



Audit of the Federal Bureau of Investigation's Efforts to Notify Victims of Child Sexual Abuse Material



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EXECUTIVE SUMMARY

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Objective

The objective of this audit was to evaluate the Federal Bureau of Investigation's (FBI) processes for notifying victims and their guardians of child sexual abuse material.¹

Results in Brief

Federal law and Department of Justice policy provide victims with certain rights, including the right to be notified of crimes committed against them. Within the FBI's Victim Services Division (VSD), the Child Pornography Victim Assistance Program (CPVA) handles the notification process for identified victims of child sexual abuse material.

We found that victims and their guardians are generally notified when they are first victimized in a case involving child sexual abuse material. However, our audit also found that, for victims whose images were part of subsequent investigations, the CPVA's notification process excluded an unknown number of victims because CPVA adopted an "actively traded" threshold established by the National Center for Missing and Exploited Children (NCMEC). We also found these victims were not always notified of their rights because of incomplete contact information in the CPVA's tracking system, which is unable to efficiently facilitate notification efforts. Finally, we determined that the publicly available information developed by the FBI for victims of child sexual abuse material did not accurately portray the actual process used by the CPVA program to notify victims.

Recommendations

Our report contains six recommendations to assist the FBI in improving its efforts to notify victims of child sexual abuse material.

"Actively Traded" Threshold

The FBI has a process to notify all victims when they are first included in a case involving child sexual abuse material. During our audit, VSD officials told us that the FBI applied an "actively traded" threshold for notifying victims and guardians when the victim's image appeared in subsequent cases involving child sexual abuse material. Throughout the audit, the FBI stated this threshold involved an image being involved in at least five separate investigations. However, at the conclusion of our audit, VSD officials told us that, as result of their recent discussions with NCMEC officials, they had determined the actively traded threshold actually consisted of an image appearing in at least five NCMEC unique CyberTipline Reports or Child Recognition & Identification System Reviews. This clarification did not alter our conclusion that, by failing to notify victims or their guardians of subsequent victimizations under this actively traded threshold, victims are potentially denied certain victim rights.

Furthermore, victims who met the actively traded threshold were not consistently notified due to an inefficient and incomplete FBI tracking system. Also, the FBI notification process was administered in a manner inconsistent with the way it was presented to the public.

CPVA's Victim Tracking Efforts

The CPVA tracking system did not satisfy its intended purpose to be the central location for information on federal victims of child sexual abuse material. In some cases, the information needed to notify victims remained outstanding for as many as 6 years. Additionally, CPVA did not proactively seek readily available information that could have led to a more complete tracking system.

¹ The FBI refers to child pornography as "child sexual abuse material" or "child exploitation material" because these terms most accurately reflect the sexual abuse and exploitation experienced by child victims.

Table of Contents

Introduction	1
Background	1
Victim's Rights under Federal Law and Policy	2
Notifying Victims.....	3
Office of the Inspector General Audit Approach.....	4
Audit Results	6
The "Actively Traded" Threshold Adopted by the FBI.....	6
Public Information on the CPVA Program.....	9
CPVA's Victim Tracking Efforts	10
Incomplete CPVA Tracking System.....	10
CPVA Efforts to Obtain and Track NPFs.....	11
Conclusion and Recommendations	16
APPENDIX 1: Objectives, Scope, and Methodology.....	17
Objective.....	17
Scope and Methodology.....	17
Internal Controls.....	17
Compliance with Laws and Regulations	18
Sample-based Testing.....	18
Computer-Processed Data	18
APPENDIX 2: The FBI Response to the Draft Audit Report	19
APPENDIX 3: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report.....	22

Introduction

Department of Justice (Department) personnel are required by law and under the Attorney General Guidelines for Victim and Witness Assistance (AG Guidelines) to identify victims of a crime, notify them of their rights, and offer them services as described in the AG Guidelines. In general, the Federal Bureau of Investigation's (FBI) Victim Services Division (VSD) is responsible for ensuring that all victims of crimes investigated by the FBI are notified and receive the services to which they are entitled. Within the VSD, the Child Pornography Victim Assistance Program (CPVA) serves the broader federal law enforcement community to streamline the notification process for identified victims of child sexual abuse material. In serving federal law enforcement beyond the FBI, the CPVA limits unnecessary contact with victims and minimizes the trauma that may occur as the result of their images appearing in numerous federal investigations.

Background

The distribution of child pornography is widespread, complex, and a dangerous threat to children everywhere.² Perpetrators of this crime exploit children by taking sexually explicit and abusive images of children and circulating the images, primarily on the Internet. According to the National Center for Missing and Exploited Children (NCMEC), many child victims are repeatedly re-victimized because the images are spread among countless perpetrators and may remain on the Internet for the rest of their lives. According to the FBI, offenders circulate millions of these abusive images using encryption, the Dark Web, and social media apps as cover for their crimes, making it very difficult for law enforcement to identify and prosecute them.³ Child victims are not limited to any age group and can span in age from infancy to teenagers. At times, victims are coerced to produce their own images while some victims are not even aware that the abusive images were taken and distributed. Law enforcement agencies and advocacy organizations typically refer to child pornography as "child exploitation material" or "child sexual abuse material" because these terms most accurately reflect the sexual abuse and exploitation experienced by child victims.

FBI field office Victim Specialists are responsible for providing services and information to victims. As of September 2019, there were approximately 170 Victim Specialists located throughout the FBI's 56 field offices. In addition, the VSD has approximately 10 Victim Notification Analysts who serve in VSD headquarters and support FBI field office Victim Specialists with their efforts to notify victims.⁴ Within the VSD, the CPVA was created to be the central repository for information regarding identified federal victims of child sexual abuse material. One of the CPVA's key responsibilities is to provide contact information to law enforcement regarding federal victims of child sexual abuse material for the purposes of victim notification. The CPVA coordinates outreach to child victims and their parent or guardian and determines if

² United States law defines child pornography as any visual depiction of sexually explicit conduct involving a minor. 18 U.S.C. § 2256 (2016)

³ The terms "dark web" and "darknet" are often used to refer to a part of the Internet that consists of services and websites that cannot be accessed through standard web browsers; instead, specific software, configurations, or authorization is needed for access. While accessing the dark web is not illegal, dark web sites are often used to engage in illegal activities because users can hide their identity and location.

⁴ These positions were added in FY 2017. Before this date, the Victim Specialists handled victim notification on their own.

the victim or guardian wishes to be notified regarding subsequent investigations and prosecutions involving images of the child.⁵ As described below, in addition to serving FBI cases, the CPVA performs this role on behalf of other federal law enforcement agencies that investigate child sexual abuse material, including Immigration and Customs Enforcement, U.S. Postal Inspection Service, and various branches of military police.

To perform its notification role, the CPVA maintains a tracking system that stores the names, contact information, and notification preferences of identified victims of child sexual abuse material. The CPVA database contains no images. Images are primarily maintained at NCMEC, which serves as a central repository for images discovered during investigations involving child sexual abuse material throughout the country and the world.⁶ NCMEC maintains a secured database called the Child Recognition and Identification System. This secured system contains a large collection of child sexual abuse material submitted by law enforcement agencies throughout the world and is designed to identify victims in images and videos through enhanced visual testing.

The CPVA and NCMEC have a crucial partnership and play central roles in ensuring identified child victims are notified and understand their rights as victims of child sexual abuse material. By performing a centralized notification role, one of the CPVA's purposes is to mitigate the additional trauma that victims may experience when receiving multiple notifications from various law enforcement agencies of other cases that may also include their images. By serving as a central repository of child sexual abuse images, NCMEC helps law enforcement agencies determine whether the same child sexual abuse material appear in multiple investigations.

Victim's Rights under Federal Law and Policy

The Victims' Rights and Restitution Act (VRRRA) provides that "at the earliest opportunity after the detection of a crime at which it may be done without interfering with an investigation, a responsible official shall," among other things, identify the victims and inform them of their rights to receive specified services, including any restitution or other relief to which they may be entitled under the law.⁷ Thereafter, the responsible official shall provide the victim notice of specified events in connection with the investigation and prosecution of the crime and status of the accused. The Crime Victims' Rights Act (CVRA) provides victims with various rights including the right to reasonable, accurate, and timely notice of any public court proceeding involving an offense against the victim; the right not to be excluded from such public court proceedings; the right to reasonably be heard at such public court proceedings; and the right to restitution as provided in law.⁸ In addition, the CVRA states that Department officers and employees "shall make their best efforts to see that crime victims are notified of, and accorded," the rights described in the CVRA. The CVRA defines a victim as

⁵ Throughout the remainder of this report, we use the term "guardian" to encompass both "guardian" and "parent."

⁶ NCMEC is a private, non-profit 501(c)(3) corporation whose mission is to help find missing children, reduce child sexual exploitation, and prevent child victimization. NCMEC has been designated by Congress to receive an annual grant from the Department's Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention to operate several programs alongside law enforcement and to administer a central repository for information related to images and video files of possible child exploitation victims. See 34 U.S.C. § 11293

⁷ 34 U.S.C. § 201041

⁸ 18 U.S.C. § 3771 (2006 & Supp. III 2009)

“a person directly and proximately harmed as a result of the commission” of a federal offense and includes a guardian for a victim who is under 18 years old. The AG Guidelines echo the requirements in these laws and provide additional guidelines for notifying victims of their rights and providing them information and services, including specific guidelines for child victims. For example, the AG Guidelines state that the right to be reasonably heard at public court proceedings includes informing victims that they can make a Victim Impact Statement. The AG Guidelines state that, “Children who are depicted in child pornography that has been advertised, transported, distributed, received, accessed, or possessed are presumed to have been directly and proximately harmed as a result of those crimes for purposes of determining whether they are a victim under the VRRRA or CVRA.”

Notifying Victims

When victims are first identified in federal cases that involve abusive images, law enforcement and victim specialists discuss with the guardian the possibility that the abusive images may appear in future investigations. Victim specialists also ensure that the child victim and guardian receive a letter as formal notification of the victim’s identification as a possible victim of a federal crime. The letter includes details on how to access the Victim Notification System (VNS), which can provide updates on the investigation and subsequent prosecution and incarceration, if applicable.⁹ In addition, around the same time, law enforcement submits the image to NCMEC to determine if the image has been seen in other cases.

When newly identified victims are submitted to NCMEC, the files are added into the NCMEC Child Recognition and Identification System database, and NCMEC groups all the images or videos depicting that child and assigns a “series” name. In 2011, NCMEC adopted a new policy whereby files from a series that have not been seen previously were assigned a generic alphanumeric series name. If the series has been seen before, it is given a unique representative name, such as “Jane Doe.” Prior to 2011, all identified series entered into NCMEC’s database received a unique representative name. A series may involve more than one child, if more than one child appears in a given image. After an identified series is added to the NCMEC database, NCMEC notifies via email both the submitting agent and the CPVA that the series has been added to its database.

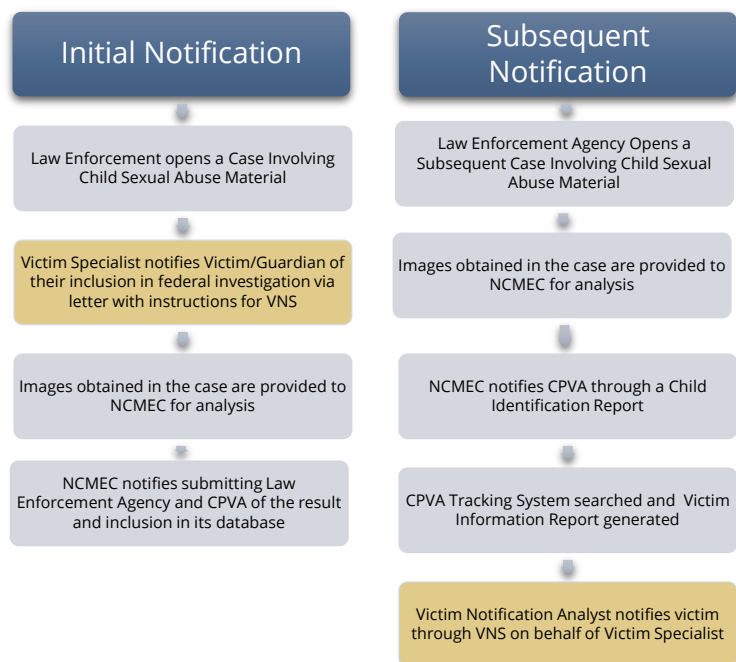
For subsequent investigations regarding possession of previously identified images, NCMEC provides to CPVA a Child Identification Report. The Child Identification Report consists of the “series” name, images or video filenames associated with the series, and the law enforcement point of contact who can provide more information if needed. CPVA then generates Victim Information Reports to be sent to investigators for all federal investigations for which there is a corresponding Child Identification Report. The Victim Information Report that is sent to investigators consists of the series name; the victim’s name and date of birth; the guardian and relationship to the victim, if applicable; notification preference and preferred method of contact; and whether a Victim Impact Statement is on file. For FBI investigations, CPVA concurrently sends the Victim Information Report to a Victim Specialist in the respective field office, as well as to a Victim Notification Analyst, who will coordinate with the designated Victim Specialist to notify the victim and

⁹ The FBI partners with the U.S. Attorney’s Offices and the Federal Bureau of Prisons in the utilization of an automated system referred to as VNS. VNS is a browser-based application run by the Department of Justice’s Executive Office for United States Attorneys designed to provide information to victims of federal crimes regarding the status of an investigation, subsequent stages of the criminal prosecution, and the location and status of an offender while incarcerated or when released. Victims who initially choose to receive notifications are given instructions on the use of VNS.

guardian through VNS. Figure 1 illustrates the typical notification process for federal investigative cases involving child sexual abuse material and highlights the point of victim notification.

Figure 1

Notification Processes for FBI Investigative Cases Involving Child Sexual Abuse Material



Source: OIG Analysis

As described above, the FBI performs initial notifications to child victims when an investigative case is opened. In subsequent notifications, NCMEC performs an analysis and notifies CPVA. CPVA searches its tracking system, generates a Victim Information Report, and notifies the victim. However, we found that when an image has been seen in multiple investigations CPVA does not use the information provided by NCMEC for notification purposes until NCMEC designates the image as “actively traded”.¹⁰ We explain the “actively traded” threshold used by the FBI and the significant concerns we have with the FBI’s application of this threshold to its notification efforts in the “Audit Results” section of this report.

Office of the Inspector General Audit Approach

Our audit objective was to evaluate the FBI’s processes for notifying victims of child sexual abuse material and their guardians. To achieve this objective, we reviewed documentation and assessed CPVA procedures.

¹⁰ During our audit, VSD officials told us that an image is considered to be actively traded when the image has been seen in five or more investigations. However, at the end of the audit, those officials told us that NCMEC officials had clarified that it determines an image as actively traded when the image has been seen in five or more unique CyberTipline Reports or Child Recognition & Identification System Reviews. The details of this clarification are discussed in the “Actively Traded Threshold Adopted by the FBI” section of the report.

We conducted site visits at FBI Headquarters and NCMEC to understand the notification processes for federal investigative cases involving child sexual abuse material. Specifically, at the FBI's VSD we interviewed various staff and managers including the Assistant Director, a Unit Chief, the Child Pornography Victim Assistance Coordinator and Victim Analyst, three Regional Program Managers, two Child Victim Program Advisors, the Victim Notification Coordinator, and a Victim Notification Analyst. Also, at FBI Headquarters, we obtained and evaluated extensive information pertaining to the CPVA tracking system. At NCMEC, we interviewed managers and staff, as well as the FBI liaison.

This audit initially contained two additional objectives that were to: (1) assess the FBI's efficiency of processing images after they are obtained through investigative processes and (2) assess the results achieved with the Crime Victims Fund to provide assistance to victims of child sexual abuse material. This audit report does not cover these objectives because of the COVID-19 pandemic which placed limitations on our ability to effectively and securely obtain the sensitive information needed to complete this audit work. The OIG will consider these objectives in future audit planning and as pandemic-related circumstances change.

Audit Results

We found that the FBI did not consistently implement the legal and Department policy requirements for notifying federal victims of child sexual abuse material and their guardians.¹¹ The Attorney General Guidelines for Victim and Witness Assistance (AG Guidelines) require that identified victims of federal crime, including victims of child sexual abuse material, are notified of their rights and offered appropriate services. Victim notification for federal cases primarily is coordinated by the FBI through the Child Pornography Victim Assistance Program (CPVA). However, we identified several critical weaknesses in the CPVA's coordination of these notification efforts. While child victims are notified when a federal investigative case is first opened involving the original production of their images, the CPVA does not consistently coordinate notification to all victims for subsequent federal investigations that involve their abusive images until an image is determined to be "actively traded," a threshold created by the National Center for Missing and Exploited Children (NCMEC) and adopted by the FBI. The FBI initially told us, the CPVA only makes a notification, in accordance with this "actively traded" threshold, when the abusive image has been seen in five or more different cases. At the conclusion of the audit, the FBI received clarification from NCMEC that the "actively traded" threshold did not relate to investigative cases but refers to five or more unique CyberTipline Reports or Child Recognition & Identification System Reviews. We believe federal law and the AG Guidelines dictate that victims are to be notified in every case in which they are victimized. By failing to notify victims or their guardians of subsequent victimizations under this actively traded threshold, these victims are potentially denied certain victim rights such as the preparation of a victim impact statement, possible restitution, and the opportunity to reconsider their notification preferences. We also determined that publicly available information from the FBI designed to assist victims of child sexual abuse material does not accurately portray the current notification processes.

The "Actively Traded" Threshold Adopted by the FBI

We found, when child victims are first identified in federal cases involving abusive images, that the law enforcement agency and Victim Specialist ensure that the child victim and the child's guardian receive a letter that provides notification of the victim's identification as a possible victim of a federal crime. However, we determined that the FBI did not notify the child victim and the guardian again until the child's abusive image had become "actively traded." The FBI's CPVA officials informed us during our audit that it understood actively traded to mean the image had been seen in five or more investigations. VSD officials told us that the FBI adopted the actively traded threshold from NCMEC. According to NCMEC, the designation "actively traded" was established by NCMEC as an internal operational standard to generate statistics for education and prevention efforts and to help lawmakers better understand the criminal component of online distribution of child sexual abuse material. We were told that the NCMEC classification of "actively traded" was never intended to be used by any external entity, such as the FBI, for any purpose. NCMEC officials told us that NCMEC established an actively traded threshold based on a belief that it provided the best method for determining that a series had become active among the community of persons interested in child sexual abuse images.

In July 2021, FBI officials told us they discussed the actively traded threshold with NCMEC and determined the FBI's interpretation of the term was different than what NCMEC intended and applied. For its own

¹¹ Victims' Rights and Restitution, 34 U.S.C. § 20141 and Crime Victims' Rights Act 18 U.S.C. § 3771 (2006 & Supp. III 2009). These authorities are described above in the Background section.

internal purposes, NCMEC defines a series as “actively traded” if images or videos depicting an identified child from a series have been seen in five or more unique CyberTipline Reports or Child Recognition & Identification System Reviews. Instead, the FBI interpreted the actively traded threshold as pertaining to images seen in five or more investigations. NCMEC provides quarterly reports to CPVA that contain a comprehensive list of all identified series, highlighting the series that have become “actively traded” during the prior 3 months.

For the period of July 2020 through September 2020, NCMEC reported that it had identified a total of 14,369 series of child sexual abuse images involving a total of 19,163 child victims. Of these cases, 1,778 were actively traded series involving 2,028 individual victims. Specific to investigations conducted by federal agencies, there was a total of 6,021 series associated with 8,693 child victims. Of the 8,693 federal victims, NCMEC determined that there were 841 child victims among 781 actively traded series.¹² Those 8,693 federal victims or their guardians may have received a victim notification related to the first crime involving their image; however, the CPVA, under its current process, would not have attempted to notify them of subsequent crimes until their images met the actively traded threshold. Table 1 shows a breakdown of all series identified by NCMEC as well as those designated as actively traded series as of September 2020.

Table 1

All Series Identified by NCMEC as of September 2020

Investigative Agency Type	Total Number of Series	Total Number of Child Victims	Number of Actively Traded Series	Number of Actively Traded Victims
Federal	6,021	8,693	781	841
ICAC ^a	4,059	5,071	198	203
International	870	1,091	626	803
Local	2,915	3,690	138	146
Military	303	348	12	12
State	201	270	23	23
Total	14,369	19,163	1,778	2,028

^a The Internet Crimes Against Children (ICAC) Task Force Program is a national network of 61 coordinated task forces representing more than 4,500 federal, state, and local law enforcement, and prosecutorial agencies.

Source: National Center for Missing and Exploited Children

According to the FBI, only 10 to 15 percent of all identified child sexual abuse material series will meet the actively traded threshold. This is consistent with the statistics from July 2020 through September 2020, as

¹² The total number of child victims differed from actively traded series because some series included multiple child victims.

indicated in the chart above. Also, according to the FBI, when a series associated with a federal case becomes actively traded, the victim or guardian is to be:

- Contacted by a Victim Specialist and asked to complete a Notification Preference Form (NPF) that provides an opportunity to opt in or out of notifications regarding any subsequent investigations related to their images,¹³
- Given an option to provide a Victim Impact Statement detailing the impact of a defendant's crime on the victim and fulfilling the right that victims be reasonably heard,
- Provided an explanation of restitution options if available, and
- Advised they may change their notification preferences at any time.

While this process provides support for federal victims with actively traded images, it does not consistently provide the same benefits to victims whose images may appear in more than one investigation. We do not believe that the actively traded threshold for notification purposes is consistent with federal law or the AG Guidelines, which do not include any thresholds or limits to victims' rights based on the number of times they are victimized. Consequently, some unnotified victims may lose opportunities to provide Victim Impact Statements for subsequent crimes involving their images, seek restitution for those subsequent crimes, and receive additional victim services. Due to inconsistent and poor tracking methods, as we describe below, neither we nor the FBI were able to determine the number of federal victims who may not have been afforded such opportunities.

We discussed with FBI officials our concern that the actively traded threshold may violate the rights of the very victim of child sexual abuse material that the FBI is trying to assist. Initially, we were told that the CPVA made this decision in order to streamline the notification of victims by focusing its efforts on the actively traded victims. Subsequently, these officials said the VSD understood a series to be labeled "actively traded" once it had been determined by five or more investigative cases to have been distributed in violation of criminal law. During the course of our audit, VSD officials met with NCMEC officials about VSD's understanding of the definition of "actively traded" and NCMEC officials advised VSD that VSD's understanding was incorrect. NCMEC officials informed VSD that NCMEC does not track series at the investigative case level. Regardless of miscommunication between the FBI and NCMEC concerning NCMEC practices, VSD had an obligation to notify victims of their rights.

As a result of these discussions during the course of our audit, FBI officials recognized that use of the actively traded threshold may have deprived an unknown number of victims of legally required notifications, possible access to restitution, and other victim services. In December 2020, FBI officials told us that they

¹³ The Notification Preference Form is used by the FBI to identify the victim's choice on whether they want to be notified of updates in federal cases they are a part of or have been added to. It provides victims with guidance on how to seek restitution for the crime, indicates the victim's preferred method of notification, and allows the victim the opportunity to provide a Victim Impact Statement, which is retained by the U.S. Attorney's Office for use in future cases. FBI officials told the OIG that CPVA does not offer the victims the NPF during the initial notification in order to minimize the victims' trauma.

were drafting a mitigation plan intended to ensure that our concerns were addressed. In April 2021, the FBI provided us with a final mitigation plan that included what the FBI told us were action items intended to modify victim outreach to include all distributed series instead of only those that meet the “actively traded” threshold. The mitigation plan included the following actions: (1) incorporate other documents outside of NCMEC’s quarterly reports into its outreach coordination, (2) request NCMEC to modify its procedures to ensure documentation reported to the FBI contains all series with a federal nexus, (3) perform a more in-depth review of current series to determine whether distribution of images has occurred, and (4) request specific enhancements to NCMEC quarterly reports. Although these actions change the VSD workflow, NCMEC has always provided documents outside of the quarterly reports to provide victim information and updates as it completes its analyses.

In addition, the mitigation plan identifies actions the FBI plans to take to change its procedures for conducting victim notification. However, the plan does not clearly state that victims will be notified of their rights every time their images are involved in a federal investigation. Therefore, we recommend that the FBI develop and implement clearly defined procedures that establish a process by which all current and future victims of child sexual abuse material are properly notified of their rights in each case where their image appears, consistent with federal law and the AG Guidelines. We also recommend that the FBI complete the in-depth review of all series that the FBI told the OIG it was performing as part of its mitigation plan to determine whether distribution of images has occurred, and use the results of the review to provide, where possible, notification to all victims.

Public Information on the CPVA Program

The FBI provides web-based information for all crime victims, including victims of child sexual abuse material. However, our review of this information showed that it did not accurately portray the FBI’s victim notification practices in place for victims of child sexual abuse material at the time our review. We believe the available information overstated the breadth of efforts undertaken to notify victims of child sexual abuse material. For example, the FBI’s website includes a victim and guardian reference guide, which states, “[i]f distribution of the images is confirmed, the Victim Specialist will request the victim and/or guardian complete and sign a Notification Preference Form.” However, as discussed above, the FBI does not seek to notify child victims or guardians until the actively traded threshold is met. While we did not find any evidence that the FBI intentionally tried to mislead victims, we believe accurate information is essential, especially as it pertains to victims of crimes involving child sexual abuse material.

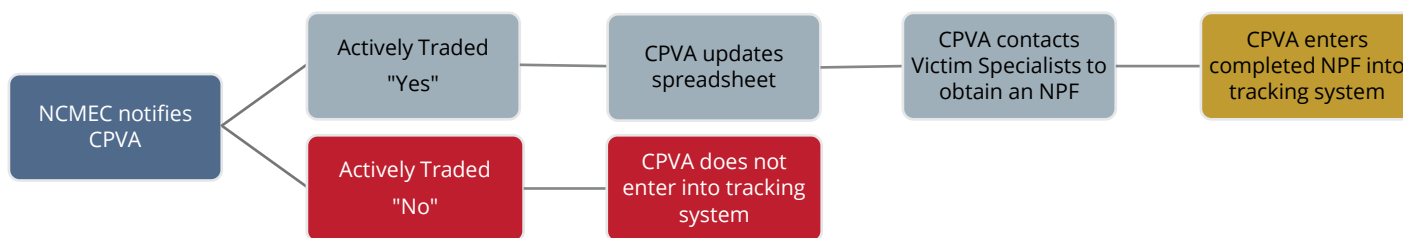
We discussed this concern with Victim Services Division officials who told us that they agree with our assessment. As discussed above, the FBI created a mitigation plan including what the FBI told us were action items intended to modify the FBI’s victim outreach to include all distributed series instead of only those that meet the “actively traded” threshold, and the OIG recommends additional items, as described above, to help ensure the FBI achieves this intent. As the FBI works to implement the recommendations from this report, it should ensure the information provided to the public is consistent with its current procedures for notification to all victims. Therefore, we recommend that the FBI update its publicly available information for victims of child sexual abuse material to ensure the information provided is consistent with its current procedures for notification to all victims.

CPVA's Victim Tracking Efforts

As previously noted, the CPVA is responsible for managing a centralized tracking system for victims whose images have been exploited. CPVA assumed this responsibility to reduce the number of times criminal justice officials contact a child victim or their guardians to request information that may have been previously obtained by the FBI or other federal law enforcement. In the same manner that NCMEC serves as the central repository for images, the CPVA tracking system is intended to serve as a central repository for victim names, addresses, races, dates of birth, contact information, law enforcement points of contact, notification preferences, and Victim Impact Statement preferences for all previously identified federal victims. According to the CPVA staff, at least a victim's name and date of birth are needed for a record to be created in the tracking system. However, a record is not created in the tracking system until the CPVA has received a Notification Preference Form (NPF) from the victim. The status of outstanding NPFs that have either not yet been provided to the victim for completion or not yet been returned by the victim are tracked by CPVA on a separate spreadsheet outside of its tracking system. Figure 2 illustrates the actions taken by the CPVA to enter "actively traded" series into the CPVA tracking system.

Figure 2

Actions Taken for "Actively Traded" Series



Source: OIG Analysis

Incomplete CPVA Tracking System

As shown in Figure 2 above, the CPVA's tracking system does not contain information for previously identified victims whose images do not meet the actively trade threshold. As discussed earlier in this report, by applying the actively traded threshold, the CPVA has left an unknown number of victims unaware of subsequent victimizations and their rights related to them. In addition, although the tracking system is intended to contain all actively traded series, some series meeting the threshold are not in the tracking system because they do not have an NPF on file. As previously noted, according to CPVA staff, the minimum information required for an entry into its tracking system is a victim's name and date of birth. However, even though this basic information may be easily obtained from records or sources other than an NPF, the CPVA does not proactively attempt to obtain it from those sources for inclusion in the tracking system. The CPVA's sole reliance on a completed NPF for entry into its tracking system is problematic because, as the central repository for information on victims of child sexual abuse material, the CPVA's primary system of record for these victims is inadequate and incomplete.

CPVA Efforts to Obtain and Track NPFs

During our discussions with CPVA staff, we were told that the CPVA maintains an electronic spreadsheet outside of the tracking system to track the status of outstanding NPFs. As noted above, it is not until an NPF is received by CPVA for a victim listed on this spreadsheet that a record for the victim is established in the CPVA tracking system.

To better understand the extent to which information on the spreadsheet had been included in the CPVA tracking system, we randomly selected 100 actively traded series, as of June 2019, from the 1,637 included on the spreadsheet to determine how many had been entered into the tracking system. Of the 100 sampled actively traded series, we found that 49 had not been entered into the CPVA tracking system because NPFs had not been obtained for the victims associated with the series. Of the remaining 51 sampled actively traded series found in the tracking system, 11 included no information other than the series name, while 2 others had the series name along with information indicating that all efforts had been exhausted to contact the victim or guardian.¹⁴ The 38 remaining actively traded series were entered into the tracking system with all victim information obtained from the received NPFs.

We also assessed the status of NPFs for all 1,637 actively traded series listed on the spreadsheet. As of June 2019, these 1,637 actively traded series were associated with 1,857 federal victims. Overall, we determined that completed NPFs were on file for only 631 actively traded series (39 percent) which included 747 victims. For the remaining 1,006 actively traded series on the spreadsheet, further action was required. The further action required was related to either the victim's need to initially complete the form, update the form upon their 18th birthday, or both.

We further reviewed the status of the 1,006 actively traded series requiring further action and determined that for 919 of these actively traded series, which included 1,011 victims, the CPVA had not received an initial NPF. For another 85 of these actively traded series, which included 94 victims, updated NPFs were required. The remaining 2 actively traded series included 5 victims, some of whom required initial forms and others of whom required updated forms. Consequently, approximately 54 percent of the actively traded victims on CPVA's spreadsheet had not been entered into the tracking system at all and therefore were not being notified of the status of their cases, or given the option to be notified, despite having met the actively traded threshold. Absent properly completed NPFs, CPVA staff do not know victims' or guardians' notification preferences and are unable to properly notify all actively traded victims. Table 2 provides the breakdown of our analyses of the 1,637 actively traded series listed on the CPVA spreadsheet as of June 2019.

¹⁴ CPVA staff explained that in the past their practice was to include series without victim information in the tracking system, but that practice was later abandoned, and the current practice requires at least a name and date of birth.

Table 2

NPF Status for Actively Traded Series on CPVA Spreadsheet as of June 2019

NPF Form Status	Actively Traded Series	Percent of Actively Traded Series	Number of Victims Included in Actively Traded Series	Percent of Victims Included in Actively Traded Series
No initial NPF	919	56%	1,011	54%
Need updated NPF	85	5%	94	5%
Some victims without initial NPF and others without updated NPF	2	Less than 1%	5	Less than 1%
Completed	631	39%	747	40%
Total	1,637		1857	

Source: OIG Analysis

The low percentage of victims with an NPF on file is also reported in the Attorney General Compliance Reports. The VSD prepares Annual Compliance Reports to report victim assistance compliance efforts to the Attorney General. For the years 2016 through 2019, the low percentage has been included in the Annual Compliance Reports and demonstrates the relatively low number of victims being notified. Table 3 summarizes data from the Annual Compliance Reports for fiscal years (FY) 2016 through 2019. For the years listed in the table, the percentage of actively traded series without victim information ranged from 47 percent in FY 2017 to 64 percent in FY 2019.

Table 3

Annual Compliance Reports CPVA Statistics

Fiscal Year	Actively Traded Series Tracked by CPVA	Actively Traded Series with Victim Information	Percentage of Actively Traded Series with Victim Information	Actively Traded Series without Victim Information	Percentage of Actively Traded Series without Victim Information
2016	886	458	52%	428	48%
2017	1,056	556	53%	500	47%
2018	1,280	557	44%	723	56%
2019	1,637	587	36%	1,050	64%

Source: Attorney General Annual Compliance Reports

When we inquired as to how CPVA staff seeks to obtain outstanding NPFs, we were told that once a series is identified as actively traded, the staff notifies an assigned field office Victim Specialist who is then responsible for contacting the victim or guardian and obtaining a fully compliant NPF.¹⁵ The CPVA spreadsheet discussed above is also used to document the dates on which the CPVA staff initially contacts a Victim Specialist regarding the need to obtain a completed NPF. However, our review of the spreadsheet found that it did not consistently reflect the dates on which the CPVA staff contacted the Victim Specialists. Because of the CPVA's inconsistent and poor tracking methods in connection with the spreadsheet, we could not assess the average time it takes for the CPVA to obtain completed NPFs. However, the examples below demonstrate the effect of this poor record keeping and seemingly inefficient process.

- In one actively traded series, an FBI Victim Specialist was notified in November 2011 about the need for an NPF and obtained it more than 6 years later, in April 2018. The law enforcement contact for the victim was an FBI Special Agent, meaning that the CPVA could have likely obtained the basic information needed for the tracking system much sooner.
- In another actively traded series, an FBI Victim Specialist was notified in July 2012 about the need for an NPF and obtained it more than 6 years later in August 2018. The law enforcement contact for the victim was from a non-federal agency.
- In another actively traded series, an FBI Victim Specialist was notified in October 2014 about the need for an NPF and obtained the form more than 2 years later, in August 2017. The law enforcement contact for the victim was an FBI Special Agent.
- For five other actively traded series, CPVA notified the FBI Victim Specialists in 2012 about the need for initial NPFs, but as of June 2019, CPVA did not document anything further about the forms, including whether they were obtained or whether officials exhausted all efforts to contact the victims or guardians. These five series included two with federal points of contact (one FBI Special Agent and one task force officer) and three non-federal points of contact (state or local law enforcement officers).
- For another six actively traded series, FBI Victim Specialists were notified in September 2011 about the need for NPFs but as of June 2019, CPVA did not document anything further about the forms, including whether the forms were obtained or whether officials exhausted all efforts to contact the victims or guardians. The law enforcement contact for one of the series was a non-federal law enforcement contact. The remaining victim law enforcement contacts were from the FBI.

While these examples demonstrate the extensive time that is sometimes required to obtain NPFs, we believe they also demonstrate that the CPVA could be more proactive in obtaining the basic information it needs for its tracking system so these victims can potentially be notified of future victimizations absent an NPF. In FBI cases, the CPVA can query the FBI's Sentinel case management system or contact the case agent for this type of information. For other federal agencies and non-federal agencies, the CPVA can reach out to the point of contact for the investigating agency to attempt to obtain the information. FBI officials told us

¹⁵ "Fully compliant" is defined as having either a current NPF or documented due diligence efforts on file. Due diligence documentation explains that all efforts were exhausted to contact the victim or guardian.

that, as they develop the previously discussed mitigation plan, CPVA staff are exploring the possibility of gathering victim information with a simple questionnaire for the law enforcement point of contact. Additionally, they have begun exploring the use of the Law Enforcement Enterprise Portal, which is used by law enforcement agencies to gather victim information.¹⁶ Although the CPVA intends to work with other agencies, the FBI has no supervisory authority over these entities to require that information be shared. We were also told that a two-step process utilizing leads in the FBI's Sentinel case management system is being developed, which would allow the CPVA to retrieve victim information earlier and allow victim notifications to occur sooner.

Overall, FBI officials agreed with our concerns regarding the lack of information in the actively traded spreadsheet and the time taken to obtain completed NPFs. According to the FBI mitigation plan discussed in prior sections of this report, the VSD is seeking to incorporate elements of the spreadsheet into the tracking system. However, because the current spreadsheet meets certain program needs, it will likely remain in place until enhancements are made to the tracking system. In addition, FBI officials told us that their ability to obtain victim information is limited by the fact that foreign agencies are not required to share victim information. Nonetheless, additional efforts could have been made to obtain the basic information needed to include many of these victims in the CPVA tracking system, making it a more complete record of victims of child sexual abuse material as intended. According to the FBI mitigation plan, the VSD has made concentrated efforts since December 2020 to ensure victim specialists collect identifying information for actively traded victims and conduct outreach for victims' preferences for future case alerts. FBI officials told us that as of March 2021, there had been an increase of about 15 percent of victims on file from state, local, and other federal investigations. Those officials also said that victims on file from FBI investigations increased by 13 percent and that the VSD recognized that victim information should be entered into the tracking system prior to receipt of an NPF.

To address the low number of victims reflected in the tracking system, the VSD planned to revise its workflow to collect identifying information for entry into the tracking system before conducting outreach to the victims identified in that information. This differs from the prior workflow in which victims were entered into the tracking system only after the NPF had been obtained. The revised workflow allows for the victim specialists to coordinate with points of contact and report victim identifying information for entry into the tracking system immediately upon receipt, even if outreach to the victim and family has not been made or has been unsuccessful. VSD also plans to transition to the use of Sentinel in lieu of the spreadsheet distributed to FBI Victim Specialists and VSD program managers. This method is intended to ensure that individuals such as the field office supervisors and crimes against children squad employees see and respond timely to requests for victim information including submission of the NPF. VSD officials believe that the use of Sentinel will lead to better overall tracking and follow-up to ensure victims are promptly contacted regarding their rights, as well as the options and resources available to them.

We recommend that the FBI ensure all identified series either have NPFs on file or maintain complete information on the status of efforts to acquire the forms. In addition, we recommend that the FBI establish a standard process for obtaining victim information that is readily available from sources other than

¹⁶ The Law Enforcement Enterprise Portal (LEEP) is managed by the FBI Criminal Justice Information Services Division. LEEP is a secure platform for law enforcement agencies, intelligence groups, and criminal justice entities that provides web-based investigative tools and analytical resources used to strengthen their cases and share departmental documents.

completed NPFs to achieve a more comprehensive tracking system for victims. We also recommend that the FBI ensure the use of a single tracking system, such as the CPVA tracking system or another system, as the: (1) comprehensive, reliable, and central repository for all victim information, to include information available from other sources such as Sentinel; and (2) source of all reports regarding the status of victim notification information and preferences.

Conclusion and Recommendations

Generally, child victims and their guardians are notified by investigators and victim specialists when their images are first identified in a federal investigation involving victims of child sexual abuse material. However, as of the time period of our audit, when those images were found in subsequent investigations, the FBI did not consistently notify these child victims and their guardians or advise them of their rights if their images were in more than one investigation. Instead, victims were only notified again when their images were considered “actively traded.” Because of the actively traded threshold, an unknown number of victims were potentially denied the rights afforded to them under the law and Attorney General Guidelines. Additionally, the FBI’s web-based information for victims of child sexual abuse material overstated the breadth of efforts undertaken to notify victims of child sexual abuse material. Further, the tracking system used to support the FBI’s notification efforts only contained actively traded victims with a completed NPF. Without completed NPFs, CPVA staff did not know victims’ or guardians’ notification preferences and were unable to properly and sufficiently notify all actively traded victims. In addition, FBI records did not consistently reflect CPVA’s efforts to notify Victim Specialists to obtain completed NPFs, and as a result we could not determine an average of how long this process normally takes. Based on a review of several series, we found that some NPFs were outstanding or incomplete for as long as 6 years. FBI officials agreed with our concerns and worked on a mitigation plan.

We recommend that the FBI:

1. Develop and implement clearly defined procedures that establish a process by which all current and future victims of child sexual abuse material are properly notified of their rights in each case where their image appears, consistent with federal law and the AG Guidelines.
2. Complete the in-depth review of all series that the FBI told the OIG it was performing as part of its mitigation plan to determine whether distribution of images has occurred, and use the results of the review to provide, where possible, notification to all victims.
3. Update its publicly available information for victims of child sexual abuse material to ensure the information provided is consistent with its current procedures for notification to all victims.
4. Ensure all identified series either have Notification Preference Forms on file or maintain complete information on the status of efforts to acquire the forms.
5. Establish a standard process for obtaining victim information that is readily available from sources other than completed Notification Preference Forms to achieve a more comprehensive tracking system for victims.
6. Ensure the use of a single tracking system, such as the CPVA tracking system or another system, as the: (1) comprehensive, reliable, and central repository for all victim information, to include information available from other sources such as Sentinel; and (2) source of all reports regarding the status of victim notification information and preferences.

APPENDIX 1: Objectives, Scope, and Methodology

Objective

The objective of this audit was to evaluate the FBI's process for notifying victims of child sexual abuse material and their guardians.

Scope and Methodology

The scope of the audit covers the period from October 2015 through September 2020, which was the conclusion of our field work. Because of limitations on our audit work and that of the FBI as the result of the COVID-19 pandemic, we were unable to perform subsequent fieldwork.

We conducted audit testing at FBI Headquarters in December 2019. To perform our testing, we obtained a universe of actively traded series, along with the supplemental electronic spreadsheet maintained by the VSD from April 2019 to June 2019 to track victim information. We judgmentally selected a sample of actively traded series to assess the extent to which the CPVA Tracking System contained victim information and Notification Preference Forms had been obtained for all such series.

We obtained a universe of actively traded series maintained by NCMEC from July 2020 through September 2020. We also performed limited testing of the VSD processes for maintaining Notification Preference Forms. We obtained the FY 2016 through 2019 Annual Compliance Reports the FBI used to report victim assistance compliance to the Attorney General. We reviewed these reports to substantiate our audit test results for the percentage of victims for whom the FBI maintained Notification Preference Forms.

We conducted this performance audit 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 our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Internal Controls

Our review of internal controls covered the FBI established policies and procedures for notifying victims and their guardians of child sexual abuse materials. We identified the FBI's management responsible for the establishment and maintenance of internal controls in accordance with the Attorney General Guidelines for Victim and Witness Assistance. We reviewed how the FBI controls were followed and allowed for the FBI to identify and respond to risks related to the notification provided to all victims and guardians of child sexual abuse material. We examined how the FBI used external information provided by the National Center for Missing and Exploited Children in its processes for notifying victims and guardians of child sexual abuse material. In addition, we examined how the FBI used its internal systems for tracking victim information to determine if all victims and their guardians received proper notification. We also examined how the FBI communicated to the designated staff the information needed to ensure victims and their guardians received proper and timely notification of child sexual abuse material. We reviewed the FBI's monitoring

principles for performing routine review of its control processes to address deficiencies that impact the FBI's efforts to notify victims and guardians of child sexual abuse material.

The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our reviews are limited, it may not have disclosed all internal control deficiencies that may have existed at the time of the audit.

Compliance with Laws and Regulations

In this audit we also tested, as appropriate, given our audit objective and scope, selected victim actively traded series, records, procedures, and practices, to obtain reasonable assurance that FBI's management complied with federal laws and regulations for which non-compliance, in our judgment, could have a material effect on the results of our audit. Our audit included examining, the FBI's compliance with the following laws and regulations that could have a material effect on the FBI's operations:

- United States Attorney General Guidelines for Victims and Witness Assistance
- Victims' Rights and Restitution Act, 34 U.S.C. § 20141
- Crime Victims' Rights Act, 18 U.S.C. § 3771

This testing included interviewing the FBI personnel and reviewing the Child Pornography Victim Assistance Tracking System, along with supplemental electronic spreadsheet maintained by the VSD for tracking victim information.

Sample-based Testing

We performed sample-based testing to select samples to obtain an understanding of the documentation the FBI used to supplement the information included in the CPVA Tracking System. This non-statistical sample design did not allow projection of the test results to the universe from which we selected the samples.

Computer-Processed Data

During our audit, we obtained information from the CPVA Tracking System. We did not test the reliability of the system as a whole; therefore, any findings identified involving information from systems were verified with documentation from other sources.

APPENDIX 2: The FBI Response to the Draft Audit Report



U.S. Department of Justice

Federal Bureau of Investigation

Washington, D. C. 20535-0001

September 9, 2021

The Honorable Michael E. Horowitz
Inspector General
Office of the Inspector General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Dear Mr. Horowitz:

The Federal Bureau of Investigation (FBI) appreciates the opportunity to review and respond to your office's report entitled, *Audit of the Federal Bureau of Investigation's Efforts to Notify Victims of Child Sexual Abuse Material*.

We agree that it is important to consistently implement the legal and Department policy requirements for notifying victims of these federal crimes. Victim Services Division remains committed to informing, supporting, and assisting victims in navigating the aftermath of crime and criminal justice process with dignity and resilience. In that regard, we concur with your six recommendations for the FBI.

Should you have any questions, feel free to contact me. We greatly appreciate the professionalism of your audit staff throughout this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Thompson", is written over a horizontal line.

Regina Thompson
Assistant Director
Victim Services Division

Enclosure (1)

cc: Douglas A. Leff, Assistant Director
Michael E. Hensle, Deputy Assistant Director

**The Federal Bureau of Investigation's (FBI) Response to the
Office of the Inspector General's Audit of the Federal Bureau of Investigation's Efforts to Notify
Victims of Child Sexual Abuse Material**

Recommendation #1: The OIG recommends the FBI develop and implement clearly defined procedures that establish a process by which all current and future victims of child sexual abuse material are properly notified of their rights in each case where their image appears, consistent with federal law and the AG Guidelines.

FBI Response to Recommendation #1: Concur. The FBI will enhance current processes and develop new standard operating procedures where needed to ensure all victims of distributed child sexual abuse material are notified in accordance with federal statutes and the AG Guidelines.

Recommendation #2: The OIG recommends the FBI complete the in-depth review of all series that the FBI told the OIG it was performing as part of its mitigation plan to determine whether distribution of images has occurred, and use the results of the review to provide, where possible, notification to all victims.

FBI Response to Recommendation #2: Concur. The FBI initiated and completed a review of all historical documentation received from NCMEC for series that do not yet meet the NCMEC actively traded threshold to determine whether distribution has occurred. To provide current distribution information as the national clearinghouse, NCMEC is also conducting their own comprehensive review of series. The FBI and NCMEC continue collaborative discussions on how to enhance existing automated reports and improve information sharing procedures.

Recommendation #3: The OIG recommends the FBI update its publicly available information for victims of child sexual abuse material to ensure the information provided is consistent with its current procedures for notification to all victims.

FBI Response to Recommendation #3: Concur. Once the comprehensive review of series in OIG recommendation #2 is complete and victim outreach is modified to include all distributed series, all processes will be in line with publicly available information.

Recommendation #4: The OIG recommends the FBI ensure all identified series either have Notification Preference Forms on file or maintain complete information on the status of efforts to acquire the forms.

FBI Response to Recommendation #4: Concur. For those series under the responsibility of the FBI, the FBI will continue to proactively collect identifying information for victims of actively traded series, as well as any series with confirmed distribution identified during the review in OIG recommendation #2.

Furthermore, the FBI plans to utilize Sentinel leads to increase visibility and accountability, set a standardized completion time for submission of the Notification Preference Form, and ensure victims are promptly notified of their rights and the resources available. While CPVA was intended to be a joint effort comprised of various agencies who investigate these crimes, the FBI has no supervisory authority

for series under the responsibility of other federal agencies or foreign law enforcement. However, the FBI will continue to explore ways to enhance information sharing.

Recommendation #5: The OIG recommends the FBI establish a process for obtaining victim information that is readily available from sources other than completed Notification Preference Forms (NPF) to achieve a more comprehensive tracking system.

FBI Response to Recommendation #5: Concur. As stated in the report, the FBI recognized that victim information can and should be entered prior to receipt of a NPF that formally indicates preferences with respect to notification of a victim's images in other cases. The FBI has changed its workflow to collect victim identifying information first, then acquire the NPF. For series under the responsibility of the FBI, transition to Sentinel leads will streamline receipt and entry of victim identifying information. The FBI continues to leverage all appropriate methods to obtain initial identifying information for all series at the first instance of distribution, regardless of agency responsibility.

Recommendation #6: The OIG recommends the FBI ensure the use of a single tracking system, such as the CPVA tracking system or another system, as the: (1) comprehensive, reliable, and central repository for all victim information, to include information available from other sources such as Sentinel; and (2) source of all reports regarding the status of victim notification information and preferences.

FBI Response to Recommendation #6: Concur. The FBI is currently engaged in a multi-phased project to digitize and consolidate documentation related to all series. This project will also centralize the tracking of victim outreach efforts.

APPENDIX 3: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The Office of the Inspector General (OIG) provided a draft of this audit report to the Federal Bureau of Investigation (FBI). The FBI's response is incorporated in Appendix 2 of this final report. In response to our audit report, the FBI concurred with our recommendations and discussed the actions it will implement in response to our findings. As a result, the status of the audit report is resolved. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendations for the FBI:

- 1. Develop and implement clearly defined procedures that establish a process by which all current and future victims of child sexual abuse material are properly notified of their rights in each case where their image appears, consistent with federal law and the Attorney General Guidelines (AG Guidelines).**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that it will enhance current processes and develop new standard operating procedures where needed to ensure all victims of distributed child sexual abuse material are notified in accordance with federal statutes and the AG Guidelines. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation that procedures have been developed and implemented to establish a process to properly notify all current and future victims of child sexual abuse material of their right in each case where their image appears, consistent with federal law and the AG Guidelines.

- 2. Complete the in-depth review of all series that the FBI told the OIG it was performing as part of its mitigation plan to determine whether distribution of images has occurred, and use the results of the review to provide, where possible, notification to all victims.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that it initiated and completed a review of all historical documentation received from the National Center for Missing and Exploited Children (NCMEC) for series that do not yet meet the NCMEC actively traded threshold to determine whether distribution occurred. To provide current distribution information as the national clearinghouse, the FBI reported that NCMEC is also conducting its own comprehensive review of series. The FBI stated that it continues collaborative discussions with NCMEC on how to enhance existing automated reports and improve information sharing procedures. This recommendation is resolved based on the FBI's concurrence with the recommendation.

This recommendation can be closed when we receive documentation for the completion of the in-depth review performed of all series that the FBI told the OIG it performed as part of its mitigation plan to determine whether distribution of images has occurred and the reviewed results, where possible, were used to notify all victims.

3. **Update the publicly available information for victims of child sexual abuse material to ensure the information provided is consistent with its current procedures for notification to all victims.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that once the comprehensive review of series stated in Recommendation 2 is complete and victim outreach is modified to include all distribution series, all processes will be in line with publicly available information. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation that the FBI completed its comprehensive review as stated in Recommendation 2, modified its victim outreach to include all distribution series, and made all processes consistent with publicly available information for victims of child sexual abuse material.

4. **Ensure all identified series either have Notification Preference Forms on file or maintain complete information on the status of efforts to acquire the forms.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that for those series under the responsibility of the FBI, it will continue to proactively collect identifying information for victims of actively traded series as well as any series with confirmed distribution identified during the review in Recommendation 2. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation that all identified series either have Notification Preference Forms on file or maintain complete information on the status of efforts to acquire the forms.

5. **Establish a standard process for obtaining victim information that is readily available from sources other than completed Notification Preference Forms to achieve a more comprehensive tracking system for victims.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response it recognized that victim information can and should be entered prior to receipt of a Notification Preference Form that formally indicates preferences with respect to notification of victim's images in other cases. The FBI reported that it has changed its workflow to collect victim identifying information first, then acquire the Notification Preference Form. For series under its responsibility, the FBI stated that transition to Sentinel leads will streamline receipt and entry of victim identifying information. The FBI stated that it continues to leverage all appropriate methods to obtain initial identifying information for all series at the first instance of distribution, regardless of agency responsibility. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation to support the established standard process for obtaining victim information that is readily available from sources other than completed Notification Preference Forms to achieve a more comprehensive tracking system for victims.

6. Ensure the use of a single tracking system, such as the Child Pornography Victim Assistance Program (CPVA) tracking system or another system, as the: (1) comprehensive, reliable, and central repository for all victim information, to include information available from other sources such as Sentinel; and (2) source of all reports regarding the status of victim notification information and preferences.

Resolved. The FBI concurred with our recommendation. The FBI stated in its response it is currently engaged in a multi-phased project to digitize and consolidate documentation related to all series. The project will also centralize the tracking of victim outreach efforts. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation to support the use of a single tracking system, such as the CPVA tracking system or another system, as the: (1) comprehensive, reliable, and central repository for all victim information, to include information available from other sources such as Sentinel; and (2) source of all reports regarding the status of victim notification information and preferences.