EXHIBIT 67 FILED UNDER SEAL



Controlled Application Review & Resolution Braces: CARRELL Plants of the Documenting Work in DDNS-DS

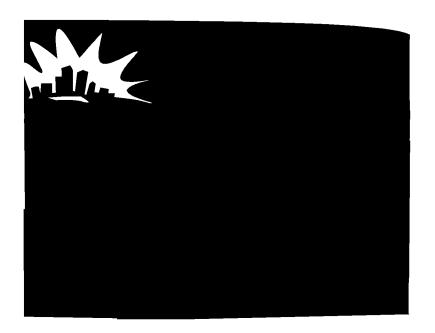


Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 3 of 68 Welcome to FDNS-DS Training

Welcome

Participation Rules

- Please Silence Mobile Phones
- Complete Exercises
- Avoid "Lewis and Clarking"
- Return from breaks on time



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Your Role As a Participant in This Training

Message from the FDNS Champion

- Focus on how you do your job
- Document your work in FDNS-DS
- Work actively through the exercises
- Relate what you learn back to your work
- Ask for help



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Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 5 of 68 CARRP II Training Outline

- Section One- Process Overview
 - Triage
 - Eligibility Assessment
 - Vetting
 - CARRP II Adjudication
- Section Two- Entering the NS Hit
 - Name
 - Sub-status
 - Type
 - Referral Basis
 - Urgency
 - Subject
 - Addresses
 - Organization



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- Section Three- Existing Record in FDNS-DS
- Section Four- Documenting the Process in FDNS-DS
 - Triage
 - Eligibility Assessment
 - Vetting
 - CARRP II Adjudication
- Section Five- Documenting Actions in FDNS-DS
 - Activities
 - Notes
 - Attachments
 - RTI
 - Related Cases and NS Hits

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Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 7 of 68 CARRP II Training Objectives

At the end of CARRP II Training you will be able to:

- **Understand the CARRP II Process**
 - Triage
 - **Eligibility Assessment**
 - Vetting
 - CARRP II Adjudication
- Know how to document the CARRP II process in the FDNS-DS
 - Promotion to Case
 - **Status Values**
 - **Sub-status Values**
 - Activities
- **Use and purpose of the Background Check Assessment**

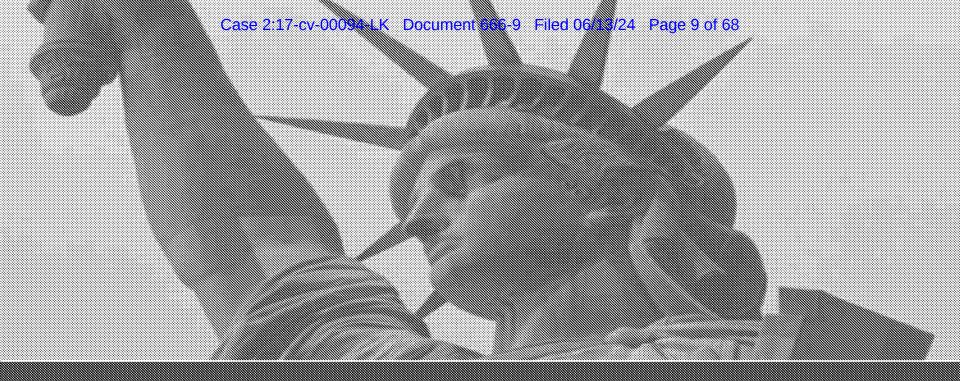
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FDNS Data System (FDNS-DS)

Benefits and Background of the FDNS-DS

- Tracks and manages nationwide fraud and national security (NS) referrals and cases.
- Provides status updates that assist when cases are in federal litigation or of congressional interest.
- Provides management statistical information which directly impacts policy decisions and program funding.
- NS tabs deployed in FDNS-DS in June 2007.

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Section I





CARRP II Referrals to FDNS / BCU

- CARRP II referrals will be initiated in two ways:
 - HQFDNS will return existing NS Hits and NS Cases to the Field during the initial phase of CARRP II
 - New NS Concerns will be referred to FDNS / BCU from adjudications, LEAs and other entities
- Referrals to FDNS / BCU include:
 - _ LE
 - Non-IBIS NS information, or
 - Letterhead Memorandum (LHM)

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Referral Guidance

- An NS referral is required for individuals and organizations involved in NS activity and for those alleged or who claim to be "falsely accused" of NS involvement or activity.
- When key words such as "suspect", "possible", "potential", "alleged" are used to describe NS involvement or activity, the individual or organization becomes an NS Concern and should be referred for vetting.
- Key words which denote affiliation or alleged affiliation with an individual or organization of NS Concern such as "associate of", "relative of", "employee/employer of" should be referred as NS Concerns.

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- Entry of new NS-Hits in the FDNS-DS???
 - General rule is that NS Concerns will be entered in the FDNS-DS and non-NS
 Concerns will not be entered in the FDNS-DS
 - Issue: Will referrals that have been erroneously referred to FDNS / BCU as NS Concerns be entered in FNDS-DS?
 - Local policy will determine which erroneous referrals will be entered in the FDNS-DS
 - Example 1: A 1% case that is erroneously referred may not be entered into the FDNS-DS
 - Example 2: A one-day lookout with unclear secondary results, that is later cleared by agent contact, may be placed in the FDNS-DS to prevent future referrals and duplicative work

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- Triage Results
 - New referrals will be triaged in the field to verify the NS Concern.
 - Referrals with no NS Concern will be returned for routine adjudication.
 - Referrals with an NS Concern will undergo an eligibility assessment for denial on statutory or regulatory grounds.

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- Eligibility Assessment Results
 All NS Concern cases will undergo an Eligibility Assessment
 - Deny and close NS Referrals that can be denied on statutory or regulatory grounds.
 - Referrals that cannot be denied on statutory or regulatory grounds will be referred for vetting.
 - KST referrals will be sent to HQFDNS.
 - Non-KST referrals will be referred to an FDNS IO or BCU Officer in the field for vetting.

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Vetting Results

All NS Concerns that are not denied will be vetted

- KST NS Concerns will be referred to HQFDNS after vetting.
- Non-KST NS Concerns will be referred to a CARRP II Adjudicator after vetting.
- Non- NS Concerns will be referred to the field for routine adjudication after vetting.

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CARRP II Adjudication Results

Vetted NS Concerns will be referred to a CARRP II Adjudicator

- CARRP will release cases with no NS Concern to the field for routine adjudication.
 - Note: CARRP may uncover additional classified or other information to clear an individual.
- CARRP will refer KST NS Concerns to HQFDNS.
 - Note: CARRP may uncover a new or additional LE hit.
- CARRP will adjudicate non-KST NS Concern cases.

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BCAA (Background Check Adjudication Assessment)

- BCAA will replace the National Security Record
- BCAA is divided into sections:
 - Triage
 - Eligibility Assessment
 - Vetting
 - CARRP Adjudication
- Each section will be approved by a supervisor
- BCAA will document all NS activities and decisions
- BCAA will be attached to the record in the FDNS-DS
- BCAA will be placed in the file with FINAL determination

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Oreating the NSBH

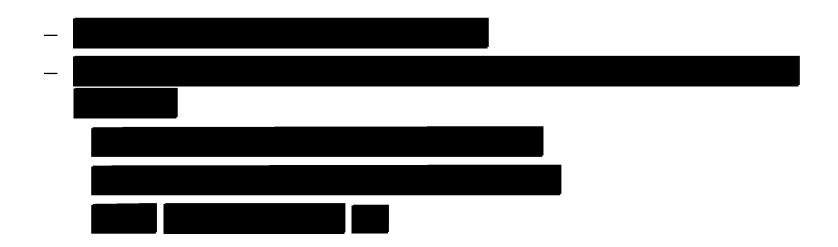
Section II





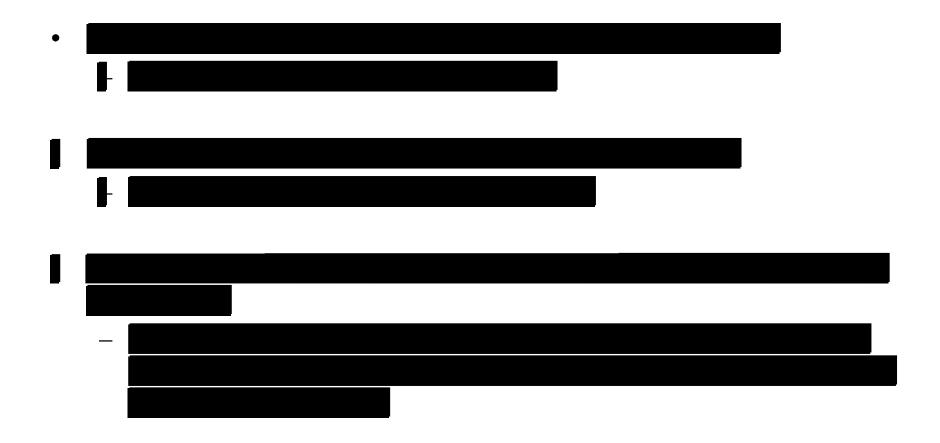
All new NS Referrals will be entered in FDNS-DS

Search FDNS-DS to determine if a NS Hit or NS Case already exists.



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Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 20 of 68 Creating the NS Hit Name



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Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 21 of 68 Creating the NS Hit- Name (cont'd)

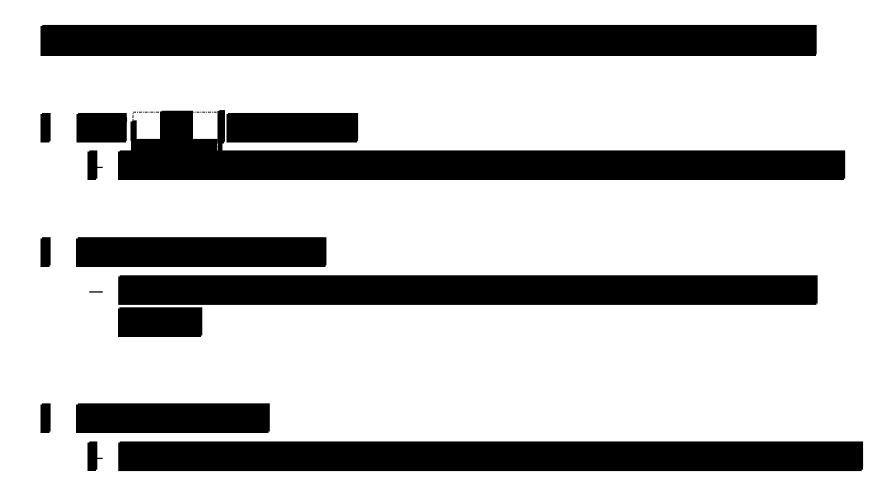
Follow the FDNS-DS National Security naming convention when entering a new NS Hit



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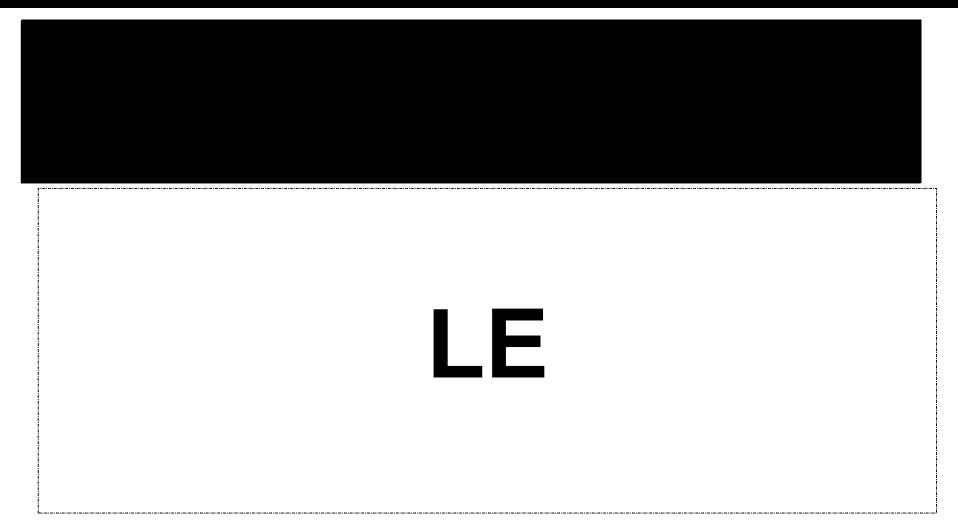
Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 22 of 68 Creating the NS Hit-



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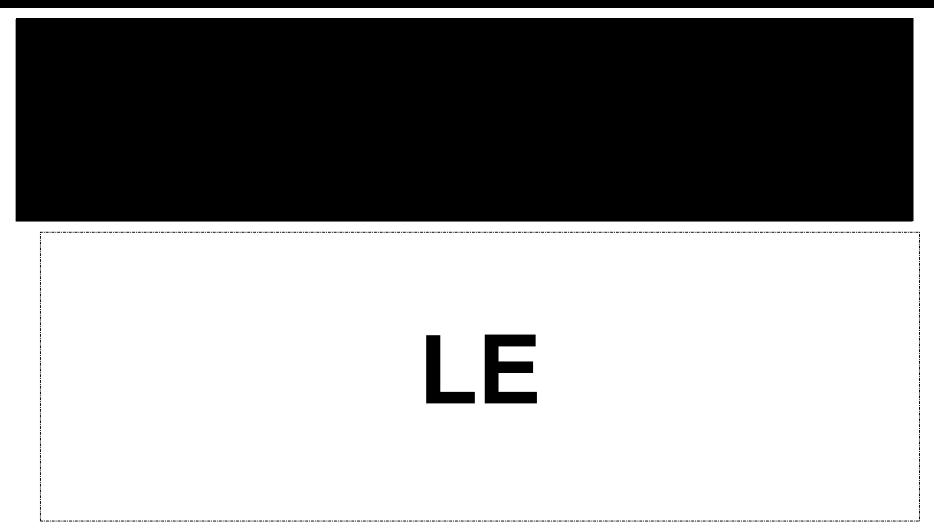
Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 23 of 68 Creating the NS Hit



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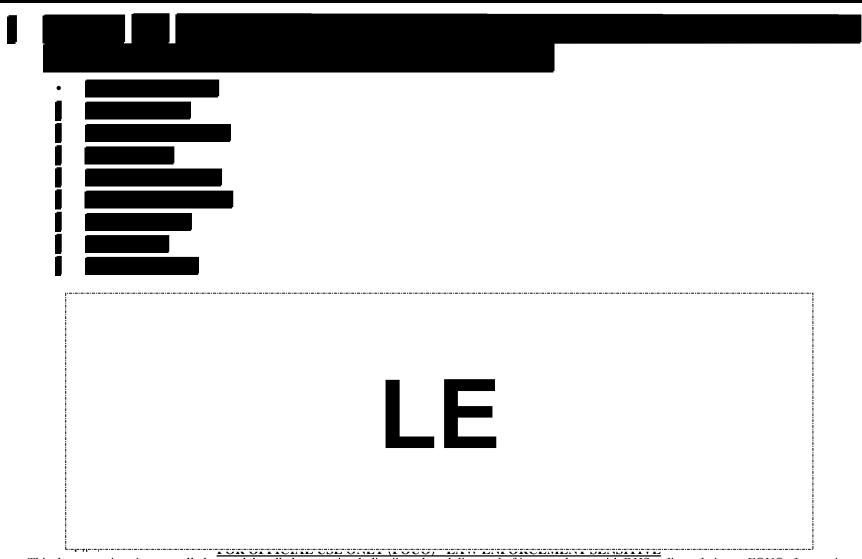
Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 24 of 68 Creating the NS Hit-



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Creating the NS





LE



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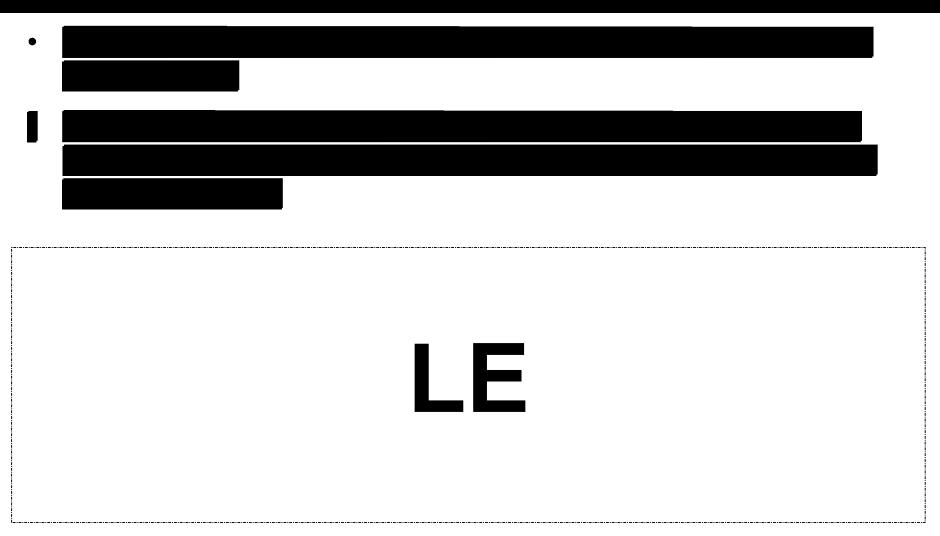


Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 28 of 68 Creating the NS Hit-



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Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 29 of 68 Creating the NS Hit-



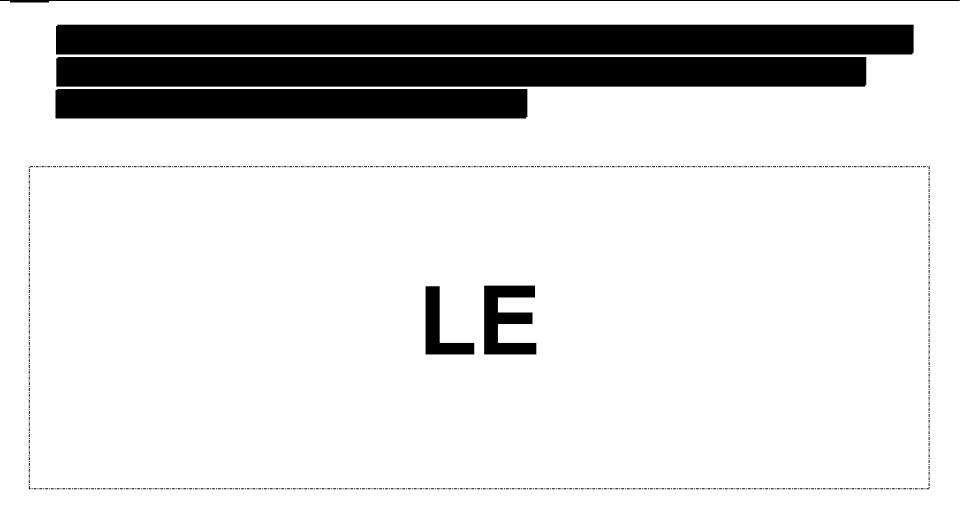
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Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 30 of 68 \overline{C}



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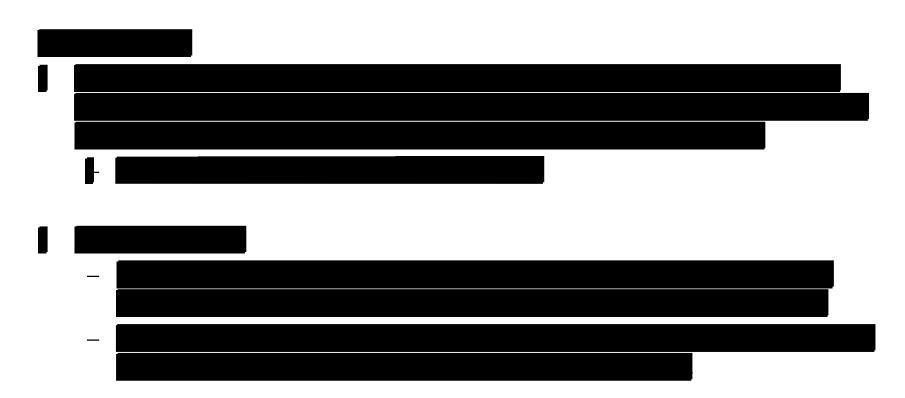


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Enter Receipt Numbers according to the following guidelines:

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Receipt Numbers Cont'd



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Britishing Regards in 1991/18-198

Section III





Existing Record in FDNS-DS

Existing NS Hit or NS Case:

Request to be added to the team if there is an existing NS Hit or NS Case.

- For cases returned from HQ FDNS, contact your local Super User to request to be added to the team.
- For cases in the field, contact the primary record owner to be added to the team.
- If the primary record owner is unavailable, please contact the record owner's supervisor to be added to the team.
- If no one else is available, contact your local Super User to be added to the team.

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Existing Record (cont'd)

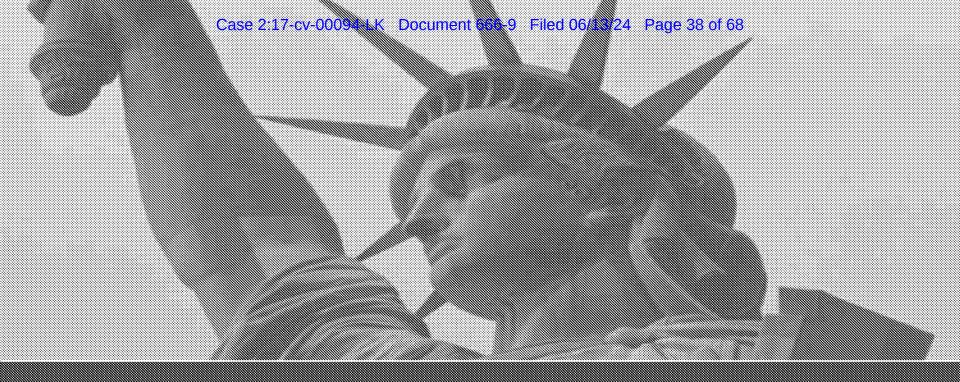
- What if a NS referral has previously been vetted and closed as non-NS and there is a new referral based on the same, unchanged IBIS hit?
 - Update the FDNS-DS record with new information.
 - Subject biographic information
 - Forms
 - Other Hit-related information
 - Attachments
- What if a NS referral has been vetted and closed as non-NS and there is a new referral based on a new or modified IBIS hit?
 - Re-open the record .
 - Begin the process again based on the new hit.

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Existing Record (cont'd)

- What if a NS referral has been vetted and determined to be NS or Unresolved and there is a new referral based on the same, unchanged IBIS hit?
 - Update the FDNS-DS hit / case with new information.
 - Subject biographic information
 - Forms
 - Other Hit-related information
 - Attachments
- What if a NS referral has been vetted and determined to be NS or Unresolved and there is a new referral based on a new or modified IBIS hit?
 - Update or re-open the record as appropriate.
 - Begin the process based on the new hit.

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Documenting the Morestein BDNS-DS

Section IV





Documenting the Process- Return of Current NS Hits

Return of Existing NSRs from HQFDNS- Non NS Concern

• Existing NSRs returned from HQFDNS that have been determined to be non-NS will be released to the field for adjudication:



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Documenting the Process- Return of Current NS Hits

Return of Existing NSRs from HQFDNS- NS / Unresolved Concern

• Existing NSRs that have been triaged by BCAU and determined to be NS or Unresolved will be returned to the field for eligibility assessment:



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Documenting the Process- Return of Current NS Hits

Return of Existing NSRs from HQFDNS- No Pending Pet / App

• Existing NSRs that have no longer have a pending petition or application will be returned to the field for routine processing and to verify there is no pending application:



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Documenting the Process-Triage

Triage Results Cases originating in the Field will undergo Triage

The Triage results will be documented in FDNS-DS

• Documenting a KST NS Concern referral:

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_			

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Triage Results Continued

- Documenting a non-KST NS Concern referral:

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Documenting the Process-Triage

Triage Results Continued

Referrals with no NS Concern will be returned for routine adjudication:



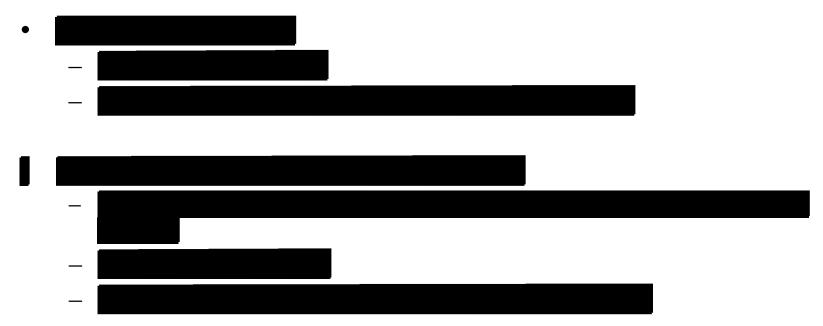
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Eligibility Assessment Results

The Eligibility Assessment results will be documented in FDNS-DS

 Documenting NS Concern referrals that will be denied on statutory / regulatory grounds (a four-step process):



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Documenting NS Concern referrals that will be denied on statutory / regulatory grounds (a four-step process)- cont'd:

•	

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Eligibility Assessment Results Continued

• KST NS Concern referrals that cannot be denied on statutory or nonregulatory grounds will be referred to HQFDNS for vetting.



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Eligibility Assessment Results Continued

- Non-KST NS Concern referrals that cannot be denied on statutory or nonregulatory grounds will be referred to the Field for vetting.
 - Non-KST and Unresolved NS Concerns will be referred from the adjudicator to the field FDNS / BCU for vetting



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Documenting the Process- Vetting Results

Vetting Results

The Vetting results will be documented in FDNS-DS

- Non-NS Concerns will be released for routine adjudication
 - Requires Supervisor Approval
 —
 —
 —
 —

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Documenting the Process- Vetting Results

Vetting Results Continued

 Non-KST and Unresolved NS Concerns will be referred to a CARRP II Adjudicator



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Request for Vetting Assistance

- Requests for Vetting Assistance- If a FDNS IO or BCU Officer requests vetting assistance from BCAU:

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Documenting the Process- CARRP II

CARRP II Adjudication Results

CARRP II Adjudication results will be documented in FDNS-DS

- Non-NS Concerns will be released for routine adjudication.
 - NOTE: CARRP adjudicators may have classified or other information that was not available to the vetting officer that clears the NS Concern.



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Documenting the Process- CARRP II

CARRP II Adjudication Results Continued





• CARRP Adjudicators will document activities, deconfliction, requests for assistance and decisions.

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Requests for Adjudication Assistance

- Requests for Adjudication Assistance- If a CARRP II Adjudicator requests adjudication assistance from NSAU:

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Documenting the Process- CARRP II

CARRP II Adjudication Results Continued

CARRP II Adjudications decisions will be recorded in FDNS-DS

- CARRP II Adjudications Decisions:
- A TECS lookout must be posted if CARRP II grants a NS Concern or Unresolved NS Concern case

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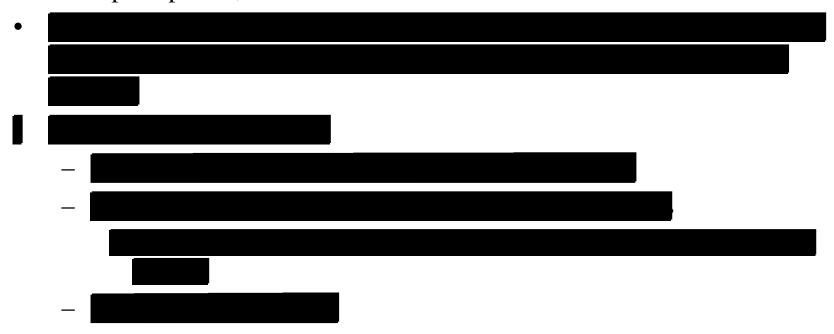


Documenting the Process- CARRP II

CARRP II Adjudication Results Continued

"Stand-alone" I-765 / I-131 applications that are not ancillary to a status

Examples: parole, deferred action etc...



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Documenting Administration SDNS-DS

Section V





Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 58 of 68 Documenting in FDNS-DS- Activities

Activities Overview

- Each activity in NS process will be documented separately in the Activities tab of the FDNS-DS
 - Each background check will be documented separately
 - Each contact will be documented separately, noting the respective TECS/NCIC number and the results of the contact (NOTE: Document officer's evaluation and conclusion of TECS/NCIC hit with the respective TECS/NCIC record)
 - Other activities will be documented separately



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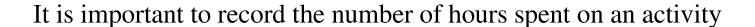
Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 59 of 68 Documenting in FDNS-DS- Activities

Adding an Activity to an NS Hit or NS Case

To add an activity to a	nn NS Hit or NS Case,	
	LE	

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Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 61 of 68 Documenting in FDNS-DS- Notes

If you can not find a data field to input information that is relevant to a specific NS Hit or NS Case,

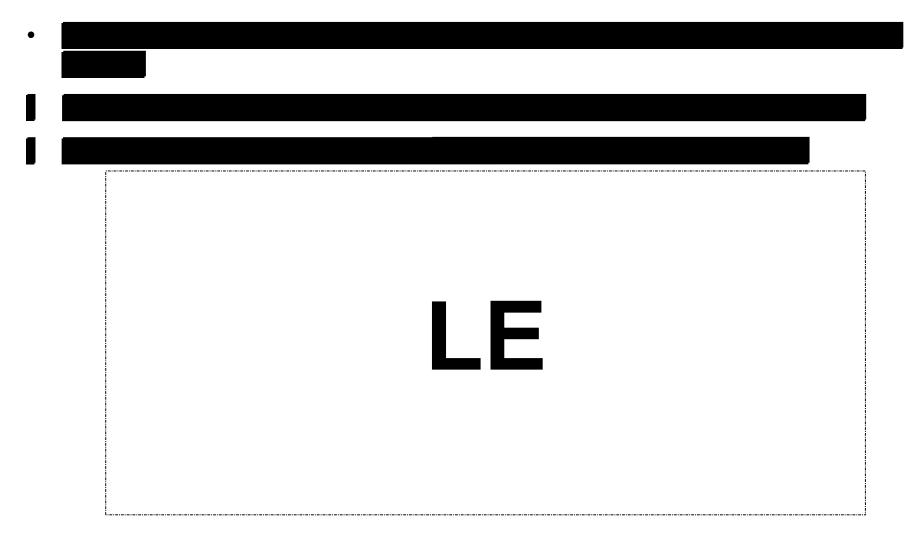
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- Any document type (MS Word, Excel, TXT or PDF file) or URL (Web address) may be attached to an NS Hit or NS Case
- If you add a PDF file, make sure it has been saved in its native format
- TECS Records may be attached ONLY with appropriate "warnings" in the header and footer
- Do not attach Classified or Public Database information (ChoicePoint / Autotrack / Lexis) in FDNS-DS



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Case 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 63 of 68 Documenting in FDNS-DS- Attachments



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ase 2:17-cv-00094-LK Document 666-9 Filed 06/13/24 Page 64 of 68

Adding an Referral to ICE (RTI)

- Create an RTI in an NS Hit or NS Case using the Word template found at the FDNS website and
 - Send to assigned Benefit Fraud Unit (BFU) when there is an Egregious
 Public Safety (EPS) case that also includes an NS Concern
 - Send to Helene Berkholcs (BFU-CA) for Non-IBIS national security
 Concerns
 - Both can be the same RTI document, but sent to different places
- * In a future release of FDNS-DS the ability to add an RTI to an NS Hit for a Non-IBIS National Security NSR will be added as a Subtab

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Adding Related Cases, NS Hits or NS Cases

(as appropriate) are used to indicate where an NS Hit or NS Case is related to a fraud Case or another NS Hit or NS Case

• This includes separate NS Hits or NS Cases created due to IBIS hits that include key words which denote an affiliation or alleged affiliation to an individual or organization of NS Concern such as "associate of", "relative of", "employee/employer of"



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- **Do Not Enter In FDNS-DS:**
 - Classified Information
 - Information from Commercial Data Brokers (Lexis, Autotrack, ChoicePoint, Accurint)
 - TECS Record Data (unless printed/saved with appropriate header and footer warnings)

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In this lesson, you learned how to:

- Understand the CARRP II Process
 - Triage
 - Eligibility Assessment
 - Vetting
 - CARRP II Adjudication
- Know how to document the CARRP II process in the FDNS-DS
 - Promotion to Case
 - Status Values
 - Sub-status Values
 - Activities
- Use and purpose of the Background Check Assessment

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