COURSE: (TS//SI//NF) OVSC1205 Special Training on FISA (Analytical) COURSE: (TS//SI//NF) OVSC1206 Special Training on FISA (Technical) **Module 3: (U) Establishing Reasonable Articulable Suspicion (RAS)** Version 22 (Final) Updated 10/17/11 Includes CAO Review feedback

DATE/PREPARER: 11/09/2010 SLS	Topic (U) Module Introduction	Page Classification		Screen Number 1 of 13		
	Home	Exit	Glossary	Next		
FRAME ID: 3010	(U) Module 3					
	(U) Establishing Rea	sonable A	rticulable Suspicion (RA	S)		
NEXT FRAME ID: 3020	(U) This module will e	nable you t	D:			
	 (TS//SI//NF) Re establishing RA 	•	e direct relationship betwe	en the Foreign Powers and		
BACK FRAME ID: n/a	, , , , , , , , , , , , , , , , , , ,	entify the ke	ey components of RAS an	d how it is applied to candidate		
ALT TAG:	identifiers					
GRAPHIC/AV:	• (TS//SI//NF) Ide	entify who c	an adjudicate and approv	e a RAS nomination		
(U) Present learning objectives in the travel journal	 (TS//SI//NF) Recognize the requirement associated with identifiers linked to U.S. persons – the OGC First Amendment Review 					
	 (TS//SI//NF) List common sources of information used to construct a RAS nomination statement 					
-(TS//SI//NF)- (OGC Attorney): This part of our definitions and descriptions to help you under to this training, guidance is also outlined in a	trip will provide you with an rstand how to satisfy RAS a	overview of t nd how to app	ly it to identifiers under the BR			

(TS//S1//NF) This module will enable you to:

- (TS//SI//NF) Recognize the direct relationship between the Foreign Powers and establishing RAS
- (TS//SI//NF) Identify the key components of RAS and how it is applied to candidate identifiers

Derived From: NSA/CSSM 1-52 Dated: 20070108 Declassify On: 20350501

- (TS//SI//NF) Identify who can adjudicate and approve a RAS nomination
- (TS//SI//NF)-Recognize the requirement associated with identifiers linked to U.S. persons the OGC First Amendment Review
- (TS//SI//NF) List common sources of information used to construct a RAS nomination statement

(TS//SI//NF) At the conclusion of this module you should understand that an identifier must be RAS-approved before conducting a query. The topic of querying BR and PR/TT bulk metadata will be discussed in Module 4.

DATE/PREPARER: 11/09/2010 SLS	Topic _(TS//SI//NF) The Two Foreign Powers	TOP	Page Classification SECRET//COMINT//NOFORN-	Screen Number 2 of 13								
	Home	Exit	Glossary	Back	Next							
FRAME ID: 3020	(IS//SI//NF) Who can be targeted under the BR and PR/TT authorities?											
NEXT FRAME ID: 3030	(TS//SI//NF) The F	oreign	Powers named in these aut	horities are								
BACK FRAME ID: 3010												
ALT TAG:	, ,	-										
GRAPHIC/AV: (U) Insert graphics/animations to illustrate the umbrella groups and their affiliated terrorist organizations (U) Add graphics to illustrate contact chaining, seeds, and hops.	(TS//SI//NF) NSA is not permitted to query the BR and PR/TT metadata unless there is a reasonable articulable suspicion that the identifier is associated with one of the FISC-approved groups.											
(TS//SI//NF) (OGC Attorney): The BR and PF Foreign Powers are is a reasonable articulable suspicion that the			NSA is not permitted to query the	The Orders list i	n great detail							
target. You CAN however query using identif	iers specifically linked to				(TS//SI//NF) It is important to note that you cannot query using just any foreign intelligence target. Furthermore, you cannot guery using iust any terrorist target. You CAN however query using identifiers specifically linked to farget may be added or removed over time, so you should reference the most current version of the lists for updates.							

DATE/PREPARER: 11/09/2010 SLS	Topic (U) What is RAS?		Page Classification E CRET//COMINT//NOFOR		een Number 3 of 13
	Home	Exit	Glossary	Back	Next
FRAME ID: 3030	(U) What is Reason	able Artic	ulable Suspicion (RA	S)?	
NEXT FRAME ID: 3035	the factual and	dentifier will practical cons are facts givin	ble Articulable Suspicion (I meet the Reasonable Articula siderations of everyday life or ng rise to a reasonable articula with one of the specified For	ble Suspicion Standard which reasonable and able suspicion that the i	prudent
BACK FRAME ID: 3020			– Forei	gn Intelligence Surveil	lance Court
ALT TAG:					
GRAPHIC/AV: (U) Display pop-up with the definition of RAS as it is discussed.					
(TS//SI//NF) (OGC Attorney): The FISC rec however, because there is a great deal of U analysts can access the metadata under the only legitimate terrorism-related identifiers a -(TS//SI//NF) So what is RAS? RAS is a lega be queried from the bulk metadata. The Rea It does not require certainty, but is more cor familiar.	J.S. person information incluese authorities. The RAS states are used to query the bulk managed that describes the asonable Articulable Suspicition of the state of the state of the suspicities are used to provide the suspicities and the suspicities are used to provide the suspicities and the suspicities are used to provide the suspicities and the suspicities are used to provide the suspicities and the suspicities are used to provide the sused to provide t	ded in the bu andard is one etadata. This e measure o ion standard	Ilk metadata, the FISC has of these guidelines which s standard must be met be f proof required to support requires just that-a suspici	set strict guidelines of helps to provide reas fore queries can be c a decision whether to on that you can expla	on when and how onable assurance tha onducted. o permit an identifier to in in a reasonable wa
(TS//SI//NF) Many of you may be familiar w compares to these other legal standards. Fo reasonable doubt. "This is the highest legal plaintiff money damages if the plaintiff prove reasonable doubt." Lower still is the standar for the suspect's home or the content of the	or example, a jury in a crimin standard of proof. A jury in a es the elements of his claim rd of proof required to justify	nal case will a civil case (s by "a prepor issuance of	not convict an accused unle such as a personal injury c iderance of the evidence." a search warrant – "probal	ess the evidence of g ase or a contract disp This standard is lowe ble cause" – whether	uilt is "beyond a oute) might award a r than "beyond a

(TS//SI//NF) The FISC has determined that this lower standard of proof is reasonable for the querying of metadata because communications metadata does not carry with it the same privacy protections as communications content. The RAS standard falls below "probable cause" but above a mere hunch or guess.

DATE/PREPARER: 11/09/2010 SLS	Topic (U) What is RAS ⁴	? TOP S	Page Classification		reen Number 4 of 13					
	Home	Exit	Glossary	Back	Next					
FRAME ID: 3035	(U) The RAS Equation (U) (Continue to display definition of RAS then pull out the RAS Equation.)									
NEXT FRAME ID: 3040	the factua	Reasonable Articulable Suspicion (RAS) Standard (TS//SI//NF) An identifier will meet the Reasonable Articulable Suspicion Standard if based on the factual and practical considerations of everyday life on which reasonable and prudent persons act, there are facts giving rise to a reasonable articulable suspicion that the identifier is associated with one of the specified Foreign Powers."								
BACK FRAME ID: 3030		associated	*	0	llanas Caurt					
ALT TAG:			- F0	reign Intelligence Survei						
GRAPHIC/AV: (U) Continue to display definition of RAS then pull out the RAS Equation.		RAS Equation Identifier + Link to Foreign Power = RAS								
(TS//SI//NF) (OGC Attorney): As it applies to or other identifier type, is associated with on FISC requires that NSA base that suspicion of the named terrorist organizations. The rec metadata are based on substantive informat identifier, analysts must provide enough fact named Foreign Powers in the BR and PR/T nomination later in this module.	e of the Foreign Po on a certain level of fac juirement that these fac ion (meaning more tha ual evidence that it wo r Orders. We will get m	owers named in ctual evidence - cts be <i>articulabl</i> n simple hunche uld lead a reaso lore into the kind	BR and PR/TT Orders - and NSA must <i>articulate</i> e effectively provides reas es or uninformed guesswo nable person to suspect t ds of facts that may be use	those facts that connection conable assurance that ork). So in order to obta hat an identifier is asso ed and how they can s	The ect the identifier with one analyst queries of the ain RAS approval for an ociated with one of the upport a RAS					
-(TS//SI//NF) In summary, based on the facture determine if there is a reasonable articulable named in the with one of the Foreign Powers listed in the metadata repository. NSA's implementation to one of the Foreign Powers and document	suspicion that the iden he Orders. There must BR and PR/TT Orders. of the BR and <u>PR/TT C</u>	ntifier is associa t be at least one Unless that det <u>Ord</u> ers mandates	ted with qualifying fact giving rise ermination is made, the id	to the suspicion that the suspicion that the suspicion that the suspice of the su	ne identifier is associated roved to query this					

DATE/PREPARER: 11/09/2010 SLS	Topic (U) Where Does RAS Fit?	Page Classification - TOP -S ECRET//COMINT//NOFORN			Screen Number 5 of 13		
	Home	Exit	Glossary	Back	Next		
FRAME ID: 3040							
NEXT FRAME ID: 3050							
BACK FRAME ID: 3035							
ALT TAG:							
GRAPHIC/AV: (U) Analyst Level of Effort Required graphic							
(TS//Si//NF) (HMC Character): From an Anal BR and PR/TT and other SIGINT authorities. considered less than that required for FBI CT	As the illustration shows, th	he level of	f effort required by an analy	yst to establish RAS wo	ould normally be		

DATE/PREPARER: 11/09/2010 SLS	1/09/2010 SLS Topic (U) Who Can Make a RAS Determination?		Page Classification ECRET//COMINT//NOFORN	Screen Number 6 of 13	
	Home	Exit	Glossary	Back	Next
FRAME ID: 3050	(U) Who can make a R	AS dete	rmination?		
NEXT FRAME ID: 3060			/ho can make a RAS determ		
BACK FRAME ID: 3040			hief of the CT Homeland Securit		
ALT TAG:	• (U	/ /TOUO) D	eputy Chief of the CT Homeland	Security Analysis	
GRAPHIC/AV:	Ce	nter			
		(U)	No one else can make this determ	unation!	
(TS//SI//NF) (OGC Attorney): The FISC st however, mean that anyone can approve approve identifiers for querying under the (TS//SI//NF) (HMC Character): As was jus Counterterrorism and its Extended Enterp	an identifier for RAS. There are a se two authorities. Those individu	i select nu als are ca s are typic	mber of people within NSA wh lled Homeland Mission Coord ally made by specially trained	to have been given the inators or HMCs. personnel in the Office	ne authority to
individuals, like me, have been given species individuals who have extensive experience take a RAS nomination, review the facts, a (TS//SI//NF) (HMC Character): According	cial training on how to apply the F e working with this target set and and make a determination as to v to the BR and PR/TT Orders, in a	RAS stand who have whether or addition to	ard and how to apply it consist extensive experience working not that particular identifier m the HMCs, the Chief and Dep	tently. HMCs are spe g with these authoritie eets the RAS standar puty Chief of the Cour	cially trained es. The HMCs can rd. nterterrorism
Homeland Security Analysis Center are an reemphasize, no one else is authorized to				s who make the RAS	5 determinations. To

DATE/PREPARER: 11/09/2010 SLS	Topic (U) OGC Requirement to Review U.S. Person Identifiers		Page Classification S TOP SECRET//COMINT//NOFORN		Screen Number 7 of 13	
	Home	Exit	Glossary	Back	Next	
FRAME ID: 3060	(U) OGC Requirement t	o review	U.S. person identifiers			
NEXT FRAME ID: 3070	• R	First Amen cligion beech	dment Rights			
BACK FRAME ID: 3050	• T	he press	6.L			
ALT TAG:		eaceable asse o petition the	mbly government for redress of griev	ances		
GRAPHIC/AV: (U) Use images from the OVSC1204 course for the First Amendment Rights						
(TS//SI//NF) (HMC Character): There are that are reasonably believed to be used b U.S. person as associated with a Foreign (TS//SI//NF) (OGC Attorney): That's right. Coordinator following his or her approval. Coordinator, and make a determination as Amendment to the Constitution. If there is Amendment, OGC will require additional i	y U.S. persons. Why does this ma Power solely because he or she i Any identifier believed to be used An OGC attorney will review the F s to whether or not NSA is targetir any indication that the RAS is ba	atter? It matt s exercising I by a U.S. p RAS nomina ng that indivi sed solely o	ers because the U.S. Govern his or her First Amendment r erson must be forwarded to t tion, as well as the RAS deci dual based solely on activities	ment is forbidde ights. he OGC by a Ho sion made by the s that are protec	n from regarding a omeland Mission e Homeland Mission ted by the First	
(TS//SI//NF) (HMC Character): If you are not. The presence of First Amendment ev transparent to the analyst, though it is a p	an analyst, should you abandon a idence does not invalidate a RAS	. RAS nomin , it just cann	ot be the sole basis for a non			

DATE/PREPARER: 11/09/2010 SLS	Topic (U) Sources of Information Used to Jusitfy RAS	Page Classificatio - TOP-SECRET//COMINT//		Scr	reen Number 8 of 13
	Home	Exit Glossary		Back	Next
FRAME ID: 3070	(U) What sources of in	formation can be used	to justify	RAS?	
	(TS//SI//NF)	FISA Orders	(TS//S	H //NF) IC and	d Public Sector
NEXT FRAME ID: 3080	Existing FISA Order	5	Centr	estigation documents gency documents	
		oorts and/or RAW		nal Counterterror	rism Center
BACK FRAME ID: 3060		GI N T		ments ments from other	r U.S. Government
ALT TAG:	 SIGINT reports FISA surveillance da 	ta derived from other	Organ		
GRAPHIC/AV:	 authorized targets Raw SIGINT (after a Validation Check) SIGDEV Work Other transcripts 	Reporting Source	 Foreign Partner nations Public records available on the internet, newspapers, or other public resources 		
(TS#SI/NF) (HMC Character): So now let's possession. A published SIGINT report desc a detainee's interrogation but NSA can rel evidence.	ribing the results of electronic	surveillance of a target might	be more reli	able than say p	ocket litter found during
 (TS//SI//NF) (OGC Attorney): Sources that a Existing FISA Orders SIGINT reports FISA surveillance data derived f SIGINT traffic, as long as the su SIGDEV work (with verified source) Other transcripts 	rom other authorized targets bmitting analyst has performed				
- (TS//SI//NF) (OGC Attorney): If an analyst/re then that inform via	equestor uses unpublished que nation will only be visible to the		<u>n, and they</u> or	-	terial appropriately as redentials, as confirmed

-(TS//SI//NF) (OGC Attorney): The following IC and public sector (open source) sources are also examples of sources that are frequently used:

- Federal Bureau of Investigation (FBI) documents
- Central Intelligence Agency (CIA) documents
- The National Counterterrorism Center (NCTC) documents
- Documents from other U.S. Government Organizations
- Foreign Partner nations, and
- Public records available on the internet, newspapers, or other public resources.

DATE/PREPARER: 11/09/2010 SLS	(U)		ge Classification R ET//COMINT//NOFO RN		creen Number 9 of 13		
	Home	Exit	Glossary	Back	Next		
FRAME ID: 3080	(TS//SI//NF)	NSA's RAS Id	lentifier Managemer	nt System			
NEXT FRAME ID: 3090							
ALT TAG:					2		
GRAPHIC/AV: E6\E62 Learning Technologies\NOFORN Course Development\Requirement_196_OVS C_1205_BR- PRTT\Graphics	 (TS//SI//NF) Supports the Homeland Defense Counterterrorism (CT) Mission. (TS//SI//NF) Provides the ability to request, justify, review, approve/disapprove RAS nominations/requests. (TS//SI//NF) Is the authoritative source for the list of RAS-approved identifiers and will export that list other systems that require it. (TS//SI//NF) Provides metrics and other information to facilitate oversight review and report generation the Department of Justice (DOJ) and the FISC. (U) Time Bounded Approvals 						
(TS//SI//NF) (HMC Character): Remem Powers = RAS. Now you may be wonde query the bulk metadata meets the RAS identifier management tool, to streamlin	ering how an identifier is nomina s standard <i>PRIOR</i> to querying th	ated for RAS. NS/ he BR and PR/TT	A must demonstrate and d bulk metadata repositori	document that eves. NSA created	er used to , the RAS		
(TS//SI//NF) (HMC Character): Typically articulating the RAS equation. An HMC, nomination statement is for a U.S. perso First Amendment review. In either case,	also using will review on, the tool includes	ew the nomination functionality that	n statement and approve allows the HMCs to forwa	or disapprove the ard such requests t	request. If the		
-(T S//SI//NF) (OGC Attorney): Through IRONMAN provides the ability to of RAS-approved identifiers, and	NSA documents all stity, review, approve/disap lexports that list to other sy	prove RAS nomir			n RAS approval. tive source for the list		
(TS//SI//NF) (OGC Attorney): It is impor nomination process. The paper trail sho a RAS decision.							

(TS//SI//NF) (OGC Attorney): NSA has overseers, specifically the DOJ National Security Division attorneys, who examine the factual support for our RAS decision process. They take a look at any notes that the HMCs or someone within the NSA OGC may have included, and they decide whether or not we have properly applied the RAS standard to all of the identifiers that are used to query the bulk metadata. So it is critical that we take great care throughout the process, gathering and presenting the evidence and applying the RAS standard in a consistent manner across all identifier nominations.

(TS//SI//NF) (OGC Attorney) The Court recognizes that occasionally, NSA may have information suggesting that a target may have used a particular identifier only for a limited time. In such cases, an HMC can determine that the RAS standard is met for the specific timetrame that the identifier was believed to be used by the target. Such instances are considered Time Bounded and are uniquely dealt with in Analysts encountering targets under these circumstances should consult with an HMC on how to proceed.

DATE/PREPARER: 11/09/2010 SLS	Topic (U) Lifespan of a RAS Approval) Lifespan of a RAS -TOP SECRET//COMINT//NOFORN- 10 of '		reen Number 10 of 13				
	Home	Exit	Glossary	Back	Next			
FRAME ID: 3090	(U) What is the Lifespan of a RAS Approval?							
NEXT FRAME ID: 3100	year. NSA CT has 180 days.	implerr	nations for foreign identifiented guidance that requ	ires RAS reviev	v/re-approval every			
BACK FRAME ID: 3080	· · · · ·	•	AS determination for an id erson is legally effective f		,			
ALT TAG:	implemented guida	ance tha	at requires RAS review/re	-approval every	90 days.			
GRAPHIC/AV: (U) Use a graphic to show effective dates for U.S. and non-U.S. person RAS approval (U) (Show passing of time and then a	· · · ·		nset of an identifier's RAS d for RAS revalidation thro	••	•			
graphic of an identifier with a "RAS- APPROVED" or "DENIED" applied over the identifier)								
identifier, per the FISC, is legally valid for one review and re-approval every 180 days. Like per the FISC, but NSA CT has implemented	(TS//SI//NF) (HMC Character): RAS approvals have sunset or expiration dates which analysts must comply with. Currently a RAS approval on a foreign identifier, per the FISC, is legally valid for one year. However, NSA CT has taken a conservative approach and implemented guidance that mandates RAS review and re-approval every 180 days. Likewise, a RAS approval for an identifier believed to be used by a U.S. person has a legal lifespan of 180 days per the FISC, but NSA CT has implemented guidance requiring review and re-approval every 90 days. It is the analyst's responsibility to monitor the sunset dates and take appropriate actions before the RAS nomination expires.							
(TS//SI//NF) (HMC Character): Any identifier information that was required for the original documentation to demonstrate that the identi revalidation, based on the totality of the evide the process.	request. Revalidations shoul fier is still associated with the	d try to v e Foreigr	alidate that the original evidence Powers named in the Orders.	e is still true by pr It is up to the HMC	esenting any new Cs to make an informed			

DATE/PREPARER: 11/09/2010 TAP	Topic (U) Knowledge Check	dge TOP-SECRET//COMINT//NOFORN			Screen Number 11 of 13	
	Home	Exit	Glossary	Back	Next	
FRAME ID: 3100	(U) Knowledge Che	eck				
NEXT FRAME ID: 3110	nomination? a) -(TS//SI//NF b) (TS//Si//NF	- -) It is a key com -) It is represen	reen the target and the Forei aponent in reaching the 'prob tative of the terrorist centr	able cause' standard	k	
BACK FRAME ID: 3090		n the FISC Ord se it is required I	by USSID SP0018 and DoD	5240.1-R		
ALT TAG:			n a DIRNSA Memo			
GRAPHIC/AV:	a) (TS//S b) (TS//S activitie c) <u>(TS//S</u> d) (TS//S	H/NF) The ident I//NF) The identi es H/NF) The identi	requires that what two facts a ifier can be tied to a terror fier is not used by a U.S. per fier can be tied to a target ar can be traced back to the a rorist group.	ist target and that tarson and they are en not that target is affilia	gaged in terrorist	
(U) (HMC Character): Let's check what yo ANSWERS: Question 1: (TS//SI//NF) Correct! The link representative of the terrorist centric scop (TS//SI//NF) Incorrect. The correct answer is representative of the terrorist centric sco Question 2: (TS//SI//NF) Correct! The RAS • The identifier can be tied to a terro	between the target and e of the BR and PR/TT r is b). The link between ope of the BR and PR/T S standard requires that	the Foreign Por authorities as no the target and t T authorities as	eted in the FISC Orders. he Foreign Powers is an ess noted in the FISC Orders.			
 That target can be tied to (TS//SI//NF) Incorrect. The correct answer The identifier can be tied to a terro That target can be tied to 		rd requires that t	he following two facts are ar	ticulable:		

DATE/PREPARER: 11/09/2010 TAP	Topic (U) Knowledge Check	Knowledge -TOP-SECRET//COMINT//NOFORN		Sc	reen Number 12 of 13			
	Home	Exit	Glossary	Back	Next			
FRAME ID: 3110	(U) Knowledge Cl		VAS determination?					
NEXT FRAME ID: 3120	 3. (TS//St//NF) Who may make a RAS determination? a) (TS//St//NF) A Homeland Mission Coordinator (HMC) or an attorney with the Department of Justice b) (TS//St//NF) An HMC or other official named in the Orders c) -(TS//St//NF) Any reasonable and prudent analyst (and OGC if identifier is believed to be used by 							
BACK FRAME ID: 3100	a U.S.	person)	lge from the FISC		s believed to be used by			
ALT TAG:	u) -(+o//o		ige nom me FISC					
GRAPHIC/AV: (U) Knowledge checks in the travel journal	 4. (TS//SI//NF) Which source of information may be used to justify RAS? a) (TS//SI//NF) SIGINT reports b) (TS//SI//NF) Open source information c) (TS//SI//NF) Second Party reports d) (TS//SI//NF) All of the above 5. (TS//SI//NF) What additional requirement is needed for an identifier reasonably believed to be used by a U.S. person? a) (TS//SI//NF) Must be reviewed by the Attorney General b) (TS//SI//NF) Must be reviewed by the Chief of the Homeland Security Analysis Center c) (TS//SI//NF)-Must be reviewed by OGC d) (TS//SI//NF) Two HMCs must agree on the RAS determination 							
(No audio or transcript on this page)								
Question 3: (T S#SI#NF) Correct! An HMC or (TS#SI#NF) Incorrect. The correct answer is								
Question 4: (TS//SI//NF) Correct! SIGINT rep (TS//SI//NF) Incorrect. The correct answer is								
Question 5: (TS//SI//NF) Correct! If an identii (TS//SI//NF) Incorrect. The correct answer is								

DATE/PREPARER: 11/09/2010 SLS	Topic (U) Summary		Page Classification ECRET//COMINT//NOFORN	Screen Number 13 of 13
	Home	Exit	Glossary	Next
FRAME ID: 3120	 (U) Now that we have completed this part of your trip you should be able to: (TS//SI//NF)-Recognize the direct relationship between the Foreign Powers and establishing RAS (TS//SI//NF)-Identify the key components of RAS and how it is applied to candidate identifiers (TS//SI//NF) Identify who can adjudicate and approve a RAS nomination (TS//SI//NF) Recognize the requirement associated with identifiers linked to U.S. persons – the OGC First Amendment Review (TS//SI//NF) List common sources of information used to construct a RAS 			
NEXT FRAME ID: n/a				
BACK FRAME ID: 3110				
ALT TAG:				
GRAPHIC/AV: (U) Review learning objectives in the travel journal	nominatio	on statemen		
 (TS//SI//NF) (HMC Character): So remember made using a particular identifier within the E (U) (OGC Attorney): Now that we have comp (TS//SI//NF) Recognize the direct rel 	BR or PR/TT metadat	a. trip you should	be able to:	the Order) BEFORE queries can be
 (TS//SI//NF) Identify the key compon (TS//SI//NF) Identify who can adjudic 	ents of RAS and how	/ it is applied to	candidate identifiers	
• (TS//SI//NF) Recognize the requirem	••			Amendment Review

• (TS//SI//NF) List common sources of information used to construct a RAS nomination statement