



U.S. Department of Justice

National Security Division

Washington, D.C. 20530

August 28, 2020

The Honorable James E. Boasberg
United States Foreign Intelligence Surveillance Court
333 Constitution Avenue, N.W.
Washington, D.C. 20001

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

Dear Judge Boasberg:

The Government respectfully submits this update as required by the Corrected Opinion and Order of the Foreign Intelligence Surveillance Court (the Court) entered on March 5, 2020 (March 5, 2020 Order), as modified by the Court's Order of June 23, 2020, which granted the Government's motion to modify the reporting period. Specifically, the Government herein provides the Court with updates regarding technological improvements the Federal Bureau of Investigation (FBI) is undertaking to aid in consistency and accountability within the FISA application process.

By way of background, the March 5, 2020 Order directed the Government to provide by March 27, 2020, "a description of any planned or implemented technological improvements to the process of preparing FISA applications or verifying the information contained in FISA applications and updates every thirty days thereafter until they have been fully implemented." March 5, 2020 Order at 17. Following the Court's grant of a one-week extension, the Government filed a response to the March 5, 2020 Order on April 3, 2020.¹ The Government subsequently provided the Court with updates regarding technological improvements to the process of preparing, or verifying the information contained in, FISA applications on April 30, 2020,² and again on May 29, 2020.³ On June 4, 2020, the Government submitted a Motion to Modify Reporting Period requesting that subsequent updates be provided to the Court every ninety days rather than every thirty days. On June 23, 2020, the Court issued an Order granting the requested modification.

The Government hereby provides the third update regarding these technological improvements. As explained previously, the FBI currently manages its FISA-related workflow

¹ Response to the Court's Corrected Opinion and Order Dated March 5, 2020 and Update to the Government's January 10, 2020 Response, at 19-20.

² Supplemental Response to the Court's Order Dated December 17, 2019; the Court's Scheduling Order Dated January 17, 2020; and the Court's Corrected Opinion and Order Dated March 5, 2020, Attachment A at 10-12.

³ Letter from Kevin O'Connor, Chief, Oversight Section to the Honorable James E. Boasberg (May 29, 2020).

processes in a platform called the FISA Management System (FISAMS), but is transitioning to a system colloquially known as “the Bridge.” The Bridge is designed to increase collaboration within FBI, as well as between FBI and OI, though it is not expected to replace FISAMS until at least the end of the fourth quarter of fiscal year 2021.

Several design features of the Bridge also are expected to enhance accuracy in the FISA process. As discussed in the April 30 Response, this includes, for example, creating a technical interface between the Bridge and the FBI’s case management system, known as Sentinel. As set forth in the May 29 Letter, this interface will afford Bridge users the ability to ensure a high level of data integrity, by automatically cross-referencing data input in the Bridge with existing case data in Sentinel. The interface between the Bridge and Sentinel also will provide users the ability to serialize to Sentinel documents created in, or required for, the Bridge, including documents necessary for the creation of an accuracy sub-file.

The FBI’s efforts to develop and implement the Bridge are continuous and ongoing. In the last update, provided in the May 29 Letter, the FBI reported that the Bridge team had received authorization from the Sentinel team to build and integrate technical interfaces with Sentinel, so as to allow for the exchange and validation of data between the two systems. Having secured that authorization, during this reporting period the Bridge team completed integration of a case validation feature, which will facilitate automated validation of the accuracy of certain information input into the Bridge, by comparing it against information contained in a related Sentinel case file. The Bridge team also completed digitization of the FBI’s electronic surveillance and physical search FISA Request Form and developed within the Bridge the user interface for the digitized version of the form. As a result of the team’s development work, the Bridge also now includes a feature that will permit automated serialization of an approved FISA Request Form into the appropriate Sentinel case file. In addition, the Bridge team completed development of a feature that will allow users to upload into the Bridge documents related to the FBI’s Confidential Human Source Checklist, as well as to associate those documents with a specified FISA Request Form. The FBI believes that automating these processes and ensuring that relevant documents are routinely serialized and/or easily uploaded into FBI systems will improve the FISA process by reducing inadvertent errors; providing ready access to documents for review and analysis; and promoting collaboration between all parties involved in the FISA process.

The FBI also is working on technological improvements related to its accuracy procedures, also known as the Woods Procedures, which will ultimately be integrated into the Bridge. These efforts are designed to use Sentinel to automate certain processes FBI personnel use to create accuracy sub-files and ensure the contents thereof are available in a manner that is consistent with the FBI’s standard minimization procedures. In essence, the project will enable an employee to package and export serialized documents comprising an accuracy sub-file to other FBI personnel involved in a FISA application. The FBI believes this will enhance the accuracy and completeness of FISA applications by, for example, making documents readily available to those FBI personnel working on applications and/or attesting to their accuracy. Until this capability is integrated into the Bridge, the FBI is working to integrate this feature into Sentinel, by adapting a pre-existing tool designed to export documents for discovery purposes.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kevin O'Connor', with a long horizontal line extending to the right.

Kevin O'Connor
Chief, Oversight Section
Office of Intelligence,
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