

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE



Semiannual Report
Office of Civil Liberties, Privacy, and Transparency
Period Covered: July 2017 through December 2017

LEADING INTELLIGENCE INTEGRATION

October 2018

Introduction

As required by Section 803 of the Implementing Recommendations of the 9/11 Commission Act of 2007 (P.L. 110-53), as amended, this report provides information about the notable activities, from July 1, 2017 through December 31, 2017, of the ODNI's Office of Civil Liberties, Privacy, and Transparency (CLPT), to include the types of privacy and civil liberties reviews conducted; the types of advice, guidance or response furnished; and the types of complaints received and processed. In the interest of enhancing transparency, it also provides a narrative overview of representative activities for the same period.

ABOUT CLPT

The Civil Liberties Protection Officer also serves as the ODNI's Chief Transparency Officer. In that capacity, he is responsible for leading implementation of the Principles of Intelligence Transparency for the Intelligence Community (IC). These principles guide how the IC should make information publicly available while protecting classified information, when disclosure would harm national security.

By leading the integration of civil liberties and privacy protections into the policies, procedures, programs, and activities of the IC, CLPT facilitates the conduct of intelligence activities in a manner that protects civil liberties and privacy, provides appropriate transparency, and earns and retains the trust of the American people. CLPT participation in developing and overseeing IC activities seeks to give the American people confidence that the IC is pursuing its vital security mission in a manner consistent with the nation's values.

In general, CLPT examines the privacy and civil liberties ramifications of intelligence-related technologies, programs, and procedures. CLPT collaborates closely with client offices to understand their initiatives or projects in detail, starting with the intelligence purpose for the specific activity, the authority pursuant to which data is obtained, and the characteristics and use of the data. Based on each set of individual circumstances, CLPT reviews the appropriateness of protective measures and compliance with legal and policy mandates, and works to modify or formulate protections as necessary.

Likewise, CLPT reviews proposed legislation, policy documents, instructions, standards, guidance, testimony, reports, releases, and other materials to ensure that any privacy and civil liberties issues are appropriately addressed and properly articulated. These reviews may pertain specifically to ODNI, or to other IC elements to the extent that the issues fall within CLPT's IC-wide responsibilities.

CLPT carries out its duties in close consultation with other offices with relevant and complementary responsibilities, including offices of general counsel, offices of inspectors general, intelligence oversight offices, civil liberties and privacy offices, and the Department of Justice (DOJ). CLPT champions the Principles of Professional Ethics for the IC: Mission, Truth, Lawfulness, Integrity, Stewardship, Excellence, and Diversity. These are fundamental, ethical principles that unite professionals across agencies and functions, while distinguishing “intelligence” from other professions.

CLPT also reviews and investigates (as appropriate) alleged privacy and civil liberties abuses. When CLPT first receives a complaint, it must determine whether the complaint was properly directed to CLPT or whether it should have been referred to a different office or agency. For example, depending on the circumstances, certain complaints may be referred to the Intelligence Community Inspector General, the Office of Equal Employment Opportunity and Diversity, or another agency. If CLPT determines a complaint is not frivolous and merits a full review, it researches the pertinent legal and policy standards, and then obtains and analyzes relevant information. Based on its findings, CLPT determines the appropriate course of action to resolve the complaint, and notifies the complainant of disposition.

OVERVIEW FOR THE REPORTING PERIOD

TRANSPARENCY AND OPEN GOVERNMENT

During the reporting period, CLPT continued to coordinate the IC elements' review, redaction, and release of large numbers of IC documents relating to the Foreign Intelligence Surveillance Act (FISA) and posted them to IC on the Record (<https://icontherecord.tumblr.com>), a public website operated by ODNI. CLPT prepared and coordinated public statements explaining the releases, and worked to ensure that the documents were redacted and presented so as to enhance public understanding.

CLPT updated the "Guide to Posted Documents," which helps the public identify and retrieve key documents relating to the use of certain national security authorities, such as FISA Section 702. In addition, CLPT prepared and posted the "Guide to Section 702 Value Examples," compiling in one place information previously released regarding the intelligence value of Section 702 collection.

During the reporting period, CLPT continued to engage with civil society, outside experts and media to address questions relating to Section 702 and its privacy and civil liberties protections. In addition, CLPT delivered presentations to: (i) the American Bar Association National Security Law Conference on FISA Section 702 privacy safeguards; (ii) the Intelligence and National Security Alliance, on privacy issues relevant to insider threat programs; and (iii) to conference attendees at a George Washington University on national security, privacy, and transparency.

Under CLPT's leadership, ODNI launched Intel.gov in November 2017. Intel.gov an all-new digital front door for the U.S. Intelligence Community, with a focus on increasing transparency about the IC's authorities and activities. The new Intelligence.gov is a platform to showcase and release information, including: data, documents, news, and products. The site allows a broad range of users to search and interact with the information in increasingly meaningful and useful ways, providing a clear, insightful, and engaging presentation focused on human narratives, strong key imagery, and dynamic digital content. The site includes the capability to conduct full-text searches of all documents posted on IC on the Record. The launch of this portal fulfills public commitments made by the ODNI as part of its transparency and open government efforts.

INSIDER THREAT

CLPT continued to support the ODNI Insider Threat Deterrence, Detection and Mitigation Program as well as activities of the National Insider Threat Task Force (NITTF), co-chaired by the National Security and Counterintelligence Center (NCSC) and the Federal Bureau of Investigations (FBI). The NITTF was established to assist non-IC federal agencies in establishing their insider threat programs consistent with law and policy. Internally, for the ODNI program, CLPT continued to help develop policies, guidance, workforce notices and training. The training is targeted to specific audiences, depending on their role in implementing program processes. Similarly, CLPT supported other NITTF activities by, for example, reviewing and recommending improvements to NITTF training materials. In addition, on several occasions during the reporting period, CLPT members addressed NITTF audiences and participated in panel discussions of privacy and civil liberties safeguards applicable to insider threat detection activities government-wide.

COUNTERTERRORISM

CLPT continued to perform its advisory and compliance role with respect to the activities of NCTC, the operational component within the ODNI primarily responsible for counterterrorism intelligence analysis and counterterrorism strategic operational planning. CLPT continues to collaborate with NCTC components to review products, speeches, newsletters, and other communications with state, local and territorial entities engaged in countering violent extremism, to ensure that these products were consistent with analytic standards, free of bias, and protective of privacy and civil liberties.

In this period, CLPT initiated a privacy review of the activities of the Joint Counterterrorism Assessment Team (JCAT), a successor body to the Interagency Threat Assessment and Coordination Group (ITACG), which was established pursuant to Section 521 of the Implementing Recommendations of the 9/11 Commission Act of 2007, Public Law No. 110-53 (9/11 Commission Act). The JCAT is hosted at NCTC and staffed by NCTC, DHS, and FBI federal employees, contractors, and sponsored state, local, tribal, and territorial government representatives; its mission is to enhance public safety through improved information sharing. JCAT staff receive disseminated intelligence products that have been scrubbed for personally identifying information, and refashions them in a manner that – by virtue of their experience – is most meaningful to state, local and tribal users of intelligence information. All JCAT products are fully vetted for any privacy implications by NCTC, DHS and FBI by civil liberties, privacy, legal, public affairs, and domestic disclosure entities.

CYBERSECURITY

During this reporting period, CLPT wrote and coordinated the Cyber Threat Intelligence Integration Center's (CTIIC) Privacy Impact Assessment. Although national security systems are not subject to the PIA requirement in the E-Government Act of 2002, CLPT conducted the impact to ensure that new business processes do not infringe privacy rights and civil liberties. CTIIC posted the PIA on their website.

Pursuant to Executive Order 13636, Improving Critical Infrastructure Cybersecurity, CLPT responded to the annual call by DHS (the lead agency) for named agencies to review and report on certain assigned responsibilities for ensuring privacy and civil liberties protection as the government works to strengthen cybersecurity.

FOREIGN INTELLIGENCE SURVEILLANCE ACT

CLPT continued to work closely with other ODNI components and with other departments and agencies to support the IC's efforts to provide information to Congress and the public regarding reauthorization of Section 702 of FISA. This included participating in congressional briefings and reports, public engagements, and the review and release of FISA-related information.

CLPT coordinated the preparation and release of reports by ODNI, NSA, FBI, and CIA regarding how the IC protects the identities of U.S. persons in FISA disseminations. These detailed reports were provided to IC leadership and posted on IC on the Record.

During this period, CLPT continued its regular oversight of CIA, FBI and NSA, which it conducts jointly with DOJ. This activity consists in large part of on-site reviews of how these entities are complying with the requirements of Section 702, including the statute, Attorney General Guidelines, and the applicable targeting and minimization procedures. Other activities involve: reviewing compliance notices and reports submitted to the Foreign Intelligence Surveillance Court (FISC); convening quarterly meetings with agency representatives; and advising on Section 702 renewal certifications to ensure they comply with the privacy and civil liberties protections prescribed by the Constitution and statute. CLPT also continued to respond to statutorily-required reporting on FISA (statistics) and for requests by the Privacy and Civil Liberties Oversight Board (PCLOB) for production of FISA documentation (as noted in Transparency section of this report).

CLPT also drafted two joint assessments of Section 702 Compliance for joint approval by the Attorney General and the Director of National Intelligence, as required by statute. To enhance transparency and to promote the greatest public understanding, CLPT continued to prepare the reports using unclassified information where feasible.

Additionally, as previously discussed, CLPT helped lead and coordinate the IC's efforts to enhance transparency regarding reauthorization of Section 702 of FISA.

EXECUTIVE ORDER (EO) 12333

CLPT continued to work with the DOJ, IC elements, and other ODNI components to update several agencies' procedures implementing Executive Order 12333, United States Intelligence Activities. These agency-specific procedures implement the requirements of Section 2.3 of EO 12333, governing how IC agencies and elements collect, retain, and disseminate information concerning U.S. persons.¹ EO 12333 requires that such procedures be approved by the Attorney General, in consultation with the DNI.

Following Attorney General approval in January 2017 of the Raw SIGINT Availability Procedures, by which IC elements may seek signals intelligence that previously had been the exclusive province of the NSA, CLPT engaged in a working group with the relevant interagency offices to develop, coordinate, and execute implementing guidance for the procedures. Additionally, as required by the procedures, CLPT developed and coordinated oversight and compliance guidance for a requesting IC element's handling of raw SIGINT. Pursuant to the procedures, IC elements may not access raw SIGINT until they have met certain requirements, including the establishment of a compliance program comparable to that of NSA, with the same types of privacy protective rules.

PRESIDENTIAL POLICY DIRECTIVE-28 (PPD-28)

CLPT participated in an interagency review of the terms of PPD-28, Signals Intelligence Activities, in light of the new Administration's stated views on privacy protection for foreign citizens. This review concluded that PPD-28 would remain in effect. In addition, CLPT helped

¹ Defined in EO 12333 Part 3, a U.S. person is a person or organization who meets any of the following criteria: (i) a U.S. citizen; (ii) , an alien known by the intelligence agency element concerned to be a permanent resident alien (i.e., lawful permanent resident green card holder); (iii) an unincorporated association substantially composed of U.S. citizens or permanent resident aliens, or (iv) a corporation incorporated in the U.S., except for a corporation directed and controlled by a foreign government or governments.

coordinate the development of procedures for implementing the Ombudsperson Mechanism called for by the EU/US Privacy Shield.

LEGISLATIVE, POLICY AND PRODUCT REVIEW

CLPT continued to conduct its routine review of IC-wide and ODNI-internal directives, policies and instructions, to ensure that privacy and civil liberties considerations were appropriately addressed. In certain instances, CLPT participated in working groups established to explore all equities and to ensure that a particular directive or policy would not result in unanticipated consequences.

Pursuant to OMB Circular A-108 and OMB Memorandum M-17-12, CLPT revisited ODNI's public facing website (specifically, the terms of ODNI's Website and Social Media Privacy Policy) and made additions and revisions as OMB directives prescribe.

CLPT worked closely with other offices and agencies to provide civil liberties and privacy comments during the interagency process for National Security Policy Memorandum 7, Integration, Sharing, and Use of National Security Threat Actor Information to Protect Americans, and National Security Policy Memorandum 9, Optimizing the Use of Federal Government Information in Support of the National Vetting Enterprise National Vetting Center.

INFORMATION SYSTEMS AND DATA GOVERNANCE

CLPT continued to support the activities of the IC Chief Information Officer and the ODNI-internal Chief Information Officer relating to information technology systems and to the security and governance of personal data in those systems. CLPT partnered with counterparts at other IC elements to promote alignment among community privacy officers regarding protections for systems and data.

Similarly, CLPT participated in meetings and activities of interagency bodies dealing with information systems and data governance, such as the IC Information Sharing and Safeguarding Council, IC Chief Information Officer Council, IC Chief Data Officer Council, and IC Information Security Risk Management Committee. CLPT's work in this area included providing privacy-related input into interagency processes for establishing IC-wide criteria for authenticating identity, authorizing access, and instituting security safeguards.

RESEARCH, SCIENCE AND TECHNOLOGY

CLPT continued to support the activities of the research and science and technology components of the ODNI and elements of the IC. ODNI's Intelligence Advanced Research

Projects Activity (IARPA) collaborates across the IC to ensure that intelligence research addresses identified future needs, and CLPT continued to participate closely with IARPA activities to provide guidance regarding potential privacy and civil liberties pitfalls of research that involves people (behaviors or other personal attributes) and/or the collection and use of personally identifiable information.

Likewise, CLPT continued its review of proposals or submissions in response to “research challenges.” For example, CLPT vetted submissions to the Galileo Awards Program, which is an annual IC-wide competition to encourage and recognize innovative ideas from the workforce that address current intelligence or organizational challenges. In addition, CLPT supported the IC Information Sharing and Safeguarding Executive’s (ISSE) sponsorship of innovative information sharing proposals through the ISSE Innovation Fund.

INTERNATIONAL ACTIVITIES (Outreach/Awareness)

CLPT continued to meet with representatives of foreign governments to enhance their understanding of how the IC protects privacy and civil liberties and provides appropriate transparency. These engagements included discussion of best practices and lessons learned. In addition, CLPT worked closely with interagency partners to provide accurate and comprehensive information to the United Nations Senior Rapporteur for Privacy (SRP). The SRP is writing a series of reports as part of his mandate, and visited the United States to learn more about how the U.S. protects privacy as it conducts national security activities.

In addition, CLPT worked with the Department of Justice, the Department of State, and the Department of Commerce as part of the European Union’s (EU’s) first annual review of the Privacy Shield Framework. CLPT helped describe how the IC protects privacy and civil liberties in general, and specifically, how it implements the safeguards in Presidential Policy Directive 28, Signals Intelligence Activities.

The Chief of CLPT organized and led a panel discussion in Brussels featuring intelligence oversight officials and privacy experts from different countries, to discuss how different nations conduct intelligence oversight and protect privacy in the national security context. He also participated in a separate intelligence oversight forum in Brussels involving intelligence oversight officials from several other countries, where where he briefed on how the IC protects privacy and provides transparency, and answered questions regarding the IC’s rules and oversight framework.

TRAINING

CLPT launched a new web-based course entitled IC Protection of United States Person Information. The course is intended to serve as a helpful resource for those individuals whose job duties involve the collection, retention, and dissemination of intelligence containing information about U.S. persons. This is the third of three web-based courses that CLPT has developed and administered in recent years, including: Understanding the Privacy Act and Personally Identifiable Information; and Properly Obtaining and Using Publicly Available Information.

CLPT staff delivered presentations at bi-weekly and quarterly training forums (for new employees, and for supervisors), and once a semester for the National Intelligence University's Counterterrorism course. Staff conducted "town halls" for audiences in other components (during this reporting period, CLPT conducted a town hall for the Human Resources Division). In addition, the Chief of CLPT conducted three "Plain Talk about Civil Liberties" sessions, to give members of the workforce to ask any questions or air any concerns.

CLPT staff also continued to provide training to their customer/accounts on an ad hoc basis by briefing, interpreting, or clarifying directives, policies or standards relevant to their missions or activities. DNI representatives deployed to FBI field offices receive pertinent briefings as well.

COMPLAINTS

CLPT is statutorily mandated to serve as an "action office" (i.e., avenue of redress) for complaints, concerns, or questions having to do with privacy and civil liberties in the IC, whether broadly focused (e.g., the privacy implications of intelligence activities) or related to narrow, individual concerns (e.g., how a particular personal record may have been used). CLPT investigated and resolved concerns around time and attendance policy and parking enforcement policies. Pursuant to applicable policy, CLPT is the hub of an incident response team to be convened upon notice of any lapse (actual or suspected) in the application of technical protocols involving systems containing personally identifiable information.

CLPT also supported on-going compliance with Section 705 of the Intelligence Authorization Act for Fiscal Year 2016 (P.L. 114-113), which requires reporting on the effects of the OPM data breach. CLPT has been ensuring that appropriate safeguards are in place to protect an individual's PII during acquisition, scanning, and conditioning of the data for assessment activities.

COORDINATION AND INTEGRATION OF CIVIL LIBERTIES AND PRIVACY ACTIVITIES

Pursuant to his authority under Intelligence Community Directive 107 (“Civil Liberties and Privacy”), the ODNI Civil Liberties Protection Officer (and Chief of CLPT), acted to strengthen the IC’s framework for protecting civil liberties and privacy by formally chartering the “IC Civil Liberties and Privacy Council.” Comprised of representatives from civil liberties and privacy offices and offices of general counsel from the IC elements and IC components of Executive Branch departments and agencies, this Council has existed informally since 2006. The Council serves as a forum for discussing issues of common concern; interpreting the implications of new laws, regulations and policies; responding in a coordinated fashion to external requests; and exchanging best practices. While it is not itself a standard-setting body, the Council may recommend that a particular standard, guidance, or set of principles should be developed and issued (e.g., pursuant to the IC’s formal policy framework).

METRICS

The following tables set forth metrics regarding CLPT activities in each of the areas enumerated in Section 803 of the *9/11 Commission Act*. The report categories are defined as follows:

Reviews: examinations of activities or processes as required by controlling privacy and civil liberties authorities.

Advice: refers to the identification of specific requirements or other safeguards identified in specific circumstances to protect privacy and civil liberties, including the formal issuance of responsive policies, procedures, guidance, interpretations and instructions.

Response to Advice: relates to specific action taken as a result of the CLPT “advice” provided, including policies, procedures, training, etc.

Privacy Act Complaint: a written allegation regarding agency non-compliance with the requirement of the Privacy Act.

ISE Complaint: a written allegation of harm arising from ODNI sharing of terrorism data in the context of the Information Sharing Environment.

Privacy and Civil Liberties Complaint: a written allegation charging violation of information privacy rights and/or civil liberties; e.g., relating to improper collection, use, retention, and dissemination of the information about U.S. persons, or violation of First Amendment rights of free speech and association, or Fifth Amendment guarantees of due process and equal protection.

Disposition of Complaints: refers to CLPT administration of the complaint (versus specific resolution of the complaint); i.e., responsive action, determination of “no merit,” or referral of the complaint to a more appropriate venue.

METRICS

Reviews		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
A-1	35	Intelligence Activities
A-2	12	Internal Operations
A-3	19	Use of Technology
A-4	0	Procedures for Redress
A-5	3	Implement Transparency
B-1	0	First Amendment
B-2	5	Fourth Amendment
B-3	0	Privacy Act/OMB Circular 108
B-4	1	Data Mining Act
B-5	8	EO 123333
B-6	11	ISE Privacy Guidelines
B-7	0	Third Party Website
B-8	0	Website Tracking Policy
B-9	0	SSN Reduction
B-10	2	Other OMB Policy
B-11	4	Principles of Transparency
B-12	21	Directed by DNI or Req. by Law
Total	121	

Type of Advice Given After Reviews		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
A	9	Written Formal Guidance
B	22	Informal Guidance
C	28	Multi-Stakeholder Consultations
Total	59	

Response to Advice Given After Reviews		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
1	18	Client directed action in accordance with guidance received
2	1	Client instituted required training
3	23	Other Action Taken
Total	42	

Promote Understanding		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
E-1	9	Internal Training
E-1-a	3	Entrance on Duty
E-1-b	0	Plain Talk/Brown Bags
E-1-c	0	Town Halls
E-1-d	3	Specific Content Briefings
E-2	6	External IC
E-3	18	Outside (Non-IC)
Total	39	

Incidents		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
D-1	2	PII
Total	2	

Complaints		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
C-1	0	PII Incident
C-2	0	Privacy Act Challenge
C-3	0	ISE (inc. Terrorist Watch List
C-4	0	1 st or 5 th Amendment
C-5	0	Retaliation/Reprisal
C-6	0	via DOJ Judicial Redress
C-7	0	via State Dept. Privacy Shield
C-8	0	Misdirected/Non CL/P
Total	0	

Disposition of Complaint		
<u>Type</u>	<u>Quantity</u>	<u>Description</u>
a.	0	Took Appropriate Action
b.	0	Informed That No Action Necessary
c.	0	Referred to Other Office
Total	0	

**Letter & Number Key for Civil Liberties, Privacy and Transparency
Semi-Annual Section 803 Report**

Definition: “Reviews” are examinations of activities or processes as required by controlling privacy and civil liberties authorities (e.g. Privacy Impact Assessments, FISA Reviews, Compliance with IT Resource Management Policy, Congressionally Directed Action (CDA), or DNI-directed Reviews). CLPT may also conduct such reviews on a discretionary basis.

Type of Review

A.	<p>Review to assist ODNI in appropriately considering privacy and civil liberties concerns and incorporating applicable privacy and civil liberties safeguards (under the Constitution, federal law/regulation/policy, Executive Orders and implementing guidelines) in the:</p> <ol style="list-style-type: none"> 1. Development of laws and polices relating to intelligence activities 2. Development of laws and policies relating to workforce administration and agency internal operations. 3. Use of technology in conducting intelligence activities or agency internal operations 4. Development of procedures for redress (to include breach of PII) 5. Development of procedures to implement transparency principles
B.	<p>Review to ensure the programs and operations of the ODNI or the IC at large are implemented in compliance with appropriate legal and policy safeguards for privacy and civil liberties:</p> <ol style="list-style-type: none"> 1. First Amendment 2. Fourth Amendment 3. Privacy Act/OMB Circular 108 4. Data Mining Act 5. EO 12333 and implementing guidelines 6. ISE Privacy Guidelines 7. Third party website/applications policy (OMB M-10-23) 8. Website tracking policy (OMB M-10-22) 9. SSN reduction (OMB-M-07-16) 10. Other OMB policy 11. Principles of Transparency for the IC 12. Directed by DNI or required by law

Definition: “Complaints” –

“Privacy Act Complaint” is a written allegation regarding agency non-compliance with the requirement of the Privacy Act.

ISE Complaint: “ISE Complaint” is a written allegation of harm arising from ODNI sharing of terrorism data in the context of the Information Sharing Environment.

Privacy and Civil Liberties Complaint: “Privacy and Civil Liberties Complaint” is a written allegation charging violation of information privacy rights and/or civil liberties, e.g., relating to improper collection, use, retention, and dissemination of the information about U.S. persons, or violation of First Amendment rights of free speech and association or Fifth Amendment guarantees of due process and equal protection.

Disposition of complaints” refers to CLPT administration of the complaint (vice specific resolution of the complaint), i.e., responsive action, determination of “no merit” or referral of the complaint to a more appropriate venue.

Type of Complaint/Allegation	
C.	<ol style="list-style-type: none"> 1. Complaint of PII incident 2. Complaint of Privacy Act violation 3. Complaint of ODNI sharing under the ISE (including terrorist watch list) 4. Complaint alleging improper collection use, retention, and dissemination of U.S. person information or alleging violation of First Amendment’s guarantees of freedom of speech and association, or Fifth Amendment guarantees of due process and equal protection 5. Complaint of retaliation/reprisal for raising a CL/P concern 6. Complaint via DOJ under Judicial Redress Act 7. Complaint via State Department under Privacy Shield 8. Misdirected complaint/non CL/P manner
Disposition of Complaint: (identify in “Comments” section)	<ol style="list-style-type: none"> a. Took appropriate responsive action b. Informed complainant that complaint does not merit responsive action c. Referred complainant to other appropriate office
D.	Incidents <ol style="list-style-type: none"> 1. PII
Promote Understanding	
E.	Promote understanding of the IC’s civil liberties and privacy protections. Inform and Promote Awareness (identify venue in “Description” section) <ol style="list-style-type: none"> 1. Internal/Training <ol style="list-style-type: none"> a. EOD b. Plain Talk/brown bags c. Town Halls d. Specific content briefings 2. External (in the IC) 3. Outside (non-IC)
Type of Advice	

A.	Written Interpretations, Opinions, Memoranda, Guidance, Instructions
B.	Informal guidance/recommendations/clarification (email, phone, meeting/consultation)
C.	Multi-stakeholder Consultations
Response to Advice	
1.	Client directed action in accordance with written guidance, procedure, or agreement by CLPT or external stakeholder guidance rendered
2.	Client instituted/required training in CLPT areas of expertise
3.	Other