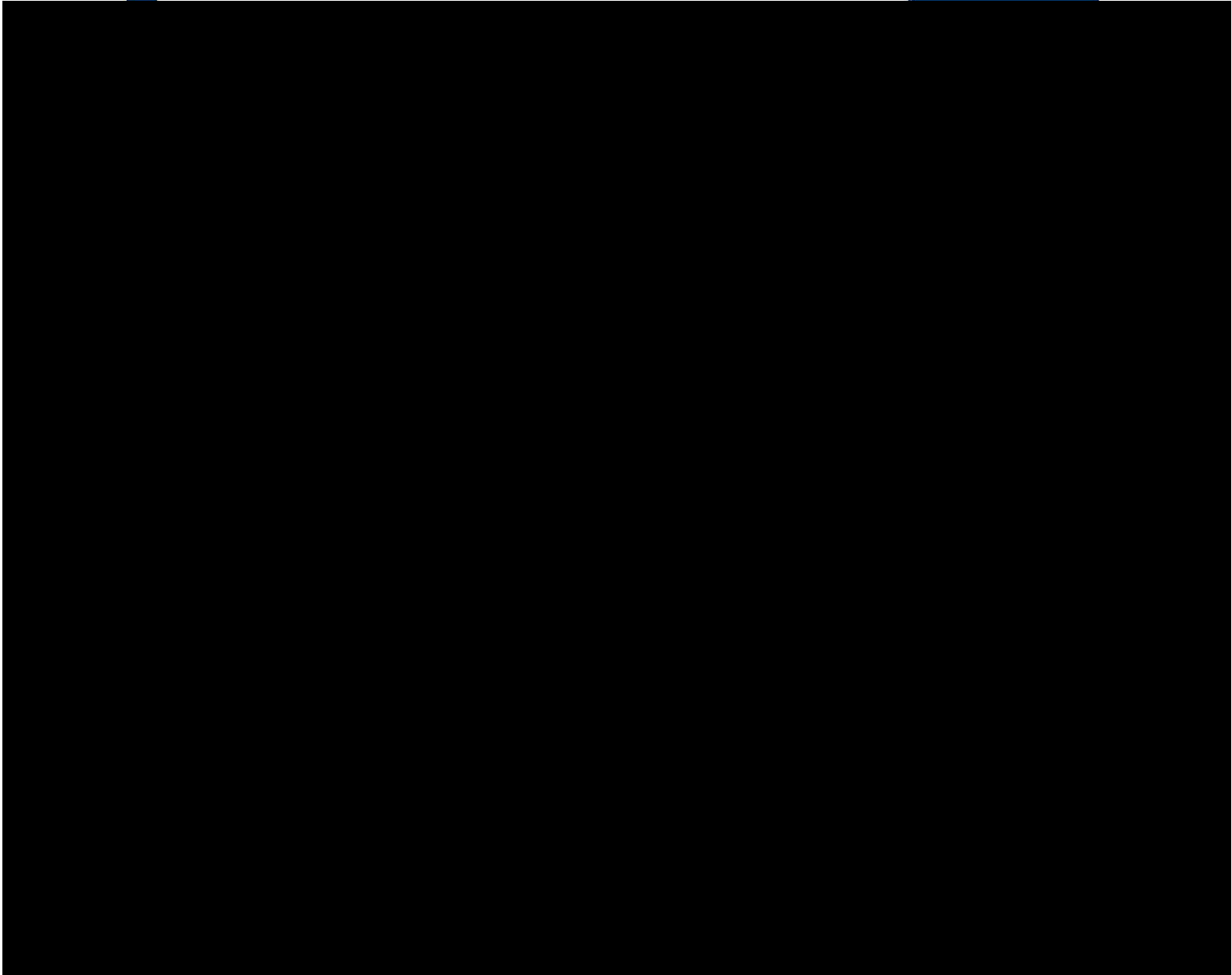
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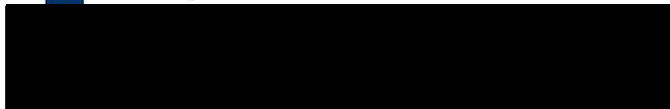
## Stages 2 & 3 Recap



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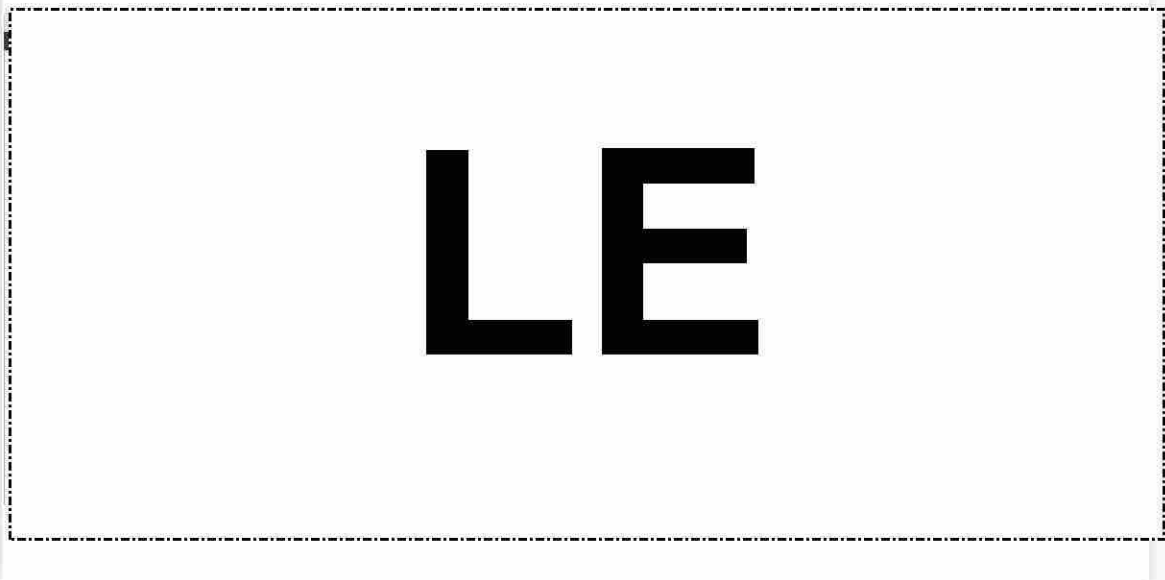
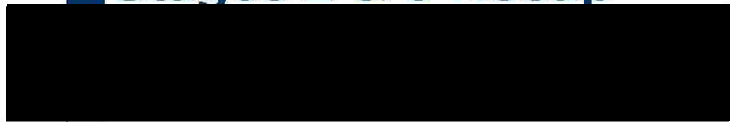
## Stages 2 & 3 Recap



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## Stages 2 & 3 Recap



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Stages 2 & 3 Recap



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What could you end up attaching to FDNS-DS during phase 2?

## Stages 2 & 3 Recap



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## Stages 2 & 3 Recap



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This is external vetting in a nutshell

It's not a systems check

It's not a deconfliction (although that could have been part of the conversation)

So where else would you put this? Because it's important – that conversation NEEDS to be documented



# **Studies in National Security:** **FDNS-DS Data Integrity (Part II)**

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## **Practical Exercise 2B: CARRP Stages 2 & 3 FDNS-DS Exercise**

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If time allows, have the class login to FDNS-DS and show them how to / have them enter one internal vetting system check and result in the system checks sub-tab

Also, show the class how to / have them document the external vetting conversation results in the Special Actions sub-tab.



## Stage 2 : Vetting and Eligibility



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- ✓ Review the systems used for vetting.
- ✓ Discuss form-specific areas of ineligibility and the importance of continuously assessing eligibility.
- ✓ Describe the collaboration between ISOs and FDNS IOs.
- ✓ Discuss good interview techniques.
- ✓ Identify lines of inquiry for interviews or RFEs.
- ✓ Examine the role and function of the JTTF.
- ✓ Consider law enforcement and headquarters resources that may help resolve a concern.

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