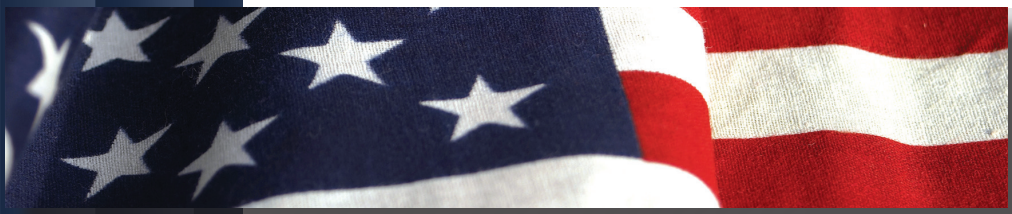
Suspicious Activity Reporting

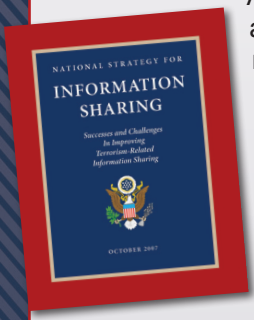


Process Implementation Checklist

Suspicious Activity Reporting Process Implementation Checklist

An Important Initiative for Your Community

The suspicious activity reporting (SAR) process focuses on what law enforcement agencies have been doing for years—gathering information regarding behaviors and incidents associated with crime and establishing a process to share information to detect and prevent criminal activity, including crime associated with domestic and international terrorism. Implementation of the SAR process can be accomplished within the agency's existing framework to gather, document, process, analyze, and share behaviors and events that are indicative of criminal activity.



After the horrific events of September 11, 2001, agencies at all levels of government recognized the risks that can result from not sharing information, as well as the value and benefits of sharing critical information—"connecting the dots." The *National Strategy for Information Sharing* (NSIS) was subsequently developed to establish, in part, a nationwide vision for the sharing of suspicious activity. One of the tasks for the federal government, as identified in the NSIS, is to "establish a unified process to support the reporting, tracking, processing, storage, and retrieval" of suspicious activity reports.

A suspicious activity report (SAR) is defined as "official documentation of observed behavior reasonably indicative of preoperational planning related to terrorism or other criminal activity."

In an effort to implement the tenets of the NSIS, state, local, tribal, territorial, and federal agencies have partnered to develop a nationwide SAR capability. To meet these requirements, an end-to-end process—the gathering, processing, reporting, analyzing, and sharing of suspicious activity—was adopted by major national law enforcement organizations. This process, also referred to as the SAR process, is graphically depicted on pages 4 and 5. A key goal of this process is ensuring that behavior which may be indicative of terrorist activity is shared with

How to Use This Checklist

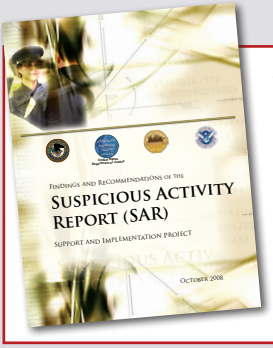
fusion centers and Joint Terrorism Task Forces (JTTF) in an expedited manner so that broad partnership resources can be leveraged as quickly as possible.

All agencies, regardless of size or jurisdiction, have a role in the nationwide SAR process. It is essential that state, local, tribal, territorial, and federal agencies work together to share SAR information in order to prevent and deter another terrorist attack on American soil.

Using this checklist in developing an internal SAR process will aid agencies in their crime prevention efforts and assist with successfully incorporating state, local, tribal, and territorial agencies into the nationwide SAR process.

For each checklist step and associated "action items," refer to the Findings and Recommendations of the Suspicious Activity Report (SAR) Support and Implementation Project for additional guidance and recommendations for implementation.

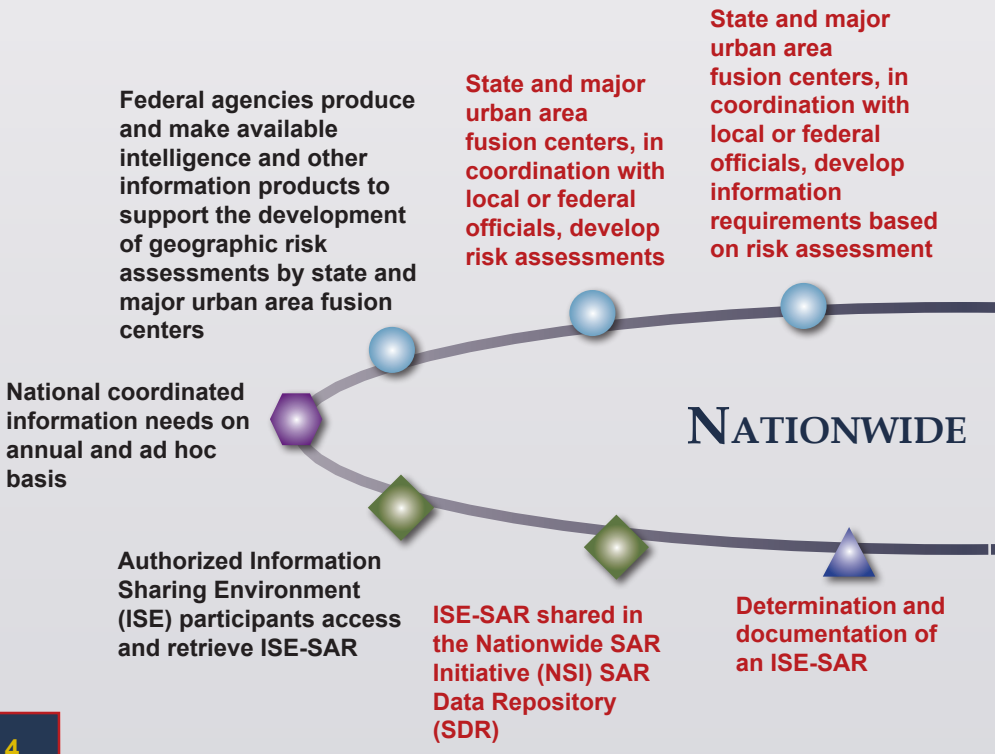
Included at the end of the checklist is an overview of the SAR sharing concept—which is a solution to sharing SAR data among state, local, tribal, territorial, and federal agencies—as well as a listing of benefits for participating in the nationwide SAR process.



This document, a companion to the *Findings and Recommendations of the Suspicious Activity Report (SAR) Support and Implementation Project,* provides a simple checklist for chief executives and senior leadership to implement a SAR process within their agency.

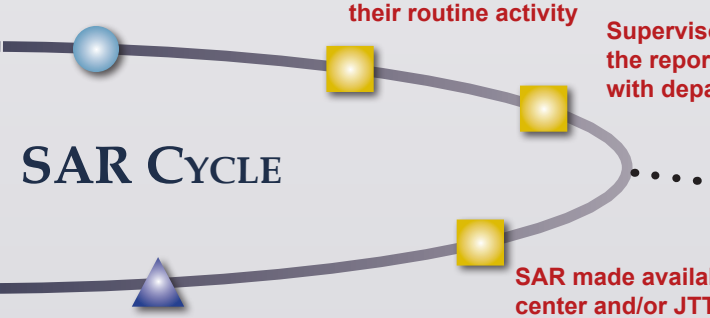
SAR Cycle Chart

As shown in the diagram below, certain steps—highlighted in red—in the SAR process focus on the activities of state, local, tribal, and territorial agencies. By following these steps, agencies can be assured that their SAR activities are in alignment with and can support crucial information sharing. This diagram will also help identify gaps in an agency's current process that may need to be addressed and/or corrected.



Suspicious Activity Processing Steps

- Planning
- Gathering and Processing
- Analysis and Production
- Dissemination
- Reevaluation



SAR Cycle

Frontline law enforcement personnel (federal, state, local, tribal, and territorial) are trained to recognize behavior and incidents that may indicate criminal activity associated with terrorism. Community outreach plan implemented

Observation and reporting of behaviors and incidents by trained law enforcement personnel during their routine activity

Supervisory review of the report in accordance with departmental policy

In major cities, SAR reviewed by trained counterterrorism expert

SAR made available to fusion center and/or JTTF

At fusion center or JTTF, a trained analyst or law enforcement officer determines—based on information available, knowledge, experience, and personal judgment—whether the information meeting the ISE-SAR criteria may have a terrorism nexus

Leadership Must Recognize the Importance of Implementing a SAR Process

The chief executive and agency leadership must **recognize** *the importance of implementing a SAR process within their agency and champion the efforts of the SAR process and the Nationwide SAR Initiative (NSI) both inside and outside the agency.*

Action Items

- Closely collaborate with partners such as fusion centers, homeland security officials, JTTFs, and the eGuardian program.
- Brief command staff/senior management on the SAR implementation process, to include policy development; privacy, civil rights, and civil liberties protections; technology; training; and community outreach.
- Assign primary responsibility for implementing the SAR process to a command-level position.
- Provide training to command staff/senior management on the implementation of the SAR process using agency training or programs already developed.

Identify Existing SAR Processes and Determine What SAR Processes Need to Be Developed

Examine the agency's business process to identify current SAR processes in place, and determine what to **develop** *and/or enhance. Develop an order/Standard Operating Procedures (SOPs) directing the gathering, processing, reporting, analyzing, and sharing of suspicious activity.* **Leverage** *the use of national standards, and* **incorporate** *national guidelines into the business process and agency SOPs.*

Action Items

- Review other agencies' SAR process mission/SOPs to better understand the process and to identify promising practices to assist in the development of the agency policy and mission statement.
- Simplify the reporting process by modifying agencies' current reports—basic incident report, offense report, information report, or field interview report—to include fields to capture SAR data (consider using one report as the primary intake for standardization).
- Identify and establish intake points for the collection and receipt of SARs (one centralized location).
- Develop an electronic means or modify the current system (i.e., records management system [RMS]) to gather, process, report, analyze, and share SAR data within the agency in real time.

Incorporate National Guidelines Into Standard Operating Procedures

Action Items

- Adopt the standardized behavioral-specific codes used to identify SARs, located in the *Information Sharing Environment (ISE) Functional Standard (FS) Suspicious Activity Reporting (SAR)*.
- Define a process for forwarding data to the urban area, regional, or statewide fusion center and JTTF.
- Ensure that SARs receive an initial vetting within 24 hours of being reported.
- Develop a method for determining disposition of SAR data (e.g., whether to respond, refer, determine unfound, or take other action).
- Develop a system for retrieving SAR data.
- Develop a mechanism for providing timely feedback to the original submitter of the SAR information.

Implement an Agency Privacy Policy

Develop and/or enhance and **implement** *an agency privacy policy to ensure that privacy, civil rights, and civil liberties are protected when performing all steps of the SAR process.*

Action Items

- Use legal/privacy advisors when developing the agency's privacy, civil rights, and civil liberties protection policy.
- A template for developing a privacy policy is available at http://www.it.ojp.gov/fusion_center_privacy_policy_template. Note the SAR provisions contained in this template.
- Promulgate the SAR privacy policy agencywide to stress the importance of privacy, civil rights, and civil liberties protections during the SAR process and within the agency.
- Ensure that the privacy policy is transparent and communicated with the public, community organizations, and other groups as appropriate.

Train All Agency Personnel on the SAR Process

Training *is a vital component of an agency's SAR process implementation. Personnel at all levels should receive training on the SAR process to ensure that it is institutionalized within the agency.*

Action Items

- Develop a framework and timetable for training all personnel within the agency.
- Focus training on:
  - The importance of privacy, civil rights, and civil liberties protections.
  - The **gathering** of suspicious activity information through behavior-based policing.
    - Behavior-based policing includes behaviors and/or incidents known to be exhibited by terrorists that would be collected in a terrorism-related suspicious activity report.
  - The mechanism for **reporting** suspicious activity (standardization).
  - The **processing** of SARs within the agency.
  - The steps in **analyzing** the SAR data.
  - The appropriate **sharing** of suspicious activity information within and outside the agency.
- Implement an evaluation program for modifying and enhancing the SAR training program based on emerging trends, lessons learned, and identified gaps.
- Ensure that all officers review the SAR Line Officer Training video at http://nsi.ncirc.gov/training_online.aspx.

Institutionalize the SAR Process Within the Agency

Once an agency's SAR process is developed, continuous improvements will ensure the integrity and **institutionalization** of the process within the agency. Criminals are continually modifying their methods, and law enforcement operations must also continue to adapt to meet these changes.

Action Items

- Develop a liaison officer program to ensure that terrorism-related suspicious activity is being gathered and reported to the proper personnel, local JTTF, and fusion center.
- Conduct periodic audits of SAR data by command-level staff or designees.
- Develop qualitative and quantitative measures on the SAR process to gauge effectiveness (management accountability reports).
- Modify the agency SAR process based on Priority Information Needs (PINs) for emerging trends/behaviors.
- Incorporate the SAR process into the development of alerts, warnings, notifications, and other relevant reports for critical infrastructure/key resources.

Educate the Community on the SAR Process

Educate the community on the SAR process to ensure transparency and openness and to elicit their support.

Action Items

- Provide educational outreach to the public regarding the SAR process and policies through initiatives such as:
  - Internet-based newsletters
  - E-mail notifications to stakeholders
  - Media commercials
  - Officer-to-citizen interaction programs
  - Distribution of CDs and DVDs related to the reporting of suspicious activity
  - Community awareness training
  - Informational flyers
  - "If You See Something, Say Something™" public awareness campaign
- Consider instituting a Building Communities of Trust program to engage community leaders in your efforts. Guidance can be found at http://nsi.ncirc.gov/documents/BCOT_Final.pdf.
- Use other online training programs for homeland security partners, such as private sector security and other government first responders. These programs can be found at http://nsi.ncirc.gov/training_online.aspx.

Partner With Others and Connect to Information Sharing Networks

Partner with other law enforcement agencies, public safety, public health, and external stakeholders. **Connect** to nationwide law enforcement information sharing networks.

Action Items

- Inform external stakeholders (mayor, city council, legislature, etc.) on the SAR process to gain their support.
- Provide educational outreach and develop partnerships with public safety (fire, emergency management services, health agencies, etc.) and the private sector (financial institutions, private security, power plants, etc.) regarding the SAR process.
- Become a member of a secure law enforcement network, such as RISSNET™, Law Enforcement Online (LEO), or the Homeland Security Information Network (HSIN).
- Access the state's criminal justice network (if available).
- Access the state or regional intelligence database (if available).
- Access the state or regional fusion center (if available).
- Ensure that the agency has the ability to send and receive secure e-mail.
- Develop the ability to export RMS data in the National Information Exchange Model (NIEM) Extensible Markup Language (XML) format for SARs.

- Continue to collaborate with nationwide partners such as fusion centers, homeland security officials, JTTFs, and the eGuardian program.
- View the online SAR training for law enforcement and hometown security partners at http://nsi.ncirc.gov/training_online.aspx.

ISE Shared SAR Solutions

The Nationwide Suspicious Activity Reporting Initiative (NSI) SAR Data Repository (SDR) is a decentralized distributed data model used to make standardized terrorism-related information available through Common Terrorism Information Sharing Standards applications and services.

Developing a SAR process and involvement in the NSI SDR will enable fusion center users to access federal, state, local, tribal, territorial, and regional SAR data. The NSI SDR provides an easy solution for fusion centers to share terrorism-related suspicious activity information, while still maintaining local control of SAR data collected from local agencies.

Law enforcement agencies are able to share information with other agencies via the NSI SDR. Each agency has control of the information it makes available for sharing. The NSI SDR is made available for search by authorized user agencies via a secure network.

Benefits of Establishing or Enhancing a SAR Process

Using the SAR Process, Agencies Can:

- Benefit from the ability to view other jurisdictions' information to assist them with their local efforts in identifying and preventing criminal activity related to terrorism.
- Further develop intelligence-led policing models.
- Apply the SAR data to the COMPSTAT process for management accountability and resource allocation.
  - COMPSTAT (COMPuter STATistics) is an accountability process—developed originally by the New York City Police Department and adopted by many law enforcement agencies around the country—that uses crime statistics to drive decision making on the deployment of resources and provides a methodology to measure police activity.
- Apply geospatial visualization of SAR data to assess relationships to critical infrastructure/key resources.
- Enhance analytic capabilities to better identify linkages.
- Enhance analytic capabilities to track SAR activity by date, time, and/or location.

SAR ADDITIONAL RESOURCES

For additional resources on the SAR process, please visit the Nationwide SAR Initiative (NSI) Web site at http://nsi.ncirc.gov. The NSI Web site serves as the central location for resources, training, and contact information on developing a SAR process within an agency.

The NSI Web site includes information on:

- NSI partners
- Online SAR training
- On-site SAR training
- Overview and implementation resources

National Strategy for Information Sharing
http://www.ise.gov/sites/default/files/nsis_book_0.pdf

National Strategy for Information Sharing and Safeguarding
http://www.ise.gov/sites/default/files/2012infosharingstrategy.pdf

Findings and Recommendations of the Suspicious Activity Report (SAR) Support and Implementation Project
www.it.ojp.gov/documents/SARReportOctober2008.pdf

Information Sharing Environment (ISE) Functional Standard (FS) Suspicious Activity Reporting (SAR)
http://nsi.ncirc.gov/documents/ISE-FS-200_ISE-SAR_Functional_Standard_V1_5_Issued_2009.pdf

National Information Exchange Model
www.niem.gov

***Assistance with privacy policy development at*:**
http://www.it.ojp.gov/docdownloader.aspx?ddid=1269

Additional resources and publications on the Nationwide SAR Initiative or the SAR process can be located at:

www.ise.gov

www.dhs.gov

www.fbi.gov

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