NATIONAL SECURITY CONCERNS
IN REFUGEE CASES
STANDARD OPERATING PROCEDURE
(“RAD CARRP SOP”)

Policy Branch
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I. ACRONYMS

- CARRP: Controlled Application Review and Resolution Program
- CLASS: Consular Lookout Automated Support System
- CLR: Clear
- DHS: Department of Homeland Security
- EV: Employment Verification
- FDNS: Fraud Detection and National Security
- FDNS-DS: FDNS Data System
- FOUO: For Official Use Only
- HQ: Headquarters
- IAC: Interagency Check
- INA: Immigration and Nationality Act
- IO: International Operations
- KST: Known or Suspected Terrorist
- LES: Law Enforcement Sensitive
- MNF: Multi-National Force
- NCL: Not Clear
- NS: National Security
- OCC: Office of Chief Counsel
- RAD: Refugee Affairs Division
- RAIO: Refugee, Asylum, and International Operations Directorate
- RSC: Resettlement Support Center
- SAO: Security Advisory Opinion
- SOP: Standard Operating Procedure
- SVPI: Security Vetting and Program Integrity
- TRIG: Terrorism Related Inadmissibility Grounds
- TSC: Terrorist Screening Center
- TSDB: Terrorist Screening Database
- UNHCR: United Nations High Commissioner for Refugees
- USCIS: United States Citizenship and Immigration Services
- USRAP: United States Refugee Admissions Program
- WRAPS: Worldwide Refugee Admissions Processing System
II. PURPOSE

The U.S. Citizenship and Immigration Services (USCIS) policy of vetting and adjudicating cases with national security (NS) concerns is known as the Controlled Application Review and Resolution Program (CARRP). This Standard Operating Procedure (SOP) provides guidance to assist officers who adjudicate and review refugee cases in identifying and processing NS concerns in accordance with CARRP policy. Refugee Affairs Division (RAD) Security Vetting and Program Integrity (SVPI) officers should refer to their internal resources for guidance on how to further review NS concerns after cases are placed on hold for CARRP.

III. AUTHORITY

This SOP now constitutes the RAD component operational guidance referenced in the Policy for Vetting and Adjudicating Cases with National Security Concerns memorandum signed by USCIS Deputy Director Jonathan Scharfen on April 11, 2008. International Operations (IO) officers will also follow this guidance when adjudicating and reviewing refugee cases. The following Refugee, Asylum, and International Operations (RAIO) component policy and guidance has been rescinded:

- “Processing of Refugee Cases with National Security Concerns” Memorandum, Barbara Strack and Joanna Ruppel, Chiefs (November 19, 2008)

IV. BACKGROUND

A critical part of the refugee adjudication is identifying NS concerns. USCIS identifies, records, vets, and adjudicates immigration cases with NS concerns through CARRP. For most domestic USCIS adjudications, this occurs in a four-step process:

- Step 1: Identification of NS Concern
- Step 2: Internal Vetting and Eligibility Assessment
- Step 3: External Vetting
- Step 4: Final Adjudication

These four steps also occur in refugee adjudications, although due to the distinctive nature of security vetting for refugees, some steps may overlap or occur in a different sequence. For example, external

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1 See “Policy for Vetting and Adjudicating Cases with National Security Concerns” Memorandum, Jonathan R. Scharfen, Deputy Director (April 11, 2008).
2 See RAIO Lesson Plan, National Security.
3 See the Appendix for a diagram of CARRP in the refugee context.
vetting typically begins early in the process upon initiation of routine security checks, when the applicant's biographic and biometric information is vetted through law enforcement and intelligence community holdings. If a security check returns derogatory information (i.e., identifies an NS concern), SVPI then conducts deconfliction by contacting the record owner to obtain more information. Identification of an NS concern and internal vetting may also occur at the interview when the officer reviews security checks and other documents in the file, elicits testimony from applicants (including derivatives and family members on other cases), or researches country conditions. External vetting continues throughout the refugee adjudication and immigration process, including post-adjudication and often, after applicants are admitted, through recurrent interagency vetting. Notwithstanding these distinctions in process flow, all four stages of CARRP are applicable to refugee adjudications.

NS concerns are divided into two categories: Known or Suspected Terrorist (KST) and Non-Known or Suspected Terrorist (Non-KST). The KST category refers to individuals who have been nominated to the Terrorist Screening Database (TSDB) through the Terrorist Screening Center (TSC). KSTs are identified through routine security checks, as these individuals are already known to the U.S. Government. Because KSTs are identified through routine security checks, officers will vet and adjudicate KST NS concerns simply by following routine security checks guidance. SVPI officers should refer to their internal resources for guidance on how to further review KST NS concerns after receipt of security checks results.

The Non-KST category refers to all other NS concerns, regardless of source, including but not limited to associates of KSTs, unindicted co-conspirators, terrorist organization members, persons involved in providing material support to terrorists or terrorist organizations, and agents of foreign governments. Individuals and organizations that fall into this category may also pose a serious threat to national security. This SOP focuses on Non-KST NS concerns that are not identified through routine security checks.

V. TERMINOLOGY

An NS concern exists when an individual or organization has an articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in sections 212(a)(3)(A), (B), or (F), or 237(a)(4)(A) or (B), of the Immigration and Nationality Act (INA). This includes, but is not limited to, terrorist activity; espionage; sabotage; and the illegal transfer of goods, technology, or sensitive information.

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4 IACs are run recurrently for 2.5 years after the final submission. This can and often does include time after an applicant has been admitted to the United States as a refugee.
6 See “Policy for Vetting and Adjudicating Cases with National Security Concerns” Memorandum, Jonathan R. Scharfen, Deputy Director (April 11, 2008)
The RAIO Lesson Plan on National Security provides guidance on what constitutes an *articulable link*: “Articulable” is defined as capable of being expressed, explained or justified. There must be a *reasonably expressed link* between the individual and the activity. The link must be able to be articulated or explained – it cannot just be a feeling or a hunch”...“you must examine the totality of the circumstances in determining whether an articulable link exists.”

**NS indicators** are distinct from NS concerns and do not, in and of themselves, constitute NS concerns. NS indicators alert the officer to the possibility of an NS concern and may include certain other possible fact patterns. When the officer identifies an NS indicator, he or she must elicit additional testimony in order to make a legally sufficient determination as to whether the applicant has an articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B), resulting in an NS concern that requires further vetting through CARRP.

**VI. IDENTIFICATION OF NS CONCERNS AND INTERNAL VETTING**

**a. Issue Spotting**

In the refugee context, the officer may identify an NS indicator or NS concern at any stage of the screening or adjudicative process, including at the interview when reviewing security checks and other documents in the file, eliciting testimony from applicants (including derivatives and family members on other cases), and/or researching country conditions. As explained above, the officer must explore any NS indicator thoroughly to determine whether it results in an NS concern that requires further vetting through CARRP.

The following are examples of some common NS indicators and NS concerns in refugee adjudications that require officer follow up:

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8 The officer should think about NS indicators in the same way he or she considers indicators for the other prongs of refugee eligibility. For example, an applicant may have assisted in the persecution of others on account of a protected characteristic to make a determination consistent with law and policy regarding whether the applicant is barred as a persecutor. Likewise, an NS indicator does not automatically constitute an NS concern. After identifying an NS indicator, the officer would know to gather additional testimony to determine whether an articulable link exists, resulting in an NS concern requiring further vetting through CARRP.
9 See “Policy for Vetting and Adjudicating Cases with National Security Concerns” Memorandum, Jonathan R. Scharfen, Deputy Director (April 11, 2008).
10 See the Appendix for examples from actual refugee cases.
The officer should consult the Adjudicative Aid for Cases Involving National Security Indicators and National Security Concerns ("RAD CARRP Lines of Inquiry") for suggested lines of inquiry for NS indicators and NS concerns.

If the officer determines that an NS concern exists, he or she must place the case on hold for CARRP. 11 Placing the case on hold for CARRP will refer it to SVPI for further vetting and a determination on whether the NS concern can be resolved. Occasionally, SVPI may forward-deploy officers on refugee processing circuit rides. In these instances, SVPI officers may further vet NS concerns in the field. 12 This is the only time, other than certain instances of TRIG as discussed below, when an NS concern could be resolved in the field.

b. Determining Whether an Articulable Link Exists

After identifying an NS indicator, the officer must determine whether the applicant has an articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or

11 As with any other aspect of the refugee adjudication, the reviewing officer will review the officer’s determination that an NS concern exists. See "Documenting the Decision" below.

12 SVPI officers must log all case-specific work related to CARRP in FDNS-DS, in accordance with FDNS policy, and other internal RAD systems as appropriate, after a case is placed on hold for CARRP.
organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B), resulting in an NS concern that requires further vetting through CARRP. 13

Given the officer’s critical role in conducting an in-person interview with the applicant, and the fact that many NS indicators identified through testimony may not otherwise be identified through security checks, the officer is ultimately responsible for eliciting sufficient testimony, developing the record, and making a final determination on whether there is an articulable link, resulting in an NS concern that requires further vetting through CARRP. 14 NS indicators by themselves, without an articulable link, are not NS concerns and do not warrant further vetting through CARRP. The officer may identify an NS indicator and, after thorough elicitation and analysis, determine that there is no articulable link, and as a result, no NS concern. If the officer comes to this conclusion, he or she must document the NS indicator, his or her analysis of why the NS indicator does not result in an NS concern, and what evidence he or she considered to arrive at that finding (e.g., applicant testimony, family member testimony, country conditions research, case file documents, etc.) in Section IV of the Refugee Application Assessment.

The officer should consult component operational guidance and other resources, including the Adjudicative Aid for Cases Involving National Security Indicators and National Security Concerns (“RAD CARRP Lines of Inquiry”), for suggested lines of inquiry that may assist in developing the record. The following examples show how the officer might determine whether the applicant has an articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B), resulting in an NS concern, given several different NS indicators identified through testimony:

**Direct Articulable Link**

In some instances, the applicant’s testimony will clearly and directly articulate a link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B).

For example, the applicant testifies that he used to be a member of a group that was engaged in active combat against the government. This group clearly met the definition of a “terrorist organization” pursuant to INA § 212(a)(3)(B)(vi) at the time of his involvement. Based on this testimony alone, there is a direct articulable link to prior involvement in, or association with, an organization described in INA § 212(a)(3)(B), and thus an NS concern. In this scenario, the officer should focus on eliciting testimony and developing the record surrounding the specific details of his

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13 If the refugee applicant has never been admitted to the United States, the officer need not consider whether he or she has an articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 237(a)(4)(A) and (B). INA § 237 describe classes of deportable aliens, and someone is only deportable if he or she has been admitted to the United States.

involvement in, and association with, the terrorist organization to assist SVPI in further vetting the NS concern.

**Potential Articulable Link**

In other instances, the applicant’s testimony may reveal an NS indicator, but there may be insufficient information to establish an articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B) without additional follow up.

For example, the applicant testifies that she

![LE]

as described in INA § 212(a)(3)(B), the officer must elicit additional testimony, research country conditions, and/or request additional evidence to continue developing the record and determine whether the applicant has an articulable link to an activity described in INA § 212(a)(3)(B). For example, the officer could elicit detailed testimony on the

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After completing this follow up, the officer would consider the totality of the circumstances, including the applicant’s testimony and any additional research, to determine whether an articulable link exists.

**No Articulable Link**

There will also be circumstances where the officer identifies an NS indicator and after additional follow-up finds that there is no articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B) and as a result, no NS concern. However, the officer must complete this follow-up and consider the totality of circumstances before arriving at this finding.

For example, the applicant testifies that he

![LE]

time. In this scenario, the record reflects that the applicant does not have an articulable link to prior,
current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B). Thus, the NS indicator of LE does not result in an NS concern, and no further vetting through CARRP is required.

i. Family Members and Close Associates

The officer will encounter applicants whose family members or close associates have prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B). Close associates may include but are not limited to

ii. Accusations

The officer will encounter applicants whose family members or close associates have prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B). Close associates may include but are not limited to
iii. Prior Involvement or Association

An articulable link can exist to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B). The officer may encounter applicants who have an articulable link to prior, but not current, involvement in, or association with, an activity, individual, or organizations described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B). This does not negate the existence of the NS concern.

For example, consider an applicant who testifies that he was a member of a group that met the definition of a Tier III terrorist organization at the time of his involvement decades ago, but that no longer meets that definition. The length of time since the applicant’s membership does not negate the NS concern, as the applicant has an articulable link to prior involvement in an organization described in INA § 212(a)(3)(B). In another example, the applicant’s close associate engaged in terrorist activity, but the applicant testifies that that person is now deceased.

c. TRIG as an NS Concern

If the applicant is inadmissible for a terrorism-related inadmissibility ground (TRIG) pursuant to INA § 212(a)(3)(B), an articulable link necessarily exists between the applicant and prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA § 212(a)(3)(B), resulting in an NS concern. Typically, when an NS concern exists, the officer must place the case on hold for CARRP.

However, in instances where the TRIG is the sole basis for the NS concern, and the applicant is eligible for a TRIG exemption, the approved TRIG exemption resolves the specific NS concern and the officer should not place the case on hold for CARRP. When there are multiple NS concerns, the officer must determine which, if any, of those NS concerns can be resolved by an approved TRIG exemption. If any

15 See USCIS TRIG guidance for more information on TRIG exemptions, including when to place a case on hold for Field TRIG Exemption or HQ TRIG Review.
16 There may be circumstances in which the officer would like RAD Policy and/or SVPI to conduct further review prior to recommending approval of a TRIG exemption. The officer should discuss such concerns with his or her supervisor to evaluate the appropriate referral mechanism to request assistance.
of the NS concerns cannot be resolved by an approved TRIG exemption, the officer must place the case on hold for CARRP.\textsuperscript{17}

In summary:

- **Eligible for TRIG exemption:** If the officer recommends approval of an available TRIG exemption and does not identify any other NS concerns besides the exemptible TRIG activity, the officer can consider the NS concern resolved and does not need to place the case on hold for CARRP. The officer should still place the case on hold for TRIG in accordance with current guidance. This would include, for example, an applicant who paid ransom to a Tier I terrorist organization for the release of a kidnapped son and was eligible for an exemption based on his material support under duress.

- **Multiple NS concerns:** If the officer recommends approval of an available TRIG exemption, but identifies an additional NS concern besides the exemptible TRIG activity, the officer must place the case on hold for CARRP for the additional NS concern, in addition to placing the case on hold for TRIG in accordance with current guidance. This would include, for example, an applicant who provided tea as part of a routine social transaction to members of a group that, at the time, met the definition of a Tier III terrorist organization, and whose husband was also a member of said organization.

- **Not eligible for TRIG exemption:** If the officer recommends denial of an available TRIG exemption or an exemption is not currently available, the officer cannot consider the NS concern resolved and must place the case on hold for CARRP, in addition to placing the case on hold for TRIG in accordance with current guidance.\textsuperscript{18} This would include, for example, an applicant who paid money to a Tier I terrorist organization for kerosene to heat his home, where duress cannot be established.

\textbf{d. Eliciting Testimony}

The officer has the affirmative duty to elicit all relevant and useful information bearing on the applicant’s eligibility for refugee status.\textsuperscript{19} The officer should use open-ended questions to the maximum extent possible and elicit testimony on the who, what, where, when, and why for each NS indicator and any resulting NS concerns.\textsuperscript{20} The use of open-ended questions assists the officer in obtaining information, maintains a non-adversarial environment, and enables the applicant to describe the situation in more detail than when constrained to only a “Yes” or “No” response.\textsuperscript{21} When the officer approaches this as an opportunity to build rapport and gain additional information in a

\begin{itemize}
\item \textsuperscript{17} The officer reviewing the TRIG exemption, either in the field or at RAD HQ, should likewise place a case on hold for CARRP if he or she identifies an NS concern that will not be resolved through an approved TRIG exemption.
\item \textsuperscript{18} See USCIS TRIG guidance for more information on TRIG exemptions, including placing a case on hold when recommending denial of an available exemption or when an exemption is not available.
\item \textsuperscript{19} See RAIO Lesson Plan, Interviewing - Eliciting Testimony; 8 CFR § 208.9(b); UNHCR Handbook, paragraphs 196 and 205(b)(i).
\item \textsuperscript{20} See the Appendix for examples from actual refugee cases.
\item \textsuperscript{21} See RAIO Lesson Plan, Interviewing - Eliciting Testimony.
\end{itemize}
non-adversarial manner, the applicant can provide more meaningful and detailed testimony, and as a result, the officer can conduct a more thorough analysis of both credibility and potential NS concerns.

The applicant’s responses to questions that are relevant to NS indicators and NS concerns are integral to the analysis of whether an NS concern exists and, consequently, inform SVPI’s final recommendation as to whether the NS concern is resolved or unresolved. If the applicant provides non-responsive or unclear answers, the wording of the question could be the source of the problem. The officer should rephrase the question to approach the NS indicator or NS concern in a different way, as this may better help the applicant understand what the officer is asking. If the applicant continues to provide non-responsive answers, the officer should inquire as to the applicant’s understanding of the interpreter and also ask directly for an explanation as to why the applicant does not appear to be answering the question. As with any other aspect of the refugee adjudication, the officer should also analyze whether the applicant is providing credible testimony regarding the potential NS concern, specifically whether the applicant’s testimony is internally and externally consistent, sufficiently detailed, and plausible.

The applicant may feel vulnerable during an interview for any number of reasons, but particularly when asked to expose highly sensitive and personal information such as biographic information of family members or close associates. For this reason, the officer may wait to elicit this information until he or she has established rapport with the applicant by eliciting testimony surrounding other aspects of the NS concern. The officer should also be mindful of who is present in the room and consider dismissing all other family members when asking sensitive questions. If the applicant demonstrates anxiety or discomfort in answering certain questions, this is also an opportune time for the officer to remind the applicant of the confidentiality of the interview.

e. Developing the Record

The Refugee Application Assessment, on which the officer will take his or her notes, serves as a record of the refugee interview, analysis, and decision-making. The officer must take notes of the interview in a modified question and answer format. Although the notes need not be a verbatim record, they should capture the officer’s questions and the applicant’s testimony as accurately as possible. The notes must mirror what transpired during the interview and serve to support the officer’s decision, confirming that he or she made a decision consistent with law and policy.

Reviewing officers in the field and at RAD headquarters (HQ), including SVPI, rely heavily on the Refugee Application Assessment when reviewing a case. Because NS concerns in refugee cases are often revealed through applicant testimony, and the officer is the only person who speaks with the applicant, it is critical that the officer develop a clear record. If the testimony is insufficient or the

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22 See RAIO Lesson Plan, Interviewing – Eliciting Testimony.
23 See RAIO Lesson Plan, Interviewing – Introduction to the Non-Adversarial Interview.
25 See RAIO Lesson Plan, Note-Taking.
record unclear, SVPI may need to remand the case for re-interview to elicit additional testimony or gain clarification surrounding the NS concern, causing great expenditure of resources and undue delay to the applicant.

f. Documenting the Decision

The officer must clearly document his or her analysis and decision on whether an NS concern exists in Section IV of the Refugee Application Assessment, including analysis for instances in which an identified NS indicator does not result in an NS concern. The officer must also place any case with an NS concern on hold for CARRP in Section VI of the Refugee Application Assessment. If the officer does not place the case on hold for CARRP in Section VI, the Resettlement Support Center (RSC) will not be alerted to place the case on hold for CARRP in WRAPS and SVPI will never be informed of the fact that there is an NS concern that requires further vetting.

g. Cross-Referenced and Related Cases

h. Supervisory Review

As with any other aspect of the refugee adjudication, the reviewing officer is responsible for reviewing all relevant forms and documents in the file, including the completed Refugee Application Assessment, to ensure that the officer’s decision on the existence of any NS concern(s) is legally sufficient and in accordance with this SOP. If the reviewing officer does not concur with the officer’s finding, the reviewing officer must document his or her analysis and decision in Section IV, Section VI, and Section VII of the Refugee Application Assessment.

The reviewing officer must ensure that the appropriate cases are placed on hold for CARRP for referral to SVPI. If the reviewing officer erroneously concurs that a case with no NS concern should go on hold for CARRP, this is a critical error and will cause undue delay to the applicant.

i. Fraud Detection and National Security Data System (FDNS-DS)

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27 The Worldwide Refugee Admissions Processing System, a Department of State operated system used to process and track refugees being considered for resettlement under theUSRAP.
FDNS-DS is the USCIS system of record for recording, tracking, and managing immigration inquiries, investigative referrals, law enforcement requests, and case determinations involving benefit fraud, criminal activity, public safety and NS concerns.

It is critical that SVPI officers log all case-specific work related to CARRP in FDNS-DS, in accordance with FDNS policy, and other internal RAD systems as appropriate, after a case is placed on hold for CARRP. This applies to both forward-deployed SVPI officers in the field and those at RAD HQ. Neither the adjudicating officer nor the reviewing officer is responsible for entering any information into FDNS-DS.

**VII. ELIGIBILITY ASSESSMENT**

If an NS concern exists but the applicant is otherwise eligible for refugee resettlement pursuant to INA § 207, the officer must place the case on hold for CARRP. The officer can recommend approval pending resolution of the NS concern. Consistent with the guidance in this SOP, the officer should also place any cross-referenced or related cases on hold for CARRP as well, regardless of whether the officer is recommending approval or denial of those cases.

If an NS concern exists but the applicant is not otherwise eligible for refugee resettlement pursuant to INA § 207, the officer should not deny the case in the field. Rather, the officer should place the case on hold for CARRP so that SVPI can review the NS concern and deconflict with law enforcement and/or the intelligence community as appropriate. Consistent with the guidance in this SOP, regardless of whether the officer is recommending approval or denial of those cases. If after further review SVPI determines that the NS concern is unresolved, SVPI will prepare a discretionary denial and include the additional reasons of ineligibility identified by the officer. If SVPI determines that the NS concern is resolved, but the applicant remains otherwise ineligible for resettlement, SVPI will refer back to the officer's recommendation for a routine denial.

For recommended denials, in the justification portion of Section VI, the officer should write, “This case is not eligible for refugee resettlement; however, it is on hold for CARRP due to the NS concern(s) as described in Section IV. If SVPI determines that the NS concern is resolved, recommend denial for [insert reason, for example ‘PA is inadmissible’, etc.].”

**VIII. EXTERNAL VETTING**

External vetting requires close coordination with law enforcement agencies and/or other record owners of NS and other derogatory information. Through external vetting, SVPI aims to identify facts or fact patterns necessary to determine the nature and relevance of the NS concern, including the

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29 SVPI officers should refer to their internal resources for guidance on entering information about NS concerns into FDNS-DS.
status and results of any ongoing investigation and the basis for the closure of any previous investigation, and any other information that may be relevant in determining eligibility.\(^{30}\)

Although external vetting is listed as Step 3 in USCIS CARRP policy, external vetting is initiated for all refugee applicants in the preliminary stages of U.S. Refugee Admissions Program (USRAP) through required security checks. The RSC initiates the request for CLASS, SAO, and IAC security checks at the time of pre-screening interview, while USCIS collects fingerprints for processing either at pre-screening or the day of the applicant’s USCIS interview. These biographic and biometric checks vet the applicant’s information across law enforcement and intelligence community holdings and provide SVPI an opportunity to inquire with record owners of NS and other derogatory information. External vetting also occurs when, in the process of reviewing a case on hold for CARRP, SVPI contacts other agencies to request additional information. After initiation, external vetting continues throughout the refugee adjudication and immigration process, including post-adjudication and often, after applicants are admitted, through recurrent interagency vetting.\(^{31}\)

The officer should review security checks results at the time of interview and/or hold lift in accordance with RAD policy.\(^{32}\) The officer should not place a case on hold for any security check solely as a result of an NS concern; the only hold that he or she should use to indicate that an NS concern exists that requires further vetting is CARRP. For example, if the officer is placing a case on hold for CARRP but all other security checks are CLR (clear), the officer should not place the case on hold for IAC as a result of the NS concern. Similarly, if the officer is placing a case on hold for IAC NCL (not clear) but there are no independent NS concerns, the officer should not place the case on hold for CARRP.\(^{33}\) However, if there are reasons independent of one another to place a case on hold for both security checks and CARRP, the officer should do so.

**IX. FINAL ADJUDICATION OF THE NS CONCERN**

SVPI reviews all cases placed on hold for CARRP and performs further vetting of NS concerns to obtain additional relevant information. Generally there are five possible outcomes for these cases:\(^{34}\)

1. If SVPI determines that the NS concern is resolved and the officer recommended approval pending resolution of the NS concern, SVPI will inform the appropriate RSC to present the case to USCIS for CARRP hold lift and approval.\(^{35}\)

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\(^{30}\) See "Policy for Vetting and Adjudicating Cases with National Security Concerns" Memorandum, Jonathan R. Scharfen, Deputy Director (April 11, 2008).

\(^{31}\) IACs are run recurrently for 2.5 years after the final submission. This can and often does include time after an applicant has been admitted to the United States as a refugee.

\(^{32}\) See RAD Lesson Plan, Security Checks: CLASS, SAO, IAC and Fingerprints.

\(^{33}\) Although some security check results may indicate the presence of an NS concern, SVPI vets these NS concerns in a separate track from those identified at interview. For that reason, the officer does not need to place any case with FP, CLASS, SAO, or IAC NOD or NCL on hold for CARRP solely as a result of the security check result.

\(^{34}\) SVPI and RAD Management should refer to USCIS guidance on the Senior Leadership Review Board referral process for high priority NS concerns as appropriate.

\(^{35}\) See Standard Operating Procedure: Refugee Cases on Hold (January 11, 2012) for instructions on how to conduct hold lifts.
2. If SVPI determines that the NS concern is resolved but the officer recommended denial based on other grounds, SVPI will inform the appropriate RSC to present the case to USCIS for routine non-discretionary denial.

3. If SVPI determines that the NS concern is unresolved, SVPI will prepare a discretionary denial. SVPI will inform the appropriate RSC to present the case to USCIS for final adjudication and issuance of the discretionary denial.

4. If SVPI determines that the record is incomplete or there is insufficient information regarding the potential NS concern to perform additional vetting, SVPI will remand the case for re-interview to elicit additional testimony surrounding the NS concern. The re-interviewing officer should follow instructions in the re-interview cover sheet regarding whether he or she must report the results of the re-interview back to SVPI. Unless SVPI explicitly instructs otherwise in the re-interview cover sheet, the officer should not lift the CARRP hold at the conclusion of the re-interview; rather the case should remain on hold for CARRP for SVPI reviewers to consider the additional testimony in their analysis of the NS concern.

5. If SVPI determines that there is actually no NS concern and the case should not have been placed on hold for CARRP, SVPI will inform the appropriate RSC to present the case to USCIS to remove the CARRP hold and continue with processing. If the officer recommended approval pending resolution of the NS concern, the officer removing the CARRP hold should treat this as a hold lift. If the officer recommended denial based on other grounds, but also placed the case on hold for CARRP, the officer removing the CARRP hold should deny the case for the reasons of ineligibility identified by the officer.
X. VERSION HISTORY

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XI. APPENDIX

a. Examples of NS Indicators and NS Concerns
LE
b. Examples of Open-Ended and Closed-Ended Questions

Open-ended questions:

Closed-ended questions:
c. Diagram of CARRP in the Refugee Context

- Depending on the facts of the case, begin at one of the two boxes.
  - Officer identifies an NS concern at interview.
  - Officer determines an NS indicator at interview.
  - Officer identifies an NS concern at interview.
  - Officer determines that an articulable link does not exist, resulting in no NS concern.

- Officer conducts internal vetting at interview.
- Officer places the case on hold for CARRP.

- SVPI conducts additional internal and external vetting.
- No NS concern: SVPI determines that CARRP hold can be lifted and case can be adjudicated.
- NS concern resolved: SVPI determines that CARRP hold can be lifted and case can be adjudicated.
- NS concern unresolved: SVPI prepares discretionary denial.
- Record incomplete: SVPI remands the case for re-interview.

Security checks are run recurrently throughout USRAP processing.
- External vetting: occurs when routine security checks compare the applicant's information against law enforcement and intelligence community holdings.
- Security check results contain derogatory information. SVPI conducts deconfliction by contacting the record holder to obtain more information.
- Security check results do not contain derogatory information.
- SVPI determines that the derogatory information does not result in an NS concern.
- SVPI determines that the derogatory information does result in an NS concern.

*SVPI officers will log all case-specific work related to CARRP in FDNS-DS and other internal RAD systems as appropriate.*

Key:
- Identification of an NS concern
- Internal vetting
- External vetting
- Deconfliction
- Final adjudication
NATIONAL SECURITY CONCERNS
STANDARD OPERATING PROCEDURE

(“RAD CARRP SOP”)

Security Vetting and Program Integrity (SVPI) Policy Branch
Last revised November 2019

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I. ACRONYMS

- **CARRP**: Controlled Application Review and Resolution Program
- **CLASS**: Consular Lookout Automated Support System
- **CLR**: Clear
- **DHS**: Department of Homeland Security
- **EV**: Employment Verification
- **FDNS**: Fraud Detection and National Security
- **FDNS-DS**: FDNS Data System
- **FOUO**: For Official Use Only
- **HQ**: Headquarters
- **IAC**: Interagency Check
- **INA**: Immigration and Nationality Act
- **IO**: International Operations
- **KST**: Known or Suspected Terrorist
- **LES**: Law Enforcement Sensitive
- **MNF**: Multi-National Force
- **NCL**: Not Clear
- **NS**: National Security
- **OCC**: Office of Chief Counsel
- **RAD**: Refugee Affairs Division
- **RAIO**: Refugee, Asylum, and International Operations Directorate
- **RSC**: Resettlement Support Center
- **SAO**: Security Advisory Opinion
- **SOP**: Standard Operating Procedure
- **SVPI**: Security Vetting and Program Integrity
- **TRIG**: Terrorism Related Inadmissibility Grounds
- **TSC**: Terrorist Screening Center
- **TSDB**: Terrorist Screening Database
- **UNHCR**: United Nations High Commissioner for Refugees
- **USCIS**: United States Citizenship and Immigration Services
- **USRAP**: United States Refugee Admissions Program
- **WRAPS**: Worldwide Refugee Admissions Processing System
II. PURPOSE

The U.S. Citizenship and Immigration Services (USCIS) policy of vetting and adjudicating cases with national security (NS) concerns is known as the Controlled Application Review and Resolution Program (CARRP).¹ This Standard Operating Procedure (SOP) provides guidance to assist officers who adjudicate and review refugee cases in identifying and processing NS concerns in accordance with CARRP policy. Refugee Affairs Division (RAD) Security Vetting and Program Integrity (SVPI) officers should refer to their internal resources for guidance on how to further review NS concerns after cases are placed on hold for CARRP.

III. AUTHORITY

This SOP now constitutes the RAD component operational guidance referenced in the Policy for Vetting and Adjudicating Cases with National Security Concerns memorandum signed by USCIS Deputy Director Jonathan Scharfen on April 11, 2008 and the Testimony-Based National Security Indicators and Concerns memorandum signed by RAIO Associate Director Jennifer B. Higgins on September 9, 2019. USCIS officers will follow this guidance when adjudicating and reviewing refugee cases. The following Refugee, Asylum, and International Operations (RAIO) component policy and guidance has been rescinded:

- “Processing of Refugee Cases with National Security Concerns” Memorandum, Barbara Strack and Joanna Ruppel, Chiefs (November 19, 2008)

IV. BACKGROUND

A critical part of the refugee adjudication is identifying NS concerns. USCIS identifies, records, vets, and adjudicates immigration cases with NS concerns through CARRP.² For most domestic USCIS adjudications, this occurs in a four-step process:

- Step 1:
- Step 2:
- Step 3:
- Step 4:

These four steps also occur in refugee adjudications, although due to the distinctive nature of security vetting for refugees, some steps may overlap or occur in a different sequence. For example, external vetting typically begins early in the process upon initiation of routine security

¹ See “Policy for Vetting and Adjudicating Cases with National Security Concerns” Memorandum, Jonathan R. Scharfen, Deputy Director (April 11, 2008).
² See RAIO Lesson Plan, National Security.
NS concerns are divided into two categories: Known or Suspected Terrorist (KST) and Non-Known or Suspected Terrorist (Non-KST).

V. TERMINOLOGY

An NS concern exists when an individual or organization has an articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in sections 212(a)(3)(A), (B), or (F), or 237(a)(4)(A) or (B), of the Immigration and Nationality Act (INA). This includes, but is not limited to, terrorist activity, espionage, sabotage, and the illegal transfer of goods, technology, or sensitive information.

The RAIO Lesson Plan on National Security provides guidance on what constitutes an articulable link: “An articulable link exists when you can express, in a few sentences, a clear connection

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3 IACs are run recurrently for 2.5 years after the final submission. This can and often does include time after an applicant has been admitted to the United States as a refugee.


between the individual and an activity, individual, or organization described in the relevant INA national security ground of inadmissibility or deportability.

NS indicators include information which suggests that a connection to activities, individuals and organizations described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B) may exist. When an NS indicator has been identified, the officer must analyze the indicator in conjunction with the facts of the case, considering the totality of the circumstances, and determine whether an articulable link exists between the individual and an activity, individual, or organization described in the aforementioned security-related inadmissibility and deportability grounds. After exploring all of the facts of the case and considering the totality of the circumstances, if the officer finds an articulable link to INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B), the case requires referral for further vetting through the CARRP process.

VI. IDENTIFICATION OF NS CONCERNS AND INTERNAL VETTING

a. Issue Spotting
b. Determining Whether an Articulable Link Exists

After identifying an NS indicator, the officer must determine whether the applicant has an articulable link to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B).\(^1\)
i. Family Members and Close Associates

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15 See “Testimony-Based National Security Indicators and Concerns” Memorandum, Jennifer B Higgins, RAIO Associate Director (September 9, 2019).
ii. Accusations (b)(7)(e) (b)(5)
iii. Prior Involvement or Association

An articulable link can exist to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B). The officer may encounter applicants who have an articulable link to prior, but not current, involvement in, or association with, an activity, individual, or organizations described in INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B). To determine whether the applicant's past activity or association results in an NS concern, the officer must make a determination based on the totality of the circumstances.

(b)(7)(e) (b)(5)

c. TRIG as an NS Concern
If the applicant is inadmissible for a terrorism-related inadmissibility ground (TRIG) pursuant to INA § 212(a)(3)(B), an articulable link necessarily exists between the applicant and prior, current, or planned involvement in, or association with, an activity, individual, or organization described in INA § 212(a)(3)(B), resulting in an NS concern. Typically, when an NS concern exists, the officer must place the case on hold for CARRP.

However, in instances where the TRIG is the sole basis for the NS concern, and the applicant is eligible for a TRIG exemption, the approved TRIG exemption resolves the specific NS concern and the officer should not place the case on hold for CARRP. When there are multiple NS concerns, the officer must determine which, if any, of those NS concerns can be resolved by an approved TRIG exemption. If any of the NS concerns cannot be resolved by an approved TRIG exemption, the officer must place the case on hold for CARRP.

In summary:

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16 See USCIS TRIG guidance for more information on TRIG exemptions, including when to place a case on hold for Field TRIG Exemption or HO TRIG Review.

17 See USCIS TRIG guidance for more information on TRIG exemptions, including placing a case on hold when recommending denial of an available exemption or when an exemption is not available.
d. Eliciting Testimony

The officer has the affirmative duty to elicit all relevant and useful information bearing on the applicant’s eligibility for refugee status. The officer should use open-ended questions to the maximum extent possible and elicit testimony on the who, what, where, when, and why for each problem. The use of open-ended questions assists the officer in obtaining information, maintains a non-adversarial environment, and enables the applicant to describe the situation in more detail than when constrained to only a “yes” or “no” response. When the officer approaches this as an opportunity to build rapport and gain additional information in a non-adversarial manner, the applicant can provide more meaningful and detailed testimony, and as a result, the officer can conduct a more thorough analysis of both credibility and potential NS concerns.

problem. The officer should rephrase the question in a different way, as this may better help the applicant understand what the officer is asking. If the applicant continues to provide non-responsive answers, the officer should inquire as to the applicant’s understanding of the interpreter and also ask directly for an explanation as to why the applicant does not appear to be answering the question. As with any other aspect of the refugee adjudication, the officer should also analyze whether the applicant is providing credible testimony specifically whether the applicant’s testimony is internally and externally consistent, sufficiently detailed, and plausible.

The applicant may feel vulnerable during an interview for any number of reasons, but particularly when asked to expose highly sensitive and personal information such as biographic information of family members or close associates. The applicant demonstrates anxiety or discomfort in answering certain questions, this is also an opportune time for the officer to remind the applicant of the confidentiality of the interview.

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20 See RAIO Lesson Plan, Interviewing – Eliciting Testimony. 8 C.F.R. § 208.9(b); UNHCR Handbook, paragraphs 196 and 205(b)(i).
21 See RAIO Lesson Plan, Interviewing – Eliciting Testimony.
22 See RAIO Lesson Plan, Interviewing – Eliciting Testimony.
23 See RAIO Lesson Plan, Interviewing – Introduction to the Non-Adversarial Interview.
e. Developing the Record

The Refugee Application Assessment (Assessment), in which the officer will take his or her notes, serves as a record of the refugee interview, analysis, and decision-making. The officer must take notes of the interview in a modified question and answer format. Although the notes need not be a verbatim record, they should capture the officer’s questions and the applicant’s testimony as accurately as possible. The notes must mirror what transpired during the interview and serve to support the officer’s decision, confirming that he or she made a decision consistent with law and policy.

Reviewing officers in the field and at RAD headquarters (HQ), including SVPI, rely heavily on the Assessment when reviewing a case. Because NS concerns in refugee cases may be revealed through applicant testimony, and the officer is the only person who speaks with the applicant, it is critical that the officer develop a clear record. If the testimony is insufficient or the record unclear, SVPI may need to remand the case for reinterview to elicit additional testimony or gain clarification surrounding the NS concern, causing great expenditure of resources and undue delay to the applicant.

f. Documenting the Decision

The officer must clearly document his or her analysis and decision on exists in Section IV of the Assessment, including analysis for instances in which an identified and the evidence considered when determining that an articulable link to INA §§ 212(a)(3)(A), (B), or (F) or 237(a)(4)(A) or (B) does not exist (i.e. the fact that the applicant credibly testified that he did not provide material support to armed groups and that he does not know anyone who belongs in an armed group).

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26 See RAIO Lesson Plan, Note-Taking.
On the other hand, if the officer finds that an NS concern exists, in order to refer the case to SVPI, the officer must provide a synopsis of the concern identified and the corresponding INA ground in Section IV of the Assessment. For example, if the applicant testifies that she is a current

g. Cross-Referenced and Related Cases

When a case requires referral through the CARRP process, the officer must also place any cross-referenced or related case on CARRP hold, pending review of the underlying NS concerns for the case to which it is connected or related. Likewise, if a case is referred through the CARRP process, the officer must also place any related but not cross-referenced cases he or she is aware of on hold for CARRP.

For recommended denials, in the Justification portion of Section VI, the officer should write, “This case is not eligible for refugee resettlement; however, it is on hold ______ alternate recommendation for [insert reason, for example ‘PA is inadmissible’, etc.].”

After CARRP review is complete, SVPI-Operations or the RAD Headquarters Regional Desks will communicate the determination to the RSC, who will include a copy of the communication in the case file and present the case to a USCIS officer for final adjudication. The applicant remains otherwise ineligible for resettlement, the adjudicator will refer back to the officer’s recommendation for a routine denial.

h. Supervisory Review

As with any other aspect of the refugee adjudication, the reviewing officer is responsible for reviewing all relevant forms and documents in the file, including the completed Assessment, to ensure that the officer’s determination of the existence of any NS concern(s) is made in accordance with this SOP. If the reviewing officer does not concur with the officer’s finding, the

reviewing officer must document his or her analysis and decision in Section IV, Section VI, and Section VII of the Assessment.\(^{30}\)

The reviewing officer must ensure that the appropriate cases are placed on hold for CARRP for referral to SVPI. If the reviewing officer erroneously concurs that a case with no NS concern should go on hold for CARRP, this is a critical error and will cause undue delay to the applicant.

**VII. ELIGIBILITY ASSESSMENT**

If an NS concern exists but the applicant is otherwise eligible for refugee resettlement pursuant to INA § 207, the officer must place the case on hold for CARRP. The officer can recommend approval pending resolution of the NS concern. Consistent with the guidance in this SOP, the officer should also place any cross-referenced or related cases on hold for CARRP as well, regardless of whether the officer is recommending approval or denial of those cases.

If an NS concern exists but the applicant is not otherwise eligible for refugee resettlement pursuant to INA § 207, the officer should not deny the case in the field. Rather, the officer should place the case on hold for CARRP so that SVPI can review the NS concern and deconflict with law enforcement and/or the intelligence community, as appropriate. Consistent with the guidance in this SOP, the officer should also refer any cross-referenced or related cases on through the CARRP process as well pending review of the underlying NS concerns for the case to which it is connected or related, regardless of whether the officer is recommending approval or denial of those cases.

For recommended denials, in the Justification portion of Section VI, the officer should write, “This case is not eligible for refugee resettlement; however, it is on hold for CARRP due to the NS concern(s) as described in Section IV. If SVPI determines that the NS concern is resolved, recommend denial for [insert reason, for example ‘PA is inadmissible’, etc.].”

After CARRP review is complete, SVPI-Operations or the RAD Headquarters Regional Desks will communicate the determination on the NS concern (resolved or unresolved) to the RSC, who will include a copy of the communication in the case file and present the case to a USCIS officer for final adjudication. If SVPI determines that the NS concern is resolved, but the applicant remains otherwise ineligible for resettlement, the adjudicator will refer back to the officer’s recommendation for a routine denial.

**VIII. EXTERNAL VETTING**

External vetting requires close coordination with law enforcement agencies and/or other record owners of NS and other derogatory information. Through external vetting, SVPI aims to identify

the nature and relevance of the NS concern to the case, in order to determine whether or not the
NS concern is resolved or unresolved.\textsuperscript{31}

initiation, external vetting continues throughout the refugee adjudication and immigration process,
including post-adjudication and often, after applicants are admitted, through recurrent interagency
vetting.\textsuperscript{32}

The officer should review security checks results at the time of interview and/or hold lift in
accordance with RAD policy.\textsuperscript{33}

However, if there are reasons independent of one another
to place a case on hold for both security checks and CARRP, the officer should do so.

IX. FINAL ADJUDICATION OF THE NS CONCERN

\textsuperscript{31} See “Policy for Vetting and Adjudicating Cases with National Security Concerns” Memorandum, Jonathan R. Scharten, Deputy
Director (April 11, 2006).

\textsuperscript{32} IACs are run recurrently for 2.5 years after the final submission. This can and often does include time after an
applicant has been admitted to the United States as a refugee.

\textsuperscript{33} See RAD Lesson Plan, Security Checks: CLASS, SAO, IAC and Fingerprints.

\textsuperscript{34} SVPI and RAD Management should refer to USCIS guidance on the Senior Leadership Review Board referral process
for high priority NS concerns as appropriate.
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