





Core Curriculum for a Fusion Center P/CRCL Officer

The items below offer general guidance on orienting you to the knowledge needed in your role as a Privacy, Civil Rights, and Civil Liberties (P/CRCL) Officer.





Upon Onboarding

As part of a Core Curriculum the following steps provide some guidance to you during your “onboarding” stage as a P/CRCL officer.

-  **Meet with your Fusion Center Director to discuss how responsibility for the various privacy, civil rights, and civil liberties functions, protections, and roles are distributed among the various fusion center staff.** Before the meeting, download and review a summary of the federal guidance on the P/CRCL function (8pp | 237kb | PDF) at fusion centers. You may wish to use it as a checklist to guide your discussion of the scope of your responsibilities.
-  **Review your center’s P/CRCL policy.** To get a sense of how your policy has been customized for your center, compare your policy to the Fusion Center Privacy, Civil Rights, and Civil Liberties Policy Template (62pp | 1.5mb | PDF) that most centers used as the foundation for their policies.
-  **Questions to ask your director or others familiar with the genesis of the policy:**
 - When was it implemented? (*The earlier the life of your center, the more likely it will have stock language*).
 - Has it been reviewed and changed / customized in the last few years? (*The goal is to engage staff in rewriting as operations evolve. Too limiting? Too broad?*)
-  **Set interviews with the various stakeholders with whom you will be interacting,** including those representing federal agency partners, such as the DHS Intelligence Officer assigned to your center and the former P/CRCL Officer, if s/he is available.








Building your Knowledge Base

The following resources are provided to assist you in building your knowledge base.

-  **Review the P/CRCL Officer’s Role and Responsibilities.** Based on your discussions about the likely scope of your role at the fusion center, review the general resources available to support you.
 1. Policy Development | 2. Policy Implementation | 3. Operations | 4. Compliance
 5. Oversight | 6. Redress | 7. Outreach | 8. Coordination | 9. SME | 10. Training
-  **Complete the on-line 28 CFR Part 23 training.** 28 CFR Part 23 establishes guidelines that govern the operation of federally funded multi-jurisdictional criminal intelligence systems. An online 28 CFR Part 23 course is available; also see the Frequently Asked Questions webpage.
-  **Identify who at your center has taken the National SARs Initiative (NSI) training** and is authorized to enter suspicious activity reports into the shared space of the Information Sharing Environment (ISE).
-  **Arrange to be briefed on the initiative.** Prior to your briefing, you may want to review the Line Officer Training video and other key resources, especially the descriptions of privacy protections.






The complete Core Curriculum is available on-line with links to materials at:

<http://fusioncenter.golearnportal.org>

-  **Meet with legal counsel for the fusion center.** You may wish to be briefed on the internal processes for fusion center legal support as well as relevant state laws. Most states have enacted data breach laws; certain state constitutions (such as CA and MT) include privacy protections; also consider freedom of information (FOIA) or “sunshine” laws and their impact on your responsibilities.
-  **Familiarize yourself with the Civil Liberties Red Flags issues** and their applicability in a fusion center setting.
-  **Familiarize yourself with the Privacy Fair Information Practice Principles (FIPPs)** and their applicability in a fusion center setting.
-  **Sign up for the next DHS P/CRCL Officers Training of Trainers (ToT).**
-  **Address any gaps in your subject matter expertise.**
-  **Sign up for specialized memberships and newsletters** on topics that may be of interest and connect with other P/CRCL Officers.
-  **Find a Mentor to assist you in developing your skills as a P/CRCL officer.**

Ensuring a Robust P/CRCL Program

The following resources are provided to assist you in building a robust P/CRCL Program

-  **Review the Compliance Verification Tool** (51pp | 4mb | PDF) and determine if your center has completed the compliance verification.
-  **Review the tools for conducting an annual P/CRCL audit.** The audit will be tailored to your P/CRCL policy and the characteristics of your center’s processes; however, this checklist and guidance will provide the broad outlines. Contact your DHS on-site Intelligence Officer for information on how to arrange for a peer-to-peer audit.
-  **Prepare to provide annual P/CRCL training to all fusion center personnel.** At a minimum, the training should cover the specifics of the fusion center’s P/CRCL policy. The U.S. Department of Homeland Security provides P/CRCL Training and Technical Assistance in the form of training modules (trainer notes/PowerPoints/job aids), exercises and case studies, help with training design, a special training of trainers program for P/CRCL Officers, periodic webinars, and on-site training.
-  **Based on your discussions and the review of your P/CRCL policy, analyze the need for policy updates or changes.** On a periodic basis or as a result of an audit or other experience you may want to consider changes to your P/CRCL policy. See the available resources on P/CRCL policy development.
-  **Design implementation plans that apply P/CRCL protections to your services and systems.** The DHS Office for Civil Rights and Civil Liberties recently recommended that fusion centers create written P/CRCL implementation plans (44pp | 435kb | PDF).

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Outreach to the Public

The following resources are provided to assist you in outreaching to the public

- Develop an effective written P/CRCL outreach plan.** There are several useful resources to assist you to fulfill your center's outreach responsibility.
- Review your center's website** – is your P/CRCL Policy posted in a prominent location? Transparency regarding your fusion center's operations is one key to ensuring that your fusion center maintains a positive relationship with the community. Your P/CRCL policy illustrates the many efforts your center takes to protect privacy, civil rights, and civil liberties.
- Post your redress policy on the fusion center's website.** Often the redress policy is part of the P/CRCL policy. To ensure that the public has meaningful access, take the time to excerpt the relevant sections of the policy and, if needed, translate these sections into "plain language". Tips and tools on writing in plain language and reformatting for readability.
- Reach out to your center's liaison officer network (if available).** The fusion center has an obligation to provide training on its P/CRCL policy and protections.