



U.S. Citizenship
and Immigration
Services

Supplemental Guidance:

Revision of Responsibilities for CARRP Cases Involving Known or Suspected Terrorists

A. KST Hits

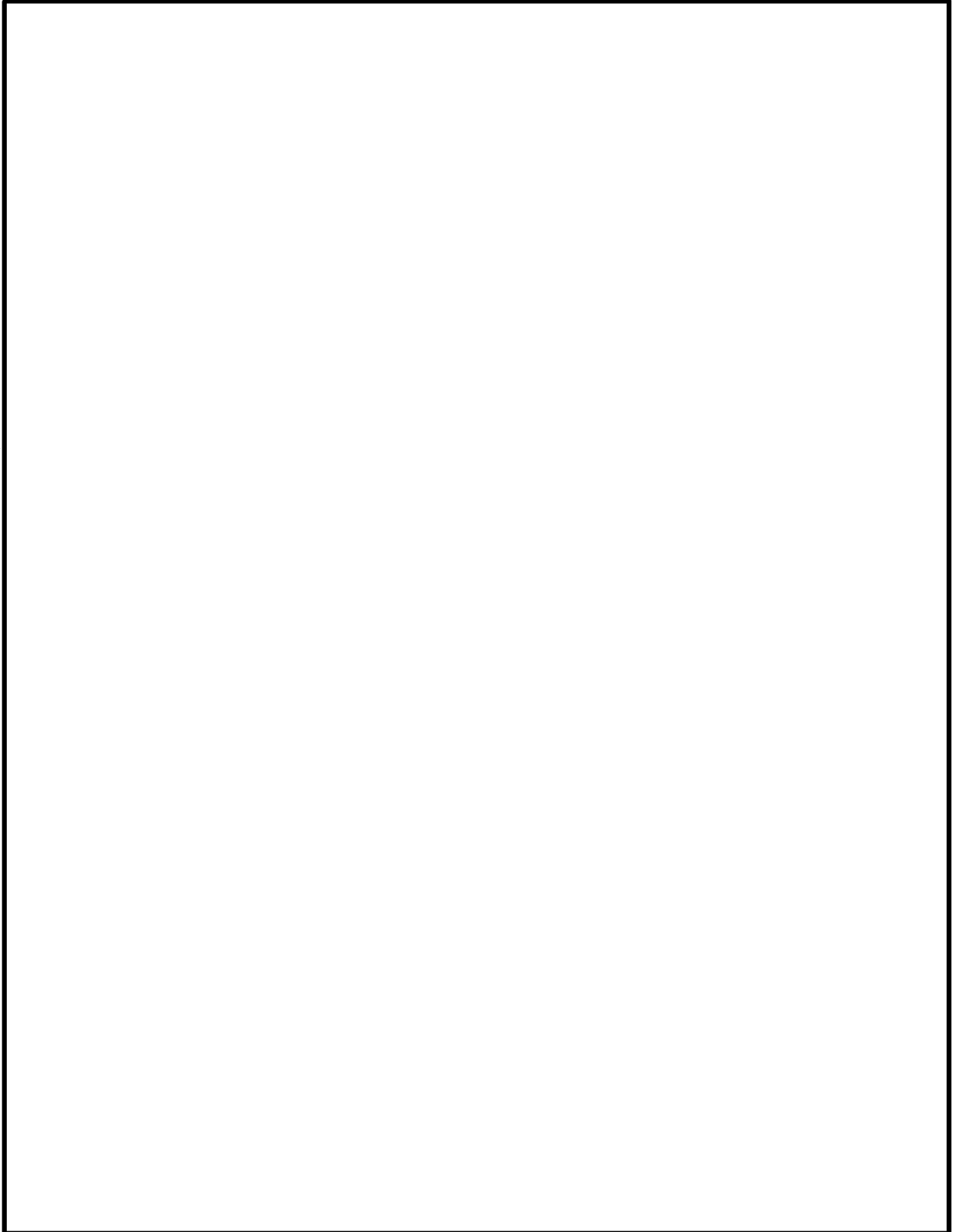
HQFDNS has issued a policy memo directing that external vetting for KSTs should now be done by local Field Offices and Service Centers. These questions and answers serve as supplemental guidance to clarify the requirements of the new CARRP policy, and answer questions raised during the drafting phase of the policy.

CARRP procedures and requirements outlined in existing policy and operational guidance (provided by various HQ directorates) remain the same, other than those specified in the attached policy memorandum. Also, this revised policy does not replace existing protocols, work flow process and procedures, or delineated roles and responsibilities of USCIS officers currently processing CARRP cases. (b)(7)(e)

1. Who will conduct external vetting of KST cases?

(b)(7)(e)

3. What is the difference between KST and Non-KST external vetting?



7. How should the KST cases be elevated to respective HQ directorate?

8. What will happen to the existing Request for Assistance (RFA) process?

9. Can the field contact the record owner who is a member of the Intelligence Committee?

¹ These KSTs are generally nominated by certain members of Intelligence Community for which a POC is not available.

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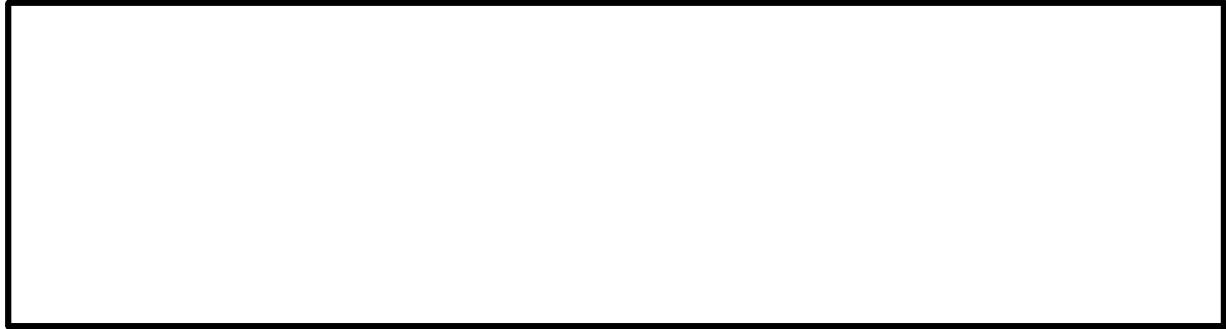
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PM-602-0042: Revision of Responsibilities for CARRP Cases Involving Known or Suspected Terrorists
Page 2

(b)(7)(e)



Policy

The field is now authorized to contact the record owner or nominating agency to vet and deconflict NS concerns involving KSTs. The field, however, is not authorized to approve applications or petitions with confirmed KST NS concerns; that authority continues to rest with the senior leadership of this Agency.

In addition, if, after completing the vetting and deconfliction process in KST cases, there continue to be national security concerns, and there is insufficient evidence or other grounds to deny the application, offices are to seek further guidance from their respective HQ Directorate, in consultation with local and HQ counsel when appropriate. HQFDNS will no longer provide adjudicative assistance. HQFDNS will, however, remain available to provide vetting assistance, including the identification of the record owner and the resolution of issues involving record owners.

Implementation

As a result of this delegation of authority, the nature of assistance requested from HQFDNS is limited to those outlined below. Following the initial eligibility assessment and internal vetting, if no ineligibility grounds are identified, the field will conduct external vetting³. Upon obtaining local management approval, the field may e-mail a Request for Assistance (RFA) to HQFDNS (FDNS-NSB@dhs.gov) under the following circumstances:

- To identify the NS record owner of the KST nominating entity;
 - HQFDNS will identify a POC. The field must then contact the POC for external vetting and deconfliction.
 - If HQFDNS is unable to identify a POC⁴, HQFDNS will conduct external vetting and deconfliction.
- To seek assistance in contacting or resolving issues with the record holder; and
- To conduct queries of classified systems⁵.

Except as noted in this memo, all current CARRP guidance provided by various Directorates remains in effect.

³ External vetting must be conducted if no ineligibility grounds have been identified or if Field Management determines further processing is necessary to strengthen or support a decision. KST external vetting is to be conducted by officers who are currently conducting external vetting of Non-KST cases.

⁴ These KSTs are generally nominated by certain members of Intelligence Community for which a POC is not available.

⁵ Classified High Side checks must not be requested routinely. Rather, the field must articulate a need for such checks. For example, where the nominating agency is either a foreign entity or a member of Intelligence Community (other than the FBI) and additional information cannot be obtained through the local JTTF.

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Use

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Contact Information

Questions or suggestions regarding this PM should be addressed through appropriate channels to HQFDNS.