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NCTC POLICY DOCUMENT

Title: Role-Based Access Policy

NCTC Policy Number: 4

1. Purpose:

- A. To establish the policy by which NCTC personnel will access data or datasets in accordance with their roles.
- B. This policy supersedes NCTC Policy 11.7.

2. References:

- A. The National Security Act of 1947, as amended;
- B. Intelligence Reform and Terrorism Prevention Act of 2004, as amended;
- C. Executive Order (EO) 12333, United States Intelligence Activities, as amended;
- D. EO 12968, Access to Classified Information, as amended; and
- E. EO 13388, Further Strengthening the Sharing of Terrorism Information to Protect Americans (Oct. 27, 2005).

3. Applicability: This policy applies to all NCTC personnel including permanent cadre, detailees, assignees, and contractors. Revisions to this policy do not supersede agreements made with data providers regarding access to data.

4. Policy:

- A. NCTC deputy directors and component managers are responsible for identifying which members of their staff require access to a given dataset in accordance with an established mission need. This access may be limited by law, Executive Order, Attorney General approved Guidelines, policies, principles, or agreements entered into by NCTC and data providers regarding data access.
- B. Information not yet identified as terrorism information, and terrorism information that has not yet been disseminated, may be further restricted within NCTC based on additional handling restrictions required by law, Executive Order, Attorney General-approved Guidelines, policies, principles, or agreements entered into by NCTC and data providers regarding data access.

UNCLASSIFIED

UNCLASSIFIED

- C. Unless otherwise restricted by agreement, information deemed to be terrorism information will be made available to all personnel within the Directorate of Terrorist Identities, the Directorate of Intelligence, the Directorate of Operations Support, and the Office of Mission Systems. Access may be granted to personnel within the Directorate of Strategic Operation Planning and the Office of National Intelligence Management with appropriate mission need and approval by ISPPPO.
- D. NCTC, in coordination with organizations providing data to NCTC, will ensure that appropriate training is provided to NCTC personnel with respect to handling of US Persons (USP) information, as well as training on handling of sensitive data and data that otherwise requires special handling pursuant to agreement between NCTC and the data provider.
- E. As information related to USP is subject to special protection by law and Executive Order, such information will be restricted to NCTC personnel with an established mission need, as approved by ISPPPO to ensure accesses are in accordance with current Attorney General Guidelines, Memoranda of Understanding or other agreements. To the extent that certain individuals are likely to achieve United States Person status in the foreseeable future, or to the extent that the data provider has required NCTC to apply US Person protections to non-US Persons, such information will likewise be restricted to NCTC personnel with an established mission need, as approved by ISPPPO to ensure accesses are in accordance with current Attorney General Guidelines, Memoranda of Understanding or other agreements.

5. Roles and Responsibilities:

- A. ISPPPO is responsible for approving accesses related to datasets acquired or accessed under law, Executive Order, Attorney General-approved Guidelines, principles, Memoranda of Understanding, or other agreements entered into by NCTC with another agency.
- B. Mission Systems, in consultation with ISPPPO, is responsible for managing accesses to applicable tools and applications, as approved by ISPPPO.
- C. NCTC Legal and NCTC CLPO are responsible for providing guidance regarding laws, Executive Orders, Attorney General-approved Guidelines, policies, principles, and agreements relevant to information access, sharing, retention and dissemination, as well as compliance. Both organizations are responsible for the compliance processes, including compliance reviews if appropriate, in accordance with the compliance program, processes, and policies established by NCTC.
- D. All NCTC Deputy Directors and NCTC Component managers are responsible for:
 - 1) Implementing, monitoring and tracking compliance by NCTC personnel within their units with this policy, as well as any access restrictions, to include removing personnel from access if they transfer within or leave NCTC, required as a result

UNCLASSIFIED

of law, Executive Order, Attorney General-approved Guidelines, other policies, principles, memoranda of understanding, or other agreements; and
2) Working with NCTC Legal and NCTC CLPO to monitor and report on compliance, and on the conduct of compliance reviews, as appropriate.

- E. Access to the National Terrorism Bulletin (NTB) will continue to be managed by DI/PSPG/DMB in accordance with existing memoranda of understanding with data providers. Access to NCTC's CURRENT website will continue to be managed by DI/PSPG/DMB.
- F. ISPPPO, in coordination with NCTC FISA Coordinator, is responsible for granting accesses to FISA data in accordance with NCTC FISA Program policies and agreements entered into between NCTC and the data provider(s).
- G. NCTC FISA Coordinator, in coordination with NCTC Legal, is responsible for providing guidance regarding access, sharing, retention, and dissemination of FISA-derived information, as well as overseeing compliance with FISA-related data management responsibilities.

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Date

6/24/2012

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