

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE



Semi-Annual Section 803 Report
Office of Civil Liberties, Privacy, and Transparency
Period Covered: January 2017 – June 2017

LEADING INTELLIGENCE INTEGRATION

May 2018

Introduction

As required by Section 803 of the *Implementing Recommendations of the 9/11 Commission Act of 2007* (P.L. 110-53), as amended, this report provides information about the notable activities, from January 1, 2017 through June 30, 2017, of the ODNI's Office of Civil Liberties, Privacy and Transparency (CLPT), to include the types of privacy and civil liberties reviews conducted; the types of advice, guidance or response furnished; and the types of complaints received and processed. In the interest of enhancing transparency, it also provides a narrative overview of representative activities for the same period.

ABOUT CLPT

CLPT is led by the Civil Liberties Protection Officer, a position established by the *Intelligence Reform and Terrorism Prevention Act of 2004*. The Act provides that the Civil Liberties Protection Officer reports directly to the Director of National Intelligence (DNI), and sets forth his duties, which include ensuring that privacy and civil liberties protections are appropriately addressed in the policies and procedures of intelligence agencies; overseeing compliance by the ODNI with privacy and civil liberties protections in programs and operations administered by the ODNI; reviewing complaints concerning possible abuses of civil liberties and privacy in ODNI programs and operations; and ensuring that the use of technology sustains, and does not erode, privacy.

The Civil Liberties Protection Officer also serves as the ODNI's Chief Transparency Officer. In that capacity, he is responsible for leading implementation of the Principles of Intelligence Transparency for the Intelligence Community (IC). These principles guide how the IC should make information publicly available while protecting classified information, when disclosure would harm national security.

By leading the integration of civil liberties and privacy protections into the policies, procedures, programs, and activities of the IC, CLPT facilitates the conduct of intelligence activities in a manner that protects civil liberties and privacy, provides appropriate transparency, and earns and retains the trust of the American people. CLPT participation in developing and overseeing IC activities seeks to give the American people confidence that the IC is pursuing its vital security mission in a manner consistent with the nation's values.

In general, CLPT examines the privacy and civil liberties ramifications of intelligence-related technologies, programs, and procedures. CLPT collaborates closely with client offices to understand their initiatives or projects in detail, starting with the intelligence purpose for the

specific activity, the authority pursuant to which data is obtained, and the characteristics and use of the data. Based on each set of individual circumstances, CLPT reviews the appropriateness of protective measures and compliance with legal and policy mandates, and works to modify or formulate protections as necessary.

Likewise, CLPT reviews proposed legislation, policy documents, instructions, standards, guidance, testimony, reports, releases, and other materials to ensure that any privacy and civil liberties issues are appropriately addressed and properly articulated. These reviews may pertain specifically to ODNI, or to other IC elements to the extent that the issues fall within CLPT's IC-wide responsibilities.

CLPT carries out its duties in close consultation with other offices with relevant and complementary responsibilities, including offices of general counsel, offices of inspectors general, intelligence oversight offices, civil liberties and privacy offices, and the Department of Justice (DOJ). CLPT champions the *Principles of Professional Ethics for the IC: Mission, Truth, Lawfulness, Integrity, Stewardship, Excellence, and Diversity*. These are fundamental, ethical principles that unite professionals across agencies and functions, while distinguishing "intelligence" from other professions.

CLPT also reviews and investigates (as appropriate) alleged privacy and civil liberties abuses. When CLPT first receives a complaint, it must determine whether the complaint was properly directed to CLPT or whether it should have been referred to a different office or agency. For example, depending on the circumstances, certain complaints may be referred to the Intelligence Community Inspector General, the Office of Equal Employment Opportunity and Diversity, or another agency. If CLPT determines a complaint is not frivolous and merits a full review, it researches the pertinent legal and policy standards, and then obtains and analyzes relevant information. Based on its findings, CLPT determines the appropriate course of action to resolve the complaint, and notifies the complainant of disposition.

OVERVIEW FOR THE REPORTING PERIOD

GUIDANCE

This period is notable for several items of guidance that ODNI finalized and released for the benefit of the IC elements and for ODNI-internal operations, as applicable. ODNI participated closely in policy processes under Executive Order (EO) 12333, further described in the EO 12333 section below.

For internal purposes, CLPT published in final form an ODNI policy on collecting and using social security numbers. Although ODNI previously adhered to an informal policy prohibiting the use of SSNs except in necessary security-related circumstances, this guidance was formalized and issued internally. Similarly, CLPT initiated a revision of its internal policy for preparing for and responding to a breach of personally identifiable information to reflect changes in issuances from the Office of Management and Budget (OMB).

In addition, the National Counterterrorism Center's (NCTC) Civil Liberties and Privacy Officer developed an internal checklist to facilitate the process of reviewing NCTC intelligence products and briefings intended for other government agencies. The checklist helps reviewers verify whether or not the material is consistent with applicable legal authorities and policies protecting U.S. person information.

TRANSPARENCY

During the reporting period, CLPT coordinated numerous reviews of IC documents for redaction and release, resulting in the posting of large numbers of documents on IC on the Record. For example, CLPT played a key role in the review, redaction, and release of dozens of *Foreign Intelligence Surveillance Act* (FISA) court opinions, filings, procedures, and related documents. CLPT also prepared a "Guide to Posted Documents" to help the public more readily identify and retrieve key documents relating to the use of FISA and other national security authorities. In addition, CLPT coordinated the preparation and release of the Annual Statistical Transparency Report, which details key statistics relating to the use of key national security authorities. CLPT also co-wrote the Third Annual Signals Intelligence (SIGINT) Progress Report, describing the status of the reform initiatives originated in January 2014, including Presidential Policy Directive 28 (PPD 28).

CLPT worked closely with other ODNI components, the National Security Agency (NSA), the Department of Defense (DoD) and the DOJ to release the Raw SIGINT Availability

Procedures, issued pursuant to Section 2.3 of EO 12333. A statement and fact sheet were prepared and posted to help explain the Procedures.

CLPT continued to engage with civil society to provide information and to discuss their issues and concerns, primarily focusing on Section 702 of FISA.

CLPT worked closely with other ODNI components and with other departments and agencies to support the IC's efforts to provide information to Congress and the public regarding reauthorization of Section 702 of FISA. This included participating in congressional briefings and reports, public engagements, and the review and release of FISA-related information. CLPT also worked closely with interagency partners to explore whether it was feasible for NSA to generate an accurate and meaningful estimate of the number of U.S. person communications incidentally acquired under Section 702.

CLPT compiled input from the ODNI component offices for the CY16 Data Mining Report, in compliance with the *Data Mining Reporting Act*. This report is provided to the Chair and Ranking Members of specified committees of the Senate and House of Representatives, and to the members of the Privacy and Civil Liberties Oversight Committee (PCLOB). The unclassified portion of the report is posted publicly to the ODNI website.

Finally, CLPT coordinated a Counterterrorism Threats briefing for the Privacy and Civil Liberties Oversight Board (PCLOB). This briefing, provided annually, is consistent with the PCLOB's mandate to oversee IC elements privacy and civil liberties activities and challenges as related to counterterrorism, and with the IC elements obligation to provide relevant information.

CONTINUOUS EVALUATION

Continuous Evaluation (CE) is a high priority and vital component of national security reform, and is essential to detecting and countering insider threats by continuously reviewing an individual's eligibility to obtain access to classified information to hold a sensitive position. EO 13587, "Structural Reforms to Improve the Security of Classified Networks and the Responsible Sharing and Safeguarding of Classified Information," requires agencies to implement CE functions for the top security clearance levels. The ODNI CE Program is managed by the ODNI National Counterintelligence and Security Center (NCSC), and provides CE services to subscribing agencies that do not establish their own CE capability. In this period, CLPT assisted CE program personnel to develop the requisite privacy-related program documentation.

INSIDER THREAT

Pursuant to EO 1358, agencies also have been working to establish insider threat prevention and detection programs to evaluate employee behaviors that are potentially indicative

of activities adverse to the IC and national security interests. The EO designated the NCSC and the FBI to serve as co-chairs of a National Insider Threat Task Force (NITTF), established to assist government agencies in developing insider threat programs to meet prescribed standards. ODNI CLPT supports the activities both of the NITTF and of the ODNI in its own efforts to address insider threat issues. This support includes developing privacy and civil liberties training to ensure that Insider Threat program personnel properly obtain, handle, and assess records and reported information about employee conduct. In addition, CLPT is assisting program personnel in developing policy guidance to assist the workforce in recognizing and reporting anomalous behaviors that may signal an individual's poor mental health or malicious intentions. In addition to that guidance, CLPT assists insider threat program managers in developing relevant standard operations procedures (SOPs), as well as training videos for the ODNI workforce at large.

CLPT supported on-going compliance with Section 705 of the *Intelligence Authorization Act for Fiscal Year 2016* (P.L. 114-113), which requires an assessment of the 2015 Office of Personnel Management (OPM) data breach. CLPT has been ensuring appropriate safeguards are in place to protect an individual's personally identifiable information (PII) during acquisition, scanning, and conditioning of the data for assessment activities. CLPT has helped prepare privacy-related provisions for internal and interagency documentation.

PERSONNEL SECURITY

CLPT participated in an ad hoc working group established by the NCSC to examine inconsistencies in the oversight and management of personnel security procedures for Government and contractor employees.

COUNTERTERRORISM

CLPT continued to perform its advisory and compliance role with respect to the activities of NCTC, the component within the ODNI primarily responsible for counterterrorism intelligence analysis and counterterrorism strategic operational planning. CLPT advises NCTC on receipt, use, retention, and dissemination of data and assists in developing SOPs and process policies for the handling and tracking of certain categories of data containing personally identifiable information. In addition, CLPT vets NCTC products, speeches, newsletters, and other communications with state, local, and territorial entities engaged in countering violent extremism, to ensure products are consistent with analytic, privacy, and civil liberties standards. CLPT also assisted NCTC in developing and publishing an internal checklist to aid in appropriately protecting U.S. person information contained in NCTC intelligence products and briefings.

FISA OVERSIGHT

CLPT continued to participate in the joint oversight with DOJ of Section 702, ensuring compliance with the statute, Attorney General Guidelines, and applicable targeting and minimization procedures. As part of the ODNI Section 702 oversight team, CLPT participated in on-site reviews of the agencies' implementing Section 702 (NSA, CIA, FBI, and NCTC), reviewed tasking to ensure compliance with targeting procedures, reviewed queries and disseminations to ensure compliance with minimization procedures, and reviewed compliance notices and reports submitted to the Foreign Intelligence Surveillance Court (FISC). CLPT participated in proactive engagement to facilitate compliance by participating and leading frequent calls and quarterly meetings with agency representatives. CLPT reviewed and provided advice on Section 702 renewal certification documents. CLPT facilitated Congressional oversight of Section 702 by assisting ODNI Office of General Counsel in coordinating IC review for producing statutorily required FISA documentation to Congress. CLPT also facilitated the continued oversight by the Privacy and Civil Liberties Oversight Board (PCLOB) by coordinating IC review and subsequent production of FISA documentation to the PCLOB. CLPT led efforts to respond to statutorily-required transparency reporting for FISA (statistics, FISC opinions), as noted above in relation to the discussion of transparency.

Additionally, as previously discussed, CLPT helped lead and coordinate the IC's efforts to enhance transparency regarding reauthorization of Section 702 of FISA.

EO 12333

CLPT continued to work with the DOJ, IC elements, and other ODNI components to update several agencies' procedures implementing Executive Order 12333, United States Intelligence Activities. These agency-specific procedures implement the requirements of Section 2.3 of EO 12333, governing how IC agencies and elements collect, retain, and disseminate information concerning U.S. persons.¹ EO 12333 requires that such procedures be approved by the Attorney General, in consultation with the DNI.

Following Attorney General approval in January 2017 of the Raw SIGINT Availability Procedures, by which IC elements may seek signals intelligence that previously had been the exclusive province of the NSA, CLPT engaged in a working group with the relevant interagency

¹ Defined in EO 12333 Part 3, a U.S. person is a person or organization who meets any of the following criteria: (i) a U.S. citizen; (ii) , an alien known by the intelligence agency element concerned to be a permanent resident alien (i.e., lawful permanent resident green card holder); (iii) an unincorporated association substantially composed of U.S. citizens or permanent resident aliens, or (iv) a corporation incorporated in the U.S., except for a corporation directed and controlled by a foreign government or governments.

offices to develop, coordinate, and execute implementing guidance for the procedures. Additionally, as required by the procedures, CLPT developed and coordinated oversight and compliance guidance for a requesting IC element's handling of raw SIGINT. Pursuant to the procedures, IC elements may not access raw SIGINT until they have met certain requirements, including the establishment of a compliance program comparable to that of NSA, with the same types of privacy protective rules.

CLPT also participated in an interagency working group that focused on drafting and coordinating an update to the Classified Annex to the DoD's Attorney General-Approved Procedures under EO 12333 (DoD Manual 5240.01). This work remains underway. As background, the Secretary of Defense issued DoD 5240.01 in October 2017, and updated DoD's prior set of procedures, which were originally issued in 1982. An annex to the 1982 procedures governs the collection, retention, and dissemination of U.S. person information, and remains in effect. DoD released a redacted version of this annex.

LEGISLATIVE, POLICY AND PRODUCT REVIEW

CLPT participated in an interagency review of the terms of PPD-28, Signals Intelligence Activities, in light of the new Administration's stated views on privacy protection for foreign citizens. This review concluded that PPD-28 would remain in effect. In addition, CLPT helped coordinate the development of procedures for implementing the Ombudsperson Mechanism called for by the EU/US Privacy Shield.

CLPT continued to conduct its routine review of IC-wide and ODNI-internal directives, policies and instructions, to ensure that privacy and civil liberties considerations were appropriately addressed. In certain instances, CLPT participated in working groups established to explore all equities and to ensure that a particular directive or policy would not result in unanticipated consequences.

Pursuant to OMB Circular A-108 and OMB Memorandum M-17-12, CLPT revisited ODNI's public facing website (specifically, the terms of ODNI's Privacy) and made additions and revisions as OMB directives prescribe.

Pursuant to Executive Order 13636, Improving Critical Infrastructure Cybersecurity, CLPT responded to the annual call by DHS (the lead agency) for named agencies to review and report on their assigned responsibilities for ensuring privacy and civil liberties protection as the government works to strengthen cybersecurity. The ODNI annually assesses the privacy and civil liberties implications of directives to analysts to produce unclassified cyber products that identify a specific targeted entity.

INFORMATION SYSTEMS AND DATA GOVERNANCE

CLPT continued to support the activities of the IC Chief Information Officer and the ODNI-internal Chief Information Officer relating to information technology systems and to the security and governance of personal data in those systems. CLPT partnered with counterparts at other IC elements to promote alignment among community privacy officers regarding protections for systems and data.

Similarly, CLPT participated in meetings and activities of interagency bodies dealing with information systems and data governance, such as the IC Information Sharing and Safeguarding Council, IC Chief Information Officer Council, IC Chief Data Officer Council, and IC Information Security Risk Management Committee. CLPT's work in this area included providing privacy-related input into interagency processes for establishing IC-wide criteria for authenticating identity, authorizing access, and instituting security safeguards.

RESEARCH, SCIENCE AND TECHNOLOGY

CLPT continued to support the activities of the research and science and technology components of the ODNI and elements of the IC. ODNI's Intelligence Advanced Research Projects Activity (IARPA) collaborates across the IC to ensure that intelligence research addresses identified future needs, and CLPT continued to participate closely with IARPA activities to provide guidance regarding potential privacy and civil liberties pitfalls of research that involves people (behaviors or other personal attributes) and/or the collection and use of personally identifiable information.

Likewise, CLPT continued its review of proposals or submissions in response to "research challenges." For example, CLPT vetted submissions to the Galileo Awards Program, which is an annual IC-wide competition to encourage and recognize innovative ideas from the workforce that address current intelligence or organizational challenges. In addition, CLPT supported the IC Information Sharing and Safeguarding Executive's (ISSE) sponsorship of innovative information sharing proposals through the ISSE Innovation Fund.

INTERNATIONAL ACTIVITIES (Outreach/Awareness)

CLPT continued to meet with representatives of foreign governments to enhance their understanding of how the IC protects privacy and civil liberties and provides appropriate transparency. These engagements included discussion of best practices and lessons learned. In addition, CLPT worked closely with interagency partners to provide accurate and comprehensive information to the United Nations Senior Rapporteur for Privacy (SRP). The SRP is writing a

series of reports as part of his mandate, and visited the United States to learn more about how the U.S. protects privacy as it conducts national security activities.

TRAINING

CLPT launched a new web-based course entitled IC Protection of United States Person Information. The course is intended to serve as a helpful resource for those individuals whose job duties involve the collection, retention, and dissemination of intelligence containing information about U.S. persons. This is the third of three web-based courses that CLPT has developed and administered in recent years, including: Understanding the Privacy Act and Personally Identifiable Information; and Properly Obtaining and Using Publicly Available Information.

CLPT staff delivered presentations at bi-weekly and quarterly training forums (for new employees, and for supervisors), and once a semester for the National Intelligence University's Counterterrorism course. Staff conducted "town halls" for audiences in other components (during this reporting period, CLPT conducted a town hall for the Human Resources Division), and the Chief of CLPT conducts a bi-annual "Plain Talk about Civil Liberties" session as an opportunity for any member of the workforce to ask questions.

CLPT staff also provide training to their customer/accounts on an ad hoc basis by briefing, interpreting, or clarifying directives, policies or standards relevant to their missions or activities. DNI representatives deployed to FBI field offices receive pertinent briefings as well.

COMPLAINTS

CLPT is statutorily mandated to serve as an "action office" (i.e., avenue of redress) for complaints, concerns, or questions having to do with privacy and civil liberties in the IC, whether broadly focused (e.g., the privacy implications of intelligence activities) or related to narrow, individual concerns (e.g., how a particular personal record may have been used). CLPT investigated and resolved concerns around time and attendance policy and parking enforcement policies. Pursuant to applicable policy, CLPT is the hub of an incident response team to be convened upon notice of any lapse (actual or suspected) in the application of technical protocols involving systems containing personally identifiable information.

CLPT also supported on-going compliance with Section 705 of the Intelligence Authorization Act for Fiscal Year 2016 (P.L. 114-113), which requires . CLPT has been ensuring that appropriate safeguards are in place to protect an individual's PII during acquisition, scanning, and conditioning of the data for assessment activities.

COORDINATION AND INTEGRATION OF CIVIL LIBERTIES AND PRIVACY ACTIVITIES

Pursuant to his authority under Intelligence Community Directive 107 (“Civil Liberties and Privacy”), the ODNI Civil Liberties Protection Officer (and Chief of CLPT), acted to strengthen the IC’s framework for protecting civil liberties and privacy by formally chartering the “IC Civil Liberties and Privacy Council.” Comprised of representatives from civil liberties and privacy offices and offices of general counsel from the IC elements and IC components of Executive Branch departments and agencies, this Council has existed informally since 2006. The Council serves as a forum for discussing issues of common concern; interpreting the implications of new laws, regulations and policies; responding in a coordinated fashion to external requests; and exchanging best practices. While it is not itself a standard-setting body, the Council may recommend that a particular standard, guidance, or set of principles should be developed and issued (e.g., pursuant to the IC’s formal policy framework).

METRICS

The following tables set forth metrics regarding CLPT activities in each of the areas enumerated in Section 803 of the *9/11 Commission Act*. The report categories are defined as follows:

Reviews: examinations of activities or processes as required by controlling privacy and civil liberties authorities.

Advice: refers to the identification of specific requirements or other safeguards identified in specific circumstances to protect privacy and civil liberties, including the formal issuance of responsive policies, procedures, guidance, interpretations and instructions.

Response to Advice: relates to specific action taken as a result of the CLPT “advice” provided, including policies, procedures, training, etc.

Privacy Act Complaint: a written allegation regarding agency non-compliance with the requirement of the Privacy Act.

ISE Complaint: a written allegation of harm arising from ODNI sharing of terrorism data in the context of the Information Sharing Environment.

Privacy and Civil Liberties Complaint: a written allegation charging violation of information privacy rights and/or civil liberties; e.g., relating to improper collection, use, retention, and dissemination of the information about U.S. persons, or violation of First Amendment rights of free speech and association, or Fifth Amendment guarantees of due process and equal protection.

Disposition of Complaints: refers to CLPT administration of the complaint (versus specific resolution of the complaint); i.e., responsive action, determination of “no merit,” or referral of the complaint to a more appropriate venue.

METRICS

Reviews		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
A-1	33	Intelligence Activities
A-2	16	Internal Operations
A-3	16	Use of Technology
A-4	1	Procedures for Redress
A-5	0	Implement Transparency
B-1	0	First Amendment
B-2	9	Fourth Amendment
B-3	15	Privacy Act/OMB Circular 108
B-4	0	Data Mining Act
B-5	4	EO 123333
B-6	0	ISE Privacy Guidelines
B-7	0	Third Party Website
B-8	0	Website Tracking Policy
B-9	1	SSN Reduction
B-10	1	Other OMB Policy
B-11	15	Principles of Transparency
B-12	23	Directed by DNI or Req. by Law
Total	134	

Type of Advice Given After Reviews		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
A	25	Written Formal Guidance
B	21	Informal Guidance
C	18	Multi-Stakeholder Consultations
Total	64	

Response to Advice Given After Reviews		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
1	26	Client directed action in accordance with guidance received
2	1	Client instituted required training
3	14	Other Action Taken
Total	41	

Promote Understanding		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
E-1	10	Internal Training
E-1-a	3	Entrance on Duty
E-1-b	0	Plain Talk/Brown Bags
E-1-c	0	Town Halls
E-1-d	12	Specific Content Briefings
E-2	15	External IC
E-3	11	Outside (Non-IC)
Total	51	

Incidents		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
D-1	3	PII
Total	3	

Complaints		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
C-1	1	PII Incident
C-2	2	Privacy Act Challenge
C-3	0	ISE (inc. Terrorist Watch List
C-4	0	1 st or 5 th Amendment
C-5	0	Retaliation/Reprisal
C-6	0	via DOJ Judicial Redress
C-7	0	via State Dept. Privacy Shield
C-8	0	Misdirected/Non CL/P
Total	3	

Disposition of Complaint		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
a.	0	Took Appropriate Action
b.	0	Informed That No Action Necessary
c.	0	Referred to Other Office
Total	0	

Letter & Number Key for Civil Liberties, Privacy and Transparency Semi-Annual Section 803 Report
Definition: “Reviews” are examinations of activities or processes as required by controlling privacy and civil liberties authorities (e.g. Privacy Impact Assessments, FISA Reviews,

Compliance with IT Resource Management Policy, Congressionally Directed Action (CDA), or DNI-directed Reviews). CLPT may also conduct such reviews on a discretionary basis.	
Type of Review	
A.	<p>Review to assist ODNI in appropriately considering privacy and civil liberties concerns and incorporating applicable privacy and civil liberties safeguards (under the Constitution, federal law/regulation/policy, Executive Orders and implementing guidelines) in the:</p> <ol style="list-style-type: none"> 1. Development of laws and polices relating to intelligence activities 2. Development of laws and policies relating to workforce administration and agency internal operations. 3. Use of technology in conducting intelligence activities or agency internal operations 4. Development of procedures for redress (to include breach of PII) 5. Development of procedures to implement transparency principles
B.	<p>Review to ensure the programs and operations of the ODNI or the IC at large are implemented in compliance with appropriate legal and policy safeguards for privacy and civil liberties:</p> <ol style="list-style-type: none"> 1. First Amendment 2. Fourth Amendment 3. Privacy Act/OMB Circular 108 4. Data Mining Act 5. EO 12333 and implementing guidelines 6. ISE Privacy Guidelines 7. Third party website/applications policy (OMB M-10-23) 8. Website tracking policy (OMB M-10-22) 9. SSN reduction (OMB-M-07-16) 10. Other OMB policy 11. Principles of Transparency for the IC 12. Directed by DNI or required by law
<p>Definition: “Complaints” – <i>“Privacy Act Complaint”</i> is a written allegation regarding agency non-compliance with the requirement of the Privacy Act. <i>ISE Complaint:</i> “ISE Complaint” is a written allegation of harm arising from ODNI sharing of terrorism data in the context of the Information Sharing Environment. <i>Privacy and Civil Liberties Complaint:</i> “Privacy and Civil Liberties Complaint” is a written allegation charging violation of information privacy rights and/or civil liberties, e.g., relating to improper collection, use, retention, and dissemination of the information about U.S. persons, or violation of First Amendment rights of free speech and association or Fifth Amendment guarantees of due process and equal protection. <i>“Disposition of complaints”</i> refers to CLPT administration of the complaint (vice specific resolution of the complaint), i.e., responsive action, determination of “no merit” or referral of the complaint to a more appropriate venue.</p>	
Type of Complaint/Allegation	
C.	<ol style="list-style-type: none"> 1. Complaint of PII incident 2. Complaint of Privacy Act violation

	<ul style="list-style-type: none"> 3. Complaint of ODNI sharing under the ISE (including terrorist watch list) 4. Complaint alleging improper collection use, retention, and dissemination of U.S. person information or alleging violation of First Amendment’s guarantees of freedom of speech and association, or Fifth Amendment guarantees of due process and equal protection 5. Complaint of retaliation/reprisal for raising a CL/P concern 6. Complaint via DOJ under Judicial Redress Act 7. Complaint via State Department under Privacy Shield 8. Misdirected complaint/non CL/P manner
Disposition of Complaint: (identify in “Comments” section)	<ul style="list-style-type: none"> a. Took appropriate responsive action b. Informed complainant that complaint does not merit responsive action c. Referred complainant to other appropriate office
D.	<p>Incidents</p> <ul style="list-style-type: none"> 1. PII
Promote Understanding	
E.	<p>Promote understanding of the IC’s civil liberties and privacy protections. Inform and Promote Awareness (identify venue in “Description” section)</p> <ul style="list-style-type: none"> 1. Internal/Training <ul style="list-style-type: none"> a. EOD b. Plain Talk/brown bags c. Town Halls d. Specific content briefings 2. External (in the IC) 3. Outside (non-IC)
Type of Advice	
A.	Written Interpretations, Opinions, Memoranda, Guidance, Instructions
B.	Informal guidance/recommendations/clarification (email, phone, meeting/consultation)
C.	Multi-stakeholder Consultations
Response to Advice	
1.	Client directed action in accordance with written guidance, procedure, or agreement by CLPT or external stakeholder guidance rendered
2.	Client instituted/required training in CLPT areas of expertise
3.	Other