

Central Intelligence Agency



Washington, D.C. 20505

1 September 2015

Mr. Nate Jones
The National Security Archive
George Washington University
Gelman Library, Suite 701
2130 H Street, NW
Washington, DC 20037

Reference: F-2014-02555 (Archive #20141049CIA123)

Dear Mr. Jones:

This is a final response to your 16 September 2014 Freedom of Information Act (FOIA) request, submitted on behalf of The National Security Archive, for a **"copy of the 31 December 2013 CIA OIG report entitled, 'CIA Processes for Engaging with the Entertainment Industry.'"** As you will recall, in our 25 September 2014 letter, we informed you that we had already begun processing a request for this information in connection with an earlier request received prior to your FOIA request. We cross-referenced your request to the earlier one in order to send you any records that were found to be releasable.

The earlier case was recently concluded. As a result of our searches undertaken in connection with the earlier request, we located one document, consisting of 20 pages, that we determined was releasable in segregable form with deletions made on the basis of Sections 1.4(c) and 3.5(c) of Executive Order 13526. Section 1.4(c) is equivalent to FOIA exemption (b)(1) and Section 3.5(c) is equivalent to FOIA exemption (b)(3). Exemption (b)(3) pertains to information exempt from disclosure by statute. The relevant statutes are Section 6 of the Central Intelligence Agency Act of 1949, as amended, and Section 102(A)(i)(I) of the National Security Act of 1947, as amended. A copy of the document is enclosed. As the CIA Information and Privacy Coordinator, I am the CIA official responsible for this determination. You have the right to appeal this response to the Agency Release Panel, in my care, within 45 days from the date of this letter. Please include the basis of your appeal.

Sincerely,

A handwritten signature in black ink that reads "Michael Lavergne".

Michael Lavergne
Information and Privacy Coordinator

Enclosure

REDACTIONS APPLIED TO THIS
DOCUMENT ON THE BASIS OF EO 13526

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CENTRAL INTELLIGENCE AGENCY

Office of Inspector General

(U) REPORT OF AUDIT

**(U) CIA Processes for Engaging With
the Entertainment Industry**

Report No. 2012-0013-AS



EO 13526 3.5(c)

31 December 2012
Issue Date

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(U) Report of Audit
(U) CIA Processes for Engaging
With the Entertainment Industry

(U) EXECUTIVE SUMMARY

(U) The objectives of this audit were to determine whether CIA processes for engaging with the entertainment industry are:

- Designed to support consistency and fairness in handling access requests.
- Designed to adequately protect classified and sensitive information.
- Effective in achieving the goals established by the Office of Public Affairs (OPA) for activities within the entertainment industry.
- In compliance with applicable laws and regulations.

(U//~~FOUO~~) We found that records maintained by OPA are not sufficient to document that entertainment industry requests to CIA for briefings, interviews, visits, and other support are handled in a consistent and fair manner and that engagement with the entertainment industry is effective in furthering CIA's goal for engagement. OPA has not maintained a comprehensive list of entertainment projects that the CIA has supported and those projects that CIA has declined to support. OPA and other CIA employees have not always complied with Agency regulations intended to prevent the release of classified information during their interactions with entertainment industry representatives. This report recommends that the Director of Public Affairs (Director, OPA) implement a central recordkeeping capability for entertainment industry requests to CIA for briefings, interviews, visits, and other support. The report also recommends that the Director, OPA issue guidance on contact with the entertainment industry and support to entertainment industry projects to help ensure that current and former CIA employees comply with CIA security requirements in their interactions with the entertainment industry.

(U//~~FOUO~~) CIA has not been reimbursed for costs incurred in supporting entertainment industry projects and has cited authority under section 8 of the Central Intelligence Agency Act of 1949 to incur such costs without reimbursement. We believe this to be a questionable use of section 8 authority. This report recommends that the Director, OPA, in coordination with the General Counsel, establish a documented policy for determining when fees should be charged by CIA in providing support to entertainment industry projects and how those fees are collected.


Assistant Inspector General for Audit

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(U) BACKGROUND

(U//~~FOUO~~) The CIA is a frequent subject of entertainment industry projects, such as books, television programs, documentaries, and motion pictures. CIA officials work with entertainment industry professionals—directors, producers, screenwriters, authors, documentarians, and actors—to debunk myths about CIA and intelligence work, present a balanced and accurate image of the CIA, and lend authenticity to entertainment industry projects. According to the CIA public website, CIA’s goal in engaging with the entertainment industry is to ensure “an accurate portrayal of the men and women of the CIA, and the skill, innovation, daring, and commitment to public service that defines them.” CIA officials have provided advice on improving the context and accuracy of scripts, provided tours of the CIA, and overseen production on CIA property. A CIA official directly involved in supporting entertainment industry projects told us that the CIA receives requests from five to seven, small-scale projects each week; many of these requests are limited to questions about CIA culture or historical events. Since October 2011, the CIA has received about three or four requests for support to large-scale entertainment projects—projects that would require a greater commitment of CIA resources to support. CIA officials directly involved in supporting entertainment industry projects told us that, since 11 September 2001, there has been only one major motion picture that has been allowed to film at CIA Headquarters.¹

(U) The CIA, Office of Public Affairs (OPA) is responsible for facilitating effective internal and external communications for CIA and is the focal point for CIA engagement with the entertainment industry. OPA comprises three branches: Media Relations, Public Communications, and Internal Communications. The OPA

[Redacted] Liaison is responsible for CIA engagement with the entertainment industry.
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(U//~~FOUO~~) OPA officials told us that they follow the provisions of Agency Regulation [Redacted] when engaging with the entertainment industry.² AR [Redacted] assigns OPA responsibility for responding to requests for briefings, interviews, and visits from the media and for arranging and monitoring responses. AR [Redacted] prescribes that OPA will not discriminate among members of the media in granting requests. A decision on whether or not to provide a briefing, interview,

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or visit is to be based on the merits of the request, the sensitivity of the subject matter, the media representative's record of abiding by CIA direction concerning any classified information that is inadvertently disclosed, and the availability of appropriate CIA personnel. Each briefing, interview, or visit must be approved in advance by the Director of Public Affairs (D/OPA) and the directorate involved. CIA officials have stated that the protection of national security equities is paramount in determining whether and how the CIA engages with the entertainment industry.

(U//~~FOUO~~) AR prescribes that briefings to the media normally will be conducted in the offices of OPA or another designated area, and an OPA representative will be present during briefings. OPA is responsible for advising current and, when requested, former CIA employees on their contacts with media representatives; maintaining a central record of all CIA contacts with media representatives, by both OPA and other components; and providing the Center for CIA Security (now the Office of Security) copies of all reports of contacts with the media. AR requires CIA employees, except as authorized by the Director, CIA; Deputy Director, CIA; EXDIR (Associate Deputy Director, CIA); or the Director, OPA, to refer all inquiries, whether official or unofficial, from media representatives to OPA and engage in no contact on behalf of the CIA with media representatives.

(U) AUDIT RESULTS AND RECOMMENDATIONS

(U) OPA Has Not Maintained Adequate Records of CIA Engagement With the Entertainment Industry

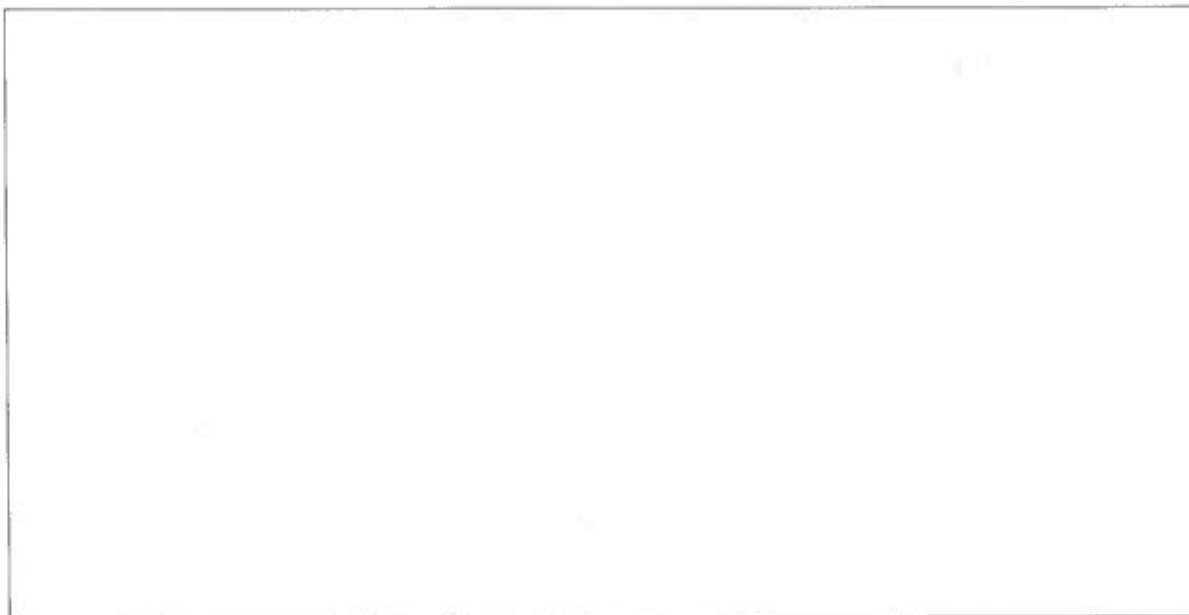
(U//~~FOUO~~) Records maintained by OPA are not sufficient to document that entertainment industry requests to CIA for briefings, interviews, visits, and other support are handled in a consistent and fair manner, that engagement with the entertainment industry is effective in furthering CIA's goal for engagement, and that classified information is protected when the CIA engages with the entertainment industry. OPA has not maintained a comprehensive list of entertainment projects that the CIA has supported and those projects that CIA has declined to support. Although AR does not specify the information to be maintained in a central record of contacts with representatives of the media, the record should include information sufficient to document that the CIA has acted in compliance with AR Maintenance of adequate records is an important control in providing assurance that CIA procedures for engaging with the entertainment industry are effective and that CIA officers comply with applicable regulations and guidance.

(U//~~FOUO~~) In 2011, OPA officials prepared a list of 22 entertainment industry projects that obtained support from CIA. The list included books, television programs, documentaries, and motion pictures. We reviewed a sample of eight projects—two books, two television programs, two documentaries, and two motion pictures—that were in production or completed between January 2006 and the start of our audit in April 2012 to assess compliance with CIA procedures

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for engaging with the entertainment industry. The eight entertainment industry projects are identified in Figure 2.



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~~(U//FOUO)~~ OPA was unable to provide documentation concerning the nature and extent of CIA's support to three of the eight projects: [redacted]

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[redacted] OPA provided limited documentation concerning CIA support to the other five projects. For only one of the eight projects was OPA able to provide a complete list of the current and former CIA employees—the briefers, interviewees, guides, security escorts—who had been in contact with entertainment industry representatives in the course of CIA support to the project.

(U) Assessments of Entertainment Industry Requests Were Not Documented

~~(U//FOUO)~~ We were unable to determine whether entertainment industry requests for support were handled in a consistent and fair manner. OPA does not maintain records of entertainment industry requests for briefings, interviews, and visits that are denied by CIA. As such, it was not possible to assess decisions to deny CIA support for compliance with AR [redacted] Regarding those entertainment industry requests that were supported by CIA, there was not sufficient documentation to assess the decision and the nature and extent of the support for compliance with AR [redacted]

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(U//~~FOUO~~) Based on the limited documentation available from OPA, CIA support and involvement in entertainment industry projects appear to have varied considerably from one project to another. For example, we noted that the CIA provided significantly more support to one of the eight entertainment industry projects that we reviewed: [redacted] Entertainment industry representatives for this project met with [redacted] CIA officers (the majority of whom were under cover), in some instances for several hours and on multiple occasions, including meeting with one officer approximately 12 times. For the four other projects in our sample for which there was some documentation concerning CIA support, it appears that CIA provided entertainment industry representatives only one or two meetings with overt CIA officers for each project. However, because of the lack of sufficient documentation, it was not possible for us to determine that [redacted] was deserving of greater CIA support based on the "merits" of the project and the application of the other criteria for assessing media requests prescribed in AR [redacted] or that [redacted] had been deemed to have greater potential for furthering the CIA's goal for interacting with the entertainment industry.

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**(U//FOUO) OPA Lacks Procedures
to Measure the Impact of Engagement
With the Entertainment Industry**

(U//~~FOUO~~) OPA lacks a systematic process to assess and document the effectiveness of CIA's engagement with the entertainment industry. OPA officials stated that although they do not have procedures to document the impact of CIA's support to entertainment industry projects, OPA officers' substantial involvement in the projects and, in most cases, the involvement of senior CIA officials ensure that projects further CIA's goal to ensure "an accurate portrayal of the men and women of the CIA, and the skill, innovation, daring, and commitment to public service that defines them." Based on our review of the six completed projects in our sample, the projects portrayed CIA in a manner generally consistent with CIA's goal. We were unable to determine whether the remaining two projects, the motion pictures, met CIA's goal because they were in production at the time of the audit. Based on our interviews with individuals involved in the projects and our review of records provided by OPA, we found nothing to suggest that the projects' results would be inconsistent with CIA's goal. However, formal procedures for assessing and documenting the extent to which CIA support to individual projects furthered CIA's goal could be useful in making decisions concerning continued CIA support to particular media projects or individual persons or entities in the entertainment industry.

**(U) Deviations From Agency Regulations
Raise Security Concerns**

(U//~~FOUO~~) OPA and other CIA employees did not always comply with Agency regulations intended to prevent the release of classified information during their interactions with entertainment industry representatives. OPA did not report contacts

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between CIA employees and media representatives to the Office of Security as required by AR [redacted] for any of the eight projects we reviewed. CIA officers from components other than OPA were interviewed by entertainment industry representatives on at least four of the five projects we reviewed for which there was some record of CIA engagement. In the case of one project [redacted] CIA officers told us that some of their official meetings with the entertainment industry representatives took place outside of CIA facilities. One of the officers stated that, with OPA's approval, his meetings outside of CIA facilities did not always include an OPA representative. [redacted] CIA officers who supported entertainment industry projects [redacted] respectively) told us that they were contacted directly by entertainment industry representatives after the initial meetings conducted with OPA. Under AR [redacted] OPA is the focal point for all CIA contacts—official or unofficial—with media representatives.

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(U//~~FOUO~~) Several CIA officers who were involved in CIA support to three of the entertainment industry projects that we reviewed told us that they did not receive guidance from OPA concerning their interaction with entertainment industry representatives. Officers who had been interviewed by entertainment industry representatives in support of one project [redacted] told us that they were unclear concerning what information could be discussed in the interviews and uncomfortable with the information being discussed. These officers thought that OPA could have better prepared them for the interviews and that OPA officials should have exercised greater control of the interviews. Based on our discussions with members of the CIA's Publications Review Board (PRB) and our review of information provided by PRB officials, many CIA employees who briefed or were interviewed by entertainment industry representatives did not submit materials to the PRB for review in advance of the briefings or interviews.⁶ AR [redacted] states that [redacted]

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(U//~~FOUO~~) There was an instance in which CIA allowed an entertainment industry representative to attend a CIA event in which information classified at the SECRET level was discussed.⁷ AR [redacted] states that [redacted]

[redacted] There is no documentation that approval was obtained to waive [redacted]

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⁷ (U) CIA officials told us that the filmmaker involved with *Zero Dark Thirty* was invited to the event so that he could absorb the emotion of the event and that he was told that he could not use anything he heard at the event for his project. During our audit fieldwork, the then Director, CIA called for an internal examination of the decision to allow the entertainment industry representative to attend the event.

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compliance with AR [] and allow the entertainment industry representative to attend the event and that this decision was appropriate and in the CIA's best interest. We also noted three entertainment projects []

[] in which foreign nationals may have participated in briefings, interviews, and visits provided by CIA. However, because of the lack of adequate records, we were unable to determine the extent of CIA's support to the eight projects, the extent to which foreign nationals participated in CIA-sponsored activities, and whether the Director, OPA approved the activities and participation by foreign nationals. Failure on the part of CIA officers to adhere to the regulatory requirements could result in unauthorized disclosures, inappropriate actions, and negative consequences for CIA. OPA has prepared draft guidance for persons holding CIA-sponsored clearances or having access to CIA information and facilities concerning contact with the entertainment industry and support to entertainment industry projects.

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(U//FOUO) Recommendation 1—(significant)—For the Director of Public Affairs: Implement a central recordkeeping capability for entertainment industry requests to CIA for briefings, interviews, visits, or other support that documents key data, such as, but not limited to:

- a. Project name and description.
- b. Names of persons and entities requesting CIA support.
- c. Subject matter involved in the project.
- d. Nature and extent of support requested from CIA.
- e. History of prior requests for CIA support from the same persons and entities.
- f. Justification for the decision to support or deny support to the project.
- g. Detailed descriptions of briefings, interviews, visits or other CIA support to the project, such as transcripts of briefings provided by current and former CIA personnel and summaries of interviews of current and former CIA employees.
- h. Approval by the Director, OPA and the directorate involved for all CIA activities undertaken in support of the project.
- i. Time period of CIA participation in the project.
- j. Names of all current and former CIA personnel involved in activities undertaken in support of the project.
- k. Documentation that materials presented by current and former CIA personnel have been appropriately reviewed by the Publications Review Board.

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- l. Certification by the Director, OPA that briefings, interviews, and other CIA support did not divulge classified information or intelligence sources and methods.
- m. Names and identifying information for all entertainment industry persons who had access to CIA personnel and/or facilities.
- n. Assessments of entertainment industry personnel's cooperation with CIA during the project and whether the project furthered CIA's goal in engaging with the entertainment industry, and other information that would be useful in decisions concerning future requests for CIA support.
- o. Costs incurred by CIA in supporting the project and whether reimbursement was obtained.

~~(U//FOUO)~~ Recommendation 2—*For the Director of Public Affairs: Issue guidance on contact with the entertainment industry and support to entertainment industry projects to help ensure that current and former CIA employees comply with CIA security requirements in their interactions with the entertainment industry.*

~~(U//FOUO)~~ We received comments on a draft of this report from the Director, OPA in which she agreed with Recommendations 1 and 2; the comments were coordinated with the Office of General Counsel (OGC); the Office of Security; and the Office of Corporate Strategy, Policy, and Integration. The Director, OPA said that well before the audit began, OPA recognized the need for more consistent documentation in its interactions with the entertainment industry and the need to establish guidelines to the workforce on that interaction. OPA has been working to address these issues since October 2011.

~~(S)~~ The Director, OPA said that OPA's new [redacted] will serve as the central online repository for the information sought in Recommendation 1 on each entertainment project. OPA officials provided us with evidence that [redacted] is fully operational and has the capability to document current entertainment projects. [redacted] allows users to quickly input and search for information about CIA's interaction on a project. OPA officials provided documentation of sufficient recordkeeping for current entertainment projects, except for the involvement of the PRB in reviewing materials presented by current and former CIA personnel to entertainment industry representatives. Regarding review of materials by the PRB, the Director, OPA stated:

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Our understanding is that [Information Review Officers] IRO's have the ability to clear information when needed, and OPA has asked them to do so. Although OPA knows generally what entertainment industry representatives are looking to discuss, representatives of the entertainment industry often do not provide advance

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questions, and so our officers are not in a position to provide advance talking points. According to the entertainment guidance, OPA officers meet with all briefers in advance of their meetings with the entertainment industry representatives, provide guidance on the ground rules, and remind officers not to provide any classified information or analysis. OPA believes this will protect classified information, and adding an extra layer of PRB review is unnecessary, duplicative, and would further burden the overstretched PRB resources.

(e) We discussed the Director, OPA's comments regarding PRB review of materials presented by current and former CIA personnel to entertainment industry representatives with the Chair, PRB. Notwithstanding the Director, OPA's comments, the Chair, PRB affirmed that presentations by current and former CIA personnel to entertainment industry representatives fall under AR [] and AR []. AR [] states that []

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[] AR [] requires "all current and former Agency employees and contractors, and others who are obligated by CIA secrecy agreement, to submit for prepublication review to the CIA's Publications Review Board (PRB) all intelligence-related materials intended for publication or public dissemination, whether they will be communicated in writing, speeches, or any other method." AR [] further prescribes that "[w]here no written material has been prepared specifically in contemplation of the speech, interview, or oral testimony, the individual must contact the PRB Chair or his representative to provide a summary of any and all topics that it is reasonable to assume may be discussed, and points that will or may be made. Unprepared or unrehearsed oral statements do not exempt an individual from possible criminal liability in the event they involve an unauthorized disclosure of classified information." The Chair, PRB told us that PRB review and approval of talking points would allow for careful consideration of all CIA equities related to the information, enable the PRB to provide guidance on topics that should not be discussed, and would facilitate the formal documentation of release decisions for future reference.

(e) In response to Recommendation 2, the Director, OPA offered the following comments concerning compliance with AR [] which states that OPA is responsible for maintaining a central record of all CIA contacts with media representatives, by both OPA and other components, and providing the Office of Security copies of all reports of contacts with the media:

Neither OPA nor the Office of Security (OS) has interpreted the cited regulation to include all discussions with the media (which would include dozens of emails and telephone calls each day). Such contact is approved by D/OPA or other senior Agency leaders, and reporting of all official media contacts would be an unnecessary and overwhelming burden on both OPA and OS. Each and every visitor to the Agency compound is cleared through the []

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[redacted] which is maintained within the Office of Security. In addition, unofficial media contacts are cleared with OPA and OS through the [redacted] which is also managed by OS. Finally, OPA works closely with the Office of Security to ensure awareness of sensitive information reported by media contacts.

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~~(C)~~ OPA's process for maintaining records of CIA contacts with media representatives when engaging with the entertainment industry implemented in response to Recommendation 1 satisfies the requirements of AR [redacted]. Although the process is adequate, it could be further strengthened if OPA verified that all such contacts are reported to the Office of Security. In addition, OPA has promulgated guidelines for interactions with the entertainment industry. The guidelines— [redacted]

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[redacted] were approved by the Deputy Director, CIA and the Associate Deputy Director, CIA in September 2012. The guidelines instruct Agency managers on contact with the entertainment industry, document the responsibilities of OPA and CIA officers in such interactions, highlight factors for evaluating whether the CIA should support a particular project, and establish the requirement for approval by CIA executive leadership of each significant interaction. The Associate Deputy Director, CIA disseminated the guidelines to CIA managers in October 2012. In addition, OPA published a *What's News* article in December 2012 informing the CIA workforce of the guidelines. The actions taken satisfy Recommendation 2, and it is closed.

(U//FOUO) CIA Has Not Been Reimbursed for Costs Incurred In Supporting Entertainment Industry Projects

~~(U//FOUO)~~ The CIA needs to establish a written policy concerning under what conditions reimbursement of costs incurred in providing support to entertainment industry projects should be sought. In the absence of a formal policy, there is increased risk that costs incurred by CIA will not be handled in a consistent manner and that CIA funds may be used for questionable expenditures.

~~(U//FOUO)~~ An OPA official told us that decisions to support entertainment industry projects that result in the CIA incurring costs, such as a decision to [redacted] are made in close coordination with OGC. [redacted]

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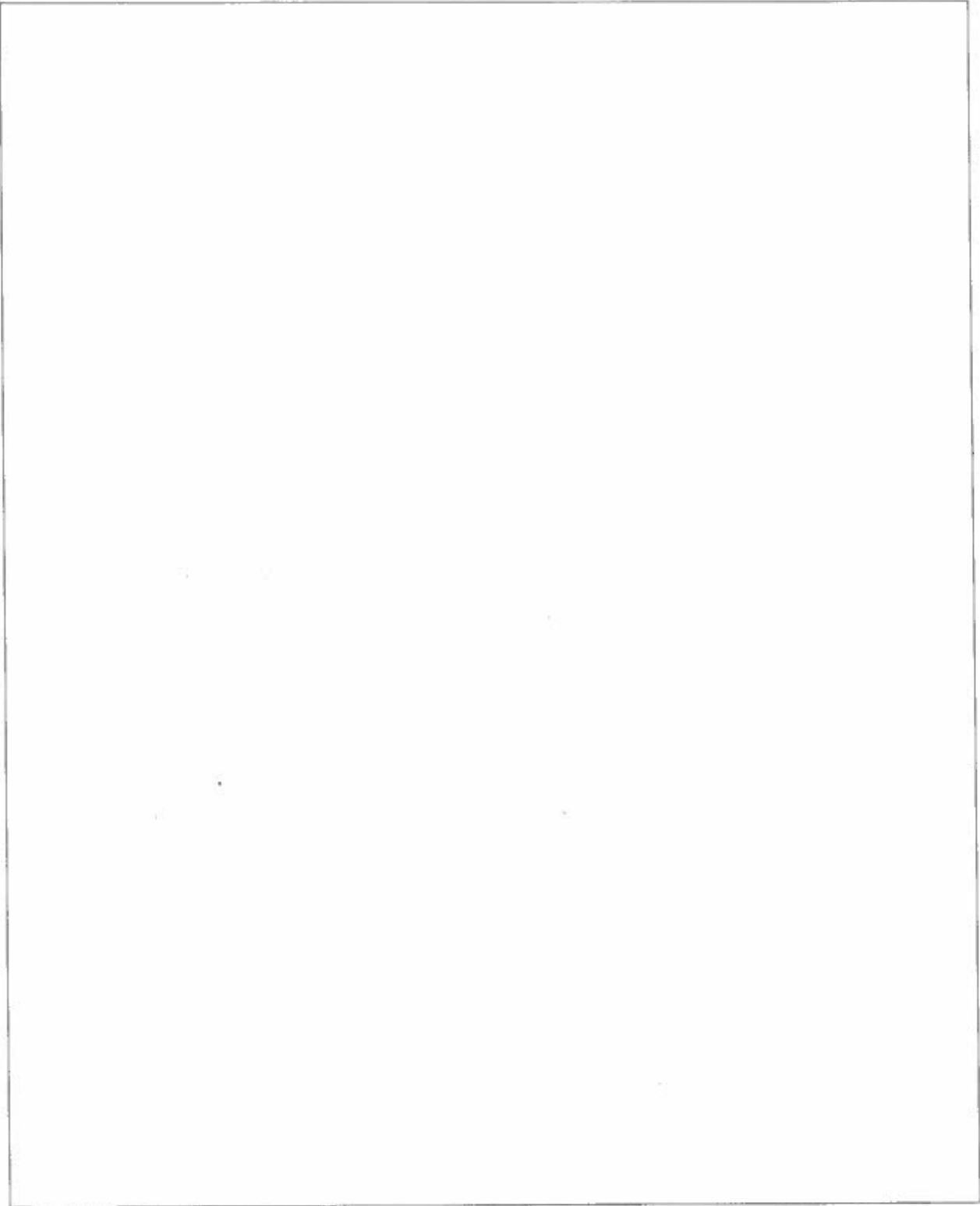
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The CIA's handling of these types of costs, as well as costs associated with additional security requirements and overtime needed to support entertainment industry projects, should be addressed in a written policy.

(U//~~FOUO~~) Recommendation 3—*For the Director of Public Affairs, in coordination with the General Counsel: Establish a documented policy for determining when fees should be charged by CIA in providing support to entertainment industry projects and how those fees are collected.*

(U) In comments on a draft of the report, the Director, OPA said that OPA consulted OGC on this recommendation. We have revised the recommendation based on the Director, OPA's comments. The Director, OPA suggested that documentation concerning how expenses incurred by the CIA in supporting an entertainment project fit within OPA's Congressional Budget Justification could be included in the [redacted] [redacted] Although OPA's suggestion would help to document decisions concerning individual expenses, without a formal policy for determining when fees should be charged by CIA in providing support to entertainment industry projects, there is increased risk that expenses incurred by CIA will not be handled in a consistent manner.

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Exhibit A

(U) Objectives, Scope, and Methodology

(U) The objectives of this audit were to determine whether CIA processes for engaging with the entertainment industry are:

- Designed to support consistency and fairness in handling access requests.
- Designed to adequately protect classified and sensitive information.
- Effective in achieving the goals established by the Office of Public Affairs (OPA) for activities within the entertainment industry.
- In compliance with applicable laws and regulations.

(U) The audit topic was selected during the Office of Inspector General's annual planning process. The CIA is a frequent subject of entertainment projects, including books, television programs, documentaries, and motion pictures. The protection of national security information and CIA equities is essential when engaging with the entertainment industry and formal processes are important controls in mitigating associated risks.

(U) The scope of the audit included CIA engagement with entertainment projects—books, television programs, documentaries, and motion pictures—completed or in production between January 2006 and the initiation of the audit on 2 April 2012.

~~(U//FOUO)~~ To accomplish the audit objectives, we:

- Reviewed the letter sent from Peter King, Chairman of the House Committee on Homeland Security, to the CIA and Department of Defense (DoD) Inspectors General on 9 August 2011 in which he expressed concern regarding ongoing leaks of classified information relating to sensitive military operations; we also reviewed the media publications referenced in the letter to obtain additional background information on his concerns.
- Obtained from OPA a list of entertainment projects with which the CIA was involved that included books, television programs, documentaries, and motion pictures. The list comprised 22 projects, 16 of which were within the scope of the audit. We judgmentally selected eight projects—two books, two television programs, two documentaries, and two motion pictures—for review to assist in assessing CIA processes.
- Identified and reviewed applicable federal laws and Agency regulations related to CIA engagement with the media. We incorporated these laws and regulations into a checklist used to review entertainment projects and interview CIA officers involved with the projects.

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- Reviewed each project selected in the sample by reading the book or watching the documentary or television program for familiarization with the project, to assist in determining whether CIA engagement with the project was effective in achieving CIA's goal, and to identify current and former CIA officers involved with the project. We were unable to watch the two motion pictures selected as part of the sample because they were still in production at the time of the audit.
- Obtained and reviewed OPA's records of engagement on each project selected in the sample to assist in assessing CIA processes.
- Interviewed a judgmental sample of current CIA officers who were involved with five of the eight projects in the sample to assist in assessing CIA processes; due to limited records, we were unable to determine whether current CIA officers were involved with the remaining three projects and the total population of CIA officers involved with the projects.
- Interviewed the Chair of the Publications Review Board (PRB) to obtain an understanding of the PRB's role in CIA processes for engaging with the entertainment industry.
- Interviewed OPA officials to obtain an understanding of CIA processes.
- Reviewed the draft guidance developed by OPA for CIA interaction with the entertainment industry.
- Collected information regarding costs incurred as a result of CIA engagement with the entertainment industry.
- Obtained and reviewed DoD instructions and met with DoD OIG officers to benchmark practices.

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(U) We conducted this performance audit from April to June 2012 and in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objectives.

(U//~~FOUO~~) Comments on a draft of this report were provided by the Director, OPA in coordination with the Office of General Counsel; the Office of Security; the Office of Corporate Strategy, Policy, and Integration; and by the Chair, PRB. We considered the comments in preparing the final report.

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~~SECRET~~**Exhibit B****(U) Recommendations**

~~(U//FOUO)~~ **Recommendation 1—(significant)—*For the Director of Public Affairs:*** Implement a central recordkeeping capability for entertainment industry requests to CIA for briefings, interviews, visits, or other support that documents key data, such as, but not limited to:

- a. Project name and description.
- b. Names of persons and entities requesting CIA support.
- c. Subject matter involved in the project.
- d. Nature and extent of support requested from CIA.
- e. History of prior requests for CIA support from the same persons and entities.
- f. Justification for the decision to support or deny support to the project.
- g. Detailed descriptions of briefings, interviews, visits, or other CIA support to the project, such as transcripts of briefings provided by current and former CIA personnel and summaries of interviews of current and former CIA employees.
- h. Approval by the Director, OPA and the directorate involved for all CIA activities undertaken in support of the project.
- i. Time period of CIA participation in the project.
- j. Names of all current and former CIA personnel involved in activities undertaken in support of the project.
- k. Documentation that materials presented by current and former CIA personnel have been appropriately reviewed by the Publications Review Board.
- l. Certification by the Director, OPA that briefings, interviews, and other CIA support did not divulge classified information or intelligence sources and methods.
- m. Names and identifying information for all entertainment industry persons who had access to CIA personnel and/or facilities.
- n. Assessments of entertainment industry personnel's cooperation with CIA during the project and whether the project furthered CIA's goal in engaging with the entertainment industry, and other information that would be useful in decisions concerning future requests for CIA support.
- o. Costs incurred by CIA in supporting the project and whether reimbursement was obtained.

~~(U//FOUO)~~ **Recommendation 2—*For the Director of Public Affairs:*** Issue guidance on contact with the entertainment industry and support to entertainment industry projects to help ensure that current and former CIA employees comply with CIA security requirements in their interactions with the entertainment industry.

Exhibit B is UNCLASSIFIED//~~FOUO~~

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(U//~~FOUO~~) Recommendation 3—*For the Director of Public Affairs, in coordination with the General Counsel:* Establish a documented policy for determining when fees should be charged by CIA in providing support to entertainment industry projects and how those fees are collected.

(U) The status of significant recommendations will be included in the Inspector General's semiannual reports to the Director, Central Intelligence Agency.

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Exhibit C

(U) Audit Team

~~(U//FOUO)~~ This audit report was prepared by the Audit Staff, Office of Inspector General.



3.5(c)

Exhibit C is UNCLASSIFIED//~~FOUO~~

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