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U.S. Department of Justice

National Security Division

U.S. FOREIGN  
INTELLIGENCE  
SURVEILLANCE COURT

2021 NOV 29 PM 4:19

Washington, D.C. 20530

MAURA PETERSON  
CLERK OF COURT

November 29, 2021

The Honorable Rudolph Contreras  
United States Foreign Intelligence Surveillance Court  
333 Constitution Avenue, N.W.  
Washington, D.C. 20001

Re: *In Re Accuracy Concerns Regarding FBI Matters Submitted to the FISC*,  
Docket No. Misc. 19-02

Dear Judge Contreras:

(U) The Government respectfully submits this update regarding technological improvements the Federal Bureau of Investigation (FBI) is undertaking to aid in consistency and accountability within the FISA application process. The Government has previously submitted multiple updates in response to the Court's Order directing the Government to provide descriptions of planned or implemented technological improvements to the process of preparing FISA applications or verifying the information contained in FISA applications. Corrected Opinion and Order of the Foreign Intelligence Surveillance Court (Mar. 5, 2020), at 17. The Government's most recent update was filed on August 30, 2021.<sup>1</sup>

(U) The FBI's efforts to develop and implement the successor to FBI's FISA-related workflow processes known colloquially as the Bridge, as described previously in greater detail, are continuous and ongoing. During this reporting period, the Bridge team developed, demonstrated, and deployed for testing changes to the FISA Request Form. For example, the team created four new FISA Request Form sections, including a new "User Instruction" section, a new "Renewals" section, a new "Technical Advisor (TA) Contact" section, and a new "Confirmation" section, which requires the FISA Case Agent to confirm that he or she has consulted with a Supervisory Special Agent at FBI Headquarters (FBIHQ) regarding the FISA request. The team also reengineered a FISA Request Form role, eliminating the previous role of the FISA Declarant and replacing it with the role of FBIHQ Reviewer, and making associated changes to the relevant FISA Request Form user screens, workflows, and system permission models. In addition to the changes to FISA Request Form, the team also developed, demonstrated, and deployed modifications to support the FBI's administrative management of the FISA workflow, which will assist with documentation requirements as well as setting tasks. The team also created a consolidated Subject/Target entity management utility across all FISA request types, combining the previously separate utilities into a single utility. Finally, to support the testing of the FISA Verification Form, the team developed and deployed user interface

<sup>1</sup> (U) Letter from Kevin O'Connor, Chief, Oversight Section to the Honorable Rudolph Contreras (Aug. 30, 2021).

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screens for the FISA Verification Form issue tracker. These new screens will help incorporate stakeholder testing feedback.

(U) As discussed in previous letters, the FBI also is working on technological improvements related to its accuracy procedures, also known as the Woods Procedures, which will ultimately be integrated with the Bridge. These efforts are designed to use Sentinel to streamline certain processes FBI personnel use to create accuracy subfiles and ensure the contents thereof are available in a manner that is consistent with the FBI's FISA minimization procedures. Previously, the FBI completed development of a feature in Sentinel called the Electronic Woods Capability (EWC) that interfaces with the Bridge and allows FBI personnel to export an accuracy subfile that can be downloaded and transmitted to other personnel involved in the FISA process. As described in the August 30, 2021 letter, following successful testing, the FBI deployed the EWC enterprise wide in or about July 2021. During the current reporting period, the team has completed the development and testing of certain enhancements to the EWC, including enabling users to review accuracy subfiles in a read-only mode; providing the ability to sort and filter accuracy subfiles; enabling users to quickly access serials from the Table of Contents within the file; and requiring users to enter mandatory annotations for the serials in an accuracy subfile.

(U) Finally, consistent with an Office of the Inspector General recommendation in the *Review of Four FISA Applications and Other Aspects of the FBI's Crossfire Hurricane Investigation*, the FBI has also refined certain requirements for enhancements to an information technology system that assists employees in the implementation of the policy for managing Confidential Human Sources (CHS). The system standardizes CHS administrative forms, simplifies rules of operation, and generates automated reminders for users to perform certain administrative activities associated with CHS management. During the current reporting period, the FBI refined its requirements for enhancements to three documents identified by the OIG (the Source Opening Communication, the CHS' Quarterly Supervisory Source Report, and the CHS Contact Report), as well as to the CHS Prioritization System (CPS) criteria. These enhancements will be made to ensure that CHS handlers document and update any CHS participation in the types of groups or activities that would bring the CHS within the definition of a "sensitive source."

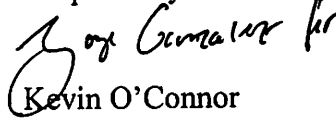
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(U) This letter constitutes the Government's seventh update in the above-captioned docket regarding planned or implemented technological improvements. The FBI has reviewed this response and confirmed its accuracy.

Respectfully submitted,



Kevin O'Connor  
Chief, Oversight Section  
Office of Intelligence,  
National Security Division  
U.S. Department of Justice

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