FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1419864-000

Total Deleted Page(s) = 1
Page 23 ~ b7E;

XXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXX

INSPECTION DIVISION
OFFICE OF INSPECTIONS

INSPECTOR'S REPORT

SPECIAL INSPECTION
CRIMINAL JUSTICE INFORMATION SERVICES DIVISON
FEBRUARY 24, 2018

Nancy McNamara
Assistant Director
Inspection Division

Table of Contents

I.	Overview	3
II.	Scope and Objectives	3
III.	Background	3
IV.	The Nikolas Cruz Investigation	4
V.	Organizational Structure and Staffing	8
VI.	Training and Onboarding	9
VII.	Intake Procedures	11
VIII.	Performance and Customer Service Metrics	14
IX.	Management Oversight and Incident Review	15
X.	Observations	17

I. Overview:

(U//~~FOUO~~) **Background:** At the request of the Deputy Director, INSD conducted a special review of the Criminal Justice Information Services (CJIS) Division, Global Operations Section (GOS), Public Access Line Unit (PALU) in relation to the 02/14/2018 Nikolas Cruz shooting incident at the Marjory Stoneman Douglas High School in Parkland, Florida.

(U//~~FOUO~~) The special review was led by Inspectors Robert C. Bone, II, and James A. Cochran.

II. Scope and Objectives:

(U//~~FOUO~~) INSD's focus began on understanding the FBI actions surrounding the Nikolas Cruz incident. INSD then began its special review focused on PALU protocols and procedures to assess: (1) the process by which PALU personnel utilized SOPs to guide the PALU work force in decision making abilities in the call center on complaints received by the FBI; (2) training of personnel to make decisions on disposition of calls; (3) performance metrics and quality control/assurance; (4) management engagement; and (5) incident details regarding electronic and telephonic tips received on 09/25/2017 and 01/05/2018 by PALU prior to the 02/14/2018 Nikolas Cruz shooting at the Marjory Stoneman Douglas High School in Parkland, Florida. Onsite interviews totaled 36. The interview breakdown consisted of [redacted] b7E

[redacted] Two sets of questions were formulated for interviews. The first set were process based questions to determine statistical sampling across all job series and shifts. The second set focused on the Nikolas Cruz intake information. INSD identified Observations and Recommendations which are detailed herein.

III. Background:

(U//~~FOUO~~) The FBI Public Access Line Unit (PALU) was formally established in the Criminal Justice Information Services (CJIS) Division, initially within the National Instant Criminal Background Check System (NICS) Section as documented via EC dated 01/20/2012, 319X-HQ-A1487711, Serial 1731. The initial purpose of PALU was to serve as a 24 hour central intake point through which the public could provide tip information about potential or ongoing crimes.

(U//~~FOUO~~) PALU was established subsequent to a study conducted by the Resource Planning Office (RPO) in November 2011. RPO assessed the projected benefits included the following: more appropriate pay grade levels than were utilized in the field (GS 5-7 vs GS 10-13 Special Agent); better opportunity to connect intel through a centralized system; capability to record

calls; enhanced interface with the public; enhanced call routing for the public, who may not be familiar with the FBI areas of responsibility; and the ability to reduce the total number of FBI personnel devoted to these tasks through centralization. The study was piloted in Los Angeles and San Diego field offices.

(U//~~FOUO~~) PALU became operational in late 2012, fielding tips for the Pittsburgh office, and in 2012 PALU began incrementally taking responsibility of handling office complaint lines. By August of 2017, PALU had responsibility for all 56 field offices.

(U//~~FOUO~~) Since its inception, PALU expanded to include the FBI's Major Case Contact Center (MC3) and a national level tip line (1-800-CALLFBI). The MC3 supported FBI operations during crisis events such as the Boston Marathon Bombing and Washington Navy Yard shooting as well as national special security events such as the Super Bowl and the Democratic and Republican National Conventions. The MC3 also supported high-profile investigations including the FBI Top 10 Most Wanted Fugitives. PALU managed the tip line for the FBI's Weapons of Mass Destruction Directorate, available to companies and business owners by calling 1-800-TELLFBI. At this number, callers reported suspicious activity regarding the location, attempted purchase, or suspicious behavior concerning weapons of mass destruction or their precursor components. In June 2016, PALU assumed management of electronic complaints, submitted through www.tips.fbi.gov., a function previously handled by the Counterterrorism Division. (U//~~FOUO~~) The short term objectives of PALU were to assume responsibility for telephone intake for all 56 field offices. Long term goals were to cover various forms of intake from the public, including, but not limited to, email and facsimile. This was initially meant to alleviate gaps identified in the collection, processing, analysis, and reporting of criminal and national security tip information from the public, under the complaint duty protocols.

(U//~~FOUO~~) From its inception through 01/31/2018, PALU received 3,074,377 telephone calls and 1,145,657 electronic tips. [redacted] b7E

(U//~~FOUO~~) With the exception of directly referring electronic tips containing pertinent threat information important to the USSS, PALU did not disseminate written information to other federal, state, local or tribal entities. PALU did, when warranted, telephonically contact other law enforcement agencies on urgent matters, but this was not consistently documented. PALU also frequently provided callers with contact information for other law enforcement agencies if the information provided by the caller did not appear to be of interest to the FBI; however, PALU did not follow up with those agencies to determine if they were subsequently contacted by the callers.

IV. The Nikolas Cruz Investigation:

(U//~~FOUO~~) On Monday, 09/25/2017, 1:57 PM [redacted] b6 b7C submitted an e-Tip to the FBI PALU. The tip was assigned

transaction number [redacted] provided the following information:

b6
b7C
b7E

"I received a comment on my YouTube channel that says 'I am going to be a professional school shooter', I took a screen shot and then reported it to YouTube. I would like an email address to send to so that you can investigate."

(U//~~FOUO~~) The tip was processed by PALU CSR [redacted]

(U//~~FOUO~~) At 2:17 PM, the CSR [redacted] created Guardian [redacted] at 2:27 PM submitted the Guardian for opening.

(U//~~FOUO~~) At 3:00 PM, a PALU LCSR [redacted] transferred the Guardian to the FBI's Jackson FO.

(U//~~FOUO~~) On Wednesday, 09/27/2017, 2:04 PM, Jackson FO relief supervisor [redacted] opened and assigned the Guardian to SA [redacted]

(U//~~FOUO~~) On Thursday, 09/28/2017, 4:04 PM, [redacted]

(U//~~FOUO~~) On Monday, 10/02/2017, [redacted] a screen shot of his YouTube channel. On 09/24/2017, approximately 6:56 PM, [redacted] saw a posting on his channel, which stated "I'm going to be a professional school shooter." The posting was from the username Nikolas Cruz. The posting did not refer to a particular time or location. [redacted] received no other suspicious or threatening postings on his YouTube channel. [redacted] did not know of anyone who would make such a threat. [redacted] agreed to contact the FBI if he received similar posts.

b6
b7C
b7E

(U//~~FOUO~~) On Tuesday, 10/03/2017, 2:04 PM, SA [redacted]

(U//~~FOUO~~) On Wednesday, 10/04/2017, 12:45 PM, SA [redacted] submitted Guardian [redacted] for closure. Subsequently, on Friday, 10/06/2017, at 2:38 PM, JN SSA [redacted] concurred with closing the incident and submitted it for program manager review. b6 b7C b7E

(U//~~FOUO~~) On Wednesday, 10/11/2017, 1:29 PM, SSA [redacted] of the Counterterrorism Division (CTD) [redacted] reviewed the incident and concurred with JN's assessment.

(U//~~FOUO~~) On Friday, 01/05/2018, 2:31 PM, [redacted] telephonically contacted PALU CSR [redacted] The call was audio recorded and a transcript was available for review. The following information was derived from the transcribed PAL call:

- [redacted] reported activities of an 18 year old male, Nikolas Cruz, [redacted]
- Cruz displayed indications of mental illness, was possibly suicidal, and recently suffered the loss of his mother. Cruz's father was deceased.
- Cruz was expelled from high school and worked at a Dollar Tree in Parkland, Florida.
- The woman believed Cruz resided with [redacted]
- Cruz received periodic payments of $25,000. These payments were from his mother's life insurance policy and from a wrongful death lawsuit related to his father's death.
- Cruz posted items on the internet that alarmed the woman and led her to believe Cruz presented a serious threat to himself and others. The woman believed Cruz might shoot up a school.
- Cruz used money from his mother's life insurance policy to purchase rifles and ammunition.
- The caller advised she had reported the information to the Parkland Police Department.

(U//~~FOUO~~) At 2:58 PM, twenty-seven minutes after receiving the call, CSR [redacted] conducted [redacted] Database record review substantiated CSR [redacted] b5 b6 b7C b7E

(U//~~FOUO~~) Immediately after [redacted] approximately 3:00 PM, CSR [redacted] sought disposition guidance from SSA [redacted] CSR [redacted] did not remember her specific statement to SSA [redacted] SSA [redacted]

(U//~~FOUO~~) On 01/05/2018, approximately 3:06 PM, SSA [redacted] advised CSR [redacted] [redacted] b6 b7C b7E

(U//~~FOUO~~) On 02/14/2018, at approximately 2:21 PM, Nikolas Cruz attacked students and teachers on and near the Marjorie Stoneham Douglas High School, Parkland, Florida. Seventeen individuals were killed and several additional individuals were wounded.

(U//~~FOUO~~) On 02/15/2018, Agents from the FBI's Miami FO interviewed [redacted] and she provided the following information:

[redacted] b6 b7C b7E

[redacted]

(U//~~FOUO~~) During a subsequent interview with SSA [redacted] on 02/19/2018 regarding his interaction with the CSR [redacted] on 01/05/2018, SSA [redacted] vaguely recalled a conversation with CSR [redacted] concerning the [redacted] call. SSA [redacted] recalled CSR [redacted] conveyed concerns about the contents of the call. SSA [redacted] questioned CSR [redacted] regarding [redacted] b6 b7C b7E

[redacted]

(U//~~FOUO~~) Due to the incident detailed above, this review commenced on 02/16/2018. INSD travelled to CJIS on 02/17/2018 and conducted leadership and staff interviews, reviewed Standard Operating Procedures (SOPs); and assessed the PALU computerized system called Public Access Line Manager (PALM).

V. Organizational Structure and Staffing:

(U//~~FOUO~~) Via the EC dated 01/20/2012, to initially staff the Public Access Line Unit (PALU), the Resource Planning Office (RPO) allocated [redacted] b7E

[redacted] The PALU was initially established within the NICS Section.

(U//~~FOUO~~) Since its inception, PALU's FSL was expanded to support additional field offices serviced, the FBI's MC3, and managed the tip line for the FBI's Weapons of Mass Destruction Directorate (WMD). In 2016, PALU assumed management of electronic complaints (e-Tips) from CTD and in August 2017, added Washington Field Office as the 56th office serviced.

(U//~~FOUO~~) PALU Organizational Chart (02/20/2018):

[redacted] b7E

(U//~~FOUO~~) As a 24-hour operation, PALU operated a day, evening and night shift. As of January 2018, there was [redacted]

[redacted]

(U//~~FOUO~~) Total PALU Funding Staffing Level with Attrition Percentage 2016-2018:

[redacted] b7E

VI. Training and Onboarding:

(U//~~FOUO~~) Initial training was internally based and process focused. In 2016, external training and career development training was added to the curriculum. New CSRs were provided with logbooks to track performance and development. A LCSR was put in charge of the training program and LCSRs largely replaced SSAs in training new CSRs. In 2017, training was expanded to include refresher classes. Remedial training was developed in early 2018 for CSRs who had been identified as low performing based upon PALU metrics.

(U//~~FOUO~~) Despite significant increases in staffing from 2012 to 2015, there was no formalized training program until 2016 nor were there dedicated training personnel. The focus in PALU was hiring CSRs to address the growing volume of phone calls from the absorption of additional field offices, not training.

(U//~~FOUO~~) Internal Training:

(U//~~FOUO~~) The first informal CSR training in FY 2012 lasted nine (9) days and included the following topics: active listening skills; communication; compliance; customer service; [redacted] federal violations; foreign language requirements; grammar; Guardian; National Crime Information Center (NCIC); and phone use. Approximately four hours were spent listening to actual complaint calls. Additional training included Virtual Academy instruction on customer service and specific federal violations. New CSRs, upon arrival, were provided a Quick Reference Guide for Phone Mail Users (40 pages), a Complaint Guide (27 pages), and a 2012 FBI PAL CONOPS Guide (21 pages). b7E

(U//~~FOUO~~) In 2014, there were four one-week unstructured trainings held throughout the year. Each one-week training covered the PAL Complaint Guide, Sentinel, FD-71 Criminal Complaint Forms, NCIC, Virtual Command Center and Orion, [redacted] listening to calls, communication and grammar, overview of crisis situations, EAP, PALM, Guardian, practice calls, and job shadowing a mentor.

(U//~~FOUO~~) External and Developmental Training:

(U//~~FOUO~~) In 2016, CSR training was formalized and expanded from nine days to three weeks. It was a mix of classroom training and listening to calls with veteran CSRs. Developmental training was instituted.

(U//~~FOUO~~) A developmental CSR Refresher Training (CRT) Program to help struggling CSRs was implemented in 2017. The six-week program totaled 27 hours of training broken into 12 hours of classroom time and 15 hours of Virtual Academy. Classroom training was taught by the LCSRs and covered the PAL Complaint Guide, interview questions, call recordings with writing practice, and database queries. Approximately 16 CSRs were selected to attend this training by their supervisors based on low performance, determined by performance metrics.

(U//~~FOUO~~) Two hours of Crisis Management Training, taught by an FBI Crisis Negotiator, was added to the mandatory training for the new CSRs. This training was highly requested and well received. An Interview Questions Manual (84 pages) marked DRAFT was disseminated in August 2017 and it replaced all above referenced training guides and manuals. It was posted to the PALU SharePoint site for reference. In December 2017, 30 CSRs were selected to attend a two-day Applied Suicide Intervention Strategies Training taught by Employee Assistance Unit counselors.

(U//~~FOUO~~) Complaint, CONOPS, and Quick Reference Guides:

(U//~~FOUO~~) The 2012 Complaint Guide contained basic guidance on: documenting calls via an FD-71 Criminal Complaint Form and [redacted] The remaining pages listed specific federal violations and how to proceed per violation. CSRs were instructed to seek supervisor assistance [redacted] b7E

(U//~~FOUO~~) The Complaint Guide was amended in 2013 to include additional information on federal violations. Guidance on procedures for [redacted] There was no documented training in 2013.

(U//~~FOUO~~) The Complaint Guide was last revised 02/03/2016. The Desktop Reference Guide was revised in October 2015. The guiding principles were threefold: it was better to send information not needed than not to send information; sooner was better than later; and it was always right to be polite. The Desktop Reference Guide [redacted] The Complaint Guide was maintained on the PALU SharePoint and updated when PALU received directive from Program Units. For example, the Complaint Guide was updated to include required language for FD-71 Criminal Complaint Forms pertaining to [redacted]

(U//~~FOUO~~) The CONOPS Guide covered PALU mission, background, and purpose. It contained information on structure, management, training, business processes, call processing, foreign language call coverage, FD-71 Criminal Complaint Form processes, and critical event procedures. Critical event procedures were relative to two topics:

b7E

(U//~~FOUO~~) The Quick Reference Guides were formally known as "cheat sheets", used by new CSRs until the information became part of their knowledge base, contained information on a frequent, singular topic such as a

(U//~~FOUO~~) The Complaint Guide was revised 02/03/2016. CSRs were instructed to seek supervisor assistance as follows:

An external, three and one-half hour training class on writing, coordinated by the CJIS Training and Advisory Process Unit (CTAP), was added to the class. A Standard Writing Guide for Composing Official Reports and Communications was given to CSRs. CSRs received external Crisis Management Training, with a focus on handling suicidal callers.

(U//~~FOUO~~) On 02/09/2018, CJIS formalized the GS-6 to 7 promotion process for CSRs. Eligible CSRs were required to participate in a two week TDY. They reviewed junior CSRs for performance by quality control of reports and monitoring calls. Mandatory CSR Refresher Training was held over the span of several days, a few hours a day, from 01/02/2018 to 02/08/2018.

(U//~~FOUO~~) **Summary:** A formalized training program did not exist until 2016, after the workforce in PALU had nearly doubled. It was insufficient to handle a rapidly expanding staffing level. Updated training was not provided when new versions of the Complaint Guide were released. There was no documentation of training on the 2016 new guidance on mass shootings. PALU focused on hiring CSRs to handle increased call volume, training was secondary to hiring with lack of training on procedures and protocol. Performance feedback was negligible and inconsistent.

VII. Intake Procedures:

(U//~~FOUO~~) The standard operating procedures outlining how PALU CSRs should answer complaint calls were documented in the Public Access Line Complaint Guide, which was first drafted in 2012 and was last revised on 02/03/2016. Although the 2016 edition of the Complaint

Guide was 75 pages long, only five pages provided guidance regarding how to answer a call, determine whether it merited FBI attention, and action the call accordingly. The remainder of the Complaint Guide consisted of brief descriptions of the violations investigated by the FBI and their case classifications. These were organized by [redacted] b7E

[redacted]

The SOPs were supported by additional documentation: the Desktop Reference Guide, which contained similar information on criminal violations, albeit in a different order and format; the Interview Question Guide, which provided sample questions for each violation for CSRs to ask callers; and a variety of acronym and writing reference materials. The PALM system also contained hyperlinks to the Interview Question Guide, among other reference materials.

(U//~~FOUO~~) The Complaint Guide directed CSRs to escalate calls to a supervisor if the caller discussed: [redacted] Additionally, the Complaint Guide required CSRs [redacted] Interviews revealed CSRs relied on these materials inconsistently. While newer employees used the Interview Question Guide, only [redacted] PALU staff interviewed knew a written policy existed which described specific [redacted] PALU staff interviewed said calls must be escalated if they [redacted]

(U//~~FOUO~~) Separate documentation covered the e-Tip component within PALM. The documentation for e-Tip focused on process and workflow and was more comprehensive than the Complaint Guide. The 2017 e-Tip[1] training materials encompassed a 62-slide presentation [redacted] b7E

(U//~~FOUO~~) Integration:

(U//~~FOUO~~) The PALM system was not integrated with any other FBI information systems of record. PALM existed solely on CJIS' unclassified enclave, and had no external query functions. Consequently, the CSRs conducted manual searches through various databases they deemed necessary. These searches were dependent on each CSR's level of expertise with the system they were querying, as well as the guidance they had received from their LCSR regarding search protocols [redacted] b7E

[1] The scope of this review did not focus on e-Tip. This was a preliminary review of the e-Tip system to understand basic functions of its process.

b7E

She was later advised by a different LCSR A second CSR regularly while a third CSR only

(U//~~FOUO~~) Additionally, PALM's lack of integration with other FBI systems required CSRs to enter the details of calls they received multiple times into multiple systems in order to generate emails, FD-71 Criminal Complaint Forms, and Guardian entries within the unclassified and secret enclaves.

(U//~~FOUO~~) Finally, field offices were unable to access call and e-Tip information stored in PALM unless a CSR had generated an FD-71 Criminal Complaint Form, Orion lead, or Guardian entry. Entries and e-Tips which did not rise to the level of formal documentation remained within PALM and were not ingested into existing FBI search engines or accessible by non-PALU personnel.

(U//~~FOUO~~) Workflow:

b7E

(U//~~FOUO~~) The workflow process for calls received by PALU varied depending on the decisions made by the CSR on the call, and relied on the CSR's Although the UC, SSAs, and LCSRs conducted quality control reviews on randomly selected calls, they did so infrequently and did not utilize a routine sampling procedure to ensure

(U//~~FOUO~~) In contrast, CSRs regularly conducted quality control reviews of e-Tips which were

(U//~~FOUO~~) PALU lacked an established process to transfer calls or e-Tips to other federal, state, or local agencies. When a CSR determined that the matter was best handled by another agency, the information provided to the caller or submitter varied depending on what each CSR deemed appropriate. PALU personnel did not provide call or e-Tip information to other agencies, with the exception of emailed notifications to the USSS when PALU received a threat against a USSS protectee. Even in these instances, PALU personnel did not complete an FD-999 Assistance, Dissemination, and Liaison with Other Agencies Form to document the dissemination.

(U//~~FOUO~~) **Summary:**

b5
b7E

[redacted] b7E

VIII. Performance and Customer Service Metrics:

(U~~//FOUO~~) Statistical analysis was a primary factor used by PALU to evaluate success. PALU installed several large-screen monitors throughout the work area to display call volume, call wait time, service level, and CSR readiness status. None of the [redacted] CSRs interviewed understood how the service level metric was calculated. The CSR time, "not ready", turned yellow when they were in a not ready status for two minutes or longer and red three minutes or longer. CSRs described their stress and anxiety increased when the number of calls waiting in the queue increased.

(U~~//FOUO~~) SSAs provided statistics to individual CSRs on a regular basis which were factored as part of the PAR Summary Rating of a CSR. CSRs were provided a statistical chart on a regular basis which was organized by individual CSR, Shift Average, and PALU Average.

(U~~//FOUO~~) The comparison of metrics on a monthly basis to the average of all CSRs caused the measure of success to change every month. CSRs were aware they needed to meet or exceed the metrics of other CSRs working the same shift; however the measure was not constant. A review of the PAR of four CSRs identified the Achieving Results Addendum of the Performance Plan was blank for all four. However, each PAR included an Achieving Results Critical Element which contained statistics aggregated over the entire rating period. As a result, CSRs were unable to articulate specifically what was expected of them to earn a successful or higher rating.

(U~~//FOUO~~) The CSR Performance Report was provided to the SSAs on a regular basis. The CSR Performance Report contained statistics for every CSR and LCSR in PALU organized by shift. The statistics included comparison with other CSRs working the same shift and the entire PALU. The statistics utilized included: logged in time; not ready time; percentage of time not ready; calls answered; average calls per hour; calls returned to que; calls returned to due to timeout; FD-71 Criminal Complaint Forms, Guardians, and Orion write-ups; and percentage of calls resulting in write-ups.

(U~~//FOUO~~) During monthly supervisor meetings conducted by the US, CSR individual CSR performance was discussed. Additional qualitative factors considered included the SSA's knowledge of the number of edits needed on a CSR's document and level of detail provided in PALM entries.

(U~~//FOUO~~) From February 2016 through February 2018, PALU received 2,334,556 complaint calls and e-Tips. Of those [redacted] b7E

February 2016 through February 2018, PALU received 1,172,309 calls. Of those [redacted] There was no metric to capture the velocity for the FO to receive the complaint.

[redacted] b7E

callers to another agency. The referral consisted of advising the caller to call the referred agency and PALU provided a telephone number when available. The CSR did not provide any notification to the referred agency. There was no process in place to determine if the caller contacted the referred agency and no FD-999 Assistance, Dissemination, and Liaison with Other Agencies Form was completed.

(U//~~FOUO~~) **Summary:** INSD assessed the metrics implemented at the PALU emphasized the availability of the CSR as opposed to completeness and quality of the call intake process. PALU promoted the number of FD-71 Criminal Complaint Forms, Orion entries, and Guardians produced which caused the scope of the CSR role to include the responsibility for identifying when a complaint should be sent to a FO. CSRs were comfortable asking SSAs, LCSRs and other CSRs for guidance and assistance when they had questions; however, no quality control practice was established to validate the accuracy of the decisions of the CSR. Complaint calls and e-Tips not resulting in FD-71 Criminal Complaint Forms, Orion entries, or Guardians were not directly accessible to FOs. CSRs had to balance their ability to write FD-71 Criminal Complaint Forms, Orion entries, and Guardians versus their not ready time. Metrics encouraged CSRs to document information quickly in order to return to a ready status and accept additional calls. CSRs experienced an increase of stress during increased call volume. The lack of a consistent quality control process obstructed the ability of PALU to mitigate risk or understand the quality of service provided to their customers.

IX. Management Oversight and Incident Review:

(U//~~FOUO~~) INSD assessed Management Engagement and Oversight in this review. [redacted]

[redacted] b2 b6 b7C

Leadership, at the branch and section level, never formally memorialized resource needs. The [redacted]

(U~~//FOUO)~~ The following are summaries of the interviews with the management:

[redacted]

b2
b6
b7C

(U~~//FOUO)~~ In an effort to evaluate the productivity, effectiveness, and health of the unit and employees, the PALU management metrics related to call wait times, CSR down-time, call volume, and report production. The UC and SSAs met monthly to discuss the metrics and disseminated the results to the CSRs. During monthly reviews of the metrics with CSRs, the SSAs conveyed competing priorities of document production and complaint calls answered. SSAs missed opportunities to conduct contemporaneous reviews of complaint calls as a means of evaluating the CSR's performance during calls. Performance feedback outside of PARs did not occur as a standard practice. PALU did not have a set of measurable, achievable and time-constrained goals and objectives in their achieving results addendum. As such, performance metrics did not directly tie to a PALU or GOS strategic objective.

(U~~//FOUO)~~ Without a clear objective or criteria for success, PALU was unable to develop SOPs, roles and responsibilities, and the commensurate training. Management did not establish an on-going training program for each role within PALU.

(U~~//FOUO)~~ The PALU converted [redacted] received calls and e-Tips into either [redacted] The PALU did not establish communication links with their customers, the FOs. As a result, the PALU neither received feedback, nor had a process to evaluate the quality of the products sent to field offices.

b7E

(U//~~FOUO~~) CSRs were rated based on performance metrics generated for each CSR for each month. All [redacted] CSRs interviewed understood they were evaluated based on two specific metrics: the number of calls they answered and the number of FD-71 Criminal Complaint Forms, Guardians, and Orion write-ups they generated. CSRs believed their SSAs rated them on the amount of time they spent in "not ready" status.

(U//~~FOUO~~) Although the CSRs were consistent in their understanding of what performance metrics applied to them, they disagreed about whether the metrics were reasonable. Of the CSRs interviewed, [redacted] CSRs assigned to the day and evening shifts said they were expected to produce FD-71 Criminal Complaint Forms, Guardians, and Orion write-ups on 1% to 4% of the calls. Conversely, [redacted] CSRs from the night shift reported they generated documents on less than 1% of the calls they answered, because PALU received so many nuisance calls during the night shift. b7E

(U//~~FOUO~~) [redacted] CSRs on all shifts reported high stress and low morale. CSRs assigned to the night shift blamed their discontent on low staffing, high volume of nuisance calls, and lack of an SSA on the night shift.

(U//~~FOUO~~) All [redacted] CSRs assigned to the day shift reported confidence in their SSAs' and LCSRs' guidance and judgment, and sought guidance from the LCSRs and SSAs when they had questions. Conversely, [redacted] night shift CSRs interviewed said they did not think a GS-9 SMPA should be making operational decisions about calls and an SSA should be assigned to the night shift.

IX. Observations and Recommendations:

(U//~~FOUO~~) **Observation 1:** INSD assessed the onboarding training for new LCSRs and SSAs was incomplete and inconsistent.

(U//~~FOUO~~) **Analysis 1:** PALU did not have a formalized training program until 2016. It was insufficient to handle a rapidly expanding staffing level. Training was not provided when new versions of the Complaint Guide were released and there was no documentation of training on the 2016 new guidance on mass shootings. PALU focused on hiring CSRs to handle increased call volume, training was secondary to hiring, with insufficient training on procedures and protocol. Performance feedback was negligible and inconsistent. CSR calls were reviewed for quality by LCSRs but feedback and performance issues were addressed by SSAs, creating a lack of cohesion. Underperforming CSRs were identified by metrics not fully indicative of actual performance. Developmental opportunities were lacking and career advancement opportunities were negligible as more than 100 CSRs competed for four LCSR positions.

(U//~~FOUO~~) **Recommendation 1:** AD, CJIS should formalize onboarding training, assess and document achievement goals and performance. Focus training on developing critical thinking skills. Expand database training and call shadowing. Cohesively address performance issues, and provide measurable feedback for CSRs.

(U//~~FOUO~~) **Observation 2:** The PALU Complaint Guide required revision.

(U~~//FOUO~~) **Analysis 2a:** The Complaint Guide directed CSRs to escalate complaint calls to a supervisor if [redacted] Most CSRs were unaware of this guidance and applied varying standards to determine which threats necessitated supervisor review. As a result, CSRs inconsistently handled threats.

(U~~//FOUO~~) **Analysis 2b:** The original version of PALU's Complaint Guide was issued in 2012 and contained 27 pages of basic guidance on: [redacted] b7E The 2012 Complaint Guide instructed CSRs to seek supervisor assistance for [redacted] In 2013, PALU amended the 2012 Complaint Guide to expand on topics such as [redacted] no guidance was provided on mass shootings. In 2016, the Complaint Guide was updated to contain guidance on mass shootings.

(U~~//FOUO~~) **Recommendation 2 (a and b):** AD, CJIS should revise the Complaint Guide to provide specific, detailed guidance concerning the escalation of a complaint call to a supervisor. PALU should expand the Complaint Guide guidance to cover all potential threats to life and include details and probative questions for each violation investigated by the FBI.

(U~~//FOUO~~) **Observation 3:** INSD assessed the PALU workflow diagram inappropriately directed database checks be conducted [redacted]

(U~~//FOUO~~) **Analysis 3:** Per the PAL Workflow diagram, [redacted] The PALU Complaint Guide instructed CSRs as follows:

(U~~//FOUO~~ [redacted] b7E

(U~~//FOUO~~) Neither the PALU workflow diagram nor the PALU Complaint Guide provided [redacted]

(U~~//FOUO~~) **Recommendation 3:** AD, CJIS should amend the PAL Workflow diagram and PALU Complaint Guide to instruct CSRs to [redacted]

(U~~//FOUO~~) **Observation 4:** INSD assessed a lack of standardized process with regard to conducting database queries by CSRs.

(U//~~FOUO~~) **Analysis 4:** The PALU 2016 Complaint Guide instructed CSRs to always [redacted] b7E

[redacted]

(U//~~FOUO~~) **Recommendation 4:** AD, CJIS should update the Complaint Guide to specify which databases to query based upon the facts of the complaint. Provide training on all databases to be queried. Write policy outlining required databases to be queried by CSRs. Provide instruction on how to [redacted]

(U//~~FOUO~~) **Observation 5:** INSD assessed the average wait time for callers was excessive.

(U//~~FOUO~~) **Analysis 5:** PALU performed a unique function for the FBI by accepting telephonic and e-mail complaints from the public and providing FD-71 Criminal Complaint Forms, Orion entries, and Guardians to FBI FOs. Call volume dramatically increased following a national critical incident. From February 2016 through February 2018, PALU received 1,172,309 complaint calls, equal to approximately 1,606 calls per day or 67 calls per hour. INSD observed times with more than 40 calls in the waiting queue and an average wait time of 12 minutes.

(U//~~FOUO~~) **Recommendation 5a:** AD, CJIS should capture the velocity of complaint calls from intake to FO dissemination and compare with call volume.

(U//~~FOUO~~) **Recommendation 5b:** AD, CJIS should provide training on probative questions for each violation investigated by the FBI, as outlined in the Complaint Guide.

(U//~~FOUO~~) **Recommendation 5c:** AD, CJIS should conduct a study with similar-sized investigative agency call intake centers to determine appropriate benchmarks and share best practices.

(U//~~FOUO~~) **Observation 6:** INSD assessed emphasis placed on CSR performance metrics, visible to the entire workforce, negatively impacted quality and performance.

(U//~~FOUO~~) **Analysis 6:** PALU installed large-screen monitors throughout the work area to display call volume, call wait time, service level, and CSR readiness status. PALU management monitored and evaluated CSR performance based upon CSR readiness and productivity. None of the 23 CSRs interviewed were able to describe how the service level metric was calculated. CSRs were aware a service level near 100 was good and the metric was derived from an equation based upon the number of calls waiting in the queue and the average wait time. PALU

management encouraged the production of Guardians, FD-71 Criminal Complaint Forms, and Orion entries. The not ready time metric encouraged CSRs to document information quickly in order to return to a ready status and accept additional calls. Night shift CSRs often skipped lunch and breaks in order to answer calls because of high call volume and lack of resources. CSR stress and anxiety was positively correlated with call volume.

(U//~~FOUO~~) PALU supervisors provided monthly performance metrics to the CSRs and expected CSRs to perform at or above their peers. The performance metrics were based upon the CSRs' ability to answer, assess, and document complaint calls. As deemed necessary, CSRs wrote FD-71 Criminal Complaint Forms, Guardians, or Orion entries, or answered another phone call. The not ready time metric encouraged CSRs to document information quickly in order to return to ready status and accept additional calls. As result, the scope of the responsibility of a CSR significantly increased from answering and transcribing complaint calls.

(U//~~FOUO~~) **Recommendation 6:** AD, CJIS should limit the visibility of individual CSR metrics to PALU management, and is encouraged to discuss performance deficiency individually as necessary.

(U//~~FOUO~~) **Observation 7:** INSD assessed a lack of standardized process to initiate the review of call data by a supervisor prior to the determination of NLV by a CSR.

(U//~~FOUO~~) **Analysis 7:** CSRs received no formalized guidance on a standardized review process for NLVs. PALU training materials and reference guides did not outline a standardized review process before a final disposition of NLV could be made by a CSR. CSRs possessed unilateral authority to designate a complaint call as NLV. The PALU lacked quality control to validate the accuracy of the decisions of the CSR, obstructing PALU's ability to mitigate risk or understand the quality of service provided to its customers.

(U//~~FOUO~~) **Recommendation 7:** AD, CJIS should standardize a secondary review process for calls deemed NLV by the CSR. Train CSRs to accurately brief pertinent facts to supervisors before a NLV designation is made. Revise the PALU Complaint Guide to incorporate guidance on the proper handling of NLVs.

(U//~~FOUO~~) **Observation 8:** INSD assessed mandatory SSA review of

(U//~~FOUO~~) **Analysis 8:** The 02/03/2016 revised Complaint Guide instructed CSRs to seek supervisor guidance if the caller articulated any of the following: b7E

(U//~~FOUO~~) **Recommendation 8a:** AD, CJIS should require [redacted] b7E

(U//~~FOUO~~) **Recommendation 8b:** [redacted]

(U//~~FOUO~~) **Observation 9:** INSD assessed a lack of management oversight during the overnight and weekend shifts.

(U//~~FOUO~~) **Analysis 9:** PALU, a 24-hour operation required 168 hours of personnel coverage per week. [redacted] Instead, PALU relied on a [redacted]

(U//~~FOUO~~) **Recommendation 9:** AD, CJIS should ensure SSAs are assigned and on site during all shifts.

(U//~~FOUO~~) **Observation 10:** INSD assessed the quality control measures to ensure incoming calls were appropriately actioned by CSRs were insufficient.

(U//~~FOUO~~) **Analysis 10:** From February 2016 through February 2018, PALU received 1,172,309 calls. Of those, [redacted] Quality control was completed on 100% [redacted] b7E however, no metric existed to capture how many reviews were returned for edits or if those edits changed a disposition from NLV to actionable. There was no SOP for quality control of the [redacted] however, there was no ability to prioritize the quality control process based upon risk.

(U//~~FOUO~~) **Recommendation 10a:** AD, CJIS should formalize the quality control process and develop formal quality metrics.

(U//~~FOUO~~) **Recommendation 10b:** AD, CJIS should share the PALM database with FO and HQ operational divisions to ensure investigator and intelligence personnel have access to [redacted] This would reduce risk and provide quality assurance in the intake process by providing higher analytical oversight. b7E

(U//~~FOUO~~) **Recommendation 10c:** AD, CJIS should pursue an increase in funded staffing levels [redacted]

- [redacted]
- [redacted]

- [redacted]
- [redacted]
- [redacted] b7E
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

[redacted]

(U/~~/FOUO~~) **Recommendation 10d:** AD, CJIS should create technological studies for commercially-available software to automatically convert a complaint call into digital text. By converting into digital text, the complaint will become searchable with the tools currently utilized by e-Tips to search key threat terms, reducing human error and creating quality control and assurance. In addition, the conversion would reduce the need to expend more funds towards higher-salaried staff, which would undermine one of the reasons for the creation of PALU.

(U/~~/FOUO~~) **Recommendation 10e:** AD, CJIS should create a technological study for commercially-available software to assist in schedule planning based on call volume data to ensure maximum use of personnel. [redacted]

[redacted]

(U//~~FOUO~~) **Observation 11:** INSD assessed the

(U//~~FOUO~~) **Analysis 11a:** The e-Tips reporting system was

b7E

(U//~~FOUO~~) **Analysis 11b:** PALU management entered

(U//~~FOUO~~) **Recommendation 11a:** AD, CJIS should implement the

(U//~~FOUO~~) **Recommendation 11b:** AD, CJIS should review, amend and add

(U//~~FOUO~~) **Observation 12:** INSD assessed the dissemination of information via FD-71 Criminal Complaint Forms was subjected to unnecessary delay for non-substantive edits.

(U//~~FOUO~~) **Analysis 12:** CSRs interviewed complained LCSRs and SSAs returned their FD-71 Criminal Complaint Forms for stylistic corrections, rather than substantive changes. The CSRs estimated between 50% and 80% of corrections focused on grammar, spelling, and punctuation rather than the substance of the complaint. These edits slowed the process of serializing the FD-71 Criminal Complaint Forms and caused delays in transmitting them to the FOs for action.

(U//~~FOUO~~) **Recommendation 12:** AD, CJIS should ensure edits to documentation do not cause a delay in the speed at which the complaint reaches FOs; additionally, ensure following the style guide does not sacrifice timely dissemination in pursuit of stylistic perfection.

b7E

(U//~~FOUO~~) **Observation 13:** INSD assessed the PALU, utilized two competing incident intake forms, the FD-71 Criminal Complaint Form and Guardian

(U//~~FOUO~~) **Analysis 13:** Complaint calls and e-Tips must be analyzed rapidly for authenticity and threat level. [redacted] b7E

[redacted]

(U//~~FOUO~~) A written survey of the CSRs indicated a preference for using [redacted]

[redacted]

(U//~~FOUO~~) **Recommendation 13a:** AD, CJIS should eliminate the FD-71 Criminal Complaint Form from use.

(U//~~FOUO~~) **Recommendation 13b:** AD, CJIS and AD Office of Partner Engagement (OPE) should create a robust informational campaign and create one streamlined threat intake system to make all threats of violence visible by all sworn law enforcement partners. This synergy would close a number of intelligence gaps in law enforcement response and share escalating information to prevent violent crimes.

(U//~~FOUO~~) **Observation 14:** INSD assessed the PALU did not utilize a formalized feedback mechanism to evaluate the relevance and quality of products disseminated to the field.

(U//~~FOUO~~) **Analysis 14:** From February 2016 through February 2018, the PALU received 1,172,309 calls. [redacted] b7E however, there was no formal process for the field to provide feedback to the PALU regarding the quality of product. With no formalized quality control process, PALU had no understanding of the quality or relevance of its products. PALU had no ability to refine its processes and procedures to better serve FOs based upon constructive feedback. The PALU had no ability to provide quality metrics to its employees regarding how their work impacted the mission of the FBI.

(U//~~FOUO~~) **Recommendation 14a:** AD, CJIS should implement a formal process to capture voluntary feedback from the field regarding the quality and relevance of its products and utilize feedback from the field as a quality control metric.

(U//~~FOUO~~) **Recommendation 14b:** AD, CJIS should utilize feedback from the field to refine its processes and SOPs to improve customer service.

(U//~~FOUO~~) **Recommendation 14c:** AD, CJIS should utilize value statements from FOs to increase morale and improve product.

(U//~~FOUO~~) **Recommendation 14d:** AD, ITADD should have a PALU opening indicator programmed in the opening of documents created within Sentinel and in DELTA to allow for personnel to designate if the information or intelligence furnished in the opening of a case was

predicated upon a PALU referral through a FD-71 Criminal Complaint Form, Guardian, Orion, or verbal transfer from the intake center.

(U//~~FOUO~~) **Observation 15:** INSD assessed data maintained within the [redacted] b7E

(U//~~FOUO~~) **Analysis 15:** [redacted]

(U//~~FOUO~~) [redacted]

From February 2016 through February 2018 PALU received 1,172,309 calls, all of which were documented in PALM. Of the 1,172,309 calls received, [redacted]. The information collected from the remaining [redacted] calls were entered into PALM but was not directly accessible to any FO. b7E

(U//~~FOUO~~) **Recommendation 15:** AD, CJIS and AD, ITADD should collaborate with the IT Applications and Data Division to [redacted]

(U//~~FOUO~~) AD, CJIS and AD, ITADD should collaborate with the Directorate of Intelligence to establish permanent analytical positions within PALU responsible for [redacted]

(U//~~FOUO~~) **Observation 16:** INSD assessed the PALU did not sufficiently refer matters of potential interest to other law enforcement agencies.

(U//~~FOUO~~) **Analysis 16:** PALU lacked an established process to transfer calls or e-Tips to other federal, state, or local agencies. CSRs provided callers with limited, inconsistent referrals to other federal, state, and local agencies, but did not respond to e-Tip complainants with similar referrals. PALU personnel did not provide complaint call or e-Tip information to other agencies, with the exception of emailed notifications to the National Center for Missing and Exploited Children when PALU received a tip about child exploitation, and the USSS when PALU received a threat against a USSS protectee. PALU personnel did not complete an FD-999

Assistance, Dissemination, and Liaison with Other Agencies Form to document the dissemination.

(U/~~FOUO~~) **Recommendation 16:** AD, CJIS; AD, ITADD; and AD, OPE should work with Information Technology Applications and Data Division (ITADD) to incorporate a mechanism within PALM by which call and e-Tip summaries can be electronically transmitted to other federal and state agencies when deemed appropriate. This mechanism should also allow PALM to generate an automated FD-999 Assistance, Dissemination, and Liaison with Other Agencies Form to document each external dissemination.

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1419864-000

Total Deleted Page(s) = 1
Page 31 ~ b2; b6; b7C;

XXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXX

INSPECTION DIVISION
OFFICE OF INSPECTIONS

INSPECTOR'S REPORT
PHASE II SPECIAL INSPECTION
CRIMINAL JUSTICE INFORMATION SERVICES DIVISON
06/04/2018 – 06/14/2018

Terry Wade
Assistant Director
Inspection Division

Table of Contents

I.	Overview	3
II.	Scope and Objectives	3
III.	Summary of Phase I Observations and Recommendations	3
IV.	Status of Phase I Observations and Recommendations	5
V.	Leadership	29
VI.	Observations	32

I. Overview:

(U//~~FOUO~~) On 02/15/2018, the Criminal Justice Information Services (CJIS) Division, Operational Programs Branch (OPB), Public Access Line Unit (PALU) learned it had received a telephonic tip regarding Nikolas Cruz, the individual subsequently responsible for the shooting incident at the Marjory Stoneman Douglas High School in Parkland, Florida (Parkland) on 02/14/2018. On 02/17/2018, INSD deployed to conduct a Special Inspection (Phase I) of the PALU. Sixteen Observations and 29 Recommendations were issued as a result of the Phase I Special Inspection. On 06/04/2018, INSD redeployed (Phase II) to CJIS to assess progress on those Observations/Recommendations.

(U//~~FOUO~~) The special review was led by Inspector James A. Cochran.

II. Scope and Objectives:

(U//~~FOUO~~) The scope of the Phase II Special Inspection was twofold: 1) INSD was directed to assess documented progress toward the resolution of the Observations and Recommendations set forth in the CJIS Phase I Special Inspection report; and 2) INSD was directed to assess the leadership of the CJIS OPB, with a weighted emphasis on the Global Operations Section (GOS) and PALU, in order to evaluate the effectiveness of leadership in the appropriate and timely resolution of the aforementioned Observations and Recommendations.

(U//~~FOUO~~) From 06/03/2018 through 06/14/2018, INSD deployed a team of one Inspector, three Team Leaders, and 21 Assistant Inspectors in Place (AIIPs). In addition to a review of documented progress toward the resolution of the previously referenced Observations and Recommendations, INSD conducted interviews of Executive Management within the OPB chain of command, Unit Chiefs and shift supervisors within the OPB, personnel assigned to the PALU, and other logical interviews as determined necessary. A total of [redacted] interviews were conducted to fully assess whether substantive procedural and structural changes, along with appropriate oversight and quality control measures, were implemented pursuant to the Phase I Special Inspection, and whether CJIS management effectively led those changes in a coordinated and timely manner. b7E

III. Summary of Phase I Observations and Recommendations:

(U//~~FOUO~~) INSD assessed 15 (52%) of the 29 Recommendations were resolved as of 06/14/2018; however, many resolved Recommendations required continued engagement by CJIS Executive Management to ensure sustainability.

(U//~~FOUO~~) INSD assessed substantive steps had been made toward the resolution of INSD's Recommendations. The Complaint Guide, previously used as the primary reference material for Customer Service Representatives (CSR), was replaced with more robust Standard Operating Procedures (SOP) which included appropriate detail regarding the [redacted] b7E

[redacted]

Appropriate training was developed, delivered, and successfully completed by CSRs to reinforce the SOPs. Individual CSR metrics were removed from the workplace monitors, quality assurance sampling of No Lead Value (NLV) calls was instituted, SSAs were assigned to all shifts to provide appropriate oversight, FSL increases were obtained, and a contract to replace the existing phone system with the Calabrio system capable of supporting voice-to-text (V2T) [redacted] b7E

(U//~~FOUO~~) However, INSD assessed CJIS did not appropriately prioritize and execute the resolution of these Recommendations through the lens of reducing organizational risk in an expeditious manner. Actions undertaken by CJIS since the Phase I Special Inspection did not sufficiently mitigate the risk posed by calls [redacted]

(U//~~FOUO~~) There were comprehensive SOPs, but no technical quality control measures, to prevent [redacted] On 06/08/2018, PALU implemented [redacted] This process mitigated risk to some extent and was anticipated to improve quality and efficiency over time through the CSR feedback loop; however, gaps remained. The Public Access Line Manager (PALM) software did not enforce two critical elements of the SOPs: [redacted] b7E

(U//~~FOUO~~) Since the Phase I Special Inspection, CJIS amended policy on several occasions regarding [redacted] in order to manage call wait times. When INSD began the Phase II Special Inspection on 06/04/2018, [redacted] b7E

(U//~~FOUO~~) To facilitate sharing NLV data within the field, on 04/11/2018, CJIS provided field office access to historical NLV transactions (03/23/2017 through 02/26/2018) by creating a standalone application called PALM Call Review (PALM CR). Participation by the field in this initiative was voluntary; however, based upon the insufficient participation level, discussions between EAD, STB and the Deputy Director were ongoing. The intent of the related Phase I Special Inspection Recommendation was to make this a repeatable, sustainable process with active field office access to PALM to enable the field offices to review NLV data on a daily basis. Of note, the 06/08/2018 version of the CJIS Information Technology Management Section (ITMS) PAL Program Increment Roadmap indicated PALM CR was a completed action. There were no additional features or enhancements assigned to Program Increments, and INSD observed nothing related to PALM CR in the Unplanned Features/Enhancements backlog. The lack of ITMS open action items regarding PALM CR was consistent with impressions conveyed by interviewees that PALM CR was a one-off system which would not be needed in the future.

(U//~~FOUO~~) INSD assessed providing field offices with real time access to NLV data was technologically feasible at the conclusion of the Phase I Special Inspection, remained

technologically feasible at the present time, and would not create an unreasonable burden on field offices when balanced against risk mitigation. For example, between 06/01/2018 and 06/07/2018, callers to PALU from the Los Angeles area of responsibility (AOR), the largest caller base, resulted in an average of

b7E

(U/~~FOUO~~) INSD assessed the PALU shift schedule represented no substantive change from the conditions which existed during the Phase I Special Inspection. The overly complex schedule and lack of uniform shift overlap resulted in avoidable communication barriers exacerbated by the significant change in the unit subsequent to Parkland.

IV. Status of Phase I Observations and Recommendations:

(U/~~FOUO~~) **Observation 1:** INSD assessed the onboarding training for new LCSRs and SSAs was incomplete and inconsistent.

(U/~~FOUO~~) **Recommendation 1:** AD, CJIS should formalize onboarding training, assess and document achievement goals and performance. Focus training on developing critical thinking skills. Expand database training and call shadowing. Cohesively address performance issues and provide measurable feedback for CSRs.

(U/~~FOUO~~) **Current Status: Not Resolved**

(U/~~FOUO~~) CJIS had not formalized onboarding training or expanded call shadowing. CJIS met the following subcomponents of the Recommendation: assess and document achievement goals and performance; focus training on developing critical thinking skills; expand database training; cohesively addressing performance issues; and provide measurable feedback for CSRs.

(U/~~FOUO~~) On 03/23/2018, CJIS established four PALU "Tiger Teams" to focus on PALU development as it transitioned from a call center to an operations center, as well as the resolution of the 16 INSD Observations from the February 2018 Phase I Special Inspection:

1. Quality Assurance (QA) Team: The QA Team's mission was to develop the PALU Business Plan and subsequently track the progress of objectives, strategies, and measures set forth; and to develop and implement a QA process to review calls and E-Tips.

2. SOP Team: The SOP Team was created to review existing procedures and to develop enhanced SOPs aligned with the requirements of an operations center in accordance with FBI collection requirements and threat categories.

3. IT Project Management Team: The IT Project Management Team's role was to assess and enhance PALU IT, creating efficiencies and improving processes.

4. Training Team: The Training Team's mission was to develop curriculum and deliver training to meet FBI training standards.

(U//~~FOUO~~) CJIS had not formalized new employee onboarding training. The Training Team determined the immediate training need was to ensure current PALU employees understood new requirements. As such, the Training Team prioritized the creation of curriculum and delivery of training on three critical areas:

1. Module 1: PALM updates since February 2018 and Database Queries

2. Module 2: Threat Identification and Assessment

3. Module 3: SOPs; Probative Questions; Database Queries

(U//~~FOUO~~) Module 1 training sessions were delivered in a classroom setting from 04/09/2018 - 04/27/2018. Remedial training was provided from 05/22/2018 - 05/25/2018 to students who failed the post-course test. All CSRs passed the training. On 06/05/2018, INSD reviewed the training materials and training roster within Virtual Academy (VA), and assessed Module 1 as completed.

(U//~~FOUO~~) Module 2 training was delivered from 04/18/2018 - 04/26/2018 in a classroom setting. Remedial sessions were completed by 05/23/2018. As a component of Module 2, CJIS delivered training on 05/23/2018 which focused on threat assessment critical thinking skills. The learning objectives included: [redacted] b7E On 06/05/2018, INSD reviewed the lesson plan, training materials, and training roster, and assessed Module 2 as completed.

(U//~~FOUO~~) Module 3 curriculum development commenced on 05/21/2018 and consisted of six separate blocks of instruction. Through review of lesson plans and course materials, INSD assessed the Module 3 curriculum was approximately 30% completed.

(U//~~FOUO~~) CJIS did not expand call shadowing as recommended subsequent to the CJIS 2018 Phase I Special Inspection. Call shadowing was a component of new employee onboarding training, which had not been developed or implemented.

(U//~~FOUO~~) CJIS appropriately established and documented goals and performance measures for PALU. In the CJIS Public Access Line Business Plan, Version 6.0, dated 03/30/2018, CJIS outlined seven programmatic training objectives and respective detailed strategies and measures. CJIS appropriately documented progress toward those training objectives internally, as well as in VA.

(U//~~FOUO~~) CJIS expanded its training curriculum on database queries to reflect the recent change reflected in the revamped PALU SharePoint site launched on 06/03/2018. The training

was delivered as a component of Module 1. INSD reviewed lesson plans, training materials, and the course roster. CJIS amended the PALU workflow diagrams for calls and E-Tips, both dated 04/02/2018, and the PALU SOP on 06/01/2018, to instruct CSRs to [redacted] b7E

[redacted]

(U//~~FOUO~~) The QA Team was established to assist PALU in identifying deficiencies, training needs, and opportunities to streamline processes, in addition to establishing a confidence level regarding the quality of PALU products and services as outlined in the PALU. The QA Team's mission was detailed in a whitepaper dated 05/29/2018, and the objective documented in PALU SOP Section 10.1. Those procedures documented three primary areas of focus: phone skills; technical skills; and, decision-making skills. The QA process commenced on 06/08/2018. Each call reviewed was scored to evaluate and improve CSRs performance. In addition, the QA Team was intended to present observed performance deficiency trends to the Training Team for consideration for inclusion in future training sessions. INSD was unable to fully assess the effectiveness of the QA Team in addressing those objectives as the team commenced operations during the Phase II Special Inspection.

(U//~~FOUO~~) The UC and SSAs in PALU have historically used individualized monthly and quarterly CSR metrics to privately discuss performance and track personnel development. The metrics formed the basis for two critical elements (Achieving Results and Making Decisions) and were reflected in all 2017 CSR PARs. The UC and SSAs used these metrics to track performance deficiencies, performance improvement, and in consideration of award nominations. The PALU UC and SSAs met weekly, and performance issues were discussed during the first meeting of each month to ensure fair and accurate CSR ratings, based on input from multiple PALU SSAs.

(U//~~FOUO~~) **Observation 2:** The PALU Complaint Guide required revision.

(U//~~FOUO~~) **Recommendation 2a:** AD, CJIS should revise the Complaint Guide to provide specific, detailed guidance concerning the escalation of a complaint call to a supervisor.

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) On 06/03/2018, PALU launched its updated SOP via a revamped PALU SharePoint site. Accessible to all PALU employees, the revamped PALU SharePoint site consolidated the PALU Complaint Guide (last revised 07/11/2017), PALU Cheat Sheet, and Probative Questions listing into one, comprehensive SOP.

(U//~~FOUO~~) Detailed guidance concerning the escalation of a complaint call to a supervisor was documented in PALU SOP Section 3.4. Updated from the PALU Complaint Guide, the new escalation guidance outlined the criteria to determine when to seek SSA assistance and included a description of the respective duties of the CSR and the SSA. The new guidance described the "Send to SSA" tab button within PALM as a quality control feature.

(U//~~FOUO~~) [redacted] b7E

[redacted]

(U//~~FOUO~~) INSD noted as of 06/08/2018, there was no [redacted]

[redacted]

(U//~~FOUO~~) CJIS established a secondary review process consisting of an independent review of [redacted]

[redacted]

(U//~~FOUO~~) The PALU Workflow Diagram, dated 04/02/2018, required [redacted]

[redacted]

(U//~~FOUO~~) In an interview conducted by INSD, the PALU UC indicated random sampling of PALM records was conducted by PALU staff prior to the launch of the formal QA process on 06/08/2018. This sampling revealed both CSRs and SSAs followed the guidance set forth in the Workflow Diagram as directed and appropriately handled the disposition of the calls.

(U//~~FOUO~~) **Recommendation 2b:** PALU should expand the Complaint Guide guidance to cover all potential threats to life and include details and probative questions for each violation investigated by the FBI.

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) Although INSD's original Recommendation was to include details and probative questions for each violation investigated by the FBI, INSD assessed the depth of review rendered by PALU and the comprehensive list of investigative programs and subprograms presented in PALU SOP Section 4.1, "Violation Guidance" met the intention of the Recommendation. Section 4.2 through 4.18 of the PALU SOP presented sufficient details and probative questions for the overwhelming majority of violations investigated by the FBI.

(U//~~FOUO~~) The PALU SOP was expanded to cover all potential threats to life (PALU SOP Section 3.5), including detailed active shooter guidance (PALU SOP Section 3.11).

(U//~~FOUO~~) The revised PALU SharePoint site featured efficiencies such as a search capability and hyperlinks within documents. For example, PALU SOP 3.6 "Database Queries" contained hyperlinks to database tutorials. PALU SOP 4.18 "Violent Crime" included guidance on "Mass Killing/Active Shooter" to include probative questions and a hyperlink to the Behavioral Analysis Unit's School Shooter Quick Reference Guide.

(U//~~FOUO~~) When the revised PALU SharePoint site launched on 06/03/2018, the PALU UC emailed PALU employees the official notification of its existence, and the SOP Team emailed PALU employees a tutorial on its use. The previous version of the PALU SharePoint site was deactivated on 06/11/2018.

(U//~~FOUO~~) The SOP Team was staffed with a representative from the PALU Administrative Team and members on a TDY basis from the CJIS Biometric Services Section, Quality Improvement Unit, Process Improvement Team (PIT). PALU incorporated the SOP Team within the unit to ensure all unit SOPs remained current and accurate.

(U//~~FOUO~~) **Observation 3:** INSD assessed the PALU workflow diagram inappropriately directed database checks be conducted [redacted]

(U//~~FOUO~~) **Recommendation 3:** AD, CJIS should amend the PALU Workflow diagram and PALU Complaint Guide to instruct CSRs to query databases [redacted] b7E

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) CJIS Division amended the PALU workflow diagrams for calls and E-Tips on 04/02/2018 and updated the PALU SOP on 06/01/2018 to instruct CSRs to query databases [redacted] Training on database queries and the new "Send to SSA" button feature in PALM was delivered to all CSRs in Module 1 training, titled "Public Access Line Manager Updates and Database Queries." The one-hour training course was provided in a classroom setting over multiple sessions during 04/09/2018 - 04/16/2018. Make-up sessions were concluded by 04/27/2018, and one-on-one remedial sessions were conducted during 05/17/2018 - 05/25/2018. As of 06/05/2018, documentation of 100% CSR completion was maintained in VA. INSD reviewed the VA Module 1 course completion list and the Module 1 remedial training list and cross-referenced the current PALU personnel roster against those lists to verify 100% compliance. Additional database query training was also included in Module 3 training, scheduled for delivery in July 2018. b7E

(U//~~FOUO~~) As a result of the CJIS 2018 Phase I Special Inspection, INSD recommended AD, CJIS devise a mechanism within the PALM to capture [redacted]

[redacted] b7E

(U//~~FOUO~~) Per INSD interview of the PALU UC on 06/11/2018 and INSD's review of emails to PALU staff, on multiple occasions since the Phase I Special Inspection, CJIS changed the policy regarding which database queries were mandatory. The changes impacted call wait time, as conveyed by PALU management to CJIS Executive Management.

(U//~~FOUO~~) INSD examined call wait times on three consecutive dates in March, as the guidance changed on each of those dates. On 03/12/2018, the PALU UC advised Executive Management directed all calls and E-Tips were to be [redacted] and noted the call wait times had increased significantly to approximately 21 minutes. This was verified by INSD review of the "PAL Hourly Combined" call report. On 03/13/2018, the PALU UC advised all CSR personnel CJIS Executive Management reversed its decision to make [redacted] According to an INSD review of the "PAL Hourly Combined" call report, call wait time had reached 34:46 minutes just prior to the 03/13/2018 email notification from the PALU UC, but started to decrease significantly after the guidance was conveyed. On 03/14/2018, the PALU UC advised Executive Management decided [redacted] Call wait time increased that evening to a maximum of 30:37 minutes. On 03/15/2018, the PALU UC directed all CSRs that [redacted] Call wait time dropped noticeably, but there were still significant wait times of up to 26:30 minutes the next day (03/16/2018). INSD attempted to determine whether there was a clear correlation between mandated database checks and call wait time, but INSD could not identify a clear trend, as other variables (such as number of CSRs logged into the system and normal call volume) could have contributed to the variation. INSD assessed further evaluation by CJIS was needed to determine the impact to call wait time with regards to augmented database queries.

(U//~~FOUO~~) When INSD began the Phase II Special Inspection on 06/04/2018, [redacted] b7E This policy was reflected in the SOP on the PALU SharePoint site as of 06/03/2018. On 06/11/2018, per INSD interview with the PALU UC, PALU received guidance via email from the Chief of Staff for EAD, STB. This email referenced the EAD's visit to CJIS in April 2018 during which "the EAD discussed [redacted] This guidance from the EAD's Chief of Staff was immediately implemented on 06/11/2018.

(U//~~FOUO~~) INSD examined the database queries mandated by the PALU SOP, to surmise whether they were sufficient to determine the lead value of the call. On 06/08/2018, three AIIPs spent approximately one hour listening to calls on the PAL line and observed CSR work process in response to each call. INSD assessed the CSRs' queries of [redacted] appropriate based on the information provided during the telephone calls. INSD also assessed it was challenging for a CSR to conduct a fruitful [redacted] when the caller provided limited information.

(U//~~FOUO~~) **Observation 4:** INSD assessed a lack of standardized process with regard to conducting database queries by CSRs.

(U//~~FOUO~~) **Recommendation 4:** AD, CJIS should update the Complaint Guide to specify which databases to query based upon the facts of the complaint. Provide training on all databases to be queried. Write policy outlining required databases to be queried by CSRs. Provide instruction on how to [redacted] b7E

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) The PALU Complaint Guide (last revised 07/11/2017), the PALU Cheat Sheet, and Probative Questions were combined into one, comprehensive SOP on 06/03/2018. The PALU SOP was updated to specify which databases CSRs should query based upon the facts of the complaint and was electronically available to the PALU personnel on the PALU SharePoint site. SOP 3.0 encompassed processing instructions regarding the [redacted] b7E INSD was granted access to the PALU SharePoint site on 06/05/2018 and verified the SOP contained detailed instructions regarding when to query various databases and step-by-step procedures for querying [redacted]

(U//~~FOUO~~) By 05/25/2018, all CSRs had received training on database queries during PALU Module 1 training. This module included guidance on all databases to be queried and instructions on how to properly [redacted] The course learning objectives included: identification of the mandatory database to search; identification of the [redacted] databases to search; and identification of how to search databases. Completion of this training by all PALU CSRs was documented in VA as of 06/05/2018. INSD reviewed the VA Module 1 course completion list and the Module 1 remedial training list, and cross-referenced the current PALU personnel roster against those lists to verify 100% compliance.

(U//~~FOUO~~) Per INSD interview of the PALU UC on 06/11/2018, on several occasions since the Phase I Special Inspection, the CJIS AD and DAD changed the guidance regarding which database queries were mandatory. When INSD began the Phase II Special Inspection on 06/04/2018, [redacted] was the only mandatory database check. This policy was reflected in the SOP on the PALU SharePoint site as of 06/03/2018. On 06/11/2018, per INSD interview with PALU UC, PALU received guidance via email from the Chief of Staff for EAD, STB. This email referenced the EAD's visit to CJIS in April 2018 during which "the EAD discussed [redacted] INSD reviewed the PALU SharePoint site on 06/12/2018 and confirmed SOP sections 3.1; 3.2; and 3.7 were updated to reflect [redacted] as mandatory database checks. b7E

(U//~~FOUO~~) **Observation 5:** INSD assessed the average wait time for callers was excessive.

(U//~~FOUO~~) **Recommendation 5a:** AD, CJIS should capture the velocity of complaint calls from intake to FO dissemination and compare with call volume.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) INSD assessed CJIS had not resolved the recommendation to capture the velocity of complaint calls from intake to field office dissemination due to a lack of interconnectivity [redacted] b7E

(U//~~FOUO~~) PALU measured call velocity as the time between when the call was received by a CSR to when a CSR terminated the call. The time on a call was measured automatically through the phone system (AVAYA) module called Contact Center Manager (CCM). A PALU MAPA was responsible for generating monthly performance reports provided to the PALU UC and SSA cadre. Velocity reports were utilized for process analytics and to identify and address potential CSR performance matters.

(U//~~FOUO~~) PALU did not calculate call velocity based on the total time from a [redacted] b7E [redacted]. INSD recognized in order to provide a consistently reliable accounting of time reflected in the velocity measure, a technical solution must be implemented to integrate [redacted] systems to leverage the full workflow tracking log available within both systems.

(U//~~FOUO~~) Based on information provided by PALU management, recent discussions with CJIS ITMS had occurred to address the velocity issue. However, INSD assessed based upon interviews with the CJIS IT Team, CJIS and the Information Technology Applications and Data Division (ITADD) had not yet discussed this matter and therefore no formal developmental items related to this recommendation were documented in the 06/08/2018 ITMS PAL Program Increment Roadmap.

(U//~~FOUO~~) **Recommendation 5b:** AD, CJIS should provide training on probative questions for each violation investigated by the FBI, as outlined in the Complaint Guide.

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) Training on probative questions for CSRs was developed, reviewed, and approved on 04/13/2018. CSR probative question training was conducted between 04/18/2018 and 04/26/2018, with makeup sessions conducted on 05/23/2018 as part of Module 2. INSD cross-checked the list of all CSRs onboard provided by CJIS and the training certificates in VA and discovered four discrepancies, all of which were satisfactorily resolved. Probative questions were included in the PALU SOPs which went into effect on 06/03/2018. On 06/08/2018, INSD confirmed 100% of the PALU CSRs received Module 2 training and passed the post-course test.

(U//~~FOUO~~) Based on information provided by the PALU Training "Tiger Team" lead, Module 3 curriculum development commenced on 05/21/2018. It included four training blocks focused on the newly revised list of probative questions pertaining to each category of federal violations.

INSD assessed PALU had completed 30% of Module 3 curriculum development as of 06/11/2018.

(U//~~FOUO~~) **Recommendation 5c:** AD, CJIS should conduct a study with similar-sized investigative agency call intake centers to determine appropriate benchmarks and share best practices.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) PALU engaged 10 federal agencies and one local police department to study operation centers' best practices on call triage, nuisance callers, and lead dissemination. A PALU SSA visited four federal agencies from 04/10/2018 to 04/13/2018, and an Acting Section Chief (A/SC) visited the USSS Protective Intelligence Operation Center on 05/25/2018. CJIS had additional telephonic or email contact with Homeland Security Investigations (HSI); U.S. Marshals Service (USMS); Metropolitan Police Department (MPD), Washington, DC; Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF); U.S. Immigration and Customs Enforcement. A two and one-half page document entitled, PALU Review of Call Centers: Response to Inspection Division Recommendation 5c, dated 06/08/2018, was provided for INSD review. This document contained largely superficial analysis, highlighted the need for further analysis to be conducted with regard to simplifying the PALU shift schedule, provided details regarding the differences between visited sites and PALU, and provided insufficient analysis with regard to best practices which could be scaled appropriately. The document contained limited recommendations for specific or substantive change.

(U//~~FOUO~~) **Observation 6:** INSD assessed emphasis placed on CSR performance metrics, visible to the entire workforce, negatively impacted quality and performance.

(U//~~FOUO~~) **Recommendation 6:** AD, CJIS should limit the visibility of individual CSR metrics to PALU management, and is encouraged to discuss performance deficiency individually as necessary.

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) CJIS removed individual CSR metrics from the large-screen monitors throughout the work area and limited the visibility of individual CSR metrics to PALU management on 03/02/2018. INSD observed the metrics had been removed from the large-screen monitors during the Phase II Special Inspection, and replaced with key threat words, total number of calls in the queue, and average caller wait time.

(U//~~FOUO~~) The UC and SSAs in PALU used individualized monthly and quarterly CSR metrics to privately discuss performance and track personnel development. The metrics formed the basis for critical elements Achieving Results and Making Decisions, and were reflected in all 2017 CSR PARs. INSD reviewed an Excel spreadsheet documenting the mid-year progress review (MYPR) ratings for all PALU CSRs, as well as a sample of PALU CSR MYPRs for employees performing at the Excellent, Minimally Successful, and Unacceptable levels. INSD's review confirmed PALU management provided detailed feedback to underperforming CSRs and

appropriate commendation to those performing above the successful level. The UC and SSAs used these metrics to track and improve performance deficiencies, as well as in support of employee award nominations. For example, PALU established awards for "Most Improved CSR" and "Veteran CSR of the Year," based on call and document metrics. The PALU UC and SSAs met weekly, and performance issues were discussed during the first meeting of each month to ensure fair and accurate CSR ratings, based on input from multiple PALU SSAs.

(U//~~FOUO~~) **Observation 7:** INSD assessed a lack of standardized process to initiate the review of call data by a supervisor prior to the determination of NLV by a CSR.

(U//~~FOUO~~) **Recommendation 7:** AD, CJIS should standardize a secondary review process for calls deemed NLV by the CSR. Train CSRs to accurately brief pertinent facts to supervisors before a NLV designation is made. Revise the PALU Complaint Guide to incorporate guidance on the proper handling of NLVs.

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) The secondary review process for PALU calls went into effect on 06/08/2018. CJIS established a QA team to evaluate PALM processes and functions as a PALU QA component. The QA team was comprised of senior Process Improvement Team (PIT) personnel with professional certifications in quality assurance and process improvement.

(U//~~FOUO~~)

b7E

CJIS Executive Management approved the use of a 99% confidence interval with 3% margin of error to determine the statistically relevant QA sample to use. Based on call volume data from March 2018, this translated to reviewing 57 calls per day.

(U//~~FOUO~~) The QA Team was

b6
b7C
b7E

The QA Team was staffed with full-time permanent MAPAs, all of which had been identified and assigned. stated the Team will be fully staffed by the end of June 2018, when training concludes for additional MAPAs. stated all personnel were assigned to PALU and there were no TDY personnel.

(U//~~FOUO~~) Based on reports provided by the QA Team, for the period between 06/08/2018 and 06/11/2018, the QA Team reviewed 766 calls.

b7E

[redacted] b7E

(U//~~FOUO~~) CJIS provided training to CSRs on how to brief SSAs as part of Module 2. CSR training was conducted between 04/18/2018 and 04/26/2018, with makeup sessions conducted on 05/23/2018. INSD cross-checked the list of CSRs onboard against the training certificates in VA and discovered four discrepancies, all of which were satisfactorily resolved. According to PALU Training Team, CJIS initiated the first block of Module 3 training. As of 06/11/2018, nine CSRs missed the training and needed to attend a makeup session. PALU Training Team initiated the second block of Module 3 training on 06/07/2018 with two sessions of 15 to 20 students each. This block also included training on briefing techniques and probative questions relative to FBI violations.

(U//~~FOUO~~) Five SOPs went into effect on 06/03/2018 pertaining to the secondary review process. There were individual SOPs for reviewing the work of CSRs, Intake Research Specialists (IRSs) (not onboard yet), and SSAs. There was also a SOP describing the PALU mechanism to resolve an initial No NLV decision. In addition to identifying calls incorrectly classified as NLV, the secondary review process assessed CSR performance in three critical areas: phone skills, technical skills, and decision making ability. The call review process also assessed SSA performance. To further develop and validate the SOPs and the PALM features supporting the QA process, the QA Team Lead reviewed PALU calls for three CSRs prior to making the QA process operational. The QA Team developed a weekly report to capture results and metrics from calls reviewed. The report was reviewed and approved by the PALU management. Additional reports were planned but were not yet implemented.

(U//~~FOUO~~) The PALM software was enhanced to support the QA function. [redacted] b7E The QA Team Lead tested the enhancements made to support the secondary review process, however, the system was not stress tested to ensure it scaled to the production workload.

(U//~~FOUO~~) As of 06/08/2018, the PALM did not enforce several critical elements of the SOPs such as the CSRs ability to [redacted] b7E

(U//~~FOUO~~) **Observation 8:** INSD assessed mandatory SSA review of [redacted]

(U//~~FOUO~~) **Recommendation 8a:** AD, CJIS should require [redacted]

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) CJIS updated the PALU Workflow Diagram on 04/02/2018 to require SSAs to [redacted] This Workflow Diagram was documented in the updated SOP, Section 3.4 which went live on the new PALU SharePoint site on 06/03/2018. All SSAs in PALU were advised of the updated SOP and the new SharePoint site via UNET email on 06/03/2018 sent by the PALU UC. Additionally, all SSAs were provided a PowerPoint Presentation (PPT) titled "New PALU SharePoint Home Page" by the PALU UC on 06/01/2018 via UNET email. SOP training was included in the learning objectives for Module 3, scheduled to be delivered by July 2018. b7E

(U//~~FOUO~~) INSD reviewed the PALU Workflow Diagram and noted the CSR was given two options for a complaint assessed to contain actionable information:

1. [redacted]
2. [redacted]

(U//~~FOUO~~) **Recommendation 8b:** AD, CJIS should add [redacted] b7E

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) The PALU Workflow Diagram dated 04/02/2018 required [redacted]

(U//~~FOUO~~) In an interview conducted by INSD, the PALU UC indicated random sampling of PALM records was conducted by PALU staff prior to the launch of the formal QA process on 06/08/2018. This sampling revealed both CSRs and SSAs followed the guidance set forth in the Workflow Diagram as directed and appropriately handled the disposition of the calls.

(U//~~FOUO~~) INSD assessed there was no IT safeguard requiring the approval of a [redacted] documented in the 04/02/2018 PALU Workflow Diagram and contained within the 06/03/2018 PALU SOP. INSD assessed an IT solution should be added to [redacted]

(U//~~FOUO~~) **Observation 9:** INSD assessed a lack of management oversight during the overnight and weekend shifts.

(U//~~FOUO~~) **Recommendation 9:** AD, CJIS should ensure SSAs are assigned and on site during all shifts.

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) PALU began 24/7 SSA coverage on 02/22/2018. INSD reviewed the most recent schedule dated 06/04/2018 and confirmed PALU had appropriate SSA coverage on all shifts.

(U//~~FOUO~~) PALU utilized seven different shifts for the scheduling of SSAs to ensure adequate SSA coverage at all times; however, INSD assessed this shift schedule was overly complex and hindered effective communication.

(U//~~FOUO~~) PALU had a FSL of [redacted] SSAs. These positions were approved by HRD and added to PALU's FSL. There were [redacted] permanently assigned SSAs on board. PALU had [redacted] permanent SSA vacancies. [redacted] SSAs were selected on the 06/06/2018 SAMMS board. There was an open posting for [redacted] SSAs in EPAS with a closing date of 06/13/2018. The remaining [redacted] SSA positions were scheduled to be posted in July 2018. b7E

(U//~~FOUO~~) At the time of the Phase II Special Inspection, PALU had [redacted] TDY SSAs on board. When combined with their [redacted] permanently assigned SSAs, PALU had an overage of [redacted] SSAs on board.

(U//~~FOUO~~) **Observation 10:** INSD assessed the quality control measures to ensure incoming calls were appropriately actioned by CSRs were insufficient.

(U//~~FOUO~~) **Recommendation 10a:** AD, CJIS should formalize the quality control process and develop formal quality metrics.

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) The QA Team was established on 03/23/2018 and was initially comprised of employees from the CJIS PIT. The team focused their efforts on learning the processes of PALU and writing the PALU Business Plan. Upon completion of the Business Plan, the QA Team shifted its focus to developing a QA process, detailed in a whitepaper dated 05/29/2018. Additionally, the results of the QA pilot program conducted from 04/23/2018 to 04/27/2018 were documented in the whitepaper.

(U//~~FOUO~~) With guidance from the PALU UC, the QA Team determined [redacted] calls (as identified by the caller [redacted] This information was presented to EAD, STB and CJIS Executive Management, who authorized the use of a [redacted] b7E

[redacted] b7E

(U/~~FOUO~~) Based on this average call volume and a mean time to conduct the QA process for each call of five minutes, the QA Team identified the need for [redacted] MAPAs in order to complete the QA requirement of [redacted] The QA Team had [redacted] MAPAs trained and assigned. The remaining [redacted] MAPAs were scheduled to conclude training on 06/29/2018.

(U/~~FOUO~~) The original [redacted] MAPAs assigned to the QA team participated in a 16-hour training course. These MAPAs did not receive formal training on answering and screening calls; however, the role of the CSR, Module 3 SOP training with an emphasis on the probative questions, how to QA a call, Guardian, and PALM were part of the curriculum. This course was taught in 16 hours of classroom instruction because the participants already possessed knowledge of PALU from their extended TDY with the unit. The second course was designed for new employees who lacked familiarity with PALU. Those [redacted] MAPAs were scheduled to receive 240 hours of training as follows:

- PAL Overview
- PAL Workflow
- Module 2: Threat Assessment
- SOP Violations 1A: review interview questions on a call for violations
- SOP Violations 1B: review interview questions on a call for violations
- SOP Violations 1C: review interview questions on a call for violations
- VA Courses – Call Center Communication Skills; Call Center Customer Service; The Customer Service Representative; Briefing Fundamentals
- Listen to call audios
- DB Queries
- Writing Guide
- E-Tip functionality
- E-Tip Test Site: Process E-Tips on the PALM Test Site
- Student Status: Includes sitting with Lead CSR/Mentor to listen to live calls with Y cord and/or take calls on own with Lead CSR/Mentor with them. Process E-Tips/Calls on live data.

(U/~~FOUO~~) The QA Team commenced operations on 06/08/2018 and utilized the QA procedures outlined in the 06/03/2018 revision of the PALU SOP. These procedures identified three primary areas of focus: phone skills, technical skills, and decision making skills. Each call reviewed was scored and the CSRs were evaluated on the established SOPs.

(U/~~FOUO~~) The QA Team failed to meet the PALU screening objectives for 06/09/2018 as set forth in the SOP. 06/09/2018 was a Saturday and the QA Team operated with reduced staffing. All calls were reviewed by the end of the next business day (06/11/2018). The SOP required all [redacted] The QA Team provided b7E

the following proposals to rectify the weekend shortfall: develop a schedule to increase weekend staffing, and amend the SOP to require [redacted]

(U//~~FOUO~~) **Recommendation 10b:** AD, CJIS should share the PALM database with field office and FBIHQ operational divisions to ensure investigator and intelligence personnel have access to [redacted] This would reduce risk and provide quality assurance in the intake process by providing higher analytical oversight. b7E

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) CJIS initiated a pilot program consisting of three field offices (Dallas, Los Angeles, and New York) on 03/06/2018. Those three field offices were given access to PALM CR. PALM CR closely mirrored the normal PALM interface but did not have access to the actual site used by the CSRs at PALU. The data was an eleven-month sampling from 03/23/2017 - 02/26/2018, consisting of [redacted]

(U//~~FOUO~~) The three pilot offices [redacted]

(U//~~FOUO~~) The three field offices which participated in the pilot program had the following [redacted]

(U//~~FOUO~~) CJIS was currently evaluating the use of N-DEx as a database to facilitate rapid information sharing with field offices and other law enforcement agencies. This effort was thoroughly documented in INSD's assessment of progress on Recommendation 13b. b7E

(U//~~FOUO~~) **Recommendation 10c:** AD, CJIS should pursue an increase in FSL [redacted]

- [redacted]

b7E

- [redacted]

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO//LES~~) CJIS Executive Management submitted a request for reorganization and FSL enhancement which was approved by EAD, STB on 05/16/2018 and documented in a whitepaper titled "Allocation of the FBI Criminal Justice Information Services (CJIS) Division's National Instant Criminal Background Check System (NICS) Section and the FBI Public Access Line (PAL) Fiscal Year (FY) 2016 and 2018 FSL Enhancements" dated 06/01/2018.

(U//~~FOUO~~) The decision paper identified a FSL enhancement of [redacted] b7E

[redacted] however, at the time of the Phase II Special Inspection, those positions had not been added to PALU's FSL. PALU intended to request specific position numbers as soon as confirmation was received from RPO regarding the addition of FSL to PALU's crosswalk.

(U//~~FOUO~~) INSD reviewed the PALU Business Plan, Version 6.0, dated 03/30/2018. This business plan also documented the proposed changes and detailed the new structure for the transition from a call center to an operations center.

(U//~~FOUO~~) The new structure created a [redacted] b7E

(U//~~FOUO~~) While CJIS did not entirely adopt the specific structure proposed by INSD, INSD assessed CJIS and STB gave appropriate consideration to the recommendation as well pursued and obtained FSL to enhance the structure of PALU. INSD assessed this recommendation was resolved.

(U//~~FOUO~~) **Recommendation 10d:** AD, CJIS should create technological studies for commercially-available software to automatically convert a complaint call into digital text. By converting into digital text, the complaint would become searchable with the tools currently utilized by E-Tips to search key threat terms, reducing human error and creating quality control and assurance. In addition, the conversion would reduce the need to expend more funds towards higher-salaried staff, which would undermine one of the reasons for the creation of PALU. b7E

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) CJIS previously identified the need for a new telephone system within PALU and NICS to replace the aging AVAYA system. The contract for this new system, Calabrio, was awarded on 06/06/2018. INSD reviewed the Order for Supplies or Services dated 06/01/2018, and confirmed the delivery date for the Calabrio contract is 06/30/2019. Calabrio would enable V2T with the ability to differentiate between the caller and the CSR/IRS. This was a critical distinction not available on the AVAYA system and would

(U//~~FOUO~~) Once deployed, Calabrio, through its V2T translation, would enable PALU to apply the same key threat word screening software used by E-Tips and provide an effective backstop to human error in the call screening process. Upon implementation, b7E

(U//~~FOUO~~) INSD assessed the Recommendation as resolved as it pertained to the technological study as opposed to successful implementation, which was addressed in INSD's analysis of Recommendation 11a.

(U//~~FOUO~~) **Recommendation 10e:** AD, CJIS should create a technological study for commercially-available software to assist in schedule planning based on call volume data to ensure maximum use of personnel.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) PALU utilized AVAYA Call Center Manager to monitor and assess peak call volume and critical needs. The schedule was adjusted for high volume periods. Additionally, a separate scheduling software titled "Work Force Optimization" was also used to manage the scheduling of CSRs.

b7E

(U/~~FOUO~~) The recently purchased Calabrio phone software was expected to increase efficiency in the scheduling process. In discussion with the implementation team, this system was projected to be in place in the second quarter of FY 2019 and contractually required to be fully implemented by the third quarter of FY 2019.

(U/~~FOUO~~) Based upon INSD interviews, the A/SC PALU provided direct guidance to the PALU QA Team to prioritize efficiency and scheduling.

(U/~~FOUO~~) As stated in the CJIS whitepaper titled "PALU Review of Call Centers Response to Inspection Division Recommendation 5c," PALU was re-evaluating its shift structures. As PALU transitioned away from a call center and towards a results driven operations center, a more standardized three-shift schedule was being explored.

(U/~~FOUO~~)

(U/~~FOUO~~) Until these systems are in place, PALU will continue to rely upon the manual scheduling of employees by a MAPA fully dedicated to scheduling within PALU. The scheduling process represented no substantive change from the conditions which existed at the time of the original Observation.

(U/~~FOUO~~) **Observation 11:** INSD assessed the

b7E

(U/~~FOUO~~) **Recommendation 11a:** AD, CJIS should implement the

(U/~~FOUO~~) **Current Status: Not Resolved**

(U/~~FOUO~~) The phone system used by PALU was scheduled for phase out. The replacement system was identified and by contract was scheduled to be operational no later than 06/30/2019.

(U/~~FOUO~~) **Recommendation 11b:** AD, CJIS should review, amend and add

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) [redacted] b7E

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) **Observation 12:** INSD assessed the dissemination of information via FD-71 Criminal Complaint Forms was subjected to unnecessary delay for non-substantive edits.

(U//~~FOUO~~) **Recommendation 12:** AD, CJIS should ensure edits to documentation do not cause a delay in the speed at which the complaint reaches field offices; additionally, ensure following the style guide does not sacrifice timely dissemination in pursuit of stylistic perfection. b7E

(U//~~FOUO~~) **Current Status: Resolved**

(U//~~FOUO~~) Due to the cessation of FD-71s and the utilization of Guardian to disseminate all threats to the field, Lead CSRs were no longer in the approval chain for outgoing documents.

(U//~~FOUO~~) Additionally, the PALU SSA FSL increased from [redacted] SSAs to [redacted] PALU had [redacted] permanent SSAs and [redacted] TDY SSAs as a result of the surge of assets. This substantial increase in SSAs resulted in reduced lead time for the approval of Guardians. In 2017, PALU generated [redacted] As of 05/31/2018, PALU generated [redacted] Through the first five months of 2018, PALU generated [redacted]

(U//~~FOUO~~) At the request of INSD, the Guardian Help Desk created a report of all Guardians generated by PALU and submitted to field offices or FBIHQ divisions during Calendar Year 2018. The Guardian Help Desk divided this report into three date ranges (01/01/2018 to 02/28/2018, 03/01/2018 to 03/29/2018, and 03/30/2018 to 06/08/2018).

(U//~~FOUO~~) During the first time period, PALU generated [redacted]

(U//~~FOUO~~) During the second time period, PALU generated [redacted] b7E

[redacted]

(U//~~FOUO~~) During the third time period, PALU generated [redacted]

[redacted]

(U//~~FOUO~~) Analysis of this data indicated a significant increase in the rate of submission of Guardian leads due to the cessation of the FD-71. The observation from the Phase I Special Inspection focused on the approval delay associated with the FD-71; however, INSD review of the empirical data regarding Guardian submissions and returns demonstrated a reduction in the rate of return to the originator during the three evaluated periods. Based on feedback from PALU management, INSD assessed the return rate to be acceptable and did not present an unnecessary delay in the approval process.

(U//~~FOUO~~) The average delay between a returned Guardian lead's creation and its resubmission was less than one hour. INSD assessed the processing time for Guardians, including those returned to the CSR for substantive edit, was reasonable.

(U//~~FOUO~~) **Observation 13:** INSD assessed the PALU, utilized two competing incident intake forms, the FD-71 Criminal Complaint Form and Guardian. [redacted]

[redacted]

(U//~~FOUO~~) **Recommendation 13a:** AD, CJIS should eliminate the FD-71 Criminal Complaint Form from use.

(U//~~FOUO~~) **Current Status**: **Resolved**

The FBI discontinued the use of the FD-71 Criminal Complaint Form on 04/27/2018 and mandated all threats be reported via Guardian.

(U//~~FOUO~~) **Recommendation 13b:** AD, CJIS and AD Office of Partner Engagement (OPE) should create a robust informational campaign and create one streamlined threat intake system to make all threats of violence visible by all sworn law enforcement partners. This synergy would close a number of intelligence gaps in law enforcement response and share escalating information to prevent violent crimes.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) [redacted] b7E

[redacted]

b7E

(U//~~FOUO~~) **Observation 14:** INSD assessed the PALU did not utilize a formalized feedback mechanism to evaluate the relevance and quality of products disseminated to the field.

(U//~~FOUO~~) **Recommendation 14a:** AD, CJIS should implement a formal process to capture voluntary feedback from field offices regarding the quality and relevance of its products and utilize feedback from the field as a quality control metric.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) INSD assessed CJIS had not resolved the Phase I Recommendation regarding the formalized process of capturing substantive feedback from field offices with regard to the relevance and quality of leads disseminated for further investigative action. CJIS provided limited ad hoc feedback to its employees but no formal process was executed.

(U//~~FOUO~~) The senior MAPA on the PIT was not aware of any documented quality control metrics based on feedback from field offices as of 06/06/2018. SOP 1.3, PALU Success Stories and Best Practices, which went into effect on 06/04/2018, documented a process for reviewing feedback from field offices to identify best practices and improve SOPs. INSD assessed this process had the potential to identify measures of PALU quality and relevance using feedback from the field.

(U//~~FOUO~~) **Recommendation 14b:** AD, CJIS should utilize feedback from field offices to refine its processes and SOPs to improve customer service.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) CJIS solicited limited ad hoc feedback, but no formal process was executed.

(U//~~FOUO~~) During the interview of the PALU A/SC, INSD was informed both the PALU UC and A/SC actively engaged in substantive conversations with field offices regarding the quality of leads being received, as well as processes for improving lead quality. The second half of SOP 1.3 (PALU Success Stories and Best Practices), which went into effect on 06/03/2018, described the process for, "Adopting best practices based on feedback from the field offices to ensure PALU provides efficient, quality service." SOP 1.3 was one of the 28 new SOPs developed since the CJIS Phase I Special Inspection, and this portion of the SOP had not been executed as of 06/06/2018. The Quality Assurance lead was assessing recently hired QA personnel to identify individuals with the appropriate skills for executing this process. CJIS documented 10/01/2018 as the delivery date for a formal process for surveying the field.

(U//~~FOUO~~) Since the Phase I Special Inspection, PALU solicited performance-related feedback from the field on three occasions. During March 2018, PALU solicited feedback from the New York, Los Angeles, and Dallas field offices regarding the PALM CR software and review process. On 04/04/2018, PALU received a recommendation from a TDY agent to reduce [redacted] b7E

[redacted]

(U//~~FOUO~~) **Recommendation 14c:** AD, CJIS should utilize value statements from FOs to increase morale and improve product.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) Although resolution of this Recommendation is contingent upon resolution of 14a and 14b, CJIS utilized ad hoc feedback to formally recognize employees who significantly contributed to field office operations.

(U//~~FOUO~~) The first half of SOP 1.3 (PALU Success Stories and Best Practices), which went into effect on 06/03/2018, described the process for approving and disseminating success stories based on field office feedback to, "reinforce the significant impact the work of the unit has on public safety." The SSAs assigned to PALU were responsible for executing this process. The PALU SharePoint site went live on 06/03/2018 and contained an area for posting success stories. As of 06/08/2018, there were no stories posted on the SharePoint site. PALU maintained a "Recognition Wall" for posting success stories, and as of 06/08/2018, the wall contained three FBI Top Ten Most Wanted posters of fugitives captured during 2016 and 2017, as a result of PAL tips. Though a formal process to recognize PALU personnel for contributions to FBI operations based on field office feedback was not fully implemented, the PALU UC provided a binder entitled, "Success Stories FY 2018 Awards." The approximately one inch thick binder contained printed emails, Guardians, ECs, award nominations and other documentation pertaining to PALU personnel performance across various dimensions, including: suicides prevented; recommendations resulting in improved operations; extra hours worked due to inclement weather; and participation in special projects. The binder included a significant number of Guardians and ECs pertaining to cases resulting from PAL tips, including several "In the Spotlight" certificates which recognize PALU employees for contributions to specific cases.

(U//~~FOUO~~) **Recommendation 14d:** AD, Information Technology Infrastructure Division should have a PALU opening indicator programmed in the opening of documents created within Sentinel and in DELTA to allow for personnel to designate if the information or intelligence furnished in the opening of a case was predicated upon a PALU referral through a FD-71 Criminal Complaint Form, Guardian, Orion, or verbal transfer from the intake center.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) Based on interviews with ITMS personnel supporting PALU, INSD assessed CJIS devised a viable approach for identifying cases opened from PAL referrals. The approach entailed identifying Guardians opened by PALU, and then using Sentinel to identify which PALU Guardians became cases; however, CJIS ITMS and ITADD had not discussed this requirement and there was nothing related to this recommendation in the 06/08/2018 version of the ITMS PAL Program Increment Roadmap.

(U//~~FOUO~~) **Observation 15:** INSD assessed data maintained within the [redacted] b7E

(U//~~FOUO~~) **Recommendation 15:** AD, CJIS and EAD, ITB should collaborate with ITADD to [redacted]

(U//~~FOUO~~) AD, CJIS and EAD, ITB should collaborate with the Directorate of Intelligence to establish permanent analytical positions within PALU responsible for [redacted]

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~) There had been no progress on the [redacted]

(U//~~FOUO~~) [redacted] b7E

b7E

(U//~~FOUO~~)

(U//~~FOUO~~)

b7E

-
-
-

(U//~~FOUO~~) Based on interviews with the ITMS personnel supporting PALU, there were no current requirements for The overall impression conveyed by interviewees was

(U//~~FOUO~~)

b7E

(U//~~FOUO~~)

(U//~~FOUO~~) **Observation 16:** INSD assessed the PALU did not sufficiently refer matters of potential interest to other law enforcement agencies.

(U//~~FOUO~~) **Recommendation 16:** AD, CJIS; EAD, ITB; and AD, OPE should work with ITADD to incorporate a mechanism within PALM by which call and E-Tip summaries can be electronically transmitted to other federal and state agencies when deemed appropriate. This mechanism should also allow PALM to generate an automated FD-999 Assistance, Dissemination, and Liaison with Other Agencies Form to document each external dissemination.

(U//~~FOUO~~) **Current Status: Not Resolved**

(U//~~FOUO~~)

b7E

V. Leadership:

(U//~~FOUO~~) To assess CJIS leadership, INSD conducted leadership interviews, to include

b7E

[redacted] b7E

Resources Management Section (RMS) onboard employees were interviewed. Through those interviews, as well as the additional interviews INSD conducted regarding CJIS' progress on the 29 Phase I Recommendations, INSD identified [redacted] b2 b6 b7C

(U//~~FOUO~~) [redacted] b2 b6 b7C

(U//~~FOUO~~) [redacted] b2 b6 b7C

[1] The scores were based on a 5.0 scale with 5.0 being the highest positive rating, 3.0 being an average rating, and 1.0 being the lowest negative rating.

VI. Observations and Recommendations:

(U//~~FOUO~~) **EM Observation 1**: The prioritization of the resolution of INSD's 16 Observations/Recommendations from the Phase I Special Inspection lacked a strategic direction anchored in limiting organizational risk.

(U//~~FOUO~~) **Analysis 1**: Actions undertaken by CJIS since the Phase I Special Inspection did not reduce the potential risk of

(U//~~FOUO~~) As of 06/08/2018, there were no technical quality control measures to prevent CSRs

b7E

(U//~~FOUO~~) On several occasions since the Phase I Special Inspection, the CJIS AD and DAD changed guidance regarding which database queries were mandatory. When INSD began the Phase II Special Inspection on 06/04/2018,
On 06/11/2018, PALU received guidance via email from the Chief of Staff for EAD, STB. This email referenced the EAD's visit to CJIS in April 2018 during which "the EAD discussed

(U//~~FOUO~~) As stated in the CJIS whitepaper titled "Public Access Line Unit (PALU) Review of Call Centers Response to Inspection Division Recommendation 5c," PALU was re-evaluating its shift structures.

(U//~~FOUO~~) To facilitate sharing NLV data with field offices, on 04/11/2018, CJIS provided field offices access to historical NLV transactions through PALM CR. The intent of the Phase I Recommendation was to make this a repeatable, sustainable process. The 06/08/2018 version of the ITMS PAL Program Increment Roadmap indicated that PALM CR was a completed action. There were no additional features or enhancements assigned to Program Increments, and INSD observed nothing related to PALM CR in the Unplanned Features/Enhancements backlog. The

overall impression conveyed by interviewees was PALM CR was a one-off system which would not be needed in the future. INSD assessed providing NLVs to the field was technologically feasible at the present time, and would not create an unreasonable burden on field offices. [redacted] b7E

[redacted]

(U//~~FOUO~~) **EM Recommendation 1a**: AD, CJIS should develop and implement technical solutions to enforce policies and processes to ensure NLVs are not incorrectly dispositioned.

(U//~~FOUO~~) **EM Recommendation 1b**: AD, CJIS should implement a read-only version of PALM so that field offices can conduct daily review of new NLVs.

(U//~~FOUO~~) **EM Recommendation 1c**: AD, CJIS should design and institute a simplified shift schedule to facilitate communications with PALU personnel and reduce the administrative burden associated with the current scheduling process.

Inspection Divisi[illegible]-house Routing Slip

Must be attached to all documents that are reviewed or need approval.

Date: 7/6/18

To	*Room*	*Names*	*Initial*
		ASSISTANT DIRECTOR	
3	3092A	*Mr. Terry Wade*	TW 7/26
		DEPUTY ASSISTANT DIRECTOR	
X	3092B	~~VACANT~~ Cheney Scott	CPC 7/24
		CHIEF INSPECTOR	
___	3204	Mr. Lawrence ~~(Larry)~~ Koleff	___
		INSPECTORS	
___	3068	*Mr. Robert Bone II*	[illegible] 7/26/18
___	3080	*Mr. Robert Britt*	___
___	3070	*Mr. Scott Cheney*	___
X	3062	*Mr. James Cochran*	[illegible] 7/16/18
___	3218	*Ms. Cindy Hall*	___
___	3208	*Mr. Anthony Russo +*	___
___	3214	*Mr. Donald Voiret*	___
___	3222	*Ms. Lucia "Lucy" Ziobro*	___
		SECTION CHIEFS	
___	3041	*Mr. Scott Hinckley*	___
___	3220	*Mr. James Langenberg*	___
___	3228	*Mr. Aaron LaSure*	___
		UNIT CHIEFS	
___	3041		___
___	3043		___
___	3421		___
___	3043		___
___	3232		___
___	3043		___
		RPO - AMAU	
___	9991	Ms./Mr. _____	

To	*Room*	*Names*	*Initial*
		TEAM LEADERS	
___	3061	[redacted]	___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
___	3061		___
X	3061		[redacted]
___	3061		___

b6
b7C
b7E

Notes: CJIS Final Report
~~First Draft~~ / Second
~~SharePoint - Final Docs / Exec Sum, Fold~~
Saved as .V3 on Sharepoint

Sharepoint 0.0 [redacted]

[redacted]

Check one (required) (Revised 06/11/2018)

___ *Please initial after each person has reviewed the document*
___ *Team Leaders please initial by your name after each review*
___ *Appropriate action required*
___ *Return/See me regarding this*
___ *For your information*
___ *Hand carry*
___ *Review & approval*

Inspection Division

HARDCOPY TO AD, INSD 7/26 FOR DISSEM. TO EAD, STB AND ADD

CJIS Phase II Special Inspection

06/04/2018 – 06/14/2018

Leadership Assessment

DAD Rainer S. Drolshagen

(U//~~FOUO~~)

(U//~~FOUO~~)

b6
b7C

(U//~~FOUO~~) **Methodology:** From 06/04/2018 through 06/14/2018, INSD conducted an on-site inspection to assess the documented progress toward the resolution of the 16 Observations and 29 Recommendations set forth in the 02/24/2018 CJIS Phase I Special Inspection final report. INSD also assessed the effectiveness of leadership of the CJIS Operational Programs Branch (OPB), with weighted emphasis on the Global Operations Section (GOS) and Public Access Line Unit (PALU).

(U//~~FOUO~~) To assess OPB leadership, INSD conducted

b7E

[redacted] Through those interviews, as well as the additional interviews conducted regarding CJIS' progress on the Phase I Observations and Recommendations, INSD assessed the overall leadership of DAD Drolshagen, as well as the impact of his leadership on progress to address the aforementioned Recommendations. b7E

Leadership Assessment

(U//~~FOUO~~) [redacted] b2 b6 b7C

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) [redacted]

[1] The scores were based on a 5.0 scale with 5.0 being the highest positive rating, 3.0 being an average rating, and 1.0 being the lowest negative rating.

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

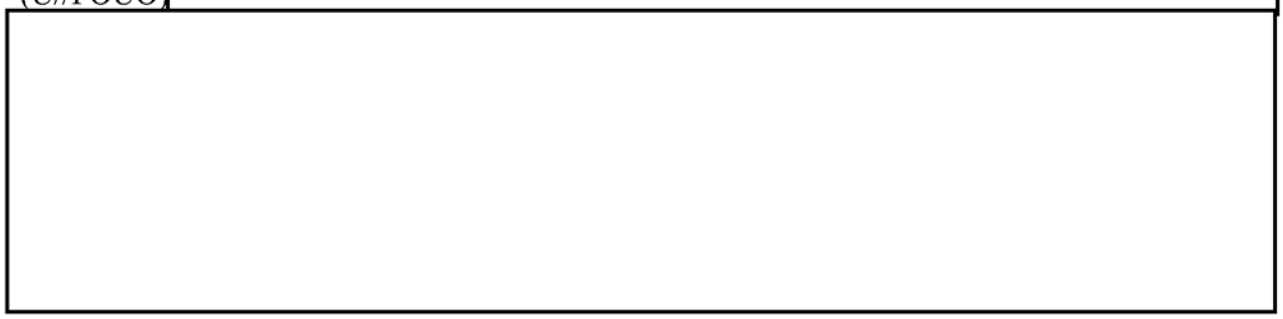
b2
b6
b7C

(U//~~FOUO~~)

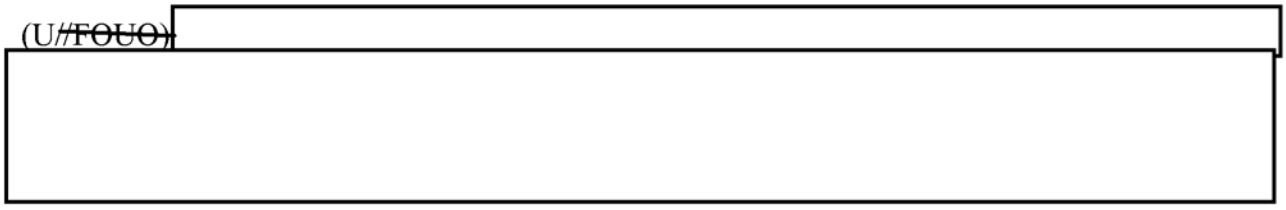
(U//~~FOUO~~)

b2
b6
b7C

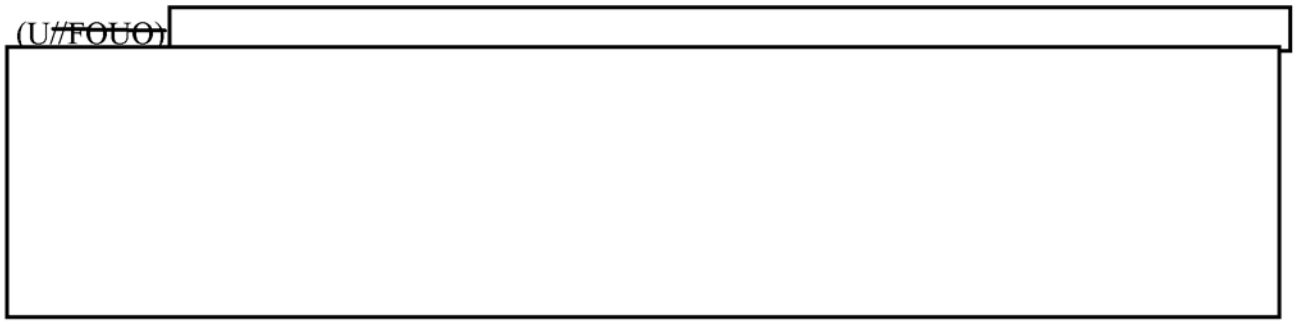
(U//~~FOUO~~)



(U//~~FOUO~~)



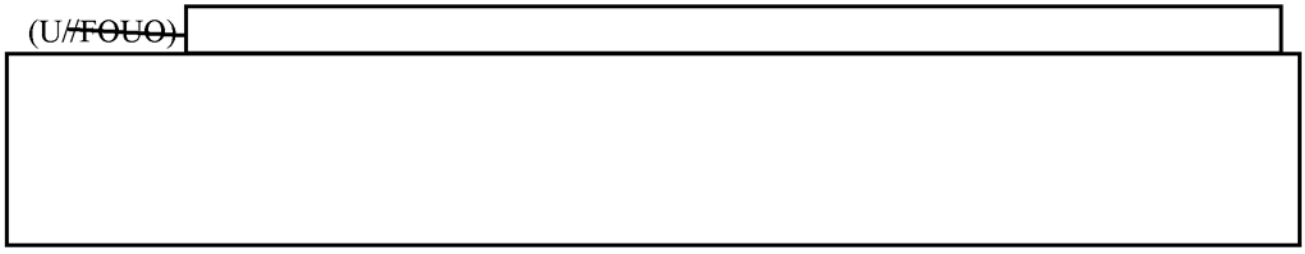
(U//~~FOUO~~)



b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)



b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

b2
b6
b7C

~~(U//FOUO)~~

~~(U//FOUO)~~

~~(U//FOUO)~~

~~(U//FOUO)~~

b2
b6
b7C
b7E

~~(U//FOUO)~~

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

Progress on Phase I Observations/Recommendations

(U/~~FOUO~~) INSD assessed 15 (52%) of the 29 Phase I Recommendations were resolved, nine of which were resolved during the period between CJIS' notification of the impending Phase II Special Inspection and the conclusion of INSD's on site review.

(U/~~FOUO~~) INSD assessed did not adequately prioritize and execute a strategy toward the resolution of Phase I Recommendations in a manner that expeditiously reduced organizational risk. INSD noted the leadership challenges with INSD assessed the prioritization was inadequate regardless.

b2
b6
b7C
b7E

(U/~~FOUO~~) CJIS devised comprehensive SOPs, but no technical quality control measures, to prevent CSRs from remained an issue. On 06/08/2018, PALU implemented This process mitigated risk to some extent and was anticipated to improve quality and efficiency over time through the CSR feedback loop; however, gaps remained. The Public Access Line Manager (PALM) software did not enforce two critical elements of the SOPs:

(U/~~FOUO~~)

b2
b6
b7C

(U/~~FOUO~~)

(U/~~FOUO~~)

[redacted]

(U//~~FOUO~~) [redacted] attempted to prioritize the recommendations as short-term and long-term endeavors. [redacted] established "Tiger Teams" in early March 2018 designed to manage tasks in the aftermath of the Parkland incident and manage the resolution of INSD Recommendations as well as other PALU-related tasks assigned by the [redacted] held a meeting at 8:30 a.m. every workday, and reviewed the progress of the items on the task tracker. [redacted] was briefed regularly on progress. [redacted] with INSD's Phase I Observations and Recommendations, either in draft or in final report format.

b2
b6
b7C

(U//~~FOUO~~) [redacted] also had a daily 9:00 a.m. meeting with [redacted] to discuss PALU-related matters and progress on resolving INSD's Recommendations. [redacted]

(U//~~FOUO~~) [redacted]

b2
b6
b7C
b7E

(U//~~FOUO~~) [redacted] advised the primary concern for him was ascertaining if another potential matter was sitting in the PALU No Lead Value (NLV) holdings, so CJIS prioritized the review of historical records, to include historic calls taken by Customer Service Representative (CSR [redacted] He was not able to provide a rationale to the interviewing Agents regarding the lack of simultaneous efforts at granting read only access to field offices for current PALU NLV transactions, other than stating again the focus was on a historical review.

(U//~~FOUO~~) Immediately after Phase I, PALU mandated CSRs query [redacted] This increased call wait time significantly, up to 20-30 minutes at times and some callers were hanging up. [redacted] as CJIS attempted to balance relevant database queries with caller wait times. At the time the Phase II Special Inspection began, only [redacted] was checked on NLV calls. During Phase II, [redacted] was added back as a mandatory check based upon a directive from [redacted]

(U//~~FOUO~~) Recommendations regarding feedback mechanisms were seen as a low priority and though informal feedback mechanisms are in place, formalized processes had not garnered significant PALU attention.

(U//~~FOUO~~) INSD assessed [redacted] negatively impacted CJIS' ability to effectively address the 16 Observations and 29 Recommendations. INSD assessed [redacted] b2 b6 b7C

CJIS Phase II Special Inspection

06/04/2018 – 06/14/2018

Leadership Assessment

AD Douglas E. Lindquist

b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~) **Methodology:** From 06/04/2018 through 06/14/2018, INSD conducted an on-site inspection to assess the documented progress toward the resolution of the 16 Observations and 29 Recommendations set forth in the 02/24/2018 CJIS Phase I Special Inspection final report. INSD also assessed the effectiveness of the leadership of the CJIS Operational Programs Branch (OPB), with weighted emphasis on the Global Operations Section (GOS) and Public Access Line Unit (PALU).

(U//~~FOUO~~) To assess CJIS leadership, INSD conducted b7E

Through those interviews, as well as the additional interviews conducted regarding CJIS' progress on the Phase I Observations and Recommendations, INSD assessed the overall leadership of AD Lindquist, as

well as the impact of his leadership on progress to address the aforementioned Recommendations.

Leadership Assessment

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

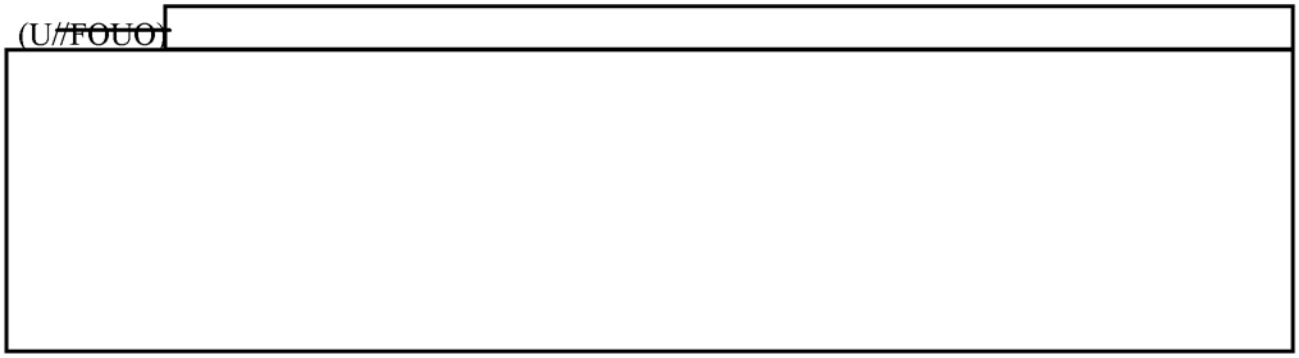
b2
b6
b7C

[1] The scores were based on a 5.0 scale with 5.0 being the highest positive rating, 3.0 being an average rating, and 1.0 being the lowest negative rating.

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)



(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

[redacted]

b2
b6
b7C

(U//~~FOUO~~) [redacted]

[redacted]

(U//~~FOUO~~) [redacted]

[redacted]

(U//~~FOUO~~) [redacted]

[redacted]

b2
b6
b7C

(U//~~FOUO~~) [redacted]

[redacted]

(U//~~FOUO~~) [redacted]

[redacted]

[redacted]

(U//~~FOUO~~) [redacted]

b2
b6
b7C

[redacted]

(U//~~FOUO~~) [redacted]

[redacted]

b2
b6
b7C
b7E

Progress on Phase I Observations/Recommendations

(U//~~FOUO~~) INSD assessed [redacted] did not adequately prioritize and execute a strategy toward the resolution of Phase I Recommendations in a manner that expeditiously reduced organizational risk.

(U//~~FOUO~~) CJIS devised comprehensive SOPs, but no technical quality control measures, to prevent CSRs from [redacted] On 06/08/2018, PALU implemented [redacted] This process mitigated risk to some extent and will likely improve quality and efficiency over time through the CSR feedback loop; however, gaps remained. The Public Access Line Manager (PALM) software did not enforce two critical

elements of the SOPs:

(U//~~FOUO~~)

(U//~~FOUO~~) INSD also assessed a more proactive engagement of would have facilitated progress on the resolution of INSD's Phase I Recommendations.

b2
b6
b7C
b7E

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~) attempted to prioritize the recommendations as short-term and long-term endeavors. was briefed regularly on progress.

b2
b6
b7C

with INSD's Phase I Observations and Recommendations, either in draft or in final report format, but he believed they discussed some of the action items in regular meetings.

(U//~~FOUO~~)

(U//~~FOUO~~) [redacted] advised the primary concern for him was ascertaining if another potential matter was sitting in the PALU No Lead Value (NLV) holdings, so CJIS prioritized the review of historical records, to include historic calls taken by Customer Service Representative (CSR [redacted] He was not able to provide a rationale to the interviewing Agents regarding the lack of simultaneous efforts at granting read only access to field offices for current PALU NLV transactions, other than stating again the focus was on a historical review.

(U//~~FOUO~~) Immediately after Phase I, PALU mandated CSRs query [redacted] This increased call wait time significantly, up to 20-30 minutes at times and some callers were hanging up. [redacted] as CJIS attempted to balance relevant database queries with caller wait times. At the time the Phase II special inspection began, only [redacted] was checked on NLV calls. During Phase II, [redacted] was added back as a mandatory check based upon a directive from [redacted]

b2
b6
b7C
b7E

(U//~~FOUO~~) In response to INSD regarding the 14 unresolved Recommendations, [redacted] provided the following explanations:

(U//~~FOUO~~) He noted CJIS was working on formalizing the onboarding training process for all CSRs, though he was not sure what the current status was. [redacted] cited the velocity evaluation with regard to duration of time from incoming call to lead disposition required further review and no decision had been made to date. Additionally, he referenced the results of an SSA's visits to several entities, to include CT Watch and US Secret Service, who's size and call volumes were significantly less than PALU's and the fact that [redacted]

(U//~~FOUO~~) [redacted] discussed the pilot program consisting of a one-time dump of the PALM to three field offices for historical review and the fact that data was made available to all field offices, though the data review was met with varied participation.

(U//~~FOUO~~) [redacted] advised INSD CJIS needed to do a better job with finding and implementing a technical solution for PALU shift scheduling, to include a more simplified shift schedule. An additional technical solution was recently contracted to allow for a threat scoring system similar to the one used for e-Tips, but the system's delivery date would be sometime 2019.

b6
b7C
b7E

(U//~~FOUO~~) [redacted] advised he was under the impression PALU engaged with the substantive FBIHQ divisions in March 2018, but was not sure if a formalized, recurring process had been initiated to [redacted]

(U//~~FOUO~~) He also noted CJIS was exploring the use of [redacted] to resolve the recommendation regarding dissemination of PAL tips to law enforcement partners. He added "warm transfers" directly to other agencies do occur when warranted.

(U//~~FOUO~~) Recommendations regarding feedback mechanisms were seen as a low priority and though informal feedback mechanisms are in place, formalized processes have not garnered significant PALU attention.

(U//~~FOUO~~) INSD assessed [redacted]

b2
b6
b7C

CJIS Phase II Special Inspection

06/04/2018 – 06/14/2018

Leadership Assessment

SC Christopher A. Nicholas

b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~) **Methodology:** From 06/04/2018 through 06/14/2018, INSD conducted an on-site inspection to assess the documented progress toward the resolution of the 16 Observations and 29 Recommendations set forth in the 02/24/2018 CJIS Phase I Special Inspection final report. INSD also assessed the effectiveness of the leadership of the CJIS Operational Programs Branch (OPB), with weighted emphasis on the Global Operations Section (GOS) and Public Access Line Unit (PALU).

(U//~~FOUO~~) To assess LESS executive leadership, INSD interviewed

b2
b6
b7C
b7E

Leadership Assessment

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

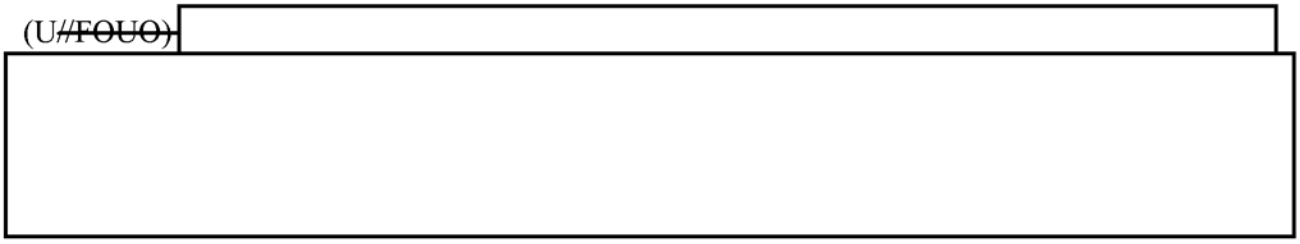
(U//~~FOUO~~)

(U//~~FOUO~~)

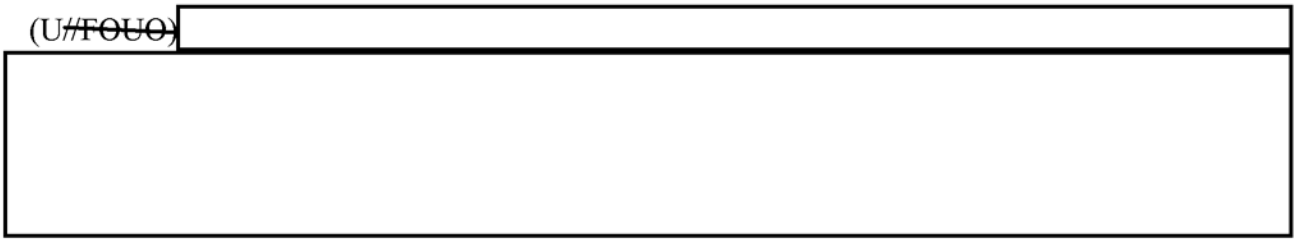
b2
b6
b7C

(U//~~FOUO~~)

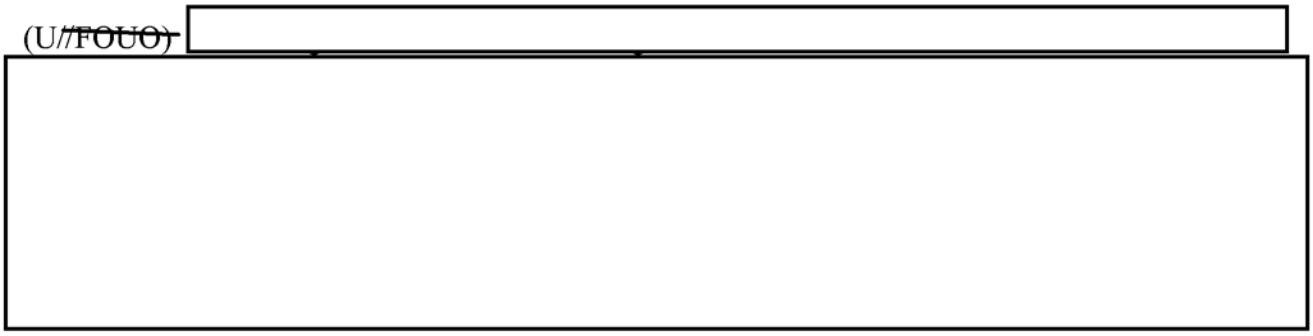
(U//~~FOUO~~)



(U//~~FOUO~~)

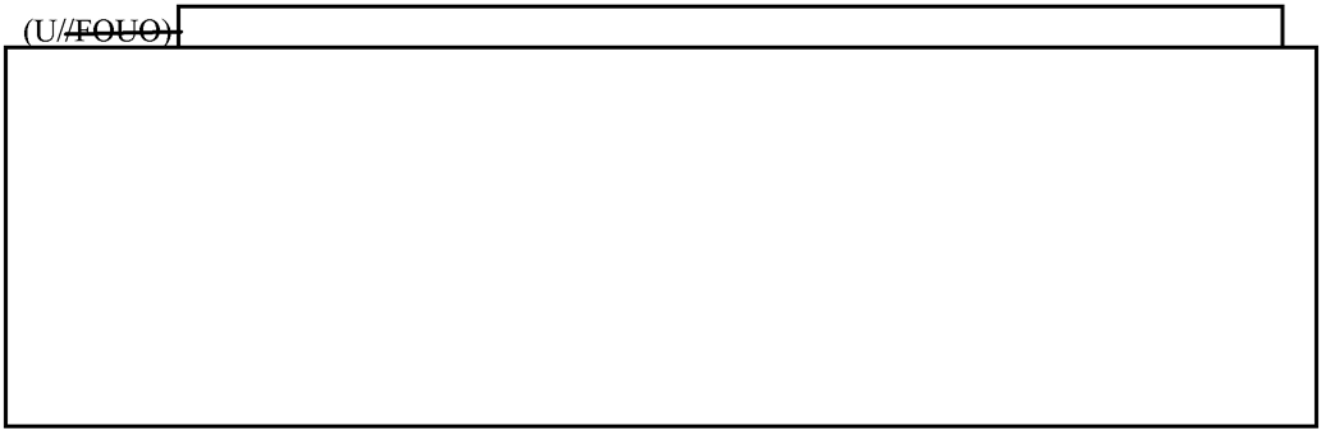


(U//~~FOUO~~)



b2
b6
b7C

(U//~~FOUO~~)



[redacted] b2 b6 b7C

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) [redacted]

[redacted] b2 b6 b7C

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~) [redacted]

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

b6
b7C

CJIS Phase II Special Inspection

06/04/2018 – 06/14/2018

Leadership Assessment

SC Scott A. Rago

b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

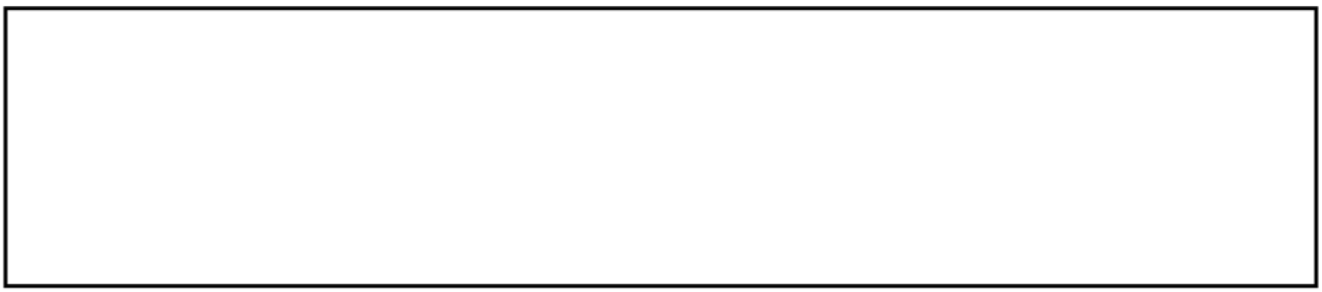
(U//~~FOUO~~) **Methodology:** From 06/04/2018 through 06/14/2018, INSD conducted an on-site inspection to assess the documented progress toward the resolution of the 16 Observations and 29 Recommendations set forth in the 02/24/2018 CJIS Phase I Special Inspection final report. INSD also assessed the effectiveness of leadership of the CJIS Operational Programs Branch (OPB), with weighted emphasis on the Global Operations Section (GOS) and Public Access Line Unit (PALU).

(U//~~FOUO~~) To assess GOS leadership, INSD interviewed

b2
b6
b7C
b7E

Leadership Assessment

(U//~~FOUO~~)



b2
b6
b7C

(U//~~FOUO~~)

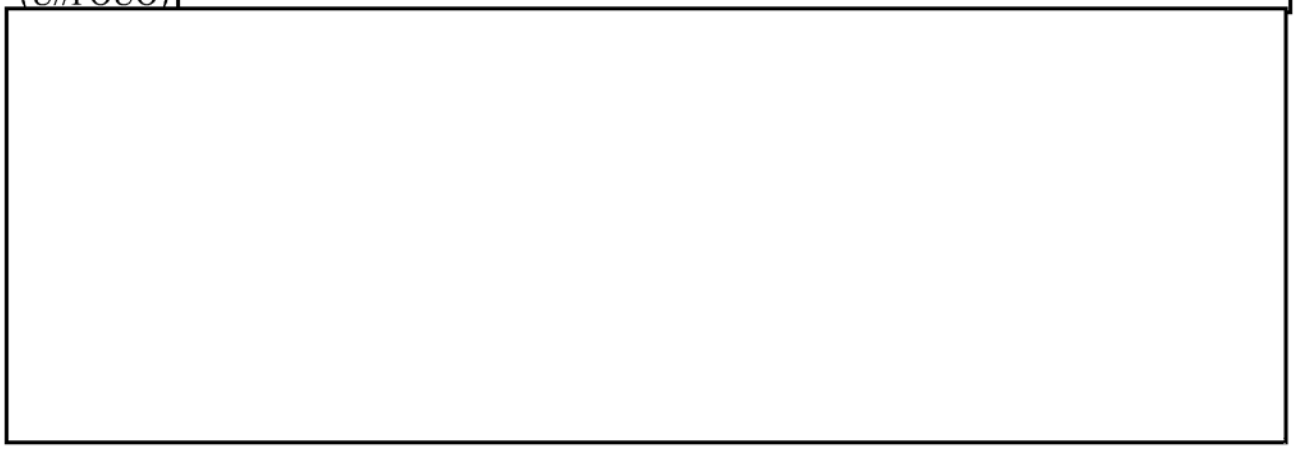
(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)



(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

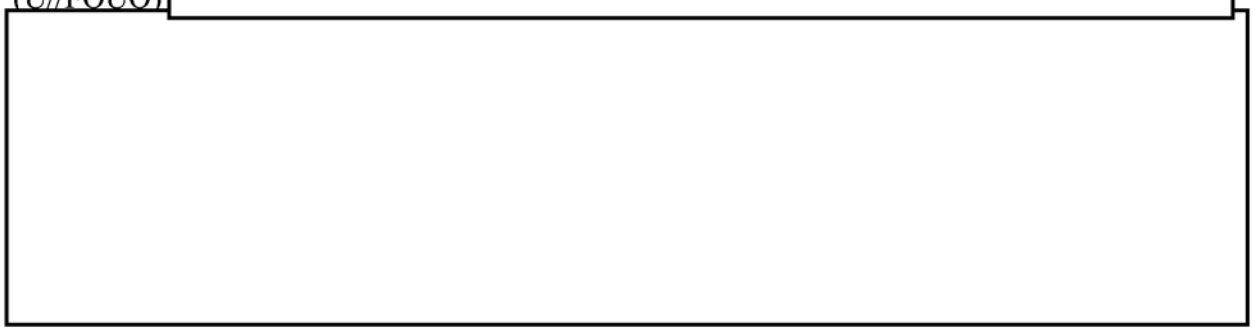
(U//~~FOUO~~)

(U//~~FOUO~~)

Progress on Phase I Observations/Recommendations

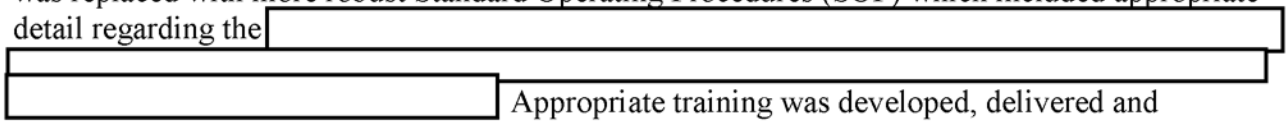
b2
b6
b7C
b7E

(U//~~FOUO~~)



(U//~~FOUO~~) INSD assessed 15 (52%) of the 29 distinct Phase I Special Inspection Recommendations were resolved, nine of which were resolved during the period between CJIS' notification of the impending Phase II Special Inspection and the conclusion of INSD's on site review on 06/14/2018.

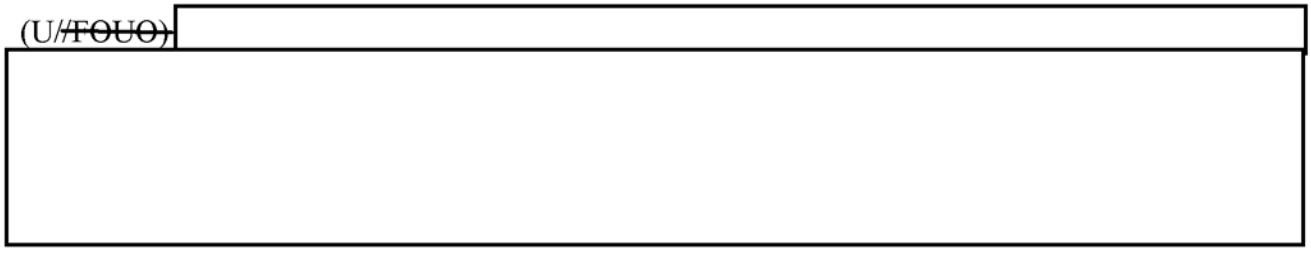
(U//~~FOUO~~) The Complaint Guide, previously used as the primary reference material for CSRs, was replaced with more robust Standard Operating Procedures (SOP) which included appropriate detail regarding the



Appropriate training was developed, delivered and successfully completed by CSRs to reinforce the SOPs. Individual CSR metrics were removed from the workplace monitors, quality assurance sampling of No Lead Value (NLV) calls was instituted, SSAs were assigned to all shifts to provide appropriate oversight, FSL increases were obtained, and a contract to replace the existing phone system with the Calabrio system capable of supporting voice-to-text with key threat word overlay was executed.

b2
b6
b7C
b7E

(U//~~FOUO~~)



(U//~~FOUO~~) INSD assessed the PALU shift schedule represented no substantive change from the conditions which existed during the Phase I Special Inspection. The overly complex schedule and lack of uniform shift overlap resulted in avoidable communication barriers exacerbated by the significant change in the unit.

(U//~~FOUO~~)

b2
b6
b7C

(U//~~FOUO~~)

(U//~~FOUO~~)

OFFICIAL RECORD
Document participants have digitally signed. All signatures have been verified by the Sentinel FBI document system.

FEDERAL BUREAU OF INVESTIGATION

Import Form

Form Type: EMAIL - Email **Date:** 12/03/2019

Title: (U) FW: Inspection Follow up

Approved By:

Drafted By:

b6
b7C
b7E

Case ID #: (U) CJIS Special 2018

Synopsis: (U) FW: Inspection Follow up

Enclosure(s): Enclosed are the following items:
1. (U) NTOS Inspection Responses 11 20 2019 v12.docx

♦♦

OFFICIAL RECORD
Document participants have digitally signed. All signatures have been verified by a certified FBI information system.

FEDERAL BUREAU OF INVESTIGATION

Electronic Communication

Title: (U/~~/FOUO)~~ AD ITADD Response to Recommendations from the 2018 CJIS Special Inspection Report

Date: 05/28/2019

CC: COCHRAN NELL
TAYLOR EVA L
BONE ROBERT C II
LAWRENCE E. KOLEFF

b6
b7C

From: IT Applications & Data Division
Contact: [redacted]

Approved By: UC [redacted]
UC [redacted]
Trudy Lou Ford
SC Trudy Lou Ford
SC BRIAN D GRIFFITH
SC Michael D. Heiler
SC Joseph Mitchell III
A/SC [redacted]
DAD Kimberly J. Del Greco
AD SLEEPER KERRY
AD Michael D. DeLeon
AD GAVIN MICHAEL T

Drafted By: [redacted]

b6
b7C
b7E

Case ID #: [redacted] (U) CJIS Special 2018

Synopsis: (U/~~/FOUO)~~ Response by the Assistant Director (AD) of Information Technology Applications and Data Division (ITADD) in coordination with Criminal Justice Information Services (CJIS) and Office of Partner Engagement (OPE) to selected recommendations from the 2018 CJIS Special Inspection Report.

Reference: [redacted]

Title: (U/~~FOUO~~) AD ITADD Response to Recommendations from the 2018 CJIS Special Inspection Report
Re: [redacted] 05/28/2019 b7E

Administrative Notes: (U/~~FOUO~~) Based on meetings and email communications between ITADD, CJIS, OPE, and INSD, it was determined ITADD, CJIS and OPE would submit a single EC in response to Recommendations 13a, 13b, 14, 15, and 16 from the 2018 CJIS Special Inspection Report.

Enclosure(s): Enclosed are the following items:
1. (U/~~FOUO~~) In accordance with [redacted] attached are AD ITADD, AD CJIS and AD OPE responses to INSD's CJIS Special Inspection Report.

Details:

In response Inspection Division's (INSD) CJIS Special Inspection Report, [redacted] the Assistant Director (AD) of the Information Technology Applications and Data Division (ITADD), Criminal Justice Information Services (CJIS), and Office of Partner Engagement (OPE) have provided the following responses to recommendations 13a, 13b, 14d, 15 and 16 to each recommendation in the form of a WORD document as requested.

♦♦

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 1 **Instruction Number:** **Recommendation Number:** 1

Executive Management:

Observation: INSD assessed the onboarding training for new LCSRs and SSAs was incomplete and inconsistent.

Instruction:

Recommendation: AD, CJIS should formalize onboarding training, assess and document achievement goals and performance. Focus training on developing critical thinking skills. Expand database training and call shadowing. Cohesively address performance issues, and provide measurable feedback for CSRs.

Response: A Public Access Line (PAL) Training Team, made up of CJIS Training and Advisory Policy Unit (CTAP) instructors, was established in March 2018 to revise existing PAL training procedures and curriculum to meet FBI training standards and guidelines. Effective 4/20/2018, CTAP instructors were incorporated into the existing PAL employee onboarding program. The PAL Training Team is finalizing Supervisory Special Agent (SSA) training to begin 7/23/2018. In addition, a new formalized PAL training program will be implemented 9/3/2018 to include the following curriculum for onboarding: PAL Overview, Threat Assessment, Federal Violations, Database Queries, Writing Guidelines, E-Tip Functionality, Student Status, and Interview Functionality. The PAL Training Team incorporates a curriculum assessment to address goals and objectives of the training. For the formalized PAL training, the Training Team anticipates the courses divided into a modular approach with multiple assessments being administered throughout the 8-week training.

On 4/17-19/2018, the FBI's Behavior Analysis Unit provided mandatory training to all PAL staff for "Concerning Behaviors and Mental Health." The training focused on asking probative questions for threat assessment of school shootings. In addition, the PAL Training Team provided Module 2 Training (completed by all Customer Service Representatives [CSRs] on 5/23/2018) and focused on threat assessment critical thinking skills.
<1 Module 2 Training Materials attached>

The PAL Training Team provided Module 1 Training (completed by all CSRs on 5/25/2018) and included training regarding PAL Manager (PALM) updates and database queries. Expanded call shadowing will be implemented in the formalized PAL training program.
<2 Module 1 Training Materials attached>

PAL established a Quality Management (QM) Team and the QM review process began 6/8/2018 to provide data on the types of discrepancies found. The PAL accuracy report provides an accuracy rate for each employee based on skills, technical skills, and decision skills. Each criteria has a corresponding Standard Operating Procedure (SOP) section. Review data is stored in a Structured Query Language database and data is retrieved to determine the discrepancies detected by type and by individual, allowing for the identification of an individual training need or a broader issue such

as a majority of staff making the same discrepancy. Accuracy and discrepancy information is available to the CSR via the SSAs and discussed on an as-needed basis. Employees whose accuracy rate is below 100% based on decision skills will have a more detailed analysis performed on their work and receive a development plan from their supervisor. The targeted reviews continue until the employee is performing at, or above, the acceptable level. Other discrepancies such as phone skills and technical skills will also be addressed with the employees in developmental meetings with a supervisor.
<3 PAL Quality Management Plan v1.4 attached>
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—10.0 QM SOPs>

Inspectors Remarks:

Status: Compliance Satisfactory

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 2 **Instruction Number:** **Recommendation Number:** 2a & b

Executive Management:

Observation: The PALU Complaint Guide required revision.

Instruction:

Recommendation: AD, CJIS should revise the Complaint Guide to provide specific, detailed guidance concerning the escalation of a complaint call to a supervisor. PALU should expand the Complaint Guide guidance to cover all potential threats to life and include details and probative questions for each violation investigated by the FBI.

Response: The CJIS Division formed a PAL SOP Team in March 2018 to conduct a review of SOPs and implemented changes necessary to ensure standardization of references and resources used by CSRs and SSAs. The appropriate segments of the Complaint Guide, Quick Reference Sheet, and Probative Questions were revised and have been merged into a comprehensive SOP for each Violation Type. The PAL SOP Team deployed the comprehensive electronic SOP 6/4/2018. The comprehensive SOP reflects specific, detailed guidance concerning the escalation of a complaint. In addition, the PAL Training Team provided escalation training in Module 2 Training (completed by all CSRs on 5/23/2018).
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18----3.4 Escalation of a Call>

The PAL Training Team provided probative question training in Module 3 Training. The PAL SOP Team expanded the SOP (implemented 6/4/2018) to cover all potential threats to life and includes details and probative questions for each violation investigated by the FBI.
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18----For example, 3.11 Active Shooter>

RESOLVED DURING PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 3 **Instruction Number:** **Recommendation Number:** 3

Executive Management:

Observation: INSD assessed the PALU did not utilize a formalized feedback mechanism to evaluate the relevance and quality of products disseminated to the field.

Instruction:

Recommendation: INSD assessed the PALU workflow diagram inappropriately directed database checks be conducted [redacted]

Response: The PAL SOP Team amended the PAL workflow diagram and PAL SOP (implemented 6/4/2018) to instruct CSRs to query [redacted] The PAL Training Team addressed database queries in Module 1 Training, completed 5/25/2018 by all CSRs, and database queries will be readdressed in Module 3 Training, which runs from May-September 2018. b7E
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—Call and E-Tips Workflow Diagrams>
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—3.6 Database Queries>

[redacted]

This observation is also addressed in Obs 14, Obs 14 at this time is not resolved. Marking this as a duplicate observation

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 4 **Instruction Number:** **Recommendation Number:** 4

Executive Management:

Observation: INSD assessed a lack of standardized process with regard to conducting database queries by CSRs.

Instruction:

Recommendation: AD, CJIS should update the Complaint Guide to specify which databases to query based upon the facts of the complaint. Provide training on all databases to be queried. Write policy outlining required databases to be queried by CSRs. Provide instruction on how to [redacted]

Response: The PAL SOP Team updated the PAL SOP (implemented 6/4/2018) to specify which databases to query based upon the facts of the complaint.
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—3.6 Database Queries>

The PAL Training Team completed Module 1 Training (PAL Update) on 5/23/2018, and included guidance on all databases to be queried and instruction on how to [redacted] The learning objectives included: b7E
•Identification of the mandatory database to search
•Identification of the [redacted] databases to search
•Identification of how to search databases
<2 Module 1 Training Materials attached>
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—3.6 Database Queries>

PAL SOP 3.0 encompasses processing instructions regarding the [redacted] In addition, the PAL Training Team included database query training in Module 1 Training, completed on 5/25/2018 by all CSRs.
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18— [redacted]

RESOLVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 5 **Instruction Number:** **Recommendation Number:** 5a

Executive Management:

Observation: INSD assessed the average wait time for callers was excessive.

Instruction:

Recommendation: AD, CJIS should capture the velocity of complaint calls from intake to FO dissemination and compare with call volume.

Response: PAL currently utilizes the AVAYA Aura Desktop Agent (AAAD) to track the length of time the CSR takes to complete the call. AAAD is used to track how long it takes to draft each report. Currently, PAL is not able to track the time from submission by the CSR to the SSA and then to the field office (FO) for review/action. A report of this nature would require tracking of multiple data sets of information across multiple systems and domains. Any attempt to measure the velocity of complaint calls from intake to field office (FO) submission would have to take the following into consideration:

b7E

PAL is in the initial stages of collaboration with the CJIS Division's Information Technology Management Section to identify the feasibility and timeline of a solution to capture the velocity of complaint calls from intake to FO dissemination and compare with call volume.
Update: 11/20/2019 - Complete

The NTOS considers this recommendation complete. The Information Technology Applications and Data Division (ITADD) developed the

The continuation of daily reporting occurs through AVAYA and Threat Intake Processing System (TIPS) data.

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 5 **Instruction Number:** **Recommendation Number:** 5b

Executive Management:

Observation: INSD assessed the average wait time for callers was excessive.

Instruction:

Recommendation: AD, CJIS should provide training on probative questions for each violation investigated by the FBI, as outlined in the Complaint Guide.

Response: The PAL Training Team provided training on probative questions for each violation in Module 2 PAL Update Training: Threat Assessment, completed 5/23/2018 by all CSRs.

The entire SOP, with probative questions, was created, reviewed, and made accessible to PAL personnel on 6/4/2018, via a consolidated and intuitive SharePoint. PAL personnel were provided a document detailing how to navigate the new SharePoint site. Effective 6/4/2018, the PAL Training Team incorporated the new SharePoint site in all CSR training as part of the SOP training curriculum.
<1 Module 2 Training Materials attached>
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18>

Inspectors Remarks:

Status: Compliance Satisfactory

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 5 **Instruction Number:** **Recommendation Number:** 5c

Executive Management:

Observation: INSD assessed the average wait time for callers was excessive.

Instruction:

Recommendation: AD, CJIS should conduct a study with similar-sized investigative agency call intake centers to determine appropriate benchmarks and share best practices.

Response: A PAL SSA participated in initial benchmarking on 4/10-13/2018, with Homeland Security Investigations; U.S. Marshals Service; DC Metro Police Department; Bureau of Alcohol, Tobacco, Firearms, and Explosives; Immigrations and Custom Enforcement; U.S. Secret Service (USSS); the FBI's Terrorist Screening Center; the FBI's Strategic Information and Operations Center; the FBI's Internet Crime Complaint Center, and the FBI's Counterterrorism Watch to study operations center best practices. The SSA gathered information regarding organization structure, span of control, SOPs and formal policies, training, quality control measures, staffing and scheduling, information technology, workload, and position descriptions.
<4 SSA Operations Center Visits attached>

In addition, a temporary duty Assistant Special Agent in Charge (ASAC) from PAL visited USSS on 5/25/2018, to benchmark and obtain best practices.
<5 ASAC SRO RPO Meeting Update 05312018 attached>
<6 ASAC USSS Meeting Update 05312018 attached>

It is worth noting that none of the call intake centers had similar call or tip volume when compared to PAL. PAL has defined a "top five" list of similar-sized investigative agencies to continue benchmarking and share best practices. On 7/13/2018, the newly transitioned Acting Program Manager/Section Chief began reaching out to the FBI FO executive management in New York, Chicago, Los Angeles, Philadelphia, and Houston to garner support and obtain the best local contact for the police departments in those areas in order to conduct on-site visits and interviews using a predetermined list of questions in order to study their intake centers and obtain best practices and benchmarks, leading to the development of key performance indicators for PAL. Benchmarking with these agencies is anticipated to be complete within 90 days.

The predetermined questions for benchmarking will be included on a PAL bench card, currently in development for use with other investigative agencies to assess various data collection points. The bench card will be used to acquire the right metrics, set a process in place to regularly assess call center key performance indicators, and in preparation to act on the results. The bench card will help to ensure the benchmarking process is

effective and PAL benefits as a result.
<7 Ops Center Bench Card draft attached>

Update: 11/20/2019 – Complete

The NTOS considers this recommendation complete. Due to the successful Benchmarking efforts with external agencies, the NTOS' leadership, staff engagement, and communication were heightened internally. The following are some examples of what the NTOS learned and executed as a result of the benchmarking efforts.
Throughout the NTOS' Benchmarking efforts, enhanced communication and employee accomplishments were detailed as a common theme. As a result, in an effort to enhance morale, the NTOS highlights employee accomplishments by sharing success stories with the NTOS staff, as well as CJIS Division and FBI Executive Management. The NTOS also shares section goals, employee expectations, and accomplishments in weekly Supervisory Special Agent (SSA) meetings and through a monthly communication, [redacted] to enhance communication and transparency. b7E
The NTOS evaluated and analyzed the aggregated results noted in the Benchmarking Questionnaire and Matrix (previously submitted) and developed continual implementation and improvement surrounding, key policies and processes, quality control, and training, some of which are noted below.
The Quality and Process Improvement Unit (QPIU) completed three operational process improvement projects in FY2019. The process improvement projects included phone tip processing, E-Tip processing, and the Quality Assurance Escalation process. Like the external agencies visited, the NTOS prioritized the development of its quality management program. By employing, in part, lessons learned and best practices, the NTOS has developed a quality management program that is significantly more robust than those agencies visited.

In addition to Threat Intake Examiners (TIEs), the NTOS incorporated an SSA into the CJIS Training and Advisory Process (CTAP) training classes as subject matter experts. This enhances consistency in training, resulting in coherence in SSA guidance and TIE Standard Operating Procedures. In an effort to further prioritize and evolve a training program, the NTOS embedded dedicated training personnel into the section.

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 6 **Instruction Number:** **Recommendation Number:** 6

Executive Management:

Observation: INSD assessed emphasis placed on CSR performance metrics, visible to the entire workforce, negatively impacted quality and performance.

Instruction:

Recommendation: AD, CJIS should limit the visibility of individual CSR metrics to PALU management, and is encouraged to discuss performance deficiency individually as necessary.

Response: The CJIS Division has limited the visibility of individual CSR metrics by removal from the monitors on 3/2/2018 and only SSAs and PAL management are able to view CSR metrics.

Accuracy and discrepancy information is available to the CSR via the SSAs and discussed individually on an as-needed basis. Employees whose accuracy rate is below 100% based on decision skills will have a more detailed analysis performed on their work and receive a development plan from their supervisor. The targeted reviews continue until the employee is performing at, or above, the acceptable level. Other discrepancies such as phone skills and technical skills will also be addressed with the employees in developmental meetings with a supervisor. SSA's utilize the CSR metrics to discuss performance and development related matters in conjunction with award proposals.

RESOLVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 7 **Instruction Number:** **Recommendation Number:** 7

Executive Management:

Observation: INSD assessed a lack of standardized process to initiate the review of call data by a supervisor prior to the determination of NLV by a CSR.

Instruction:

b7E

Recommendation: AD, CJIS should standardize a secondary review process for calls deemed NLV by the CSR. Train CSRs to accurately brief pertinent facts to supervisors before a NLV designation is made. Revise the PALU Complaint Guide to incorporate guidance on the proper handling of NLVs.

Response: PAL standardized a secondary review process for calls deemed NLV by CSRs, as follows:

Upon the 6/8/2018 implementation of the QM team, a random sample of NLV transactions receive a secondary review. The daily sample for review is based on a Random Simple Sample (currently calculated at a 99% Confidence Interval with a 3% Margin of Error) of the previous day's total work. The sample equates to

In addition, the CJIS Division is researching a solution which will convert voice to text (V2T) and subsequently This solution would leverage a Calabrio software feature planned for CJIS introduction 11/1/2018.

The PAL Training Team provided training to CSRs to accurately brief pertinent facts to supervisors prior to an NLV designation in Module 2 Training, completed 5/23/2018.

The PAL SOP Team updated the PAL SOP (implemented 6/4/2018) to incorporate guidance on the proper handling of NLVs.
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18----3.2.1 Telephone Calls Workflow Diagram>
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18----3.13 Request SSA Review>

RESLOVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 8 **Instruction Number:** **Recommendation Number:** 8a

Executive Management:

Observation: INSD assessed mandatory SSA review of [redacted]

Instruction: b7E

Recommendation: AD, CJIS should require [redacted]

Response: The PAL SOP Team updated the PAL workflow diagrams on 4/2/2018, to require SSAs to [redacted]

<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—Call and E-Tips Workflow Diagrams>

RESOVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 8 **Instruction Number:** **Recommendation Number:** 8b

Executive Management:

Observation: INSD assessed mandatory [redacted]

Instruction: [redacted] b7E

Recommendation: AD, CJIS should add [redacted]

Response: [redacted]

<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—3.4 Escalation of a Call>

RESOLVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 9 **Instruction Number:** **Recommendation Number:** 9

Executive Management:

Observation: INSD assessed a lack of management oversight during the overnight and weekend shifts.

Instruction:

Recommendation: AD, CJIS should ensure SSAs are assigned and on site during all shifts. b7E

Response: On 2/22/2018, the CJIS Division surged SSAs from across the division to include Unit Chiefs (UCs). [redacted] PAL has 24/7 SSA coverage across all shifts

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 10 **Instruction Number:** **Recommendation Number:** 10a

Executive Management:

Observation: INSD assessed the quality control measures to ensure incoming calls were appropriately actioned by CSRs were insufficient.

Instruction:

Recommendation: AD, CJIS should formalize the quality control process and develop formal quality metrics.

Response: The Biometric Services Section (BSS) Process Improvement Team (PIT) analyzed the call process and developed a quality management process. Options for sample sizes were calculated, and 99% confidence interval with a margin of error +/-3 was chosen for implementation. A pilot of the quality review was performed from 04/23-27/2018. Implementation of the QM process took place on 6/8/2018. b7E

An automated queue process within PALM was completed 6/8/2018. Each day, all calls designated [redacted] These transactions are a sample from the previous day's calls (midnight to midnight).

Accuracy rates are calculated based on the number of transactions reviewed and the number of transactions without discrepancies per individual. A weekly report is disseminated to the Operations UC. Individuals with an accuracy rate falling below 100% [redacted]

The quality management process analyzes data to identify discrepancy trends and corrective/preventive actions will be taken such as root cause analyses in collaboration with CTAP and PAL Operations Unit.

[redacted]

RESOLVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 10 **Instruction Number:** **Recommendation Number:** 10b

Executive Management:

Observation: INSD assessed the quality control measures to ensure incoming calls were appropriately actioned by CSRs were insufficient.

Instruction:

Recommendation: AD, CJIS should share the PALM database with FO and HO operational divisions to ensure investigator and intelligence personnel have access to [redacted] This would reduce risk and provide quality assurance in the intake process by providing higher analytical oversight. b7E

Response: Remote access to a modified [redacted]

The CJIS Division provided [redacted]

RESOLVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 10 **Instruction Number:** **Recommendation Number:** 10c

Executive Management:

Observation: INSD assessed the quality control measures to ensure incoming calls were appropriately actioned by CSRs were insufficient.

Instruction:

Recommendation: AD, CJIS should pursue an increase in funded staffing levels [redacted] b7E
staffing:

[redacted]

Response: The CJIS Division is coordinating with the Human Resources Division (HRD) on a number of PAL workforce and classification studies, including the following milestones:

- The CJIS Division requested an increase in funded staffing level (FSL) and the request was approved in the 2018 Budget Enhancement.
  - PAL received [redacted] additional FSL for SSA positions
  - PAL received [redacted] additional professional staff FSL
- The CJIS Division Assistant Director approved PAL to reorganize from a Unit to a Section
- PAL implemented a two-tier structure on 7/1/2018 and is waiting on approval from CJIS, HRD, and FBI HQ regarding the recommended staffing plan.

<11 PAL Operations Center Section Org Chart 7 13 2018 V4>

BSS PIT is currently analyzing the E-Tip process and results will be provided to PAL management on 7/16/2018. The results will be included in any schedule proposals and the first draft of operations schedules are tentatively set to be available 7/23/2018.

RESOLVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 10 **Instruction Number:** **Recommendation Number:** 10d

Executive Management:

Observation: INSD assessed the quality control measures to ensure incoming calls were appropriately actioned by CSRs were insufficient.

Instruction:

Recommendation: AD, CJIS should create technological studies for commercially-available software to automatically convert a complaint call into digital text. By converting into digital text, the complaint will become searchable with the tools currently utilized by e-Tips to search key threat terms, reducing human error and creating quality control and assurance. In addition, the conversion would reduce the need to expend more funds towards higher-salaried staff, which would undermine one of the reasons for the creation of PALU.

Response: The CJIS Division's Program Research and Standards Unit (PRSU) explored speech-to-text automated speech recognition capabilities. PRSU conducted a brief survey of commercial off-the-shelf providers, government off-the-shelf capabilities, and open-source solutions. Resources for the MITRE Corporation (MITRE) to pursue testing potential solutions from this survey were approved on May 15, 2018 by the Financial Management Unit. The contracting officer officially added these funds to the MITRE contract on July 12, 2018 for work to begin.

The CJIS Division has been working toward the replacement of its phone system's current contact center suite functionality since 2017. This suite of tools is used throughout the CJIS Division, including PAL, the National Instant Criminal Background Check System (NICS), the Facial Analysis Comparison and Evaluation Services Unit, and the CJIS Division Switchboard. The replacement product, by Calabrio, will offer improvements to several features, including multilingual V2T translation to be implemented on 11/1/2018.

The CJIS Division will implement the Calabrio V2T for all PAL calls to reduce errors, improve processing efficiency, and as an entry mechanism for near-real-time keyword evaluation of V2T translated calls. [redacted] the CJIS Division will be using [redacted] technology to backstop human CSR [redacted] b7E

RESOLVED UNDER PHASE II

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 10 **Instruction Number:** **Recommendation Number:** 10e

Executive Management:

Observation: INSD assessed the quality control measures to ensure incoming calls were appropriately actioned by CSRs were insufficient.

Instruction:

Recommendation: AD, CJIS should create a technological study for commercially-available software to assist in schedule planning based on call volume data to ensure maximum use of personnel. [redacted] b7E

Response: PAL evaluated the current Verint software solution used by the NICS Section to automate and enhance software scheduling and staffing to effectively manage workflow. In addition, PAL is currently leveraging the Subject Matter Expert (SME) in the NICS Section to assist PAL in developing data driven schedules first using Verint and then the replacement product, Calabrio. The NICS SME will be used for knowledge transfer to an individual identified in PAL. The CJIS Division is actively in the process of replacing the Verint product with Calabrio, which contains enhanced features in the area of Workforce Management and Optimization and will be used by many CJIS Programs to include NICS. This replacement is on schedule for a 10/1/2018 delivery.

Although managing a master schedule for work shifts should not consume the majority of a Management and Program Analyst's work day, there is a manual component of entering data into the workforce management solution and functional scheduling that will take some time. As the workflow and staffing stabilizes, less changes will be required and scheduling will become more of a secondary duty. Data points used by the software solution include reports from the Avaya Contact Center Manger such as, but are not limited to, hourly data associated with calls offered, calls answered, calls abandoned, average answer delays, and average abandoned delays. This information is analyzed over an extended period of time on an ongoing basis to identify any patterns that would indicate staffing shortages during specific days or specific time periods. In addition, CSR performance is measured based on criteria and metrics for individual CSR's such as, average calls processed per hour, average not ready time, and the percentage of calls resulting in documents drafted for possible lead value and disseminated to the field. Utilizing individual CSR performance data coupled with overall PAL call and E-Tip volume, schedules are developed, monitored, and evaluated for effectiveness and efficiency.

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 11 **Instruction Number:** **Recommendation Number:** 11a

Executive Management:

Observation: INSD assessed the [redacted] b7E

Instruction:

Recommendation: AD, CJIS should implement the [redacted]

Response: [redacted]

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 11 **Instruction Number:** **Recommendation Number:** 11b

Executive Management:

Observation: INSD assessed the [redacted]

Instruction: [redacted] b7E

Recommendation: AD, CJIS should review, amend and add [redacted]

Response: PAL keyword list is assessed and updated monthly by PAL staff in comparison to FBI's threat priorities, to include criminal violations, crisis situations, and current events. The list is updated as new keywords are identified.

[redacted]

As of 7/13/2018, PAL collected key threat word feedback from FBI HQ operational divisions for inclusion into the PAL Key Threat Word list. The CJIS Division will coordinate with FBI HQ's operational divisions quarterly to review the key threat word list. The next review with FBI HQ operational divisions is in October 2018.

[redacted]

<12 Key Threat Word List July 12 2018>

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 12 **Instruction Number:** **Recommendation Number:** 12

Executive Management:

Observation: INSD assessed the dissemination of information via FD-71 Criminal Complaint Forms was subjected to unnecessary delay for non-substantive edits.

Instruction:

Recommendation: AD, CJIS should ensure edits to documentation do not cause a delay in the speed at which the complaint reaches FOs; additionally, ensure following the style guide does not sacrifice timely dissemination in pursuit of stylistic perfection.

Response: Due to the significant increase in the number of SSAs assigned to PAL, Lead CSRs no longer edit documents for style guide compliance prior to forwarding to an SSA for review.

The PAL SOP Team updated the PAL Unit Standard Writing Guide 2017 (implemented 6/4/2018) by redefining guidance to PAL employees to reduce non-substantive edits.
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—3.1 PAL Unit Standard Writing Guide>

RESOLVED VIA CESSATION OF FD-71

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 13 **Instruction Number:** **Recommendation Number:** 13a

Executive Management:

Observation: INSD assessed the PALU, utilized two competing incident intake forms, the FD-71 Criminal Complaint Form and Guardian. [redacted]

Instruction:

b7E

Recommendation: AD, CJIS should eliminate the FD-71 Criminal Complaint Form from use.

Response: On 4/27/2018, the FBI retired the Sentinel FD-71 form used for intake and complaints. PAL retired all FD-71 reporting to the field offices as of 4/20/2018, and is reporting via Guardian only.

Follow-up response 6/6/2019

(U//~~FOUO~~) Response 13a: On 04/27/2018, ITADD disabled the ability to create new FD-71 Criminal Complaint Forms and CJIS discontinued the use of the form. Consequently, the FD-71 form has been retired.

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 13 **Instruction Number:** **Recommendation Number:** 13b

Executive Management:

Observation: INSD assessed the PALU, utilized two competing incident intake forms, the FD-71 Criminal Complaint Form and Guardian [redacted] b7E

Instruction:

Recommendation: AD, CJIS and AD Office of Partner Engagement (OPE) should create a robust informational campaign and create one streamlined threat intake system to make all threats of violence visible by all sworn law enforcement partners. This synergy would close a number of intelligence gaps in law enforcement response and share escalating information to prevent violent crimes.

Response: The CJIS Division is exploring the potential ability to use the National Data Exchange System as an existing database to share information with FOs; HQ; and state, local, and federal agencies. The CJIS Division drafted a White Paper for review by the Criminal Justice Information Law Unit (CJILU) for legal guidance on the review of [redacted] Once PAL receives feedback from CJILU and a process is developed, CJIS will coordinate with the Office of Partner Engagement (OPE) to develop a Communication Strategy for messaging and implementation.

Follow-up response 6/6/2019
(U//~~FOUO~~) Response 13b: Recommendation 13b has been combined with recommendation 16.
The Inspection Division advised CJIS that any responses related to recommendation 13b should be provided under recommendation number 16.

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 14 **Instruction Number:** **Recommendation Number:** 14a

Executive Management:

Observation: INSD assessed the PALU did not utilize a formalized feedback mechanism to evaluate the relevance and quality of products disseminated to the field.

Instruction:

Recommendation: AD, CJIS should implement a formal process to capture voluntary feedback from the field regarding the quality and relevance of its products and utilize feedback from the field as a quality control metric.

Response: The PAL QM Team recognizes a customer feedback loop must exist as a part of a comprehensive QM system. The CJIS Division is developing a formal feedback mechanism which will be incorporated into the QM process as a quality management metric. A formal process to survey the field offices will be developed by 10/1/2018.

In the interim, PAL continues to gather informal feedback from field offices regarding the quality and relevance of its products through the following process: All PAL supervisors and employees are highly encouraged to identify success stories resulting from PAL involvement and best practices gleaned from field office feedback. Adopting best practices based on feedback from the field offices ensures we are providing efficient, quality service and meeting our customer's needs. Feedback from the field is provided to the PAL QM Team for inclusion in the QM process. <319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18—1.3 PALU Success Stories and Best Practices>

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 14 **Instruction Number:** **Recommendation Number:** 14b

Executive Management:

Observation: INSD assessed the PALU did not utilize a formalized feedback mechanism to evaluate the relevance and quality of products disseminated to the field.

Instruction:

Recommendation: AD, CJIS should utilize feedback from the field to refine its processes and SOPs to improve customer service.

Response: The PAL QM Team recognizes a customer feedback loop must exist as a part of its processes and SOP. The CJIS Division is developing a formal feedback mechanism which will be incorporated into PAL processes and SOP and the PAL SOP Team will be involved in the process to ensure any feedback received from the field regarding SOP/processing is captured and addressed appropriately. A formal process to survey the field offices will be developed by 10/1/2018.

In the interim, PAL continues to gather informal feedback from field offices regarding the quality and relevance of its products. All PAL supervisors and employees are highly encouraged to identify success stories resulting from PAL involvement and best practices gleaned from field office feedback. Adopting best practices based on feedback from the field offices ensures we are providing efficient, quality service and meeting our customer's needs.
<319W-HQ-A1487699-CJIS, SERIAL 17 and 319W-HQ-A1487699-CJIS, SERIAL 18----1.3 PALU Success Stories and Best Practices>

Update: 11/20/2019 - Complete
The NTOS considers this recommendation complete. In an effort to go above and beyond the annual Lync call with Field Office Guardian Coordinators, the NTOS sends quarterly reminders to the FBI Guardian Coordinators regarding the available survey. Field Offices are encouraged to provide relevant feedback regarding the quality of Guardians disseminated.
Proactive communications with each FBI Field Office was established to obtain feedback by utilizing the NTOS SSAs and Reserve Service Personnel (RSP) Supervisory Management and Program Analysts (SMAPA) as a liaison cadre. Each SSA/RSP was assigned to a Continental United States (CONUS) region as a primary point of contact to each Field Office and corresponding fusion center(s). The SSA and RSP liaisons maintain regular communications with the Field Offices to provide information, obtain feedback and share success stories.
In addition, in order to establish and maintain credible partner relationships, the NTOS actively participated in engagement opportunities with customers, and stakeholders, including tribal partners within the NTOS CONUS regions throughout FY2020. The NTOS personnel have also briefed at more than 10 conferences and participated in collaborative working groups.
The NTOS led 41 FBI Field Office visits in partnership with the Criminal Investigative Division (CID), the Office of Partner Engagement (OPE), and ITADD, to enhance collaboration with FBI and state and local law enforcement partners. As a result, the NTOS engaged stakeholders to properly execute a Threat to Life (TTL) dissemination plan. The NTOS began executing direct communication of TTLs to state and local partners on 6/30/2019, in tandem with the OPE pilot. Through these efforts, the NTOS has garnered support and directly shares TTLs with six Fusion Centers, covering seven FBI Field Offices.
Based on feedback from FBI Field Offices and CID, the NTOS developed [redacted] b7E

[redacted] b7E

[redacted] Nine Field Offices participated in the Working Group discussions. The Working Group will continue to engage with the Field Offices in an ongoing effort to enhance the NTOS and Field Office relations.

Inspectors Remarks:

Status: Compliance Satisfactory

Observation Number: Obs 14 **Instruction Number:** **Recommendation Number:** 14c

Executive Management:

Observation: INSD assessed the PALU did not utilize a formalized feedback mechanism to evaluate the relevance and quality of products disseminated to the field.

Instruction:

Recommendation: AD, CJIS should utilize value statements from FOs to increase morale and improve product.

Response: When a PAL success story is submitted from a FO or external agency, the value statement and success is forwarded to PAL staff, via email, to increase morale and reinforce the significant impact the work of the unit has on public safety. PAL established a formal process on 6/25/2018 to capture value statements and the success stories reported by FOs and external agencies. The success stories are captured and preserved in the PAL SharePoint site, including documentation of the value statement provided by the field/agency, and the CSR(s) who appropriately handled the tip. The success stories are compiled in a SharePoint list that is linked to the PAL home page, ensuring that all CSRs have access to view and add to the list. The PAL Training Team will incorporate success stories/value statements into the formalized PAL training program to share PAL success with incoming employees. Success stories are also reported to executive management and the FBI HQ on the weekly PAL dashboard.

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 14 **Instruction Number:** **Recommendation Number:** 14d

Executive Management:

Observation: INSD assessed the PALU did not utilize a formalized feedback mechanism to evaluate the relevance and quality of products disseminated to the field.

Instruction:

Recommendation: AD, ITADD should have a PALU opening indicator programmed in the opening of documents created within Sentinel and in DELTA to allow for personnel to designate if the information or intelligence furnished in the opening of a case was predicated upon a PALU referral through a FD-71 Criminal Complaint Form, Guardian, Orion, or verbal transfer from the intake center. b7E

Response: In 2016 and 2017, CJIS worked with ITADD, CTD, and OGC on possible avenues to upload PALM data into Sentinel. Upon further review, ITADD expressed concerns on the [redacted] OGC also expressed concerns about holding [redacted] CJIS and ITADD will meet 7/17/2018 to discuss this issue and continue to consult with OGC on any outcomes.
<242-HQ-C1497803-PALADMIN SERIAL 23>

Updated response 6/6/2019
(U~~//FOUO)~~ Response 14d: A PALU opening indicator already appears in Guardian opening documents. By the end of FY19Q2, ITADD will enhance Sentinel and Delta to include a PALU opening indicator on opening documents.
(U~~//FOUO)~~ The Sentinel FD-71 Criminal Complaint form has been retired and replaced by the Guardian FD-71a and Orion on the Secret enclave has been replaced by the Crisis Management module within Sentinel. All threat intake is being processed through Guardian, therefore no work is necessary in designating PALU intake via the Sentinel FD-71 or Orion.

See Sentinel for updated response.

Inspectors Remarks:

Status: Compliance not Satisfactory / Under AE Review

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 15 **Instruction Number:** **Recommendation Number:** 15

Executive Management:

Observation: INSD assessed data maintained within the [redacted]

Instruction: [redacted] b7E

Recommendation: AD, CJIS and AD, ITADD should collaborate with the IT Applications and Data Division to [redacted]

(U//~~FOUO~~) AD, CJIS and AD, ITADD should collaborate with the Directorate of Intelligence to establish permanent analytical positions within PALU responsible for [redacted]

Response: PAL is coordinating with the CJIS Division's CJILU to obtain legal guidance on the feasibility of having [redacted]

The CJIS Division provided [redacted]

The CJIS Division currently has [redacted] Intelligence Analysts (IA) to be placed in units within the division and [redacted] IA position was placed in PAL effective 6/10/2018. The CJIS Division is coordinating with the Intelligence Branch to assess FSL requirements, intelligence functions, and the IA role in PAL and the CJIS Division. The assessment will take place within the next 30 days.

Updated Responses 6/6/2019

ITADD will [redacted] by the end of FY19Q2. Until approved, as of 07/27/2018, CJIS provided [redacted]

Inspectors Remarks:

Status: Compliance Satisfactory

CJIS Phase I
Inspection Division Tracking Database

Division	*Office*	*Inspection Title*	*Inspection Type*	*Response Due*
Criminal Justice Information Servi		CJIS Phase I	SPECIAL	9/9/2018

Observation Number: Obs 16 **Instruction Number:** **Recommendation Number:** 16

Executive Management:

Observation: INSD assessed the PALU did not sufficiently refer matters of potential interest to other law enforcement agencies.

Instruction:

Recommendation: AD, CJIS; AD, ITADD; and AD, OPE should work with Information Technology Applications and Data Division (ITADD) to incorporate a mechanism within PALM by which call and e-Tip summaries can be electronically transmitted to other federal and state agencies when deemed appropriate. This mechanism should also allow PALM to generate an automated FD-999 Assistance, Dissemination, and Liaison with Other Agencies Form to document each external dissemination.

Response: The CJIS Division is coordinating with ITADD (preliminary discussions began 5/15/2018) to develop a solution to incorporate a mechanism within PALM by which call and E-Tip summaries can be can be electronically transmitted to other federal and state agencies when deemed appropriate. <242-HQ-C1497803-PALADMIN SERIAL 23>

UPDATED RESPONSES 6/6/2019

CJIS, ITADD, and OPE collaborated, and will continue to do so, to enhance PALM and eGuardian to directly push threat intake which is outside of the FBI's purview from PALM through eGuardian to partner agencies by the end of FY19Q3. OPE will initiate a pilot to test the new capabilities with select partner agencies by the end of FY19Q4. OPE will expand access to the new capabilities across the US by the end of FY20Q2. OPE will coordinate with CJIS, ITADD, and other internal and external stakeholders to develop and deploy a communications strategy and training to partner agencies for the roll out of the new capabilities.

(U//~~FOUO~~) ITADD will enhance eGuardian and Guardian to provide the same threat intake to the corresponding Field Office for information purposes only. ITADD will develop [redacted] Concurrently, CJIS, ITADD, and OPE will participate in a working group formed by OPE to evaluate any technical alternatives that might be more expedient. b7E

(U//~~FOUO~~) Use of the FD-999 for documenting liaison and assistance is being reviewed by the Office of Private Sector and ITADD for potential improvements in conjunction with the development of the new Liaison Relationship Management system. By the end of FY20Q2, ITADD will provide the capability to automate the population of FD-999 fields, or its equivalent, to document such external dissemination.

Update: 11/20/2019 - Complete

The NTOS considers this recommendation complete. The NTOS collaborated with stakeholders such as the FBI Field Offices, the CID, the Counterterrorism Division (CTD), and the OPE, to determine specific actions the NTOS should utilize to mitigate risk associated with disseminating TTL tips to state/local partners. In an effort to ensure immediate sharing of TTL tips to state and local law enforcement, the NTOS established the State Information Page as a resource for employees processing the National Threat Operations Center (NTOC) tips. This resource provides a single location for employees to access confirmed contact information, and to quickly share information with the appropriate law enforcement partner. The State Information Page is aligned with the FBIs 56 Field Offices. The NTOS will remain engaged with the tipster until law enforcement is on scene to address the threat.

A large percentage of tips received by the NTOC are state and local law enforcement matters. Studies presented on 05/03/2019, highlighted 82% of all NTOC-generated TTL Guardians should be directed to state and local partners as the lead investigative agency. The TTL tip information in the FBI's holdings is where the organization encounters the most significant risk.

The NTOS Project Team executed the dissemination plan using a strategic approach. Prioritization of the FBI Field Offices for which this would have the most impact was based on the volume of tips disseminated along with input from the OPE, based on the number of fusion centers in a given Area of Responsibility (AOR). As of November 21, 2019, the NTOS visited 41 FBI Field Offices. Furthermore, the Project Team developed the

[redacted] b7E

As a result, the NTOS began executing direct communication of TTLs to state and local partners on 6/30/2019, in tandem with the OPE pilot. The NTOS incorporated the direct communication pilot into its daily operation as it continues with outreach and collaboration activities with all Field Offices to garner support for the information sharing initiative. November 2019, the NTOS provided a briefing to Congressional Staffers outlining NTOS' direct dissemination efforts with state and local law enforcement partners.

Inspectors Remarks:

Status: Compliance Satisfactory

Official Record

FEDERAL BUREAU OF INVESTIGATION

Electronic Communication

Title: (U) CJIS Division Response to 2018 Special Inspection: Recommendation 14d Completion **Date:** 12/18/2020

CC:

b6
b7C
b7E

From: CJIS
Contact:

Approved By: ASC

Drafted By:

Case ID #: (U) CJIS Special 2018

Synopsis: (U) This serves as an update to the Criminal Justice Information Services (CJIS) Division response to the 2018 CJIS Special Inspection Inspector's Report (Serial 3).

Details:

(U) Recommendation 14d: AD, ITID should have a PAL opening indicator programmed in the opening of documents created within Sentinel and in Delta to allow for personnel to designate if the information or intelligence furnished in the opening of a case was predicated upon a PAL referral through a FD-71 Criminal Complaint Form, Guardian, Orion or verbal transfer from the intake center.

(U) Status: To expand on the requirement for an opening indicator on documents created within Sentinel and Delta, the National Threat Operations Center (NTOC) requested its own suffix within Guardian to memorialize the lead came from NTOC specifically, not D1 (the suffix for the CJIS Division as a whole). This allows NTOC to provide reports and metrics specific to NTOC and pull reports upon request.

(U) On 11/19/2019, the Information Technology Applications and Data Division (ITADD) indicated

Title: (U) CJIS Division Response to 2018 Special Inspection: Recommendation 14d Completion
Re: [redacted] 12/18/2020 b7E

the Directorate of Intelligence accepted this requirement into its backlog for Delta; however, the work to complete the requirement required prioritization.

(U) From 02/12/2020 forward, collaboration meetings were held between NTOS and ITADD.

(U) Final Completion Date: On 10/09/2020, the Source Opening Communication and Source Re-Opening Communications became available. This item is complete.

(U) Per the response dated 07/18/2018 (Serial 3), along with this update, the CJIS Division has responded and closed out all findings.

♦♦