

UNCLASSIFIED

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE
WASHINGTON, DC

Mr. Austin Evers
Executive Director
American Oversight
1030 15th Street, Suite B255
Washington, DC 20005

May 13, 2021

Subject: ODNI Case DF-2020-00143; Civil Case 1:20-cv-01797 (American Oversight v. ODNI)

Mr. Evers,

This is the first interim response to your Freedom of Information Act (FOIA) request dated 21 February 2020 (Enclosure 1), in which you requested “*All decision memoranda, directives, or policy interpretations or guidance signed, approved, or otherwise adopted by Acting DNI Grenell.*”

Your request is being processed in accordance with the FOIA, 5 U.S.C. § 552, as amended. We have completed processing three documents for this response.

Upon review, we have determined that portions of one of the documents must be withheld pursuant to the following FOIA exemptions:

- (b)(3), which applies to information exempt by statute. The relevant statutes are the National Security Act of 1947, as amended, 50 U.S.C. § 3024(i) and 50 U.S.C. § 3024(m), which protect intelligence sources and methods and identifying information of ODNI personnel;
- (b)(6), which applies to information, the release of which would constitute a clearly unwarranted invasion of personal privacy.

A copy of this document with redactions has been included (Enclosure 2).

The other two documents are publically available on ODNI’s website. Below is the web address:

- <https://www.dni.gov/index.php/what-we-do/ic-related-menus/ic-related-links/intelligence-community-policy-guidance>
- https://www.dni.gov/files/documents/ICPG/02-25-20_ODNI_ICPG_IC_Personnel_Security_Database_Scattered_Castles_20-00078_U.pdf

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However, we have provided you a copy of these two documents for your use (Enclosures 3a and 3b).

If you have any questions, please contact DOJ attorney, Michael Drezner, at Michael.L.Drezner@usdoj.gov or by phone at (202) 514-4505.

Sincerely,



Sally A. Nicholson
Chief, Information Review
& Release Group
FOIA Public Liaison
Information Management Office

Enclosures

FEB 24 2020

From: FOIA <foia@americanoversight.org>
Sent: Friday, February 21, 2020 4:07 PM
To: DNI-FOIA
Subject: FOIA Request (ODNI-20-0266)
Attachments: ODNI-20-0266.pdf

Dear FOIA Officer:

Please find attached a request for records under the Freedom of Information Act.

Sincerely,

Clay M. Goode
Paralegal
American Oversight
foia@americanoversight.org
www.americanoversight.org | @weareoversight

FOIA: ODNI-20-0266



FEB 24 2020

February 21, 2020

VIA EMAIL

Patricia Gaviria
Office of the Director of National Intelligence
Information Management Division
ATTN: FOIA/PA
Washington, DC 20511
dni-foia@dni.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the implementing regulations of your agency, American Oversight makes the following request for records.

The Office of the Director of National Intelligence (ODNI) has recently undergone significant turmoil. This week, press reported that three senior career officials—Joseph Maguire, Jason Klitenic, and Andrew Hallman—would be stepping down from their leadership roles. Notably, press reports indicate that President Trump decided to remove Joseph Maguire, Acting DNI, from his position after Trump learned that the Intelligence Community had briefed Congress on Russian interference on his behalf in the 2020 elections.¹ In his place, President Trump named Ambassador to Germany Richard “Ric” Grenell—a highly political ally of the president, with minimal experience in foreign policy or national security²—and reporting also indicates Grenell will take on Kash Patel, a former staffer of Representative Devin Nunes who worked to discredit the investigation into Russian interference during the 2016 election, as a senior advisor.³ This leadership

¹ Ellen Nakashima, et al., *Senior Intelligence Official Told Lawmakers that Russia Wants to See Trump Reelected*, WASH. POST (Feb. 21, 2020, 6:53 AM), https://www.washingtonpost.com/national-security/after-a-congressional-briefing-on-election-threats-trump-soured-on-acting-spy-chief/2020/02/20/1ed2b4ec-53f1-11ea-b119-4faabac6674f_story.html.

² Julian Barnes & Maggie Haberman, *Trump Names Richard Grenell as Acting Head of Intelligence*, N.Y. TIMES, Feb. 19, 2020, <https://www.nytimes.com/2020/02/19/us/politics/dni-national-intelligence-director-grenell.html>.

³ Daniel Lippman, *NSC Aide Who Worked to Discredit Russia Probe Moves to Senior ODNI Post*, POLITICO (Feb. 20, 2020, 8:00 PM) <https://www.politico.com/news/2020/02/20/kash-patel-odni-post-116546>.

transition follows on the heels of other indications that Trump may be politicizing ODNI. In July 2019, former Director Dan Coats was asked to step down just three days after President Trump's now-infamous call with Ukrainian President Zelensky in which the president pressured the Ukrainians to investigate a domestic political opponent, and another respected career official, Principal Deputy DNI Sue Gordon, was also forced out soon thereafter.⁴

American Oversight seeks records to shed light on whether and to what extent the President is politicizing the intelligence community.

Requested Records

American Oversight requests that ODNI produce the following records within twenty business days:

All decision memoranda, directives, or policy interpretations or guidance signed, approved, or otherwise adopted by Acting DNI Grenell. This request includes any document establishing, modifying, clarifying, or rescinding any DNI or other Intelligence Community policy, legal or policy interpretation, or practice, whether presented as a memorandum, letter, guidance document, or in any other form.

Please provide all responsive records from February 19, 2020, through the date the search is conducted.

American Oversight believes this request for a small number of recent readily-identifiable documents created by high-ranking officials should be assigned to the Simple processing track, and American Oversight expects that ODNI will be able to respond promptly.

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a) (4) (A) (iii) and your agency's regulations, American Oversight requests a waiver of fees associated with processing this request for records. The subject of this request concerns the operations of the federal government, and the disclosures will likely contribute to a better understanding of relevant government procedures by the general public in a significant way. Moreover, the request is primarily and fundamentally for non-commercial purposes.

American Oversight requests a waiver of fees because disclosure of the requested information is "in the public interest because it is likely to contribute significantly to

⁴ Julian Borger, *Trump's Ukraine Call Sparks New Questions Over Intelligence Chief's Firing*, THE GUARDIAN (Sep. 28, 2019, 1:01 AM), <https://www.theguardian.com/us-news/2019/sep/27/dan-coats-dni-trump-firing-ukraine>.

public understanding of operations or activities of the government.”⁵ The public has a significant interest in ensuring that the Intelligence Community does not become politicized but rather is able to continue providing objective, unbiased assessments to national security decisionmakers. Records with the potential to shed light on recent leadership transitions would contribute significantly to public understanding of operations of the federal government, including whether and to what extent decisions about DNI leadership are being made for political reasons. American Oversight is committed to transparency and makes the responses agencies provide to FOIA requests publicly available, and the public’s understanding of the government’s activities would be enhanced through American Oversight’s analysis and publication of these records.

This request is primarily and fundamentally for non-commercial purposes.⁶ As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight’s financial interest. American Oversight’s mission is to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.⁷

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through numerous substantive analyses posted to its website.⁸ Examples reflecting this commitment to the public disclosure of documents and the creation of editorial content include the posting of records related to an ethics waiver received by a senior Department of Justice attorney and an analysis of what those records demonstrated regarding the Department’s process for issuing such waivers;⁹ posting records received as part of American Oversight’s “Audit the Wall” project to gather and analyze information related to the administration’s proposed construction of

⁵ 5 U.S.C. § 552(a)(4)(A)(iii).

⁶ See 5 U.S.C. § 552(a)(4)(A)(iii).

⁷ American Oversight currently has approximately 15,500 page likes on Facebook and 101,500 followers on Twitter. American Oversight, FACEBOOK, <https://www.facebook.com/weareoversight/> (last visited Feb. 7, 2020); American Oversight (@weareoversight), TWITTER, <https://twitter.com/weareoversight> (last visited Feb. 7, 2020).

⁸ News, AMERICAN OVERSIGHT, <https://www.americanoversight.org/blog>.

⁹ DOJ Records Relating to Solicitor General Noel Francisco’s Recusal, AMERICAN OVERSIGHT, <https://www.americanoversight.org/document/doj-civil-division-response-noel-francisco-compliance>; Francisco & the Travel Ban: What We Learned from the DOJ Documents, AMERICAN OVERSIGHT, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

a barrier along the U.S.-Mexico border, and analyses of what those records reveal;¹⁰ posting records regarding potential self-dealing at the Department of Housing & Urban Development and related analysis;¹¹ posting records and analysis relating to the federal government's efforts to sell nuclear technology to Saudi Arabia;¹² and posting records and analysis regarding the Department of Justice's decision in response to demands from Congress to direct a U.S. Attorney to undertake a wide-ranging review and make recommendations regarding criminal investigations relating to the President's political opponents and allegations of misconduct by the Department of Justice itself and the Federal Bureau of Investigation.¹³

Accordingly, American Oversight qualifies for a fee waiver.

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks "communications," please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- In conducting your search, please understand the terms "record," "document," and "information" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as

¹⁰ See generally *Audit the Wall*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Border Wall Investigation Report: No Plans, No Funding, No Timeline, No Wall*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/border-wall-investigation-report-no-plans-no-funding-no-timeline-no-wall>.

¹¹ *Documents Reveal Ben Carson Jr.'s Attempts to Use His Influence at HUD to Help His Business*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/documents-reveal-ben-carson-jr-s-attempts-to-use-his-influence-at-hud-to-help-his-business>.

¹² *Investigating the Trump Administration's Efforts to Sell Nuclear Technology to Saudi Arabia*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/investigating-the-trump-administrations-efforts-to-sell-nuclear-technology-to-saudi-arabia>.

¹³ *Sessions' Letter Shows DOJ Acted on Trump's Authoritarian Demand to Investigate Clinton*, AMERICAN OVERSIGHT, <https://www.americanoversight.org/sessions-letter>.

letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions.

- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Federal Records Act and FOIA.¹⁴ It is not adequate to rely on policies and procedures that require officials to move such information to official systems within a certain period of time; American Oversight has a right to records contained in those files even if material has not yet been moved to official systems or if officials have, by intent or through negligence, failed to meet their obligations.¹⁵
- Please use all tools available to your agency to conduct a complete and efficient search for potentially responsive records. Agencies are subject to government-wide requirements to manage agency information electronically,¹⁶ and many agencies have adopted the National Archives and Records Administration (NARA) Capstone program, or similar policies. These systems provide options for searching emails and other electronic records in a manner that is reasonably likely to be more complete than just searching individual custodian files. For example, a custodian may have deleted a responsive email from his or her email program, but your agency's archiving tools may capture that email under Capstone. At the same time, custodian searches are still necessary; agencies may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.

¹⁴ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

¹⁵ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, No. 14-cv-765, slip op. at 8 (D.D.C. Dec. 12, 2016).

¹⁶ Presidential Memorandum—Managing Government Records, 76 Fed. Reg. 75,423 (Nov. 28, 2011), <https://obamawhitehouse.archives.gov/the-press-office/2011/11/28/presidential-memorandum-managing-government-records>; Office of Mgmt. & Budget, Exec. Office of the President, Memorandum for the Heads of Executive Departments & Independent Agencies, “Managing Government Records Directive,” M-12-18 (Aug. 24, 2012), <https://www.archives.gov/files/records-mgmt/m-12-18.pdf>.

- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
- Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Hart Wood at foia@americanoversight.org or 202.873.1743. Also, if American Oversight's request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,



Austin R. Evers
Executive Director
American Oversight

From: From the Acting DNI ODNI (b)(3)
Sent: Friday, March 13, 2020 10:35 AM
To: From the Acting DNI
Subject: External Hiring Pause

Classification: UNCLASSIFIED

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OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE

Colleagues,

Over the past several weeks, I have seen firsthand the professionalism and expertise of the ODNI workforce. I want to thank each of you for the critical work you perform on a daily basis in support of America's national security. As I have told a number of you, I wish all Americans had a better sense of your contributions. They would be impressed and proud.

During my short tenure as Acting Director, my focus will be to make ODNI the most effective organization possible in executing its vital mission. Much great work was done through Transformation in 2018. My predecessors commissioned four thoughtful and thorough studies over the past 24 months that identified opportunities to take the next step in better aligning ODNI's organization and resources to our mission, which is to help the entire Intelligence Community be more effective. Particularly, I would like to focus on ensuring ODNI does not duplicate the work of other IC elements.

Since I assumed the Acting DNI role on February 20, I have led our leadership team in a careful review of these studies – each of which was completed prior to my arrival – with an eye toward implementing key recommendations where possible in my short time here. While this review is underway, I have directed a temporary, short-term pause in external hiring. A similar hiring pause was implemented in 2018 as part of ODNI's first Transformation effort.

Rest assured that this review is not an effort to purge, as some have erroneously suggested, but to ensure that all officers have opportunities to contribute and focus on our ODNI mission. It is our duty to be the best stewards possible of taxpayer dollars.

I look forward to sharing further details with you when the specifics of the review are finalized.

Sincerely,

Ric

Acting Director of National Intelligence

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Classification: UNCLASSIFIED



INTELLIGENCE COMMUNITY POLICY MEMORANDUM 200 (01)

MEMORANDUM FOR: Distribution

SUBJECT: (U//~~FOUO~~) Intelligence Community Standards and Procedures for Revised or Recalled Intelligence Products

REFERENCES:

- A. (U//~~FOUO~~) ODNI Memorandum ES 2005-01963, Intelligence Community Standards and Procedures for Revised or Recalled Intelligence Products, 5 August 2005
- B. (U) National Security Act of 1947, as amended
- C. (U) Executive Order 12333, as amended
- D. (U) Foreign Intelligence and Surveillance Act (FISA) of 1978, as amended

A. (U//~~FOUO~~) **Purpose:** It is incumbent upon the Intelligence Community (IC) to adopt the necessary standards and procedures for preventing the further use or dissemination of intelligence products found to contain incomplete, misleading, false information, or information that is being recalled for a FISA-compliance reason. The Office of the Director of National Intelligence (ODNI) directs all IC elements to revise their internal regulations to implement and adhere to the following procedures for issuing and responding to notices of revised or recalled intelligence products. This Intelligence Community Policy Memorandum incorporates the provisions of and supersedes Reference A.

B. (U) **Policy:**

1. (U//~~FOUO~~) IC elements shall use exclusively the terms *administrative revision*, *substantive revision*, *administrative recall*, *substantive recall*, and *FISA-compliance recall* when issuing notices that previously disseminated intelligence products that have been modified or withdrawn because they subsequently have been found to contain false, misleading, incomplete information, or information that is being recalled for a FISA-compliance reason. IC elements shall no longer use "cancellation," "correction," "burn notice," "reissue," "fabrication notice," or other terms in the subject or title line of such notices.
 - a. (U//~~FOUO~~) *Administrative revision* is used to notify recipients that a modification has been made that does not affect the substance of the original product; e.g., misspellings, typographical errors, additional recipients.
 - b. (U//~~FOUO~~) *Substantive revision* is used to notify recipients that a change has been made that does affect the substance of the original product but does not

SUBJECT: (U//~~FOUO~~) Intelligence Community Standards and Procedures for Revised or Recalled Intelligence Products

invalidate it; e.g., dropped words or sentences, inaccurate paragraphs or comments, minor analytic judgments.

- c. (U//~~FOUO~~) *Administrative recall* is used to notify recipients that a product has been withdrawn due to significant but non-substantive technical, legal, or policy issues (but is not used for a FISA-compliance recall); e.g., compromise of sources and methods, identification of US person, improper classification.
 - d. (U//~~FOUO~~) *Substantive recall* is used to notify recipients that a product has been withdrawn due to significant concerns about the accuracy of the information, the integrity of the source, or the soundness of the analytic judgments.
 - e. (U//~~FOUO~~) *FISA-compliance recall* is used to notify recipients that a product has been recalled specifically for a FISA-compliance reason.
2. (U//~~FOUO~~) The above terms shall appear as the first two words in the subject or title line of all revision or recall notices, followed by as much of the original product's subject or title line as possible or appropriate. A revision or recall notice shall be issued to all recipients of the original product; a separate notice shall be issued for each revised or recalled product. The ODNI shall issue supplemental guidance as required on message and cable formatting standards to clearly distinguish revision and recall notices from other message or cable traffic.
 3. (U//~~FOUO~~) Each revision or recall notice shall reuse the serial or product number of the original product when possible and appropriate. The text of each revision or recall notice shall reference the original date/time group or date of issue, as well as the full subject or title line of the original product. Each revision or recall notice shall state why the product is being revised or recalled and what action is expected or required of the recipients of the notice. A *FISA-compliance recall* notice shall explicitly state the product is being recalled for a FISA-compliance reason and must be removed with steps taken to prevent its further use or disclosure. Each revision or recall notice shall specify a point-of-contact who can provide additional details on why the notice was issued.
 4. (U//~~FOUO~~) To prevent the inadvertent further use or dissemination of false, misleading, or incomplete information, or information that is being recalled for a FISA-compliance reason, each IC element shall revise its internal regulations and procedures to enable it to quickly identify any of its own products that incorporate, repeat, or are based on intelligence products that subsequently have been revised or recalled. Whenever possible, administrative and substantive revision and recall notices should be electronically linked to the original product to facilitate an assessment of the impact of the revision or recall.

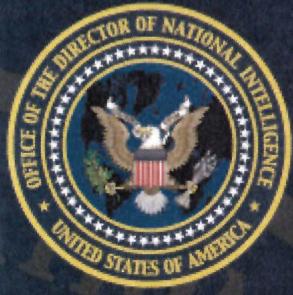
SUBJECT: (U//~~FOUO~~) Intelligence Community Standards and Procedures for Revised or Recalled Intelligence Products

5. (U//~~FOUO~~) Each IC element shall promptly notify recipients of its products as soon as it has determined that a previously issued product contains, cites, or is based on an intelligence product that was subsequently revised or recalled, especially when the revision or recall significantly changes or invalidates the original information or analysis, or contains information recalled for a FISA-compliance reason.
6. (U//~~FOUO~~) Each IC element shall support and contribute to efforts by the ODNI to implement, populate, and keep up-to-date a database that shall serve as the Community's definitive, comprehensive repository of information on revised or recalled intelligence products. Intelligence users and recipients will be able to consult this database to check if a specific intelligence product has been revised or recalled. The ODNI shall issue supplemental guidance as required to support the development and implementation of this Community capability.
7. (U//~~FOUO~~) Each IC element shall designate an individual or entity to be responsible for ensuring that these guidelines are implemented expeditiously and that revision or recall notices are appropriately and promptly issued and acted on.
8. (U//~~FOUO~~) The Deputy Director for Mission Integration (DD/MI) is the accountable official for this policy and shall monitor the IC-wide implementation of these standards and any additional measures deemed necessary to ensure that revised or recalled intelligence products are not further disseminated.



Richard A. Grenell
Acting Director

2/27/20
Date



INTELLIGENCE COMMUNITY POLICY GUIDANCE

704.5

Intelligence Community Personnel Security Database Scattered Castles

A. AUTHORITY: The National Security Act of 1947, as amended; the Counterintelligence Enhancement Act of 2002, as amended; Executive Order (EO) 12333, as amended; EO 12968, as amended; EO 13526; ICD 704, *Personnel Security Standards and Procedures Governing Eligibility for Access to Sensitive Compartmented Information*; and other applicable provisions of law.

B. PURPOSE

1. This Intelligence Community Policy Guidance (ICPG) mandates the recognition and use of the Scattered Castles database, or successor database, as the Intelligence Community's (IC) authoritative personnel security repository for verifying personnel security information for the purposes of, but not limited to, visitor control, clearance reciprocity, and logical access to systems.

2. This Policy Guidance revises ICPG 704.5, *Intelligence Community Personnel Security Database Scattered Castles*, 2 October 2008.

C. APPLICABILITY: This Policy Guidance applies to the IC, as defined by the National Security Act of 1947, as amended, and such other elements of any department or agency as may be designated by the President, or designated jointly by the Director of National Intelligence (DNI), and the head of the department or agency concerned, as an element of the IC, or those government entities designated to determine eligibility for access to Sensitive Compartmented Information (SCI).

D. POLICY

1. Scattered Castles is the program name for the IC security clearance repository for all clearance and access determinations. It serves as the trusted, authoritative personnel security repository for verifying personnel security clearances, access to SCI and other controlled access programs, reciprocity, and documented exceptions to personnel security standards. Scattered Castles is hosted on the Joint Worldwide Intelligence Communication System (JWICS). The Scattered Castles database shall:

- a. Consolidate personnel security data records within the IC;
- b. Include records of all eligibility-for-access determinations to include approvals, denials, revocations, and suspensions;
- c. Include records of all waivers, deviations, or conditions relating to eligibility-for-access determinations;
- d. Serve as a National Agency Check data source to avoid duplicative background investigations, adjudications, and where applicable, polygraph examinations;

e. Include records of all personnel holding current access to SCI and other controlled access programs (CAP), if applicable, with the exception of classes of personnel exempted due to specific mission concerns. In sensitive situations, IC organizations may record specific personnel under pseudonym. In these cases, the source IC organization must maintain internal records containing the true information for such personnel;

f. Include records of all collateral clearances and personnel security background investigations and adjudications granted or conducted by an IC element, to include pending and cancelled investigations or adjudications;

g. Include records of all personnel previously granted a clearance or access to SCI and other controlled access programs, and retain records as follows, unless directed otherwise by the DNI or designee:

(1) For personnel whose clearance has been suspended, denied, or revoked, retain records for 50 years from the date of suspension, denial, or revocation;

(2) All other records shall be retained in accordance with the General Records Schedule, Sec. 5.6, Item 181, or successor records retention guidance.

h. Serve as the primary source for verifying and accepting visit certifications without additional hard copy or electronic documentation from the visitor's parent organization. Where Scattered Castles is not available, hard copy or electronic visit certifications shall continue to be accepted by the organization to be visited.

2. In order to promote IC integration, personnel security clearance reciprocity, and uninterrupted access to the IC Information Environment, IC elements shall ensure all relevant and required information is entered into the Scattered Castles database in a timely manner. In addition, IC elements accepting Second Party Integrees shall refer to DNI policy memorandum ES 2016-00816, *Second Party Integree Access to the Intelligence Community Information Environment*.

3. The Scattered Castles database shall serve as the primary source for security clearance and access verifications. In order to facilitate hiring actions and personnel mobility across the IC, IC elements may grant human resources professionals or other personnel, as appropriate, access to Scattered Castles.

4. The Scattered Castles Executive Steering Group (SCESG), comprised of representatives from each IC element, shall be responsible for determining database requirements and access management to include identifying required data fields.

E. ROLES AND RESPONSIBILITIES

1. The Director, National Counterintelligence and Security Center (NCSC) shall:

a. Collaborate with the Department of Defense (DoD) and the Office of Personnel Management (OPM) to ensure personnel security information contained in the *Joint Personnel Adjudication System* (JPAS) within DoD and the *Central Verification System* (CVS) within OPM, or successor databases, is also entered into the Scattered Castles database.

b. Oversee, operate, and maintain the Scattered Castles database in collaboration with the SCESG;

c. Chair the SCESG; and

d. Collaborate with the ODNI Special Programs Division to ensure timely and updated inventory of IC CAPs and ensure agencies provide Scattered Castles CAP information in accordance with ICD 704.

2. The Assistant DNI for Information and Data shall provide NCSC with the *Access Value List* with the most recent SCI and other IC CAP inventory to be recorded in Scattered Castles, consistent with ICD 906, *Controlled Access Programs*.

3. Heads of IC elements shall:

a. Designate representatives with the appropriate levels of personnel security expertise to the SCESG;

b. Identify security points-of-contact, access managers, technical representatives, and data load points-of-contact;

c. Ensure all Scattered Castles data is accurate, valid, appropriately classified, and submitted weekly to the Scattered Castles database, at a minimum, to include briefings, debriefings, and temporary (interim) clearances;

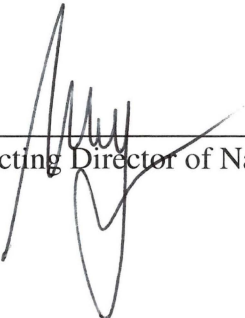
d. Record all clearance denials, revocations, suspensions, and reciprocity inquiries within 24 hours of the decision;

e. Populate the Scattered Castles database and retain relevant and comprehensive personnel security information in compliance with record retention requirements identified in this ICPG; and

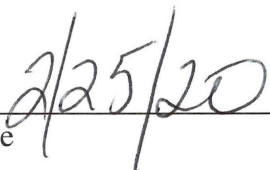
f. Update the Scattered Castles database regarding granted crossover clearances and access approvals.

g. Grant access to the Scattered Castles database, as appropriate.

F. EFFECTIVE DATE: This Policy Guidance becomes effective on the date of signature.



Acting Director of National Intelligence



Date