

**Department of Homeland Security
Office of Intelligence and Analysis
Policy Instruction: IA-904
Issued: August 31, 2011**

**I&A Joint Production with State and Major
Urban Area Fusion Centers**

I. Purpose

This Instruction defines policies and procedures for the Office of Intelligence and Analysis (I&A) when coordinating and collaborating on Analytic Products with State and Major Urban Area Fusion Centers (Fusion Centers). Furthermore, it defines requirements, review, clearance, and dissemination entailed in joint production with Fusion Centers. These procedures are to ensure that joint intelligence products produced with Fusion Centers are issued in a timely manner; conform to I&A's mission, analytic standards, and legal and regulatory requirements; respond to the needs of Departmental customers including Fusion Centers; and maintain the integrity of the intelligence production process.

II. Scope

This Instruction is applicable to all I&A intelligence personnel, including deployed intelligence personnel. I&A personnel may only prepare joint Analytic Products that are consistent with I&A's authorities. All I&A intelligence personnel must abide by this Instruction in the production of Joint Seal Products with Fusion Center and SLTT partners.

III. Authorities

- A. Public Law 107-296, "The Homeland Security Act of 2002," as amended.
- B. Executive Order 12333, "United States Intelligence Activities," 4 December 1981, as amended.
- C. Executive Order 13311, "Homeland Security Information Sharing," 25 October 2005.
- D. Executive Order 13388, "Further Strengthening the Sharing of Terrorist Information to Protect Americans," 27 October 2005.
- E. Executive Order 13526, "Classified National Security Information," 29 December 2009.

- F. Intelligence Community Directive (ICD) 203, "Analytic Standards," June 2007.
- G. Intelligence Community Directive 206, "Sourcing Requirements for Disseminated Analytic Products," June 2007 (Appendix A).
- H. Delegation 0103, "Delegation to the Assistant Secretary for Public Affairs to Authorize Use of the Department of Homeland Security Seal," 11 December 2003.
- I. "Interim Intelligence Oversight Procedures for the Office of Intelligence and Analysis," 3 April 2008.
- J. I&A Policy Directive 900.1, "Review and Clearance of Analytic Products Disseminated Outside the Federal Government."
- K. I&A Policy Directive 900.3, "Customer Feedback on I&A Products and Analytic Services."

IV. Definitions

For the purposes of this Policy Directive, the following definitions apply:

- A. **Collaboration**: The joint preparation of analytic products between an I&A analyst(s), a Fusion Center analyst(s), or external organization analyst(s) with the resulting analytic products expressly crediting the contributions of all analytical organizations.
- B. **Coordination**: A formal provision of draft analytic products between I&A analysts and a Fusion Center entity to gain mutual agreement on publication by addressing each organization's views on product adequacy, increasing its factual accuracy, clarifying its judgments, and resolving or sharpening areas of disagreement.
- C. **Customer**: Any recipient of an I&A analytic product or service.
- D. **Customer Feedback**: Recordable customer responses to an I&A product or service. This includes information about an analytic product obtained via a customer satisfaction survey or an analytic tradecraft product evaluation report.
- E. **DHS Clearing Offices**: The Office for Civil Rights and Civil Liberties, Privacy Office, I&A Intelligence Oversight Officer, I&A State and Local Program Office (SLPO), and the Office of General Counsel-Intelligence Law Division.

- F. **DHS Single Point of Service (SPS)**: DHS' consolidated program to process support requests from a state, local, tribal, and territorial (SLTT) partner; DHS Component; Intelligence Community (IC) member; non-IC federal agency; or an international partner in a visible, transparent, and accountable manner. SPS consists of elements from the National Operations Center, I&A, and the Office of Intergovernmental Affairs.
- G. **Dissemination**: The transmission, communication, sharing, or passing of analytic products to any entity outside I&A. This action includes e-mail, hardcopy, website posting, or any other method of transmission or distribution.
- H. **Finished Intelligence/Analytic Product**: An intelligence report or product developed through detailed analytic research from the collection, processing, integration, analysis, evaluation, and interpretation of available information.
- I. **Joint Seal Products**: Analytic products produced by I&A in partnership with other intelligence or analytic elements (e.g., FBI or Fusion Centers) that carry the organizational seals of all participating partners according to the analytic threshold(s) established in this policy in coordination with the Office of Public Affairs.
- J. **Key Intelligence Questions (KIQs)**: The questions that serve as the basis for analysis conducted to meet the needs of I&A customers. KIQs are identified in I&A's annual Program of Analysis.
- K. **Product Abstract**: The request form submitted by analytic branch leadership as part of the Product Package, which provides the Production Management Division (PMD) Production Branch with information about the originating author, branch, and division; product priority; KIQs addressed; completed branch responsibilities; Standing Information Needs (SINs) met; and intended recipients of the Finished Intelligence or analytic product.
- L. **Production Management Division (PMD)**: The I&A division with principal responsibility for intelligence production. PMD has three branches:
1. **Production Branch**: Provides Finished Intelligence or analytic product vetting, technical editing, and coordination for publication of I&A and Fusion Center products.
 2. **Media Services Branch**: Provides a full range of dissemination, website, graphics, and printing support to I&A and other stakeholders.

3. **Customer Assurance Branch:** Provides quality assurance, performance management, customer feedback, access to sensitive intelligence reporting, and analytic tradecraft support to I&A.
- M. **Product Package:** Includes the Product Abstract, draft Finished Intelligence or analytic product, digitally stored source documents and designated divisional share drive path, and clearance office e-mails (outlined in Policy Directive 900.1), that are submitted to the Production Branch.
- N. **Program of Analysis:** Outlines the KIQs I&A intends to answer during a given fiscal year, and assesses how well I&A executed the past year's set of KIQs. The Program of Analysis guides the production of analysis as codified in the I&A Production Plan.
- O. **Senior Leadership:** The I&A and Fusion Center leadership who are responsible for reviewing and approving the final version of a joint analytic product prior to dissemination. Within I&A, the Deputy Under Secretary for Analysis (DU/SIA-A) or designee will be the approving authority for all Joint Seal Products.
- P. **State and Local Support Request (SLSR):** A system that tracks requests from SLTT partners for support that includes, but is not limited to, requests for information, intelligence, classification downgrades, name traces, US Person (USPER) identities, or briefing support.
- Q. **State and Major Urban Area Fusion Center (Fusion Center):** Fusion Centers serve as focal points within the state and local environment for the receipt, analysis, gathering, and sharing of threat-related information among the federal government and SLTT and private sector partners.
- R. **US Person:** Includes: (a) a US citizen; (b) an alien known by I&A to be a permanent resident alien; (c) an unincorporated association substantially composed of (a) or (b); and (d) a corporation incorporated in the United States, except for a corporation directed and controlled by a foreign government(s). A corporation or corporate subsidiary incorporated abroad, even if partially or wholly owned by a corporation incorporated in the United States, is not a USPER. A person or organization outside the United States shall be presumed not to be a USPER unless specific information to the contrary is obtained. A person or organization within the United States shall be presumed to be a USPER unless specific information to the contrary is obtained. However, an alien within the United States shall be presumed not to be a USPER unless I&A obtains specific information to the contrary.
- S. **Waiving Officials:** Individuals with the authority to waive the clearance and review process during a time of immediate threat to homeland

security or when a product is deemed to be otherwise time sensitive. Officials with this authority are the Under Secretary for Intelligence and Analysis, the Principal Deputy Under Secretary for Intelligence and Analysis, and the DU/SIA-A.

V. Responsibilities

A. **Analysts/Intelligence Officers:** I&A analysts and intelligence officers, in accordance with the requirements outlined in the I&A Program of Analysis, will:

1. Identify joint production opportunities among Fusion Center(s) and I&A.
2. Engage Fusion Center analyst(s) to begin the joint production process by coordinating through the SLPO Intelligence Coordination Branch (ICB) to solicit input on draft products from other I&A analysts or intelligence officers.
3. Maintain communications by collaborating and coordinating with appropriate Fusion Center elements throughout the branch and division review process. Draft I&A analytic products will adhere to the I&A Tradecraft and Analytic Integrity Checklist for Analysts (Appendix B). This responsibility also requires analysts/intelligence officers to:
 - a. Make every effort to maintain the Fusion Center analytic contribution within the joint product. Authors will be transparent with the Fusion Center if they assess that significant changes are necessary to obtain a Joint Seal.
 - b. Coordinate with SLPO ICB by copying (b) (6), (b) (7)(E) @dhs.gov throughout the I&A review process.
 - c. For review purposes, allow one business day for every two pages of the product—unless identified as time sensitive—for I&A Analysis and Production (A&P) division representatives, the SLPO ICB, and/or intelligence officers to provide comments or concurrence on the product as necessary.
 - d. Ensure affirmative concurrence is received from required clearance offices pursuant to I&A's Policy Directive 900.1. Analysts and intelligence officers will work with clearance offices to resolve any comments. If comment resolution—to include presentation of opposing viewpoints—cannot be reached after five business days, analysts and intelligence officers will submit the Joint Seal Product to a Waiving Official

to resolve. In the event of a time sensitive product, the analyst or intelligence officer shall inform the clearing offices of the necessity of streamlining the clearing office review process.

- e. Obtain, document, and digitally archive I&A product review and concurrence e-mails pursuant to I&A's Policy Directive 900.1.
4. Digitally archive all sources used in drafting Finished Intelligence and analytic products.
5. Coordinate with collaborating Fusion Center analyst(s) to ensure all Fusion Center review and pre-dissemination clearances are obtained.
6. Obtain all necessary release authorities required by Executive Order 13526, the Foreign Intelligence Surveillance Act (FISA), Originator Controlled (ORCON), and other appropriate dissemination control and release approvals.
7. Coordinate with the Media Services Branch, as appropriate, to prepare pictures, charts, or other graphics before applicable analytic branch leadership submits the Product Package to the Production Branch.
8. Properly identify, mark, and minimize USPER information as appropriate.
9. Properly identify and cite applicable SINS within all products.
10. Submit the draft analytic product for review to the respective senior reviewer within the analytic branch.
11. Verify that classification markings comply with Controlled Access Program Coordination Office (CAPCO) and current I&A Classification Guide standards.
12. Ensure branch chief or designee, and equivalent leadership within the Fusion Center(s), have reviewed and/or provided comments on the draft analytic product prior to being reviewed by the I&A senior reviewer.
13. Ensure draft analytic products have been reviewed by the appropriate A&P Division Director and Fusion Center equivalent prior to being submitted to PMD for processing and dissemination. Designated analytic division leadership contacts are the only personnel authorized to submit a Product Package to PMD.

14. Provide customer feedback, if received from outside of I&A after the final dissemination of the product, to the Customer Assurance Branch via appropriate e-mail addresses:

- a. NIPR: (b) (6), (b) (7)(E)@hq.dhs.gov
- b. SIPR: (b) (6), (b) (7)(E)@dhs.sgov.gov
- c. JWICS: (b) (6), (b) (7)(E)@dhs.ic.gov

B. *Analytic Branch Chiefs* will:

1. Review draft analytic products for compliance with IC analytic tradecraft standards, I&A Policy Directives, and applicable IC Directives.
2. Provide feedback to the authoring analyst(s) that clearly explains substantive changes made prior to final review of draft analytic products.
3. Serve as the final review to ensure relevant analysis adheres to analytic standards in ICD 203.
4. Ensure appropriate analytic coordination or collaboration has been completed as outlined in the Tradecraft and Analytic Integrity Checklist for Analysts (Appendix A). Ensure digitally archived copies of all source documents used in each analytic product, as well as an approved copy of the product, are digitally stored and maintained in an approved centralized division location on the I&A shared drive. Hard copy sources should be scanned if an electronic version is not available.

C. *Analytic Division Directors* will:

1. Serve as an approving authority to ensure the analysis within the product is objective and written for maximum utility.
2. Ensure the analysis is clear, concise, and well written in compliance with the I&A Style Guide and IC tradecraft standards.
3. Ensure that the product receives the necessary clearance from each clearing office and all appropriate clearing office changes are made prior to submission of the product to PMD. If the analytical division is unable to reach consensus with all clearing offices after five business days, the division director will elevate the product to an authorized Waiving Official for final resolution. In the event of a time sensitive product, the division director shall inform the clearing

offices of the necessity of expediting the clearing office review process.

4. Ensure the product is properly sourced and includes an applicable Source Summary Statement.

D. ***Production Branch Chief:*** Upon receipt of a complete Product Package from the A&P analytic division director, or authorized designee, the Production Branch Chief will:

1. Ensure the completeness of the Product Package received from analytic divisions.
2. Oversee progress and status of the Product Package until the product is disseminated.
3. Ensure that the Product Package contains all applicable clearance statements and disclaimers.
4. Verify that all classification markings have been verified and comply with CAPCO standards.
5. Confirm that the analytic product complies with EO 13526 and the I&A Classification Guide.
6. Ensure that dissemination is aligned with the classification and dissemination controls of the applicable Finished Intelligence and analytic products.
7. Confirm proper markings of USPER throughout the product.
8. Verify all analytic products conform to I&A formatting standards.
9. Confirm that references comply with I&A Implementation Plan for ICD 206 sourcing pursuant to applicable policies issued by the Office of the Director of National Intelligence.
10. Ensure the analytic product is submitted to the DU/SIA-A (or designee) for final substantive review and comment, and is tracked during the Senior Leadership review stage.
11. Ensure pre-dissemination review of the analytic product is complete after approval by the DU/SIA-A (or designee).

E. ***Deputy Under Secretary for Analysis (or designee)*** will:

1. Conduct a final substantive review per Policy Directive 900.1 and provide approval of analytic products for dissemination.

2. Return analytic products to the Production Branch for final review or transmittal to the appropriate analytic branch leadership for revision as necessary.
3. Serve as the final I&A authority in the event of a disagreement regarding the content or dissemination of a Joint Seal Product.

F. *Media Services Branch Chief* will:

1. Ensure assistance is provided to analysts with the creation of pictures, charts, or other graphics before analytic division leadership submits the Product Package to the Production Branch.
2. Ensure analytic products are disseminated to international partners only after the I&A Foreign Disclosure Office completes applicable responsibilities.
3. Ensure an appropriate archive is maintained for analytic products that have been either distributed or disseminated.

G. *Customer Assurance Branch Chief* will:

1. Ensure that customer feedback is collected and analyzed to develop recommendations for product improvements.
2. Verify the maintenance and improvement of I&A customer feedback and outreach mechanisms with respect to joint I&A/Fusion Center analytic products and provide the customer feedback reports to the I&A analytic leadership, workforce, and SLTT authors.
3. Promote the Regional Analytic Advisor Plan as an avenue to exchange analytic knowledge between I&A and Fusion Center analysts.

H. *Foreign Disclosure Officer*: Before analytic products can be disseminated or distributed to international partners, the Foreign Disclosure Officer will:

1. Review and determine the releasability of analytic products to international partners. This includes all potential release of caveated information, such as NOFORN, FISA, ORCON, and other dissemination control and release approvals.
2. Coordinate any foreign release with the appropriate I&A analytic branches.
3. Submit the final product version for foreign release to the Production Branch for editing and dissemination.

- I. **State and Local Program Office** will:
1. Identify joint production opportunities among Fusion Center(s) and I&A.
 2. Connect Fusion Center analyst(s) with the appropriate I&A analyst to begin the joint production process.
 3. As necessary, serve as a third party to facilitate a joint production discussion among analysts to de-conflict any point of analytic disagreement.
 4. Augment the Customer Assurance Branch's feedback activities by ensuring that DHS intelligence officers solicit and capture feedback from SLTT customers on I&A products and analytic services.
 5. Communicate feedback from DHS intelligence officers and Fusion Center partners regarding I&A products and analytic services. This communication should be routed through the Customer Assurance Branch's e-mail addresses identified in this Policy Directive.
- J. The SPS will continue its policy of screening incoming SLSRs and forwarding to the analytic divisions. Analytic divisions will determine which resulting SLSR responses are subject to review and clearance in accordance with this Policy Directive.

VI. Policy and Requirements

- A. All I&A intelligence personnel must abide by this Policy Directive in the production of Joint Seal Products with Fusion Center and SLTT partners. Policy Directive 900.2, Producing Finished Intelligence, does not apply to products under the scope of this Policy Directive.
- B. **All analytic products prepared in accordance with this Policy Directive shall:**
1. Maintain the Fusion Center analytic contribution. While a proposed Joint Seal Product may incur adjustments to conform with I&A formatting and style requirements, I&A analysts will try to avoid refocusing or significantly refining products in an attempt to justify Joint Seal submission. I&A analysts will be transparent with the Fusion Center if significant changes are necessary to meet I&A analytic production thresholds to obtain a Joint Seal.
 2. Meet tradecraft and classification standards as established in ICD 203 and with sourcing requirements as established in ICD 206.

3. Comply with all applicable IC, DHS, and I&A policies, standards, and guidance.
4. Comply with writing and formatting style provided in the I&A Style Guide.
5. Include complete and proper classification markings in compliance with CAPCO and I&A Classification Guide standards.
6. Be reviewed and cleared as required by Fusion Center policies and clearance procedures and by Policy Directive 900.1.
7. Properly identify, mark, and minimize USPER information as appropriate.
8. Be submitted to the Production Branch on the appropriate electronic network, based on the overall classification of the analytic product.
9. In the event that I&A or a Fusion Center receives a request for information—whether pursuant to a Freedom of Information Act, “sunshine,” or discovery law—regarding a Joint Seal Product; consult with the other authoring party prior to any disclosure in order to develop a consensus view regarding an appropriate response.

C. Joint Seal Product Guidelines:

1. I&A analysts will work through SLPO ICB as necessary to ensure that Fusion Center analysts via DHS intelligence officers are provided with the opportunity to comment on draft Joint Seal Products applicable to their area of responsibility. Similarly, DHS intelligence officers will work through the SLPO ICB to ensure that applicable A&P elements are granted an opportunity to provide input to products within their respective area(s) of responsibility.
2. Joint Seal Products must include a state or local perspective and must satisfy one or more of the following criteria to qualify as an analytic product for a Joint DHS and Fusion Center seal:
 - a. I&A analytic contribution(s) such that substantive content is modified within the analytic product and/or,
 - b. I&A Substantive tradecraft assistance such that the analytic product is altered to adhere to IC Tradecraft Analytic Standards.

3. The template used for the Joint Seal Products will be provided by the originator or lead office, or as agreed upon by the product author(s).
 4. The seal of the originating or lead component of the Joint Seal Product will be placed on the left side of the product banner if organized horizontally, and at the top left of the banner if organized vertically.
 - a. All seals used within Joint Seal Products will be of the same size and a minimum of five-eighths of an inch in diameter.
 - b. Branding guidelines and specifications will be in accordance with the I&A Style Guide.
- D. Before disseminating Joint Seal products, I&A personnel must ensure that approval to share has been obtained from the proper authorities for all products to which EO 13526 applies or contain FISA information. I&A personnel will also ensure that Joint Seal Products have proper dissemination controls. I&A dissemination of analytic products must also comply with any policy or memorandum of understanding governing the production and dissemination of Joint Seal Products with other agencies.
- E. Thresholds for I&A involvement in Joint Seal Production related to special events are restricted by DU/SIA-A guidance. National Special Security Events and certain other events defined as "high-profile" by the Federal Special Events Working Group are automatically considered for joint seal threat assessments with SLTT by I&A and FBI headquarters analysts.
- F. **Joint Seal Product Coordination Process:**
1. To begin a joint product, I&A analysts and Fusion Center analysts (through the I&A intelligence officer), will route the proposed joint product or topic abstract to the DHS Intelligence Coordination Branch **(b) (6), (b) (7)(E)**@dhs.gov).
 2. The SLPO ICB will then coordinate with I&A analytical divisions to determine the branch most appropriately suited to work with the Fusion Center analyst(s) to further develop the proposed Joint Seal Product.
 3. I&A Analytic Divisions, in conjunction with the SLPO ICB, will identify a sponsoring I&A branch along with analyst point(s) of contact within that branch to work with ICB, the DHS intelligence officer, and the Fusion Center author(s) on the joint product.
 4. The sponsoring branch will make any substantive and/or analytical contributions or revisions to this product deemed necessary. Prior

to transmitting a draft product, I&A will make every effort to maintain the Fusion Center analytic contribution within the joint analytic product.

- a. While the proposed joint product may have to be altered to conform to I&A formatting and style requirements, I&A analysts will make a reasonable effort to avoid refocusing or significantly refining products in an attempt to justify Joint Seal submission. They will be candid with the Fusion Center if significant changes are necessary to meet I&A analytic production thresholds to obtain a Joint Seal.
 - b. The sponsoring branch analysts and Fusion Center authors will collaborate to resolve issues and differences identified during the review process. After the sponsoring branch has appropriately revised the draft to their satisfaction, they will send it back to the SLPO ICB (b) (6), (b) (7)(E)@dhs.gov) and the involved DHS Intelligence Officer embedded within the authoring Fusion Center for review.
 - c. Following that review, and the resolution of differences within five business days or less, the sponsoring branch will submit the product for review with the appropriate DHS Clearing Offices, pursuant to Policy Directive 900.1. Following Clearing Office revisions and concurrence, the sponsoring branch will send the product back to the SLPO ICB (b) (6), (b) (7)(E)@dhs.gov) and the relevant intelligence officer. If concurrence among clearing offices and analysts cannot be reached within five business days, the product shall be elevated to Waiving Officials for final resolution.
5. The SLPO ICB will facilitate the final coordination of the Clearing Office-approved draft with the relevant intelligence officer, lead Fusion Center analyst, and Fusion Center Director. The ICB will then submit the field-coordinated version to the sponsoring division.
- a. If any changes are made that require a second-round Clearing Office review, the I&A branch will submit the product for second and final Clearing Office review.
 - b. If a second-round review is not necessary, within five business days, the Division will send the product directly to PMD for publication and dissemination.
 - c. If the Division Director cannot reach resolution on comments within five business days, the product shall be sent to a Waiving Official.

G. Customer Feedback

1. I&A and Fusion Center Joint Seal Products will include a customer assurance survey.
2. SLPO ICB will provide customer feedback to analysts contributing to the Joint Seal Product following dissemination.

VII. References

- A. DHS I&A Implementations Plan: "ICD 206, Sourcing Requirements for Disseminated Analytic Products."
- B. Tradecraft and Analytic Integrity Checklist for Analysts.
- C. I&A Style Guide

VIII. Review, Revision, and Rescission

This Policy Directive will be reviewed annually by the I&A Policy Board or as the Under Secretary for Intelligence and Analysis deems necessary.

Department of Homeland Security
Office of Intelligence and Analysis
Policy Directive Number: 900.4

**I&A JOINT PRODUCTION WITH STATE
AND MAJOR URBAN AREA FUSION CENTERS
SIGNATURE PAGE**

This signature authorizes the implementation of this I&A Policy Directive. The signature below is effective for all non-substantive future revisions of this Policy Directive (for example, revisions that are stylistic, grammatical, or format related, and do not substantively change the original Policy Directive). This signature page may be posted with any non-substantive revisions.

Questions or concerns regarding this Policy Directive should be addressed to the Production Management Division at (b) (6), (b) (7)(E) or (b) (6), (b) (7)(E) @dhs.gov.

(b) (6)

Caryn A. Wagner
Under Secretary for Intelligence and Analysis

8/31/11
Date