Security Advisory Opinion Requirements Review Board  
Wednesday, September 30, 2015  
Department of State Headquarters  
Harry S. Truman Building Room 6829  
1000-1200 hrs

Summary of Conclusions  
AMENDED NOVEMBER 10, 2015

The Security Advisory Opinion Requirements Review Board (SAO RRB) met to provide stakeholders with updates from the June 11th meeting as well as to review recent and new SAO RRB proposals.

Nonresponsive & LE

Nonresponsive & LE

11/05/2015: Adopted.

2. SAO Merlin Vetting Process  
Members agreed that the primary focus of the SAO Merlin is to identify terrorism information for use in refugee benefits adjudication decisions.

2a. Options for Streamlining SAO Merlin Process  
The SAO Merlin WG presented its findings, also documented in the ‘Options Paper to Streamline SAO Merlin Process’:

DP and LE
Members agreed that the Merlin WG should continue to explore the implementation of specific technical and procedural refinements proposed under Option 1 of the SAO Merlin assessment, specifically thresholds for matching and proximity of subjects to identified derogatory terrorism information.

**Recommendation:** SAO RRB recommends to the Refugee and SIV IPC:

1. FBI Name Check performed as part of the SAO Merlin process will continue through December 31, 2015, and be discontinued as of January 1, 2016.
2. FBI Foreign Terrorist Tracking Task Force (FTTTF) will be brought up to the level of capability necessary to provide screening results to State/PRM and USCIS for use during the adjudication of refugee benefits.
3. FBI will work with partners to provide a requirements/deployment plan by the next RRB meeting (December 16, 2015). In the meantime, FTTTF will continue interim screening of refugee applicant data against FTTTF holdings. (REDACTED)

11/05/2015: Adopted

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ACTION: Following a final review of the updated SAO Merlin country list and further analysis of FBI bulk data matching tools, SAO RRB Chairs will prepare a set of recommendations for IPC consideration. (SAO RRB Chairs by October 9, 2015)
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Security Advisory Opinion Requirements Review Board
Friday, December 18, 2015

The U.S. Customs and Immigration Enforcement (ICE) Headquarters,
500 12th St. SW, Room 10175, Washington, DC.
1000 – 1130 hrs.

Summary of Conclusions
AMENDED: December 23, 2015

The Security Advisory Opinion Requirements Review Board (SAO RRB) met to provide stakeholders with updates from the September 30th meeting as well as to review recent and new SAO RRB proposals.

1. **SAO Merlin Follow Up / Federal Bureau of Investigation (FBI) Foreign Terrorist Tracking Task Force (FTTTF) Vetting of Refugee Applicants (FBI/National Counterterrorism Center)**

FTTTF provided an update regarding the transition from the FBI National Name Check Program (NNCP) to FTTTF with respect to SAO Merlin checks:

- FBI is on schedule for the transition from NNCP to FTTTF on January 1, 2016.
- NNCP will receive its last data ingest on December 31, 2015 and will process all requests received through that date. NNCP anticipates completing the queue of SAO Merlin requests on or around February 29, 2016.
- FTTTF will be the sole FBI recipient of SAO Merlin screening requests beginning on January 1, 2016.
- In anticipation of full transition of sole responsibility for the performance of FBI SAO Merlin screening checks from NNCP to FTTTF, FBI focused on the following six areas of performance:
  - **Data ingest:** Data will be receive from the Department of State on a daily basis. Mechanisms are currently in place to receive SAO Merlin data.
  - **Data screening software:** Programs for the automated screening of SAO Merlin data are near completion. These programs are anticipated to be fully functional on January 1, 2016.
  - **Human resources for manual vetting and processing of request:** FBI will have significant resources in place beginning on January 1, 2016. The scale of resources dedicated to this initiative will be adjusted accordingly once the transition to FTTTF is complete.
  - **Format of response:** The results will be returned to the Department of State (State) and U.S. Citizenship and Immigration Services (USCIS) will follow the green (no derogatory information found, recommend approval); yellow (derogatory information found, it may or may not rise to the level of national security concern) and red (derogatory information found, recommend deny). All green and yellow results will be provided to USCIS while all red results will be sent to State.
  - **Time period for the return of results:** FTTTF is dedicated to returning screening results within a 45 day period.
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- Feedback mechanism: FBI is currently working on a feedback mechanism to alert FBI of all instances in which its denial recommendations are overridden by adjudicative partners.

**ACTION:** FBI will provide SAO RRB with an inventory of data elements ingested from State for SAO Merlin vetting, as well as a list of the FBI data holdings against which it will vet. (by December 29).

**RECOMMENDATION:** SAO RRB has reviewed the proposal to transition sole responsibility for the performance of FBI SAO Merlin screening checks from NNCP to FTTTF and has approved the proposal. FBI agreed to provide documentation of the precise data elements vetted by FTTTF as part of the SAO Merlin process. **RECOMMENDATION ADOPTED.**

**AMENDED:** Format of response: FTTTF confirmed that all screening results from FTTTF will be sent directly to State.

2.

**LE & DP**

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