# Accountable Systems: Fusion Center Prototype



Spring 2010







The Decentralized Information Group explores technical, institutional, and public policy questions necessary to advance the development of global, decentralized information environments.

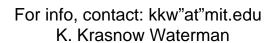




## Agenda

- Challenge of Accountability
- Prototyping Fusion Center information sharing
- Scenarios
  - 1. 2 parties, 1 document, 1 policy
  - 2. Policy calls
    - 1. Another policy (understanding definitions & cross-ontology reasoning)
    - 2. Another fact (drawing from additional resources)
  - 3. Pre-processing for subjective judgments
  - 4. Modeling substituting parties or policies
  - 5. Validating ensuring a hard result
  - 6. Scaling modeling the Privacy Act
    - 1. Adding to the cross-ontology knowledge base
  - 7. Future possibilities
- Future work
- Technical Notes
- Team







## Challenge

Organizations have obligations regarding the collection, use, and sharing of information.





## Examples

- Law
  - HIPAA
  - SOX
  - Privacy Act
- Regulation
  - Know Your Customer
  - Suspicious Activity Reporting
- Contract
  - Business partners
  - Vendors
- Policy
  - Corporate
  - Association





### Accountability

How should they prove to others that

How should they prove to others that they are meeting those obligations?





### The Goal – Accountable Systems

Ability for systems to determine whether each use of data is/was permitted by the relevant rules for the particular data, party, and circumstance and make that decision available to access control, audit, and other technology for real-time enforcement, retrospective reporting, redress, and risk modeling.

System, system on the wall... Is this fair use after all?







## About this Project

- Sponsor: Department of Homeland Security
- Modeling Fusion Centers
  - Information sharing
  - Privacy rules
- Creating a prototype Accountable System





## Assumptions

- Web-based
  - All users and files on internet or intranet
- Semantic Web
  - Greater interoperability, reusability, and extensibility
- Security & Authentication
  - Enhancement not replacement
- Enhancing Accountability & Transparency
  - NOT replacing lawyers

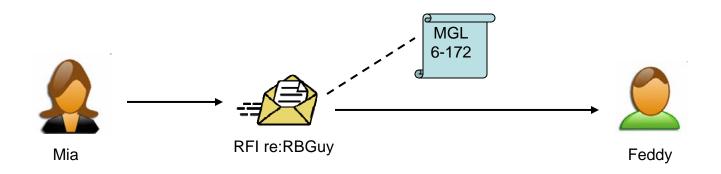




### Scenarios

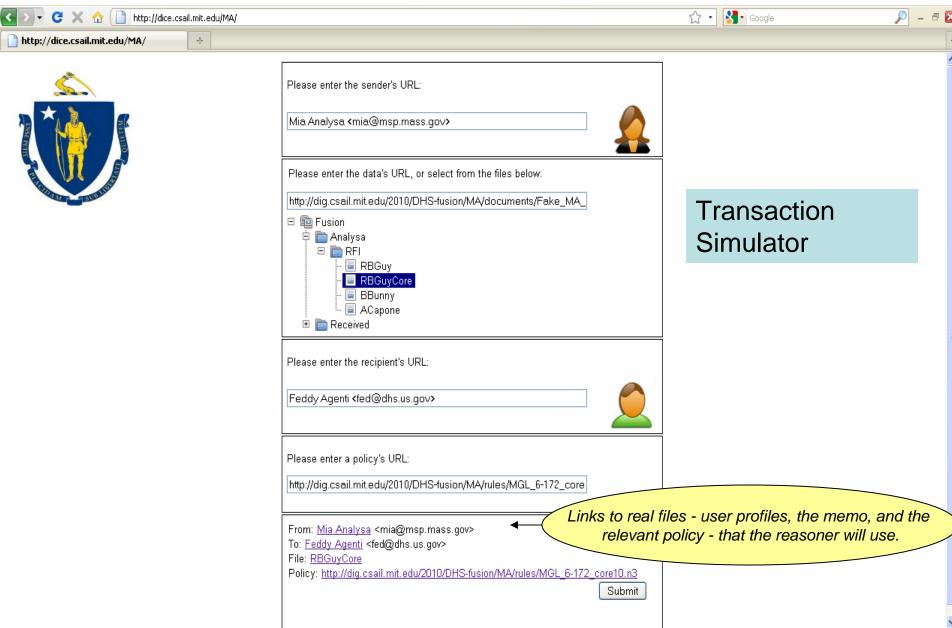
### Scenario 1

- Massachusetts analyst (Mia) sends Request for Information (RFI) to Department of Homeland Security agent (Feddy).
- RFI contains criminal history info about a specific person (RBGuy); regulated by Massachusetts General Law 6-172.











For info, contact: kkw"at"mit.edu K. Krasnow Waterman



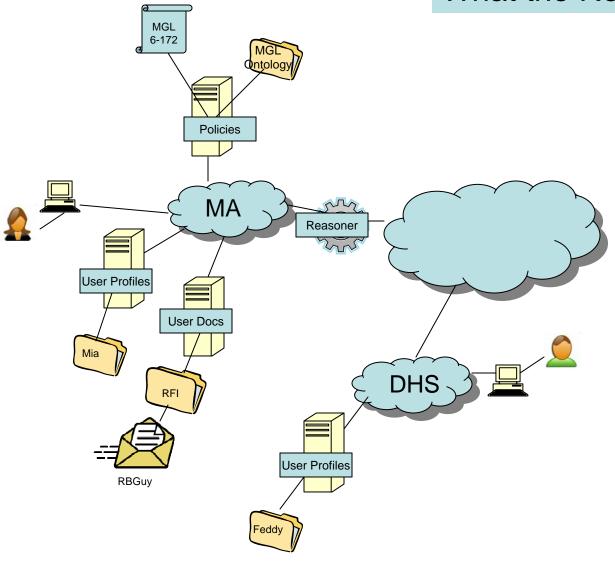
## Rule: Mass. General Law § 6-172 (Privacy of Criminal Records)

- Applies to
  - Criminal Justice Agencies
  - Agencies given statutory permission
    - E.g., military recruiting
  - Agencies determined to be appropriate recipients in the public interest
  - Requests by the general public





### What the Reasoner Knows

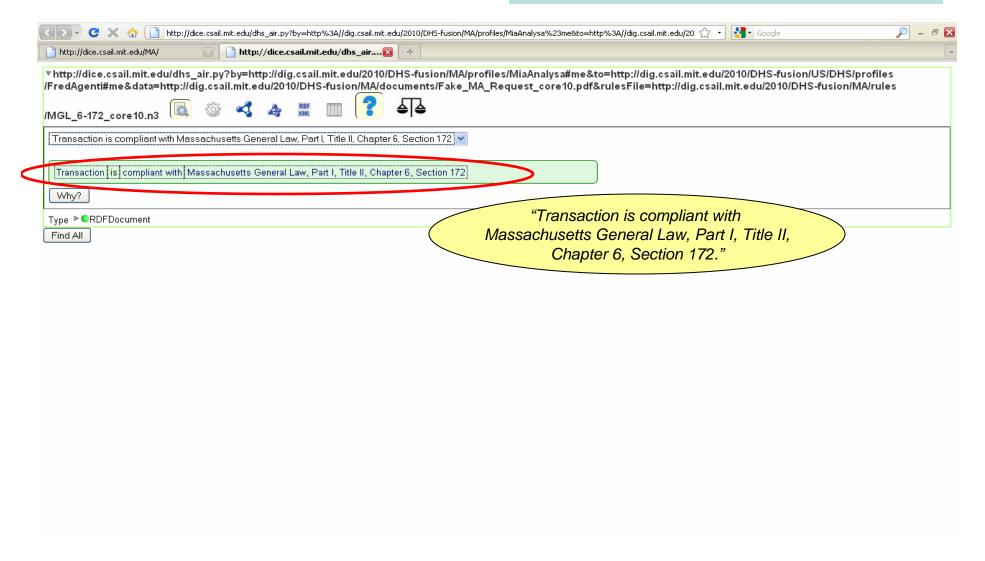




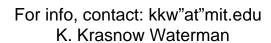
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#### Simple Compliance Answer









#### **Detailed Explanation**







## Accomplishment

- Reasoner received
  - Mia's user profile (27 facts)
  - Feddy's user profile (25 facts)
  - Mia's document (6 facts)
  - MGL § 6-172 (35 sub-rules)
- Produced correct result!

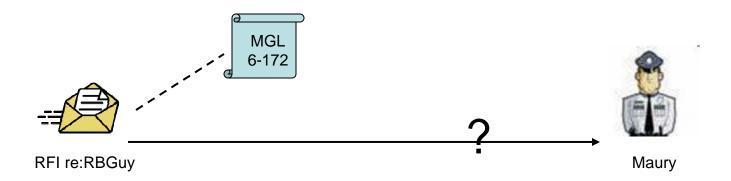




### Scenarios

### Scenario 2

- Baltimore police detective, Maury, does a federated search query across multiple systems; Mia's memo is responsive.
- The Massachusetts system will decide whether Maury can access the document.





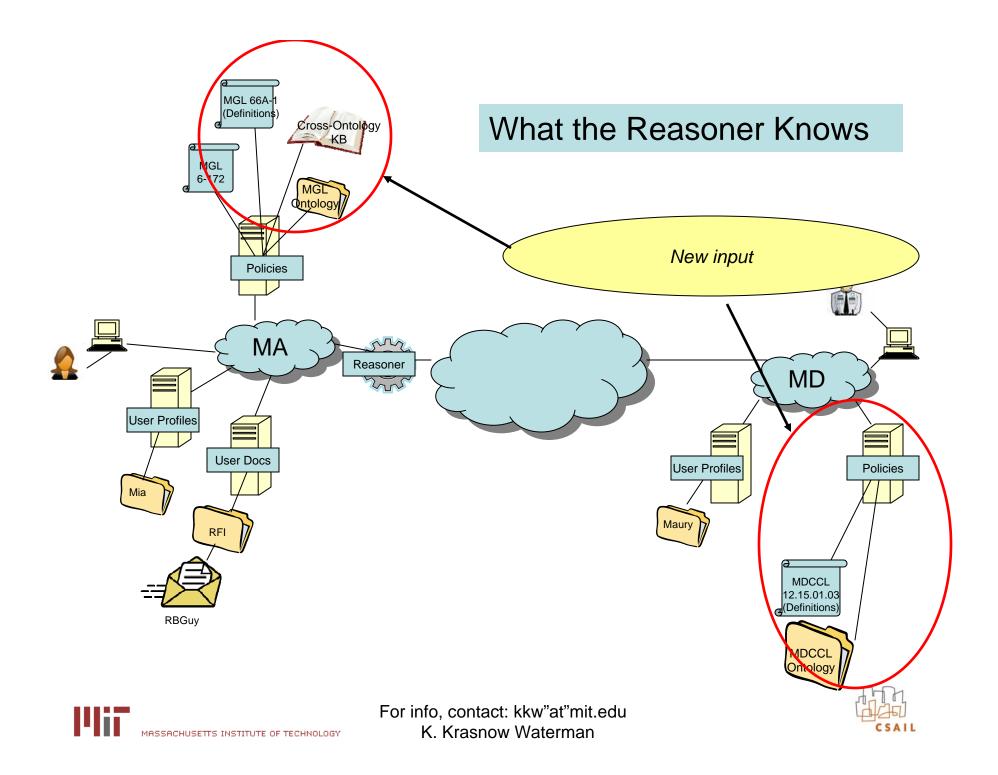


# The rule calls another rule: Comparing definitions

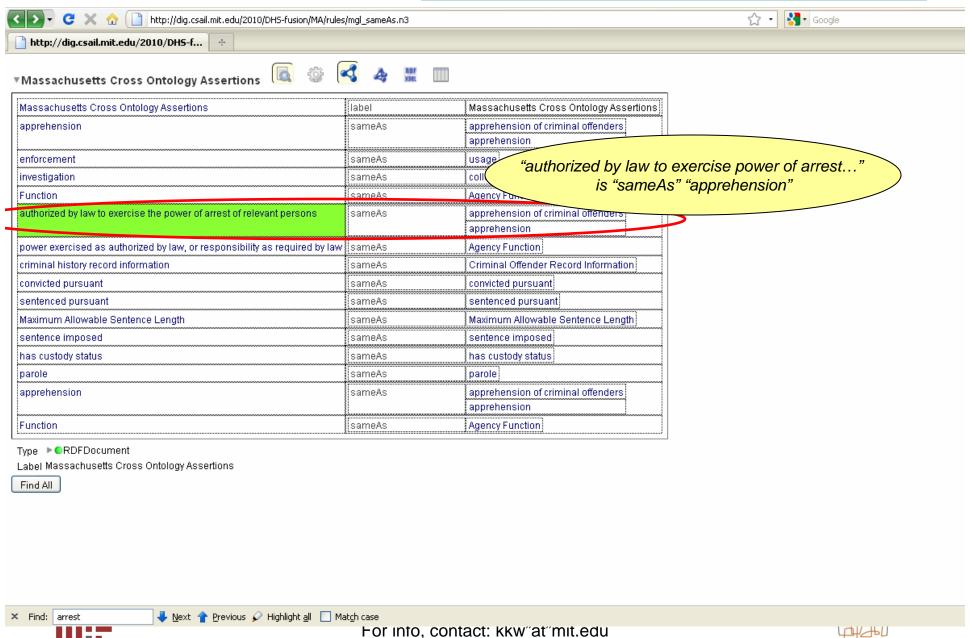
- MGL § 6-172
  - requires recipient be a "Criminal Justice Agency"
    - But, having the label "Criminal Justice Agency" is not sufficient
    - Different jurisdictions have different definitions
- MGL § 66A-1 (defines "CJA")
  - "...an agency at any level of government which performs as its principal function activity relating to (a) the apprehension, prosecution, defense, adjudication, incarceration, or rehabilitation of criminal offenders; or (b) the collection, storage, dissemination, or usage of criminal offender record information."
- Maury's MD user profile
  - "...exercise the power of arrest"



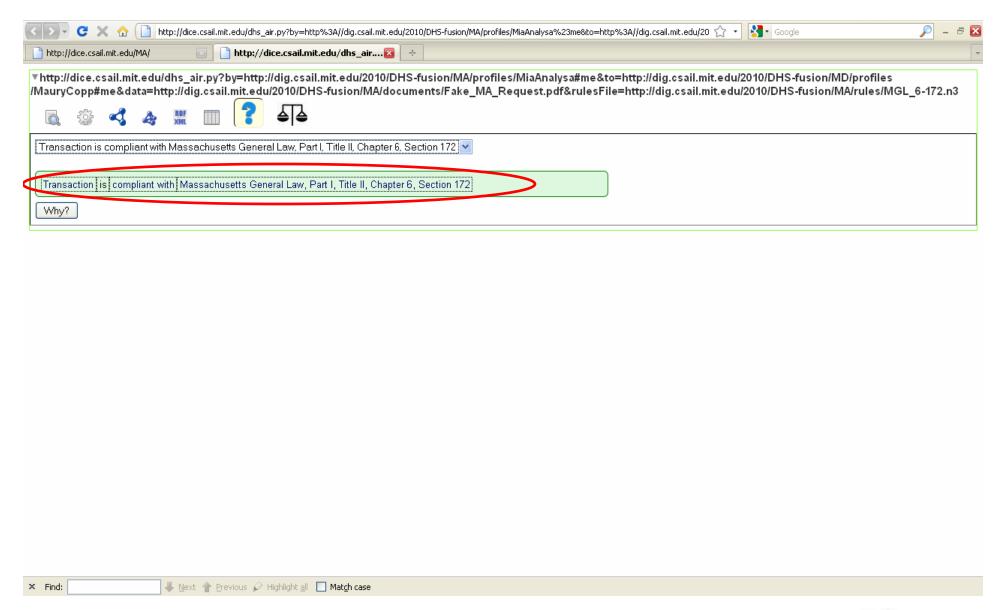




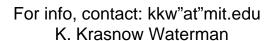
#### Cross-ontology Knowledge Base



MASSACHUSETTS INSTITUTE OF TECHNOLOGY













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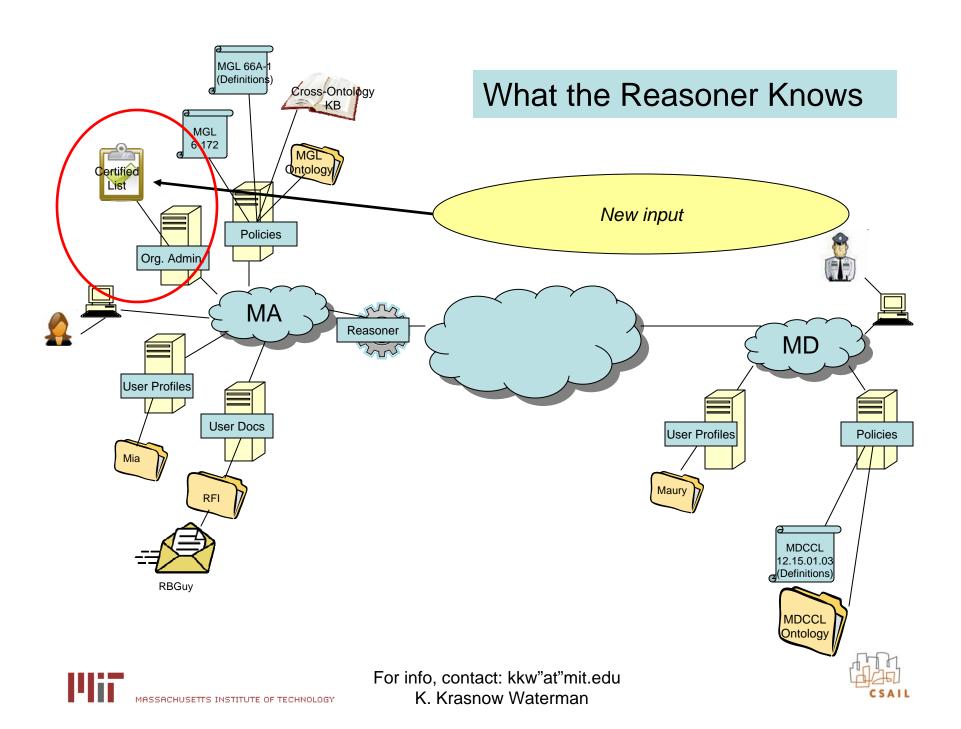


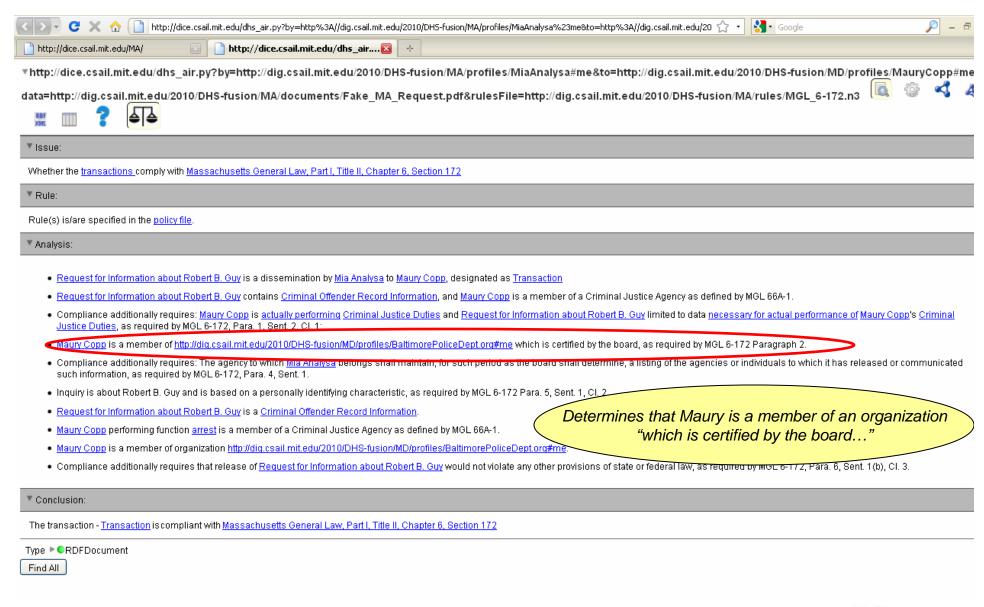
### Adding additional fact requirements

- MGL § 6-172
  - Requires that the requestor be a CJA
  - AND certified by a Board
    - In writing
    - No access until after that certification











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# Addressing subjective rules: In the Result

 In Scenario 1 (Mia to Feddy), the reasoner listed subjective requirements as conditions to the finding of compliance





#### Result Conditional on Subjective







# Next: Pre-processing subjective requirements

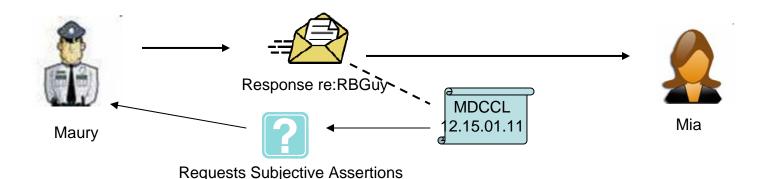




### Scenarios

### Scenario 3

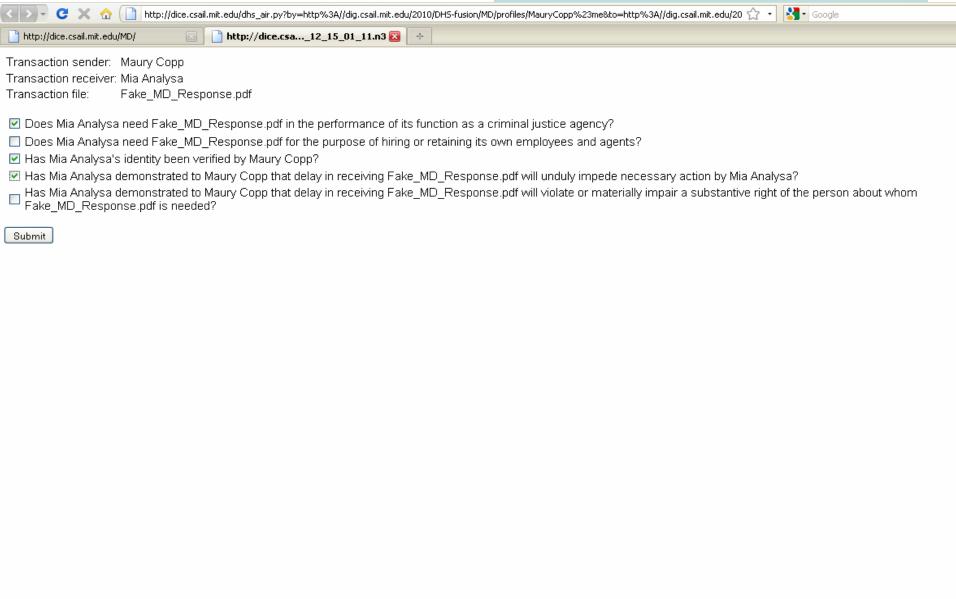
- Baltimore detective (Maury) is sending a response to the Massachusetts analyst's (Mia's) Request for Information (RFI).
- Response contains detailed criminal history info about a specific person (RBGuy); regulated by MD Code of .... Law 12.15.01.11.



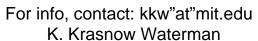




#### Query for Subjective Assertions

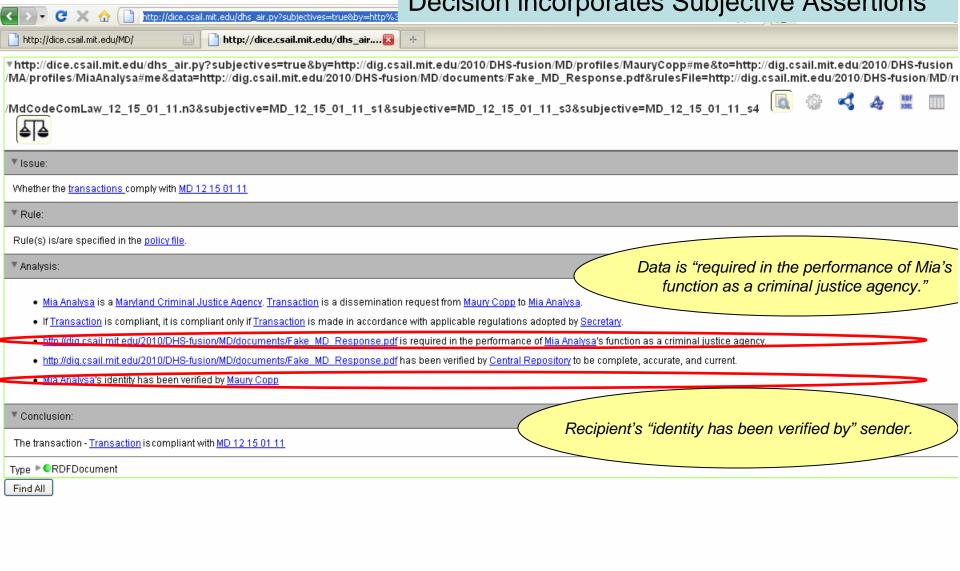








#### **Decision incorporates Subjective Assertions**



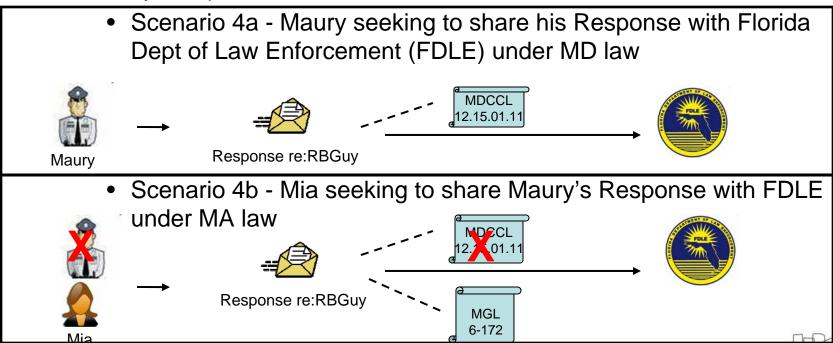




# What if? Applying a different rule

### Scenario 4

- Maury is cautious. Before giving his information to Mia, he wants to understand what she can do with his information.
- Maury compares:



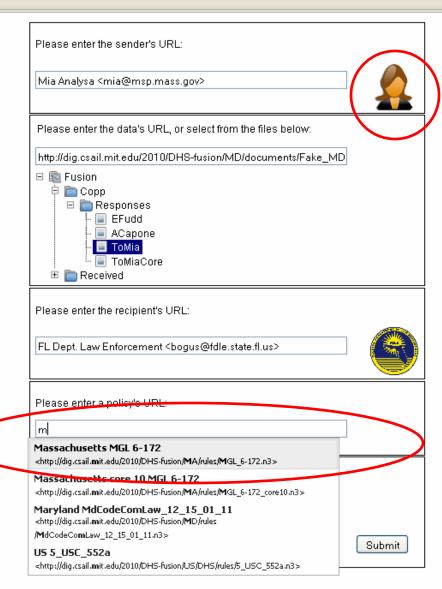


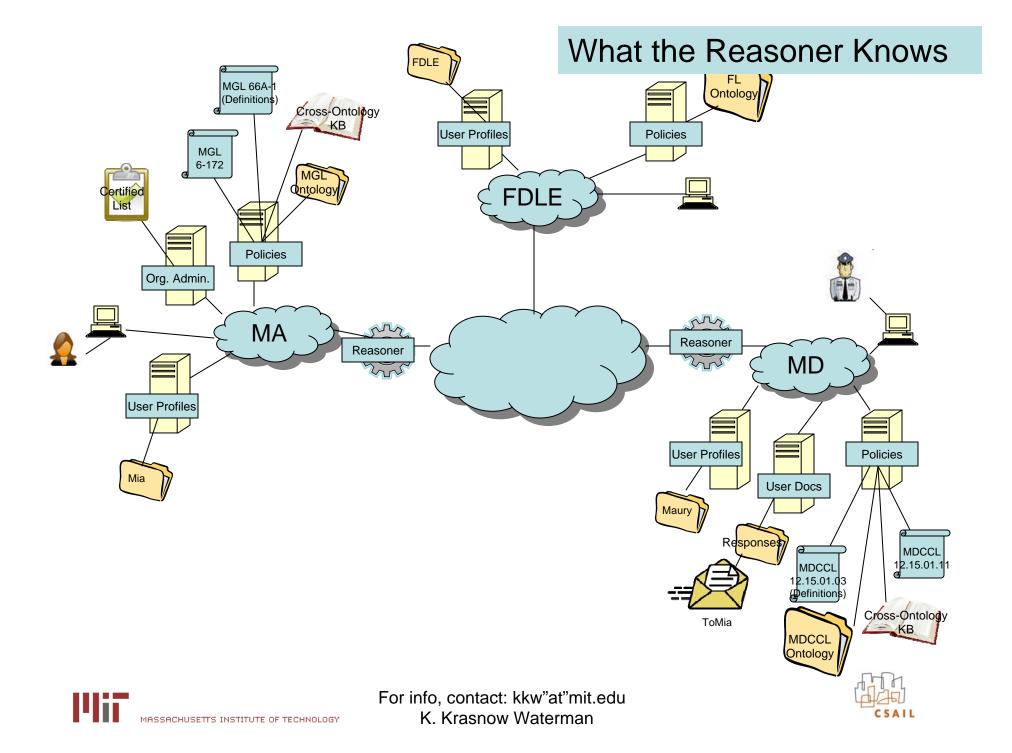
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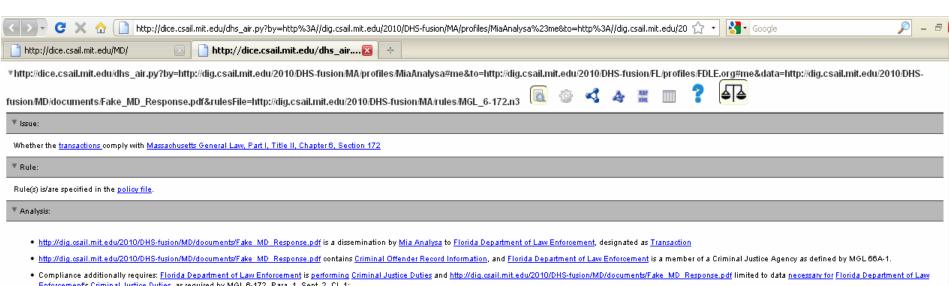


### Risk Modeling with a Different Party &/or Policy









- Enforcement's Criminal Justice Duties, as required by MGL 6-172, Para. 1, Sent. 2, Cl. 1:

  The agency to which Florida Department of Law Enforcement belongs is not certified by the board as required by MGL 6-172, Para. 2.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf is a request by Florida Department of Law Enforcement to Mia Analysa in writing.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD\_Response.pdf contains conviction data CONVICTION DATA and therefore shall be available to any person upon written request per MGL 6-172 Para. 6, Sentence 1a.
- <a href="http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf">http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf</a> contains information indicating custody status and placement within the correction system, and therefore shall be available to any person upon written request per MGL 6-172 Para. 6, Sentence 1b.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD\_Response.pdf does not contain personal information, as stated in MGL 6-172 Para. 6, Sent. 1 (b), Cl. 1.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdfConsists of Conviction Data
- Maximum allowable sentence is imprisonment for a term of five years or more as required by MGL 6-172, Para. 7, Sent. 1, Cl. 1.
- Florida Department of Law Enforcement performing function apprehension is a member of a Criminal Justice Agency as defined by MGL 86A-1.
- http://dig.osail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf contains conviction data. Subject is convicted pursuant to http://law.justia.com/manyland/codes/gps/11-114.html
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf is a criminal history record information.
- http://dig.osail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf contains custody status: mdcol:Parole,
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf maximum allowable sentence length of: 20.
- <a href="http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf">http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf</a> Subject received sentence: 5.
- Compliance additionally requires that release of http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf would not violate any other provisions of state or federal law, as required by MGL 6-172, Para. 6, Sent. 1(b), Cl. 3.

Conclusion:

The transaction - Transaction is compliant with Massachusetts General Law, Part I, Title II, Chapter 6, Section 172

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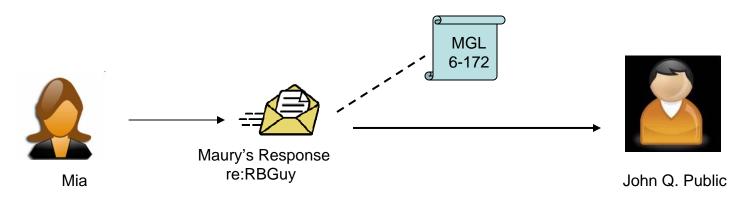




## Testing the policy expression

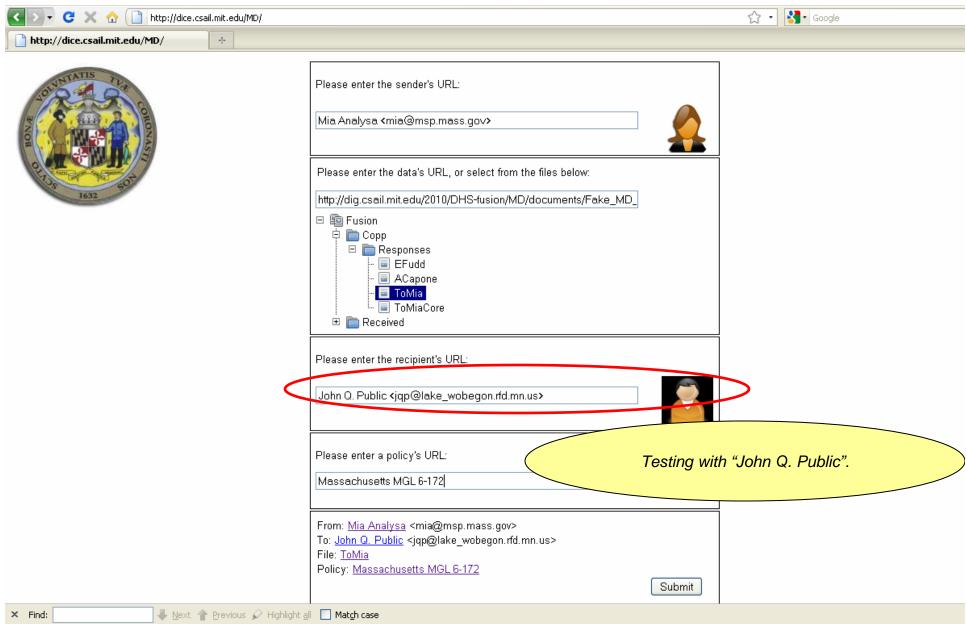
### Scenario 5

- Under the MA law, the public can have access to some criminal history info
  - If there was a conviction
  - If the possible sentence was greater than 5 years
  - If the subject is still in jail or on parole













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http://dice.csail.mit.edu/MD/	
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/JohnQPublic#me&data=http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake_MD_Response.pdf&rulesFile=http://dig.csail.mit.edu/2010/DHS-fusion/MA/rules	
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* Issue.	
Whether the transactions comply with Massachusetts General Law, Part I, Title II, Chapter 6, Section 172	
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Valle:	

Rule(s) is/are specified in the policy file.

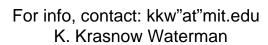
#### ▼ Analysis:

- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf is a dissemination by Mia Analysa to John Q. Public, designated as Transaction
- . John Q. Public is not a member of Criminal\_Justice\_Agency. Compliant dissemination may be possible under other criteria.
- . Subject is not enlisting. Compliant dissemination may be possible under other criteria.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf is a request by John Q. Public to Mia Analysa in writing.
- <a href="http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf">http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf</a> contains conviction data <a href="http://contains.conviction">CONVICTION DATA</a> and therefore shall be available to any person upon written request per MGL 6-172 Para Sentence 1a.
- <a href="http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf">http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD Response.pdf</a> contains information indicating custody status and placement within the correction system, and therefore shall be available to any person upon written request per MGL 6-172 Para. 6, Sentence 1b.
- http://diq.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf does not contain personal information, as stated in MGL 6-172 Para. 6, Sent. 1 (b), Cl. 1.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdfConsists of Conviction Data.
- Maximum allowable sentence is imprisonment for a term of five years or more as required by MGL 6-172, Para. 7, Sent. 1, Cl. 1.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf contains conviction data. Subject is convicted pursuant to http://law.justia.com/maryland/codes/qps/11-114.html.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf contains custody status: mdccl:Parole.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake MD\_Response.pdf maximum allowable sentence length of: 20.
- http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf Subject received sentence: 5.
- Compliance additionally requires that release of <a href="http://diq.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf">http://diq.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake\_MD\_Response.pdf</a> would not violate any other provisions of state or federal law, as required by MGL 6-Para. 6, Sent. 1(b), Cl. 3.

#### Conclusion:

The transaction - Transaction is compliant with Massachusetts General Law, Part I, Title II, Chapter 6, Section 172







## Accomplishment

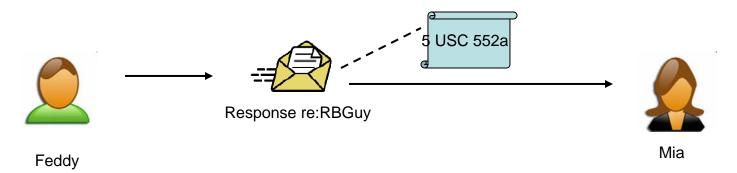
- Recognizes that John Q. Public doesn't meet any of the criteria in paragraph 1.
- Finds the match in sub-rules from paragraph 7.
- Reads the tags from the document to match with the requirements
  - there was a conviction
  - the possible sentence was greater than 5 years
  - the subject is still in jail or on parole





# Scenarios: Increasing Rule Complexity

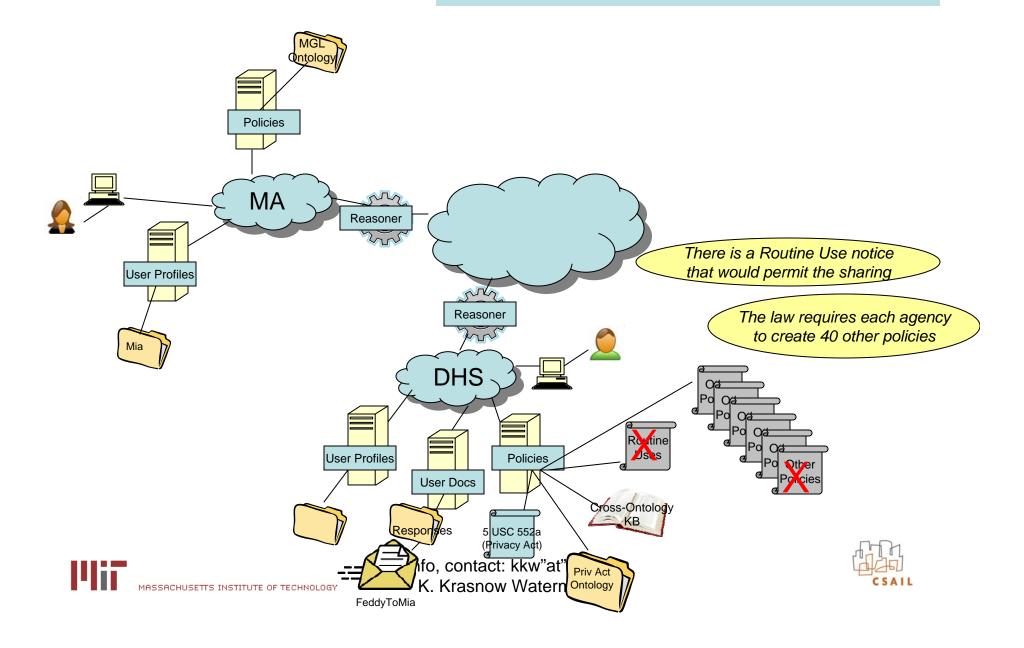
- Scenario 6
  - Feddy from DHS wants to respond to Mia.
  - His response will be regulated by the Privacy
     Act and its 135 sub-rules (1200 lines of code)



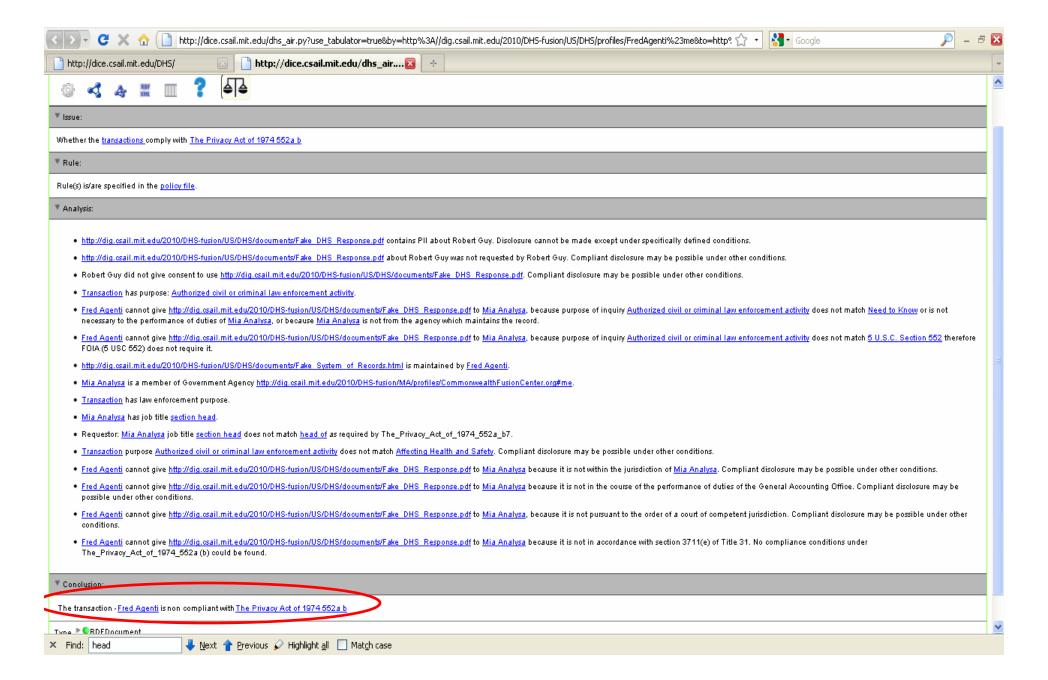




## What the Reasoner Doesn't Know



## Non-compliant for Many Reasons



## Adding to Cross-Ontology Knowledge

- Feddy notices something not quite right.

Requestor: Mia Analysa job title section head does not match head of as required by The\_Privacy\_Act\_of\_1974\_552a\_b7.

- He knows\* he can treat Mia as "head of" her agency for this purpose because the head of her organization delegated the record requesting authority to "section chiefs".
- The system will let him add that equivalency to the cross-ontology knowledge base.

\* DOJ says (http://www.justice.gov/opcl/1974condis.htm):

Record-requesting authority may be delegated down to lower-level agency officials when necessary, but not below the "section chief" level. See OMB Guidelines, 40 Fed. Reg. at 28,955; see also 120 Cong. Rec. 36,967 (1974), reprinted in Source Book at 958, available at <a href="http://www.loc.gov/rr/frd/Military\_Law/pdf/LH\_privacy\_act-1974.pdf">http://www.loc.gov/rr/frd/Military\_Law/pdf/LH\_privacy\_act-1974.pdf</a>.





# Knowledge Base Editor

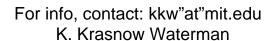


Feddy tells his system that "section chief" and "head of" are equivalent in this context by cutting and pasting their link addresses into the blanks.



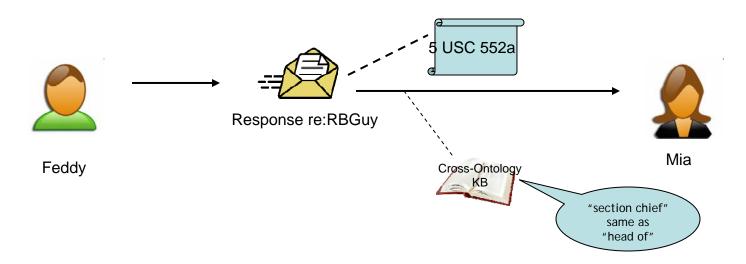
👃 Next 👚 Previous 🔎 Highlight all 🔲 Match case

nead





 Feddy runs his request again (after adding the "same as" information to the cross-ontology knowledge base)













## Possible Future Scenarios

- Hand-shake
  - Recipient is permitted to accept
  - Sender is permitted to send
- Applying multiple rules
- Potentially conflicting rules
- Recognizing compliant pattern and applying it to large volume transactions





## Future Research

- Scalability
  - Goal-directed reasoning
- Transparency
  - Permanent store for TMS
  - Aggregate reporting
- Validation
  - Policy expression
  - Results
- Flexibility
  - Handling incomplete information
  - Propagation

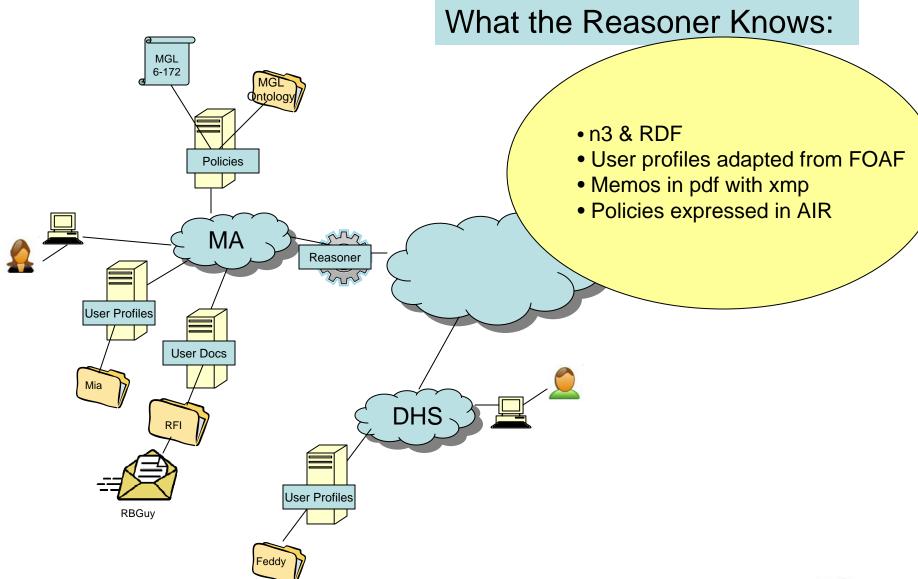




# **Technology Notes**











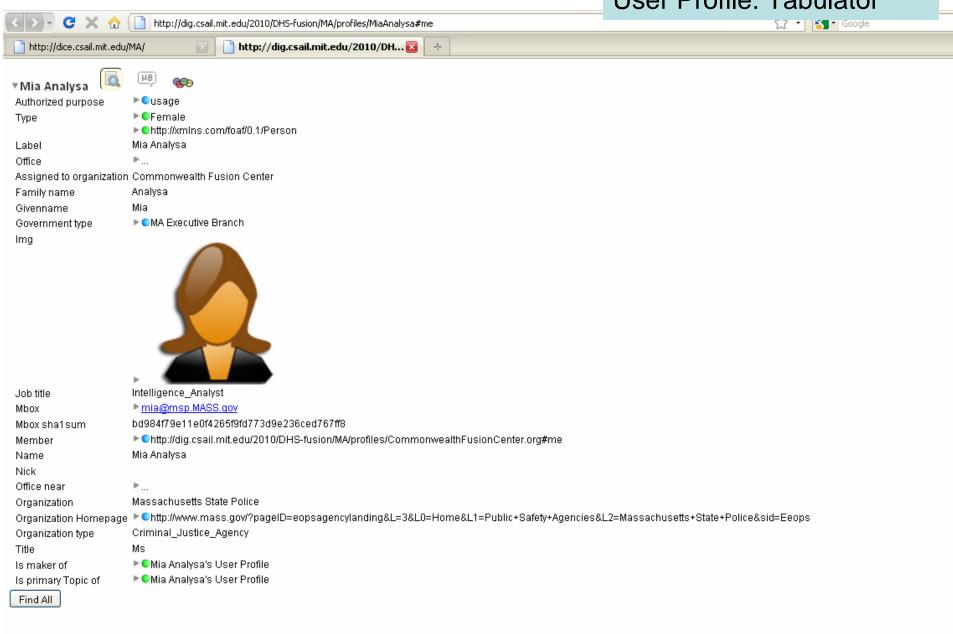
User Profile: rdf

```
File Edit View Help
@prefix rsa: <http://www.w3.org/ns/auth/rsa#>.
@prefix cert: <http://www.w3.org/ns/auth/cert#>.
@prefix dc: <http://purl.org/dc/elements/1.1/>.
@prefix foaf: <http://xmlns.com/foaf/0.1/>.
Oprefix rdfs: <http://www.w3.org/2000/01/rdf-schema#>.
@prefix con: <http://www.w3.org/2000/10/swap/pim/contact#>.
@prefix s: <http://www.w3.org/2000/01/rdf-schema#>.
@prefix geo: <http://www.w3.org/2003/01/geo/wgs84 pos#>.
@prefix doap: <http://usefulinc.com/ns/doap#>.
@prefix fusion: <a href="mailto://dig.csail.mit.edu/2010/DHS-fusion/common/fusion">http://dig.csail.mit.edu/2010/DHS-fusion/common/fusion</a> ONT#>.
@prefix mgl: <http://dig.csail.mit.edu/2010/DHS-fusion/MA/rules/MGL_6-172_ONT#>.
@prefix mglcja: <http://dig.csail.mit.edu/2010/DHS-fusion/MA/rules/MGL_66A-1_ONT#>.
@prefix : <http://dig.csail.mit.edu/2010/DHS-fusion/MA/profiles/MiaAnalysa#>.
      dc:title
        "Mia Analysa's User Profile";
          foaf:PersonalProfileDocument;
    foaf:maker
        <#me>;
    rdfs:seeAlso
         "http://dig.csail.mit.edu/2010/DHS-fusion/MA/rules/MGL_66A-1_ONT.n3";
    rdfs:seeAlso
        "http://dig.csail.mit.edu/2010/DHS-fusion/MA/rules/MGL_6-172_ONT.n3";
    foaf:primaryTopic
        <#me>.
<#me>
          con: Female, foaf: Person;
    s:label
        "Mia Analysa";
    con:office
              [ con:address
                       [ con:city
                           "Maynard";
                       con:state
                            "MA";
                       con:country
                           "USA";
```



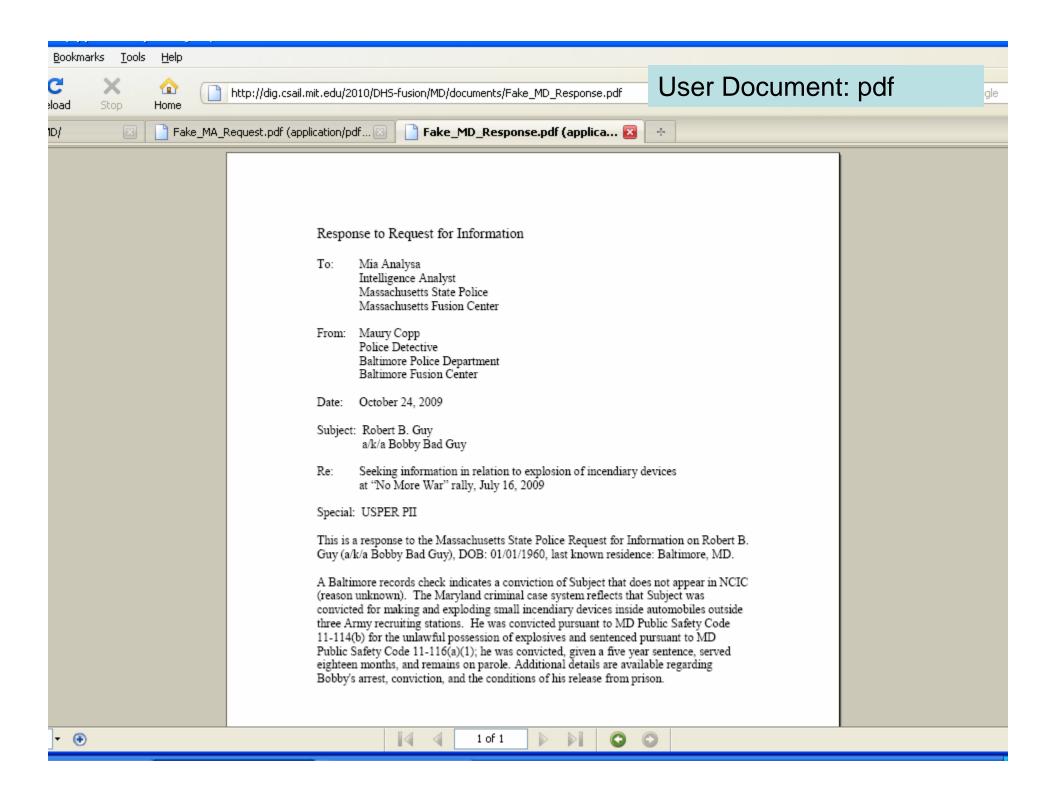


#### User Profile: Tabulator









```
http://dig.csail.mit.edu/2010/DHS-fusion/MD/documents/Fake_MD_Response.xmp
                                                                                          User Document: embedded xmp
  http://dice.csail.mit.edu/MD/
                                       Fake_MA_Request.pdf (application/pdf...
                                                                          http://dig.csai...._____
<?xpacket begin="" id="W5M0MpCehiHzreSzNTczkc9d"?>
<x:xmpmeta xmlns:x="adobe:ns:meta/" x:xmptk="Adobe XMP Core 4.2.1-c043 52.372728, 2009/01/18-15:56:37">
   <rdf:RDF
     xmlns:mdccl="http://dig.csail.mit.edu/2010/DHS-fusion/MD/rules/MdCodeComLaw 12 15 01 03 0NT#"
     xmlns:rdf="http://www.w3.org/1999/02/22-rdf-syntax-ns#">
     <rdf:Description rdf:about=""
            xmlns:dc="http://purl.org/dc/elements/1.1/"
                  xmlns:tami="http://dig.csail.mit.edu/2009/AIR/air#"
            xmlns:cc="http://creativecommons.org/ns#">
         <dc:creator>
            <rdf:Sea>
               <rdf:li>Maury Copp</rdf:li>
            </rdf:Seg>
         </dc:creator>
         <dc:title>
            <rdf:Alt>
               <rdf:li xml:lang="x-default">Request for Information</rdf:li>
            </rdf:Alt>
         </dc:title>
               <tami:policy rdf:resource="http://dig.csail.mit.edu/2010/DHS-fusion/MD/rules/MdCodeComLaw 12 15 01 11.n3"/>
               <rdf:type rdf:resource="http://dig.csail.mit.edu/2010/DHS-fusion/MD/rules/MdCodeComLaw_12_15_01_03_0NT#Criminal_History_Record_Informatic
               <cc:license rdf:resource="http://creativecommons.org/licenses/by/3.0/"/>
         <mdccl:purpose rdf:resource="http://dig.csail.mit.edu/2010/DHS-fusion/MD/rules/MdCodeComLaw 12 15 01 03 0NT#Performance of function"/>
         <mdccl:verified_by rdf:resource="http://dig.csail.mit.edu/2010/DHS-fusion/MD/rules/MdCodeComLaw_12_15_01_03_0NT#Central_Repository"/>
      </rdf:Description>
      <rdf:Description
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        <mdccl:convicted pursuant rdf:resource="http://law.justia.com/maryland/codes/gps/ll-ll4.html"/>
        <mdccl:sentenced pursuant rdf:resource="http://law.justia.com/maryland/codes/qps/11-116.html"/>
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              <mdccl:sentence imposed>5</mdccl:sentence imposed>
              <mdccl:has_custody_status rdf:resource="mdccl:Parole"/>
      </rdf:Description>
   </rdf:RDF>
</x:xmpmeta>
```



12.15.01.11

#### .11 Dissemination of CHRI--Criminal Justice Agency.

A. Subject to the provisions of Regulation .12B, the Central Repository and other criminal justice agencies shall disseminate CHRI, be it conviction or nonconviction criminal history record information, to a criminal justice agency may request this information from the Central Repository or another criminal justice agency only if it has information:

- (1) In the performance of its function as a criminal justice agency; or
- (2) For the purpose of hiring or retaining its own employees and agents.
- B. Dissemination Between Criminal Justice Agencies.
- (1) A criminal justice agency may not disseminate CHRI to another criminal justice agency until the disseminating agency has requested and received from the Central Repository verification that the information to be complete, accurate, and current.
- (2) The criminal justice agency or the Central Repository shall verify the identity of the criminal justice agency to which the disseminating agency intends to provide the information.
- (3) A criminal justice agency may satisfy the verification requirement through the use of an automated information system provided by the Department of Public Safety and Correctional Services.
- (4) The Central Repository shall maintain a record or log of the request showing the:
- (a) Date the request was made;
- (b) Information to be disseminated;
- (c) Criminal justice agency receiving the information; and
- (d) Date of the dissemination.
- (5) This section does not apply if the receiving criminal justice agency demonstrates to a responsible official of the disseminating criminal justice agency or the Central Repository that a delay in the receipt of informa Central Repository will unduly impede necessary action by the requesting criminal justice agency or will violate or materially impair a substantive right of the person about whom the information is needed. However, agency shall maintain a log of each dissemination under these conditions, showing the:
- (a) Date of dissemination;
- (b) Information disseminated;
- (c) Criminal justice agency to whom it was disseminated; and
- (d) Date of the dissemination.
- C. When a request for the dissemination of CHRI is made by a criminal justice agency from another state, disseminations shall be limited to the purposes for which CHRI is disseminated to criminal justice agencies wi
- D. A fee, as specified in Regulation .14 of this chapter, shall be charged for each request for access to CHRI for other than a criminal justice purpose.





### Policy: AIR

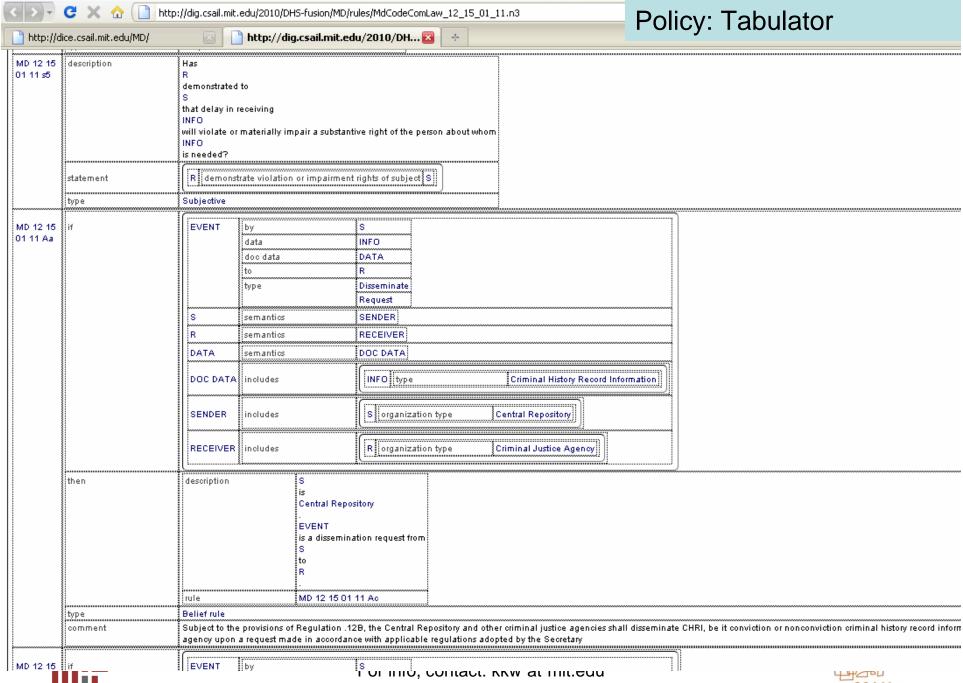
```
File Edit View Help
:MD 12 15 01 11 s5 a air:Subjective;
  air:description ("Has ": R " demonstrated to ": S " that delay in receiving ": INFO " will violate or materially impair a substantive rig
  air:statement { :R mdccl:demonstrate violation or impairment rights of subject :S }.
:MD 12 15 01 11 a air:Policy;
  air:rule :MD 12 15 01 11 Aa;
  air:rule :MD 12 15 01 11 Ab.
:MD 12 15 01 11 Aa a air:Belief-rule;
  rdfs:comment
    Subject to the provisions of Regulation .12B, the Central Repository and other criminal justice agencies shall disseminate CHRI, be it
    :EVENT a mdccl:Disseminate, mdccl:Request;
      mdccl:by :S;
      mdccl:data :INFO;
      mdccl:to :R;
      mdccl:doc-data :DATA.
    :S log:semantics :SENDER.
    :R log:semantics :RECEIVER.
    :DATA log:semantics :DOC-DATA.
    :DOC-DATA log:includes ( :INFO a mdccl:Criminal History Record Information ).
    :SENDER log:includes { :S foaf:organization type mdccl:Central Repository }.
    :RECEIVER log:includes { :R foaf:organization type mdccl:Criminal Justice Agency }.
  );
  air:then [
    air:description ( :S " is " mdccl:Central Repository ".\n" :EVENT " is a dissemination request from " :S " to " :R ".");
    air:rule :MD 12 15 01 11 Ac
  1.
:MD 12 15 01 11 Ab a air:Belief-rule;
  air:if {
                                                                          • Each policy is represented as
    :EVENT a mdccl:Disseminate, mdccl:Request;
                                                                                 • rules and patterns in a policy file
      mdccl:bv :S:
      mdccl:data :INFO;

    definitions and classifications in

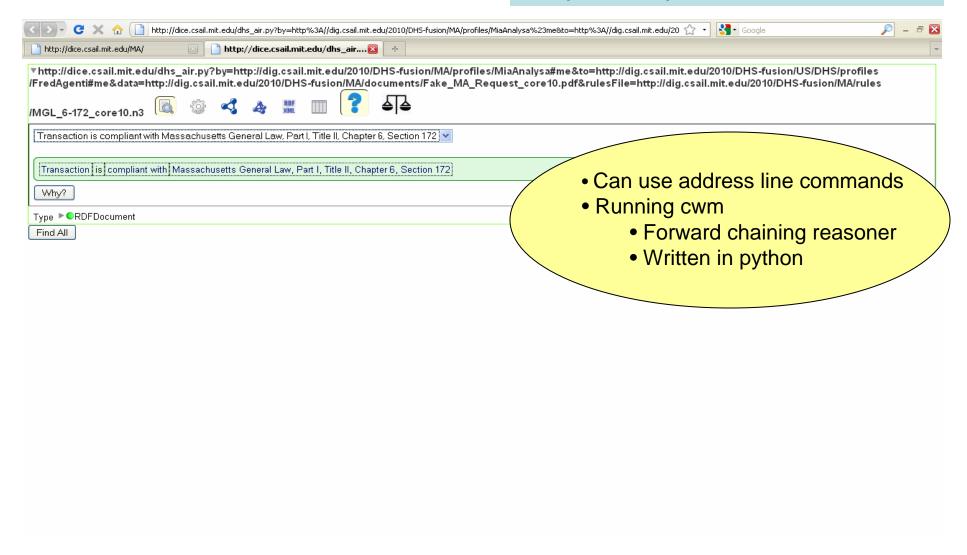
      mdccl:to :R;
      mdccl:doc-data :DATA.
                                                                                 an ontology file.
    :S log:semantics :SENDER.
    :R log:semantics :RECEIVER.
    :DATA log:semantics :DOC-DATA.
    :DOC-DATA log:includes { :INFO a mdccl:Criminal History Record Information }.
    ·SFMDFP loc.includes ( .S foaf.organization twne "Criminal Justice Agency" )
```



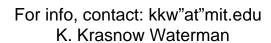




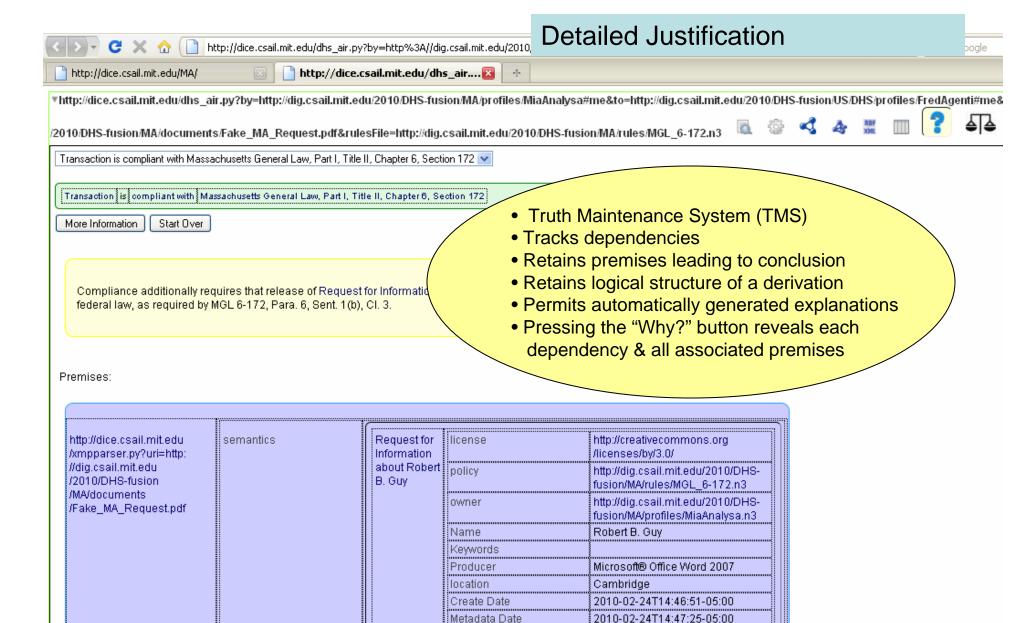
## Simple Compliance Answer











Modify Date

Instance ID

Marked

Document ID

2010-02-24T14:47:25-05:00

b0bb-8e40-8400-7f17dd8bda38 uuid:be1e9556-821c-724b-be6a-

uuid:3eed3dd5-

892ad8b51d91

True

#### "Lawyer Pane"







## Statute Text

- MGL § 6-172
  - http://www.mass.gov/legis/laws/mgl/6/6-172.htm
- MCCL 12.15.01.11
  - http://www.dsd.state.md.us/comar/comarhtml/12/12.15.01.11.htm
- 5 USC § 552a (Privacy Act)
  - http://www.law.cornell.edu/uscode/5/usc\_sec\_05\_00000552---a000-.html





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