

[redacted] OGC (FBI)

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From: [redacted] (OI) (OGA)

Sent: Friday, March 25, 2005 9:38 AM

To: [redacted] (OGC) (FBI); [redacted] (OI) (FBI)

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Subject: RE: IDW EC

UNCLASSIFIED
NON-RECORD

[redacted] what do the minutes say?

-----Original Message-----

From: [redacted] OGC (FBI)

Sent: Friday, March 25, 2005 9:37 AM

To: [redacted] (OI) (OGA); [redacted] (OI) (FBI)

Subject: RE: IDW EC

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UNCLASSIFIED
NON-RECORD

It should be done next week. It doesn't look like your draft EC addresses the collaboration index. Are you taking that off the table right now? Should I leave it out of this PIA?

-----Original Message-----

From: [redacted] (OI) (OGA)

Sent: Friday, March 25, 2005 9:22 AM

To: [redacted] (OGC) (FBI)

Cc: [redacted] (OI) (FBI)

Subject: RE: IDW EC

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DATE 08-27-2007 BY 65179 DMH/BJA/CAL

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UNCLASSIFIED
NON-RECORD

How long will the PIA take? Delay has operational impact.

-----Original Message-----

From: [redacted] (OGC) (FBI)

Sent: Thursday, March 24, 2005 1:24 PM

To: [redacted] (OI) (FBI); [redacted] (OI) (CON); [redacted]

[redacted] (CD) (FBI); [redacted] (OGC) (FBI); [redacted]

[redacted] (SecD) (CON); [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted]

[redacted] (OIPP) (FBI); [redacted] (RMD) (FBI); [redacted] (OI) (FBI); GRIGG,

G. CLAYTON (CTD) (FBI); [redacted] (ITSD) (FBI); HALL, DEAN E. (OIPM) (FBI);

[redacted] (OGC) (FBI); [redacted] (OGC) (FBI); LAUGHLIN, LAURA M. (SE

(FBI); [redacted] (SecD) (FBI); [redacted] (OGC) (FBI); [redacted]

[redacted] (OGC) (FBI); [redacted] (OI) (FBI); [redacted] (RMD) (FBI);

[redacted] (RMD) (FBI); [redacted] (SecD) (OGA); [redacted]

[redacted] (OGC) (FBI); [redacted] (OI) (FBI); RITCHHART, KENNETH MICHAEL (ITSD)

(FBI); [redacted] (OI) (FBI); [redacted] (CyD) (FBI); [redacted]

[redacted] (OI) (CON); [redacted] (SecD) (FBI); [redacted] (OI) (FBI);

SOLOMON, JONATHAN I. (DO) (FBI); [redacted] (ITSD) (FBI); VAN DUYN,

DONALD N. (CTD) (FBI); TANNER, MARK A. (DO) (FBI)

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b7c

Subject: RE: IDW EC

**UNCLASSIFIED
NON-RECORD**

I am still writing up the PIA for these data sets. Although I don't anticipate any show stoppers, we need to complete the PIA before this EC can be finalized. One issue that will be included in the PIA is that the data from [redacted] has certain restrictions on use as contained in the MOU with DHS. Those restrictions carry over to use of the data in IDW. I've already provided Gervis with a copy of the MOU. b2 b7E

-----Original Message-----

From: [redacted] (OI) (FBI)
Sent: Thursday, March 24, 2005 12:47 PM
To: [redacted] (OI) (CON); [redacted] (CD) (FBI); [redacted] (OGC) (FBI); [redacted] (SecD) (CON); [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (OI) (FBI); [redacted] (OIPP) (FBI); [redacted] (RMD) (FBI); [redacted] (OI) (FBI); GRIGG, G. CLAYTON (CTD) (FBI); [redacted] (ITSD) (FBI); [redacted] (OGC) (FBI); HALL, DEAN E. (OIPM) (FBI); [redacted] (OGC) (FBI); LAUGHLIN, LAURA M. (SE) (FBI); [redacted] (SecD) (FBI); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); [redacted] (RMD) (FBI); OCLAIR, DEBRA A (RMD) (FBI); [redacted] (SecD) (OGA); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); RITCHHART, KENNETH MICHAEL (ITSD) (FBI); [redacted] (OI) (FBI); [redacted] (CyD) (FBI); [redacted] (OI) (CON); [redacted] (SecD) (FBI); [redacted] (OI) (FBI); SOLOMON, JONATHAN I. (DO) (FBI); [redacted] (ITSD) (FBI); VAN DUYN, DONALD N. (CTD) (FBI)
Subject: FW: IDW EC

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**UNCLASSIFIED
NON-RECORD**

Attached please find the draft EC for additional, authorized IDW data sets as approved at the 15 February ISPG.

v [redacted]

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-----Original Message-----

From: [redacted] (OI) (FBI)
Sent: Thursday, March 24, 2005 12:41 PM
To: [redacted] (OI) (FBI)
Cc: [redacted] (OI) (FBI)
Subject: IDW EC

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**UNCLASSIFIED
NON-RECORD**

As we discussed...

Thank [redacted]

[redacted]

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[Redacted] OGC) (FBI)

From: [Redacted] (OIPP) (FBI) b6
Sent: Friday, March 25, 2005 9:59 AM b7C
To: [Redacted] OGC) (FBI)
Cc: [Redacted] (SecD) (CON); [Redacted] (SecD) (FBI)
Subject: RE: IDW EC

UNCLASSIFIED
NON-RECORD

I see you go by [Redacted] My apologies for not getting that straight.

I believe your views are consistent with ours, and I agree with your insight regarding when in the development process such policy should be applied.

I will review the PIA's and likely will want to meet with you for more details. I'd like to discuss this issue with my colleagues first, however.

Thank you again, ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 08-27-2007 BY 65179 DMH/BJA/CAL

[Redacted]

-----Original Message-----

From: [Redacted] (OGC) (FBI) b6
Sent: Friday, March 25, 2005 9:50 AM b7C
To: [Redacted] OIPP) (FBI)
Cc: [Redacted] (SecD) (CON); [Redacted] (SecD) (FBI)
Subject: RE: IDW EC

UNCLASSIFIED
NON-RECORD

[Redacted] The idea behind doing a PIA is that privacy policy as well as legal issues regarding privacy can be assessed as the project is being developed. If issues are identified, then there can be discussions about the best way to mitigate those privacy concerns during the planning and development stages instead of waiting until the system is completed - and therefore, harder to change. If the you read the MIOG sections on the PIA it gives you a pretty good idea of why we do them and what we hope to accomplish. As to your last sentence, "what affect the PIA's might have on the underlying information technology" I think that privacy considerations must be a part of the IT structure. For example, developing role based access to limit access to sensitive information to only certain people who have a need to know. The privacy consideration directs the IT structure. I've attached a copy of the PIAs that were done for IDW and the IDW data mart so that you can see what one typically looks like.

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If the CIOs office is developing any checklists for projects, the PIA should be on the list. It is FBI policy but is also required for certain systems by section 208 of the E-Government Act. I'm happy to meet with you if you want to discuss all/any of this. Thanks!

[Redacted]

-----Original Message-----

From: [Redacted] OIPP) (FBI)
Sent: Friday, March 25, 2005 9:28 AM
To: [Redacted] OGC) (FBI) b6
b7C

Cc: [redacted] (SecD) (CON) [redacted] (SecD) (FBI)
Subject: RE: IDW EC

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[redacted]

Mark provided me with the MOU's. Now, I would like to request copies of the PIA's to which you referred. The reason for this request is to emphasize the importance of privacy issues that do not seem to be stressed as much as security issues when determining policy and rules of engagement that impact information technology. We are studying ways to allow information sharing, but at the same time assuring that information confidentiality, integrity and availability concerns are met. These considerations are often framed in the context of national security, but I would think that we have an equal obligation to protect the privacy and civil rights of our citizens. Thus, we need to know what affect of the PIA's might have on the underlying information technology.

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Thank you,

[redacted]
OCIO/OIPP/EAU
202 [redacted]

b2

-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Thursday, March 24, 2005 2:13 PM
To: [redacted] (OIPP) (FBI); TANNER, MARK A. (DO)(FBI)
Subject: RE: IDW EC

UNCLASSIFIED
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A PIA is a Privacy Impact Assessment. See MIOG, part II, section 16-21 through 16-21.6. I only mentioned one MOU and that is one that we have with DHS that covers sharing information from [redacted]. The data currently comes in from DHS to FTTF. Mark - do you have an electronic version of the final DHS MOU that you can send [redacted]. Or does someone in the OCIO already have a copy that [redacted] can get?

-----Original Message-----

From: [redacted] (OIPP) (FBI)
Sent: Thursday, March 24, 2005 1:38 PM
To: [redacted] (OGC) (FBI)
Subject: RE: IDW EC

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UNCLASSIFIED
NON-RECORD

[redacted]

For my edification, what is a PIA?
Are the MOU's you mentioned available to the Enterprise Architecture Unit of OIPP/OCIO?
Thank you,

[redacted]
OCIO/OIPP/EAU
202 [redacted]

-----Original Message-----

From: [redacted] (OGC) (FBI)

Sent: Thursday, March 24, 2005 1:24 PM

To [redacted] (OI) (FBI); [redacted] (OI) (CON);
 [redacted] (CD) (FBI); [redacted] (OGC) (FBI);
 [redacted] (SecD) (CON); [redacted] (OI)(FBI);
 [redacted] (OI) (OGA); [redacted] (OIPP) (FBI);
 [redacted] (RMD)(FBI); [redacted] (OI) (FBI); GRIGG, G.
 CLAYTON (CTD) (FBI); [redacted] (ITSD)(FBI); HALL, DEAN E.
 (OIPM) (FBI); [redacted] (OGC)(FBI); [redacted] (OGC) (FBI);
 LAUGHLIN, LAURA M. (SE) (FBI); [redacted] (SecD) (FBI);
 [redacted] (OGC) (FBI); [redacted] (OGC) (FBI);
 [redacted] (OI) (FBI); [redacted] (RMD)(FBI);
 (RMD) (FBI); [redacted] (SecD) (OGA); [redacted] (OGC)
 (FBI); [redacted] (OI) (FBI); RITCHHART, KENNETH MICHAEL
 (ITSD)(FBI); [redacted] (OI) (FBI); [redacted] (CyD) (FBI);
 [redacted] (OI) (CON); [redacted] (SecD) (FBI);
 [redacted] (OI) (FBI); SOLOMON, JONATHAN I. (DO) (FBI);
 [redacted] (ITSD) (FBI); VAN DUYN, DONALD N. (CTD) (FBI); TANNER,
 MARK A. (DO)(FBI)

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Subject: RE: IDW EC

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I am still writing up the PIA for these data sets. Although I don't anticipate any show stoppers, we need to complete the PIA before this EC can be finalized. One issue that will be included in the PIA is that the data from [redacted] and [redacted] has certain restrictions on use as contained in the MOU with DHS. Those restrictions carry over to use of the data in IDW. I've already provided Gervis with a copy of the MOU.

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-----Original Message-----

From [redacted] (OI) (FBI)
 Sent: Thursday, March 24, 2005 12:47 PM
 To [redacted] (OI) (CON); [redacted] (CD)
 (FBI); [redacted] (OGC) (FBI);
 (SecD) (CON); [redacted] (OI)(FBI); [redacted] (OI)
 (OGA); [redacted] (OI) (FBI); [redacted] (OIPP)
 (FBI); [redacted] (RMD)(FBI); [redacted] (OI)
 (FBI); GRIGG, G. CLAYTON (CTD) (FBI); [redacted] (ITSD)
 (FBI); [redacted] (OGC) (FBI); HALL, DEAN E. (OIPM) (FBI);
 [redacted] (OGC)(FBI); [redacted] (OGC) (FBI);
 LAUGHLIN, LAURA M. (SE) (FBI); [redacted] (SecD) (FBI);
 [redacted] (OGC) (FBI); [redacted] (OGC) (FBI);
 [redacted] (OI) (FBI); [redacted] (RMD)(FBI);
 [redacted] (RMD) (FBI); [redacted] (SecD) (OGA);
 [redacted] (OGC) (FBI); [redacted] (OI) (FBI);
 RITCHHART, KENNETH MICHAEL (ITSD)(FBI); [redacted]
 (OI) (FBI); [redacted] (CyD) (FBI); [redacted] (OI)
 (CON); [redacted] (SecD) (FBI); [redacted]
 (OI) (FBI); SOLOMON, JONATHAN I. (DO) (FBI); [redacted]
 (ITSD) (FBI); VAN DUYN, DONALD N. (CTD) (FBI)

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Subject: FW: IDW EC

UNCLASSIFIED
NON-RECORD

Attached please find the draft EC for additional, authorized IDW data sets as approved at the 15 February ISPG.

v [redacted]

-----Original Message-----

From: [redacted] (OI) (FBI)
Sent: Thursday, March 24, 2005 12:41 PM
To: [redacted] (OI) (FBI)
Cc: [redacted] (OI) (FBI)
Subject: IDW EC

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UNCLASSIFIED
NON-RECORD

As we discussed...

Thanks [redacted]

[redacted]

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UNCLASSIFIED

11/6/2006

[redacted] (OGC) (FBI)

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From: [redacted] OGC) (FBI)

Sent: Tuesday, May 31, 2005 8:55 AM

To: [redacted] (OI) (FBI); [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (OI/CON); GUILLOTTA, MARGARET R. (OI) (FBI); [redacted] (OI) (CON); [redacted] (CD) (FBI); BOWMAN, MARION E. (OI) (FBI); [redacted] (SecD) (CON); [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (ITOD) (FBI); [redacted] (OIPP) (FBI); [redacted] (RMD) (FBI); GRIGG, G. CLAYTON (CTD) (FBI); [redacted] (ITSD) (FBI); [redacted] (OGC) (FBI); HALL, DEAN E. (OIPM) (FBI); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); [redacted] (OGC) (FBI); [redacted] (ITOD) (FBI); [redacted] (OGC) (FBI); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); [redacted] (RMD) (FBI); [redacted] (RMD) (FBI); [redacted] (SecD) (OGA); [redacted] (OI) (CON); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); RITCHHART, KENNETH (ITSD) (FBI); [redacted] (OI) (FBI); [redacted] (CyD) (FBI); [redacted] (OI) (CON); [redacted] (SecD) (FBI); SOLOMON, JONATHAN I. (DO) (FBI); [redacted] (ITSD) (FBI); VAN DUYN, DONALD N. (CTD) (FBI); [redacted] (ITSD) (FBI)

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Subject: RE: IDW Dataset EC

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[redacted]

(1) I have not seen the IDW PIAs and I will reach out to ALU to get a copy. I need to review that and then I'll give you more comments b/c some of my concerns may be addressed in that document. Some of the records contained in these data sets (eg [redacted]) are subject to special handling restrictions but these may be addressed in the IDW PIA and/or in the guidance RMD will issue.

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Is there a draft of the RMD guidance available for review now?

(2) I believe in par. 6, the file numbers should be "265" rather than "295."

(3) In the last paragraph on p. 2, the EC states that the data sources are currently "owned and licensed by CTD." What do you mean by this? The DHS files are being shared pursuant to an MOU with DHS and the purpose was not limited to CTD work. From a legal perspective, I don't believe these data sets are owned and licensed by CTD but perhaps you could explain to me what you are trying to express.

Thanks.

vpc

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DATE 08-27-2007 BY 65179 DMH/BJA/CAL

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[redacted]
Assistant General Counsel
Policy & Training Unit
National Security Law Branch
(202) [redacted]

b2

-----Original Message-----

From: [redacted] (OI) (FBI)

Sent: Friday, May 27, 2005 7:53 AM

To: [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (OI) (CON); GUILLOTTA, MARGARET R. (OI) (FBI); [redacted] (OI) (CON); [redacted] (CD) (FBI); BOWMAN, MARION E. (OI) (FBI); [redacted] (OGC) (FBI); [redacted] (SecD) (CON); [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (ITOD)

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(FBI) [redacted] (OIPP) (FBI); [redacted] (RMD)(FBI); GRIGG, G. CLAYTON (CTD)
 (FBI) [redacted] (ITSD)(FBI) [redacted] (OGC) (FBI); HALL, DEAN E. (OIPM) (FBI);
 [redacted] (OGC)(FBI); [redacted] (OI) (FBI); [redacted] (OGC) (FBI);
 [redacted] (ITOD)(FBI) [redacted] (OGC) (FBI); [redacted] (OGC)
 (FBI); [redacted] (OI) (FBI) [redacted] (RMD)(FBI); [redacted] (RMD) (FBI);
 [redacted] (SecD) (OGA) [redacted] (OI) (CON); [redacted] (OGC)
 (FBI) [redacted] (OI) (FBI); RITCHHART, KENNETH MICHAEL (ITSD)(FBI);
 [redacted] (OI) (FBI); [redacted] (CyD) (FBI); [redacted] (OI) (CON); [redacted]
 [redacted] (SecD) (FBI); SOLOMON, JONATHAN I. (DO) (FBI) [redacted] (ITSD) (FBI); VAN DUYN,
 DONALD N. (CTD) (FBI) [redacted] (ITSD)(FBI)
Subject: IDW Dataset EC

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UNCLASSIFIED
NON-RECORD

All,

Please find attached the IDW data set EC for your review. Please send changes/comments to me and I will incorporate appropriately.

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SSA [redacted]
Directorate of Intelligence
Intelligence Issues Group
202-324-[redacted]

b2

UNCLASSIFIED

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[redacted] (OGC) (FBI)

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b7C

From: GRIGG, G. CLAYTON (CTD) (FBI)

Sent: Monday, March 28, 2005 10:46 AM

To: [redacted] (OI) (FBI); [redacted] (OGC) (FBI)

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Cc: [redacted] (OI) (FBI); [redacted] (OI) (FBI)

Subject: RE: IDW EC

UNCLASSIFIED
NON-RECORD

Thanks for the update. We will stand by...

-----Original Message-----

From: [redacted] (OI) (FBI)

Sent: Thursday, March 24, 2005 3:00 PM

To: [redacted] (OGC) (FBI)

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b7C

Cc: [redacted] (OI) (FBI); GRIGG, G. CLAYTON (CTD) (FBI); [redacted] (OI) (FBI)

Subject: RE: IDW EC

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DATE 08-27-2007 BY 65179 DMH/BJA/CAL

[redacted]

Absolutely...this can go on pause... It seemed to me in the course of discussion it was reported that the PIA for sharing [redacted] and [redacted] data had been completed and approved...mostly because [redacted] had been reluctant to even consider them in the ISPG discussion without the PIA... My mistake... I guess it was the MOU that was approved.

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I think that this and other comments from the DACT membership may be helpful while we wait on the PIA.

What additional language in the DRAFT EC do you think would be required to capture the restrictions on use as contained in the MOU with DHS? I do not believe we have a copy of the MOU.

v [redacted]

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-----Original Message-----

From: [redacted] (OGC) (FBI)

Sent: Thursday, March 24, 2005 1:24 PM

To: [redacted] (OI) (FBI); [redacted] (OI) (CON); [redacted] (CD) (FBI); [redacted] (OGC) (FBI); [redacted] (SecD) (CON);

[redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (OIPP) (FBI);

[redacted] (RMD) (FBI); [redacted] (OI) (FBI); GRIGG, G. CLAYTON (CTD)

(FBI); [redacted] (ITSD) (FBI); HALL, DEAN E. (OIPM) (FBI); [redacted] (OGC)

(FBI); [redacted] (OGC) (FBI); LAUGHLIN, LAURA M. (SE) (FBI); [redacted]

(SecD) (FBI); [redacted] (OGC) (FBI); [redacted] (OGC) (FBI); [redacted]

[redacted] (OI) (FBI); [redacted] (RMD) (FBI); [redacted] (RMD) (FBI); [redacted]

[redacted] (SecD) (OGA); [redacted] (OGC) (FBI); [redacted] (OI) (FBI);

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RITCHHART, KENNETH MICHAEL (ITSD)(FBI); [redacted] (OI) (FBI) [redacted]
 (CyD) (FBI); [redacted] (OI) (CON); [redacted] (SecD) (FBI); [redacted]
 [redacted] (OI) (FBI); SOLOMON, JONATHAN I. (DO) (FBI); [redacted] (ITSD) (FBI);
 VAN DUYN, DONALD N. (CTD) (FBI); TANNER, MARK A. (DO)(FBI)
Subject: RE: IDW EC

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I am still writing up the PIA for these data sets. Although I don't anticipate any show stoppers, we need to complete the PIA before this EC can be finalized. One issue that will be included in the PIA is that the data from [redacted] and [redacted] has certain restrictions on use as contained in the MOU with DHS. Those restrictions carry over to use of the data in IDW. I've already provided Gervis with a copy of the MOU.

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-----Original Message-----

From: [redacted] (OI) (FBI)
Sent: Thursday, March 24, 2005 12:47 PM
To: [redacted] (OI) (CON); [redacted] (CD) (FBI); [redacted]
 [redacted] (OGC) (FBI); [redacted] (SecD) (CON); [redacted] (OI)
 (FBI); [redacted] (OI) (OGA); [redacted] (OI) (FBI); [redacted]
 (OIPP) (FBI); [redacted] (RMD)(FBI); [redacted] (OI) (FBI); GRIGG, G.
 CLAYTON (CTD) (FBI); [redacted] (ITSD)(FBI); [redacted] (OGC) (FBI);
 HALL, DEAN E. (OIPM) (FBI); [redacted] (OGC)(FBI); [redacted] (OGC)
 (FBI); LAUGHLIN, LAURA M. (SE) (FBI); [redacted] (SecD) (FBI); [redacted]
 [redacted] (OGC) (FBI); [redacted] (OGC) (FBI); [redacted] (OI) (FBI);
 [redacted] (RMD)(FBI); [redacted] (RMD) (FBI); [redacted] (SecD)
 (OGA); [redacted] (OGC) (FBI); [redacted] (OI) (FBI);
 RITCHHART, KENNETH MICHAEL (ITSD)(FBI); [redacted] (OI) (FBI); [redacted]
 [redacted] (CyD) (FBI); [redacted] (OI) (CON); [redacted] (SecD) (FBI);
 [redacted] (OI) (FBI); SOLOMON, JONATHAN I. (DO) (FBI); [redacted]
 [redacted] (ITSD) (FBI); VAN DUYN, DONALD N. (CTD) (FBI)
Subject: FW: IDW EC

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Attached please find the draft EC for additional, authorized IDW data sets as approved at the 15 February ISPG.

vr [redacted]

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-----Original Message-----

From: [redacted] (OI) (FBI)
Sent: Thursday, March 24, 2005 12:41 PM
To: [redacted] (OI) (FBI)
Cc: [redacted] (OI) (FBI)
Subject: IDW EC

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As we discussed...

Thanks [redacted]



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[redacted] (OGC) (FBI)

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From: [redacted] (OGC) (FBI)

Sent: Tuesday, May 31, 2005 9:04 AM

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b7c

To: [redacted] (OGC) (FBI)

Cc: [redacted] (OGC) (FBI); [redacted] (OGC)(FBI); [redacted] (OGC)

Subject: RE: IDW Dataset EC

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DATE 08-27-2007 BY 65179 DMH/BJA/CAL

IDW PIAs attached.

-----Original Message-----

From: [redacted] (OGC) (FBI)

Sent: Tuesday, May 31, 2005 8:55 AM

To: [redacted] (OI) (FBI); [redacted] (OI) (FBI); [redacted] (OI) (OGA);
[redacted] (OI) (CON); GULOTTA, MARGARET R. (OI) (FBI); [redacted] (OI) (CON);
[redacted] (CD) (FBI); BOWMAN, MARION E. (OI) (FBI); [redacted] (SecD) (CON);
[redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (ITOD) (FBI); [redacted]
[redacted] (OIPP) (FBI); [redacted] L.(RMD)(FBI); GRIGG, G. CLAYTON (CTD) (FBI); [redacted]
(ITSD)(FBI); [redacted] (OGC) (FBI); HALL, DEAN E. (OIPM) (FBI); [redacted] (OGC)(FBI);
[redacted] (OI) (FBI); [redacted] (OGC) (FBI); [redacted] (ITOD)(FBI);
[redacted] (OGC) (FBI); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); [redacted]
[redacted] (RMD)(FBI); [redacted] (RMD) (FBI); [redacted] (SecD) (OGA); [redacted]
[redacted] (OI) (CON); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); RITCHHART,
KENNETH MICHAEL (ITSD)(FBI); [redacted] (OI) (FBI); [redacted] (CyD) (FBI); [redacted]
[redacted] (DI) (CON); [redacted] (SecD) (FBI); SOLOMON, JONATHAN I. (DO) (FBI); [redacted]
F. (ITSD) (FBI); VAN DUYN, DONALD N. (CTD) (FBI); [redacted] (ITSD)(FBI)

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Subject: RE: IDW Dataset EC

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Liz,

(1) I have not seen the IDW PIAs and I will reach out to ALU to get a copy. I need to review that and then I'll give you more comments b/c some of my concerns may be addressed in that document. Some of the records contained in these data sets (eg [redacted]) are subject to special handling restrictions but these may be addressed in the IDW PIA and/or in the guidance RMD will issue.

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Is there a draft of the RMD guidance available for review now?

(2) I believe in par. 6, the file numbers should be "265" rather than "295."

(3) In the last paragraph on p. 2, the EC states that the data sources are currently "owned and licensed by CTD." What do you mean by this? The DHS files are being shared pursuant to an MOU with DHS and the purpose was not limited to CTD work. From a legal perspective, I don't believe these data sets are owned and licensed by CTD but perhaps you could explain to me what you are trying to express.

Thanks.

vpc

[redacted]
Assistant General Counsel
Policy & Training Unit
National Security Law Branch

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(202 [redacted])

b2

-----Original Message-----

From: [redacted] (OI) (FBI)
Sent: Friday, May 27, 2005 7:53 AM
To: [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (OI) (CON);
 GULOTTA, MARGARET R. (OI) (FBI); [redacted] (OI) (CON); [redacted] (CD)
 (FBI); BOWMAN, MARION E. (OI) (FBI); [redacted] (OGC) (FBI); [redacted]
 (SecD) (CON); [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (ITOD)
 (FBI); [redacted] (OIPP) (FBI); [redacted] (RMD) (FBI); GRIGG, G. CLAYTON (CTD)
 (FBI); [redacted] (ITSD) (FBI); [redacted] (OGC) (FBI); HALL, DEAN E. (OIPM) (FBI);
 [redacted] (OGC) (FBI); [redacted] (OI) (FBI); [redacted] (OGC) (FBI);
 [redacted] (ITOD) (FBI); [redacted] (OGC) (FBI); [redacted] (OGC)
 (FBI); [redacted] (OI) (FBI); [redacted] (RMD) (FBI); [redacted] (RMD) (FBI);
 [redacted] (SecD) (OGA); [redacted] (OI) (CON); [redacted] (OGC)
 (FBI); [redacted] (OI) (FBI); RITCHHART, KENNETH MICHAEL (ITSD) (FBI); [redacted]
 [redacted] (OI) (FBI); [redacted] (CyD) (FBI); [redacted] (OI) (CON); [redacted]
 [redacted] (SecD) (FBI); SOLOMON, JONATHAN I. (DO) (FBI); [redacted] (ITSD) (FBI); VAN DUYN,
 DONALD N. (CTD) (FBI); [redacted] (ITSD) (FBI)
Subject: IDW Dataset EC

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All,

Please find attached the IDW data set EC for your review. Please send changes/comments to me and I will incorporate appropriately.

SSA [redacted]
 Directorate of Intelligence
 Intelligence Issues Group
 202-324 [redacted]

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[redacted] (OGC) (FBI)

From: [redacted] (OGC) (FBI)
Sent: Tuesday, June 07, 2005 9:33 AM
To: [redacted] (OI) (FBI)
Cc: [redacted] (OGC) (FBI); [redacted] (OGC) (FBI); [redacted] (RMD) (FBI); [redacted] (RMD) (FBI)
Subject: RE: IDW Dataset EC

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[redacted] - my comments are as follows:

1. Page 2 - statement that data sources are "owned and licensed" by CTD. I'm not sure what that means but I'm particularly troubled by the "licensed" language. I don't know of any licensing involved with the data.

2. Somewhere I think the EC needs to state that restrictions on the data must be maintained. For example, the [redacted] MOU contains restrictions on the FBI's use of the data. Our PIA provided that such restrictions must be maintained. I think that would be a useful thing to put in this EC as well.

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3. Suggest that the last paragraph be reworded to indicate a collaborative process involving RMD, the DACT, OGC and the substantive units. RMD will need input from the DACT, OGC and the users in order to develop this policy. Suggest something like:

"The DACT will continue to work with RMD, OGC and the substantive units to develop appropriate policy regarding records retention and use."

-----Original Message-----

From: [redacted] A. (OI) (FBI)
Sent: Friday, May 27, 2005 7:53 AM
To: [redacted] (OI) (FBI); [redacted] (OI) (OGA); [redacted] (OI)(CON); GULOTTA, MARGARET R. (OI) (FBI); [redacted] (OI) (CON); [redacted] (CD) (FBI); BOWMAN, MARION E. (OI) (FBI); [redacted] (OGC) (FBI); [redacted] (SecD) (CON); [redacted] (OI)(FBI); [redacted] (OI) (OGA); [redacted] (ITOD) (FBI); [redacted] (OIPP) (FBI); [redacted] (RMD)(FBI); GRIGG, G. CLAYTON (CTD) (FBI); [redacted] (ITSD)(FBI); [redacted] (OGC) (FBI); HALL, DEAN E. (OIPM) (FBI); [redacted] (OGC)(FBI); [redacted] (OI) (FBI); [redacted] (OGC) (FBI); [redacted] (ITOD)(FBI); [redacted] (OGC) (FBI); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); [redacted] (RMD)(FBI); [redacted] (RMD) (FBI); [redacted] (SecD) (OGA); [redacted] (OI) (CON); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); RITCHHART, KENNETH MICHAEL (ITSD)(FBI); [redacted] (OI) (FBI); [redacted] (CyD) (FBI); [redacted] (OI) (CON); [redacted] (SecD) (FBI); SOLOMON, JONATHAN I. (DO) (FBI); [redacted] (ITSD) (FBI); VAN DUYN, DONALD N. (CTD) (FBI); [redacted] (ITSD)(FBI)
Subject: IDW Dataset EC

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NON-RECORD

All,

Please find attached the IDW data set EC for your review. Please send changes/comments to me and I

11/6/2006

will incorporate appropriately.

SSA [redacted]
Directorate of Intelligence
Intelligence Issues Group
202 [redacted]

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[Redacted]
From: [Redacted] (OGC) (FBI)
Sent: Thursday, December 29, 2005 1:39 PM
To: GRIGG, G. CLAYTON (CTD) (FBI)
Subject: IDW

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Gervus - Happy New Year!

Back in March, we did a PIA on the addition of data sets to IDW (66F-HQ-C1321794 serial 205) (attached). One issue that we set aside and said we would address in a separate EC was the IDW collaboration Index. (See page 5). To date, we have not addressed this. I seem to recall that the IDW collaboration index was a concept that you were floating. Is it something that you are still working on? If so could you provide me with additional information in order that we can



additions to IDW
pia.wpd (108 ...)

evaluate whether any privacy/legal issues exist? Thanks!

THIS IS A PRIVILEGED COMMUNICATION AND IS NOT TO BE FURTHER DISSEMINATED WITHOUT PRIOR OGC APPROVAL.

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From: [redacted] (OGC) (FBI)
Sent: Monday, September 20, 2004 4:43 PM
To: [redacted] (OGC) (FBI); [redacted] (OGC) (FBI)
Subject: RE: Discretionary Access Control Team

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[redacted]

Sometimes OI has too many meetings and not enough resources, which is why I was not there last week, but I normally will be.

[redacted]

-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Monday, September 20, 2004 3:19 PM
To: [redacted] (OGC) (FBI); [redacted] (OGC) (FBI)
Subject: Discretionary Access Control Team

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Folks, too many attorneys at the DACT is not yet posing any problems but not having enough of the right kind still is. We had another meeting of DACT again last week (I think they will be every other week) and again we really could have used a knowledgeable spook-law attorney. If this wasn't just a situational anomaly, we need to take another look at providing NSLB cover for these meetings.

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W-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Wednesday, August 25, 2004 7:46 AM
To: KELLEY, PATRICK W. (OGC) (FBI)
Subject: RE: Discretionary Access Control Team

UNCLASSIFIED
NON-RECORD

I had a discussion on this with [redacted] last night. We also felt that there might be too many lawyers, so I'll let [redacted] make the call.

-----Original Message-----

From: KELLEY, PATRICK W. (OGC) (FBI)
Sent: Tuesday, August 24, 2004 6:07 PM
To: [redacted] (OGC) (FBI)
Subject: RE: Discretionary Access Control Team

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NON-RECORD

[redacted] I recommend you coordinate with [redacted] as who from NSLB should participate. If you and [redacted] go along with [redacted] think we'll have 5 lawyers there—that may be overkill.

-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Tuesday, August 24, 2004 3:59 PM
To: KELLEY, PATRICK W. (OGC) (FBI); [redacted] (OGC) (FBI); [redacted] (OGC) (FBI); [redacted] (OGC) (FBI)

Cc: [redacted] (OGC)(FBI); [redacted] (OGC) (OGA); [redacted] (OGC) (FBI)
Subject: RE: Discretionary Access Control Team

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Although I am not looking for more work, [redacted] and I have been involved in many information sharing meetings regarding [redacted] both within the FBI and with OIPR. I would suggest that [redacted] represent NSLPTU at these meetings. Also, last week I briefed the new CTO, Jack Israel, on the sharing of [redacted] in our databases. We don't want the lead, but I think you want us there.

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Tom

-----Original Message-----

From: KELLEY, PATRICK W. (OGC) (FBI)
Sent: Tuesday, August 24, 2004 3:36 PM
To: [redacted] (OGC) (FBI); [redacted] (OGC) (FBI); [redacted] (OGC) (FBI)
Cc: [redacted] (OGC)(FBI); [redacted] (OGC) (OGA); [redacted] (OGC) (FBI)
Subject: RE: Discretionary Access Control Team

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NON-RECORD

[redacted] please follow with [redacted] thanks.

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-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Tuesday, August 24, 2004 11:46 AM
To: [redacted] (OGC) (FBI); [redacted] (OGC) (FBI)
Cc: KELLEY, PATRICK W. (OGC) (FBI); [redacted] (OGC)(FBI); [redacted] (OGC) (OGA); [redacted] (OGC) (FBI)
Subject: FW: Discretionary Access Control Team

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I now think we do need a criminal lawyer on this group and have asked [redacted] to attend further meetings, at least until it appears no longer necessary. But now I think it is necessary. E.g., the first meeting yesterday surfaced numerous 6E questions (what is 6E, what leeway does/does not PATRIOT Act provide, etc.) These are weekly meetings, but there isn't one next week.

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[redacted] if you will be unable to attend, we will also need to get NSLB to identify a pinch hitter.

-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Wednesday, August 18, 2004 5:46 PM
To: [redacted] (OGC) (FBI)
Cc: [redacted] (OGC)(FBI); KELLEY, PATRICK W. (OGC) (FBI); [redacted] (OGC) (OGA); [redacted] (OGC) (FBI); BOWMAN, MARION E. (OGC) (FBI)
Subject: RE: Discretionary Access Control Team

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I am not seeking representation on this group but I urge the OGC reps to become familiar with the various statutory and regulatory restrictions or conditions on info dissemination of information obtained through criminal process; e.g., Rule 6(e) [redacted] or in the alternative refer those matters to ILU and we will provide advice back through you.

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b7E

-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Wednesday, August 18, 2004 1:35 PM
To: KELLEY, PATRICK W. (OGC) (FBI); [redacted] (OGC) (OGA); [redacted] (OGC) (FBI);

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[redacted] (OGC) (FBI); BOWMAN, MARION E. (OGC) (FBI)
Cc: [redacted] (OGC)(FBI)
Subject: FW: Discretionary Access Control Team
 FYI. UAC will proceed accordingly.

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-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Wednesday, August 18, 2004 1:03 PM
To: [redacted] (OGC) (FBI)

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Subject: RE: Discretionary Access Control Team
 Yes. When he first mentioned it to me, he said he was thinking of me as their legal advisor and asked what I thought about adding a privacy guru, and I recommended you.

I don't think at this point we also need a crminal lawyer, as I think we are going to be dealing mostly with the Intelligence Community. That could change, of course.

-----Original Message-----

From: [redacted] (OGC) (FBI)
Sent: Wednesday, August 18, 2004 10:29 AM
To: [redacted] (OGC) (FBI)
Cc: [redacted] (OGC) (OGA); BOWMAN, MARION E. (OGC) (FBI); [redacted] (OGC) (FBI);
 KELLEY, PATRICK W. (OGC) (FBI); [redacted] (OGC)(FBI); [redacted] (OGC) (FBI)
Subject: FW: Discretionary Access Control Team

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[redacted] I wasn't clear if [redacted] was anticipating that you would be the OGC/NSLB rep on the DACT or asking NSLB to pony up someone else in addition. Can you enlighten?

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At this point PWK sees me as being the OGC/privacy rep.

I note that the proposed OGC representation of an NSLB practioned and a privacy practioned does not include any practioned in criminal ops/DT.. Do you think this is a gap that needs covering by yet another lawyer on the team? Or what?

-----Original Message-----

From: [redacted] (OI) (OGA)
Sent: Wednesday, August 18, 2004 8:57 AM
To: VAN DUYN, DONALD N. (CTD) (FBI); LAUGHLIN, LAURA M. (CID) (FBI); [redacted] (CD) (FBI); [redacted] (CyD) (FBI); [redacted] (SecD) (OGA); [redacted] (OGC) (FBI); [redacted] (OI) (FBI)
Cc: RITCHHART, KENNETH MICHAEL (ITOD)(FBI); [redacted] (ITOD)(FBI); GRIGG, G CLAYTON (CTD) (FBI); [redacted] (OGC) (FBI); [redacted] (OI) (FBI); [redacted] (DO) (FBI); [redacted] (CI) (FBI); [redacted] (DO) (FBI); AZMI, ZALMAI (OCIO) (FBI); HALL, DEAN E. (SecD) (FBI)
Subject: Discretionary Access Control Team

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The Information Sharing Policy Group (ISPG) has decided to form a Discretionary Access Control Team (DACT) to make recommendations to the ISPG on the issues of which individuals/organizations will have access to what FBI data in the FBI Investigative Data Warehouse and DataMart (IC Organizational Shared Space). The DACT will include senior representatives from CID, CTD, CD, CYD, SecD, OGC, and OI. The IDW and DataMart project managers will provide assistance. The types of issues requiring DACT recommendations include:

- Approval of data sets and development of access control requirements for the Investigative Data Warehouse (IDW), including review of existing restrictions on internal access to FBI case files or databases.
- Approval of data sets and scoping and definition of access control requirements for the DataMart, and
- Response to proposals for access to FBI data by Intelligence Community organizations

The first meeting of the DACT is scheduled for Monday, 23 August, 2004 at 11:00 AM in Room 11526 (SCIF). By COB Thursday, 8/19, project managers should let me know what they consider the information sharing policy issues needing the most immediate recommendations and decisions.

Thanks,

[Redacted]

Special Advisor for Policy Matters
Office of Intelligence [Redacted]

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FBI Information Sharing Policy Group

July 2004 Meeting

Co-Chairs
EAD-Administration
EAD-Intelligence

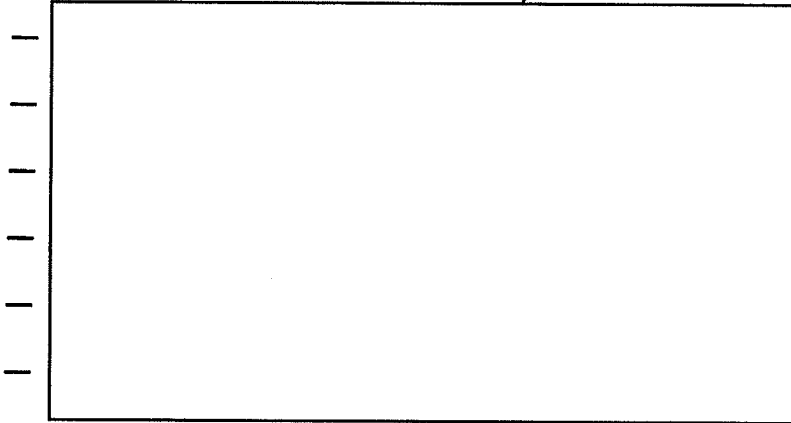
July 26, 2004
1100 Hours
Room 5145

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Agenda

- IDW Issues (40 Min)
 - IDW and Enterprise Data Warehouse Background
 - IDW Project Requests
 - IDW Data and User Policy Decisions
- Follow-Up Issues (20 Min)



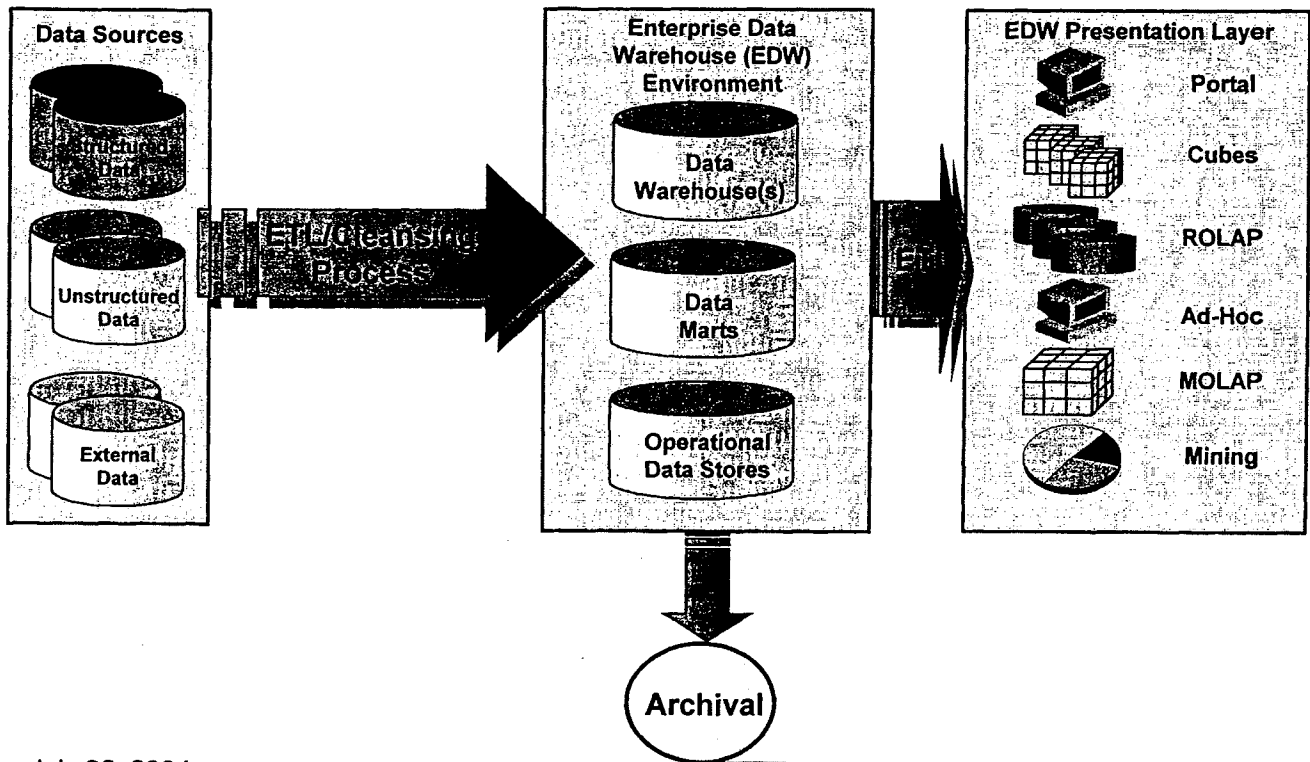
IDW Background

- The Investigative Data Warehouse (IDW) is a single point of entry for accessing FBI and non-FBI data sets
- The IDW project initiative will ultimately integrate many of the underlying system data sources to support FBI data mining and target searching as well as selective sharing with other Federal agencies.
- It is the forerunner of an FBI Enterprise Data Warehouse which will be a true repository of data for investigative, intelligence and administrative activities.
- IDW 1.1 fully operational system with limited data
 - ATO: July 2004, release to IRD in FY-05 for O&M
- IDW 2.0 will have additional data and capabilities
 - In development thru FY-05, estimated IOC in May 05

Why We Need to Move Beyond IDW 1

- There are two implementations, IDW-S and CTD/SPT
 - Different tool versions and data sets result in custom systems as opposed to one enterprise system
- IDW 1 lacks a formal FBI policy framework for governance, authorization of data sources, access by personnel to specific data sets, approved requirements, and OGC-approved Privacy Impact Assessment
- IDW 1 is a collection of separate data sets, not an integrated warehouse -- analysts cannot perform integrated search and correlation across all data sets
- There are no discretionary access controls – all the users can see all the data all the time
- Data access limitations include locked out ACS files and excluded case classifications

What is an Enterprise Data Warehouse?



July 26, 2004

Proposed IDW 2.0

- Focusing on Enterprise Data Warehouse capabilities
 - Enterprise Data Architecture
 - Enterprise Data Warehouse
 - Enterprise Metadata Management
 - Data Acquisition
- Allowing FBI users to view, search, integrate, correlate, share, and protect information from multiple data sources for intelligence, investigative, and administrative activities.
- First phase should meet requirements for intelligence and investigative activities.