ANNUAL CIVIL LIBERTIES AND PRIVACY REPORT

REGARDING THE ACTIVITIES OF THE
NATIONAL SECURITY AGENCY/CENTRAL SECURITY SERVICE
(NSA/CSS)

Calendar Year 2025

NSA/CSS Civil Liberties, Privacy, and Transparency Office

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Executive Summary

As the Director of Civil Liberties, Privacy, and Transparency (CLPT) for the National Security Agency/Central Security Service (NSA/CSS), I am pleased to present this unclassified report for the calendar year 2025. This report is required under Section 1062 of the Intelligence Reform and Terrorism Prevention Act (IRTPA) of 2004 (Public Law 108-458), which codified Section 803 of the Implementing Recommendations of the 9/11 Commission Act of 2007 (U.S.C. § 2001ee-1).

This report contains the following information:

- The number and types of reviews undertaken by the NSA/CSS CLPT Office;
- The types of advice provided and the responses given to such advice;
- The number and nature of complaints received by the NSA/CSS CLPT Office; and,
- A summary of the disposition of such complaints, the reviews and inquiries conducted, and the impact of the NSA/CSS CLPT Office's activities.

The metrics presented in this report demonstrate the dynamic work of NSA/CSS professionals, who advance U.S. national security interests while also protecting the civil liberties and privacy interests of the American people. In 2025, for example, the CLPT Office reviewed more than 500 NSA/CSS activities, affirmed appropriate privacy safeguards were applied to more than 600 National Security Systems, and processed more than 5000 total submissions from members of the public and the NSA/CSS workforce. Section III of this report also includes three unclassified examples of advice provided.

In 2025, the NSA/CSS made significant strides, which included implementing new Executive Orders and the President's Management Agenda. CLPT professionals within NSA/CSS continue to play an essential role in promoting transparency and executing the President's mandate to eliminate government overreach and ensure accountability for the American people.

T.D. STUCK
NSA/CSS Director, Civil Liberties, Privacy, and Transparency

I. OVERVIEW OF THE NSA/CSS CIVIL LIBERTIES AND PRIVACY PROGRAM

NSA/CSS has instituted a comprehensive civil liberties and privacy program. The CLPT Director oversees the program and serves as the senior NSA/CSS official responsible for the protection of civil liberties and privacy, as required by 42 U.S.C. 2000ee-1 and Intelligence Community Directive 107, "Civil Liberties Privacy and Transparency," and as the Senior Component Official for Privacy, as required by Department of Defense Instruction 5400.11, "DoD Privacy and Civil Liberties Programs." More details on the program can be found in NSA/CSS Policy 12-1, "NSA/CSS Civil Liberties and Privacy Program", available at www.nsa.gov.

The National Defense Authorization Act for Fiscal Year 2023 (Public Law 117-263) amended the periodicity of this report from semi-annually to annually. This report combines semi-annual metrics from prior reports to facilitate comparison with the annual metrics for this calendar year.

II. NUMBER AND TYPES OF REVIEWS

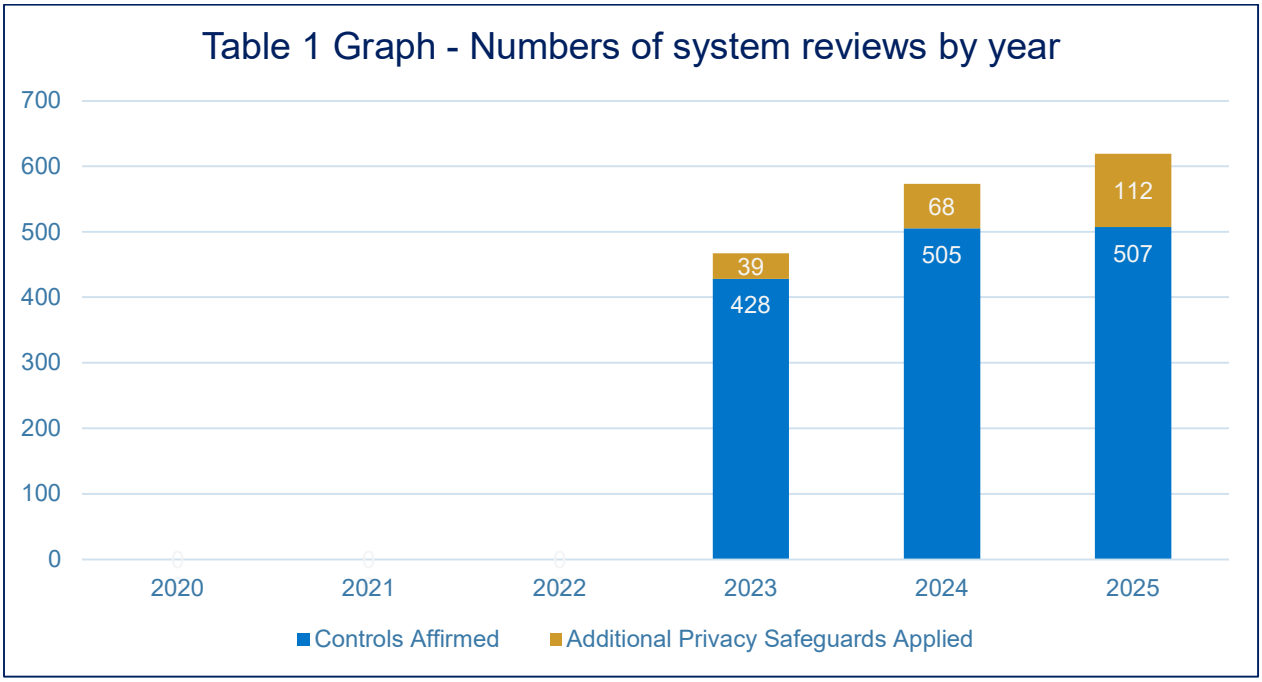
The CLPT Office evaluates the civil liberties and privacy impact of NSA/CSS activities through a variety of reviews. These reviews aim to identify risks and potential mitigations early in the process, enabling the implementation of safeguards and mitigation strategies with minimal impact on mission objectives or duplication of efforts. This section outlines the different types of reviews conducted by the CLPT Office (as shown in Tables 1 and 2 below). The number of reviews conducted by year is displayed in graphs in Tables 1 and 2.

These metrics vary from year to year due to several factors, such as process efficiencies and shifts in mission needs over time. The overall upward trend in Table 1 and overall downward trend in Table 2 for 2023-2025 generally reflect efficiencies gained through continuous improvement, including implementation of updated System Privacy Overlay requirements for National Security Systems consistent with Committee on National Security Systems Instruction 1253 and National Institute of Standards and Technology Special Publication 800-53 for National Security Systems.

System Privacy Assessments are completed for each new NSA/CSS system before granting systems the authority to operate, and for existing systems at least once every three years. To ensure compliance, the NSA Chief Information Officer has implemented a system privacy assessment process that aligns with DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance," and other relevant requirements. This process involves identifying the personally identifiable information (PII) present on each system, evaluating the existing physical, administrative, and technical safeguards in place, and ensuring that system privacy overlays align with the sensitivity of the information. Table 1 illustrates the total number of systems reviewed and the outcome of each review, indicating whether additional privacy protections were implemented based on the CLPT Office's analysis.

Table 1 – NSA/CSS System Privacy Assessments

Systems Reviewed & Outcome of Review	Jan.–Jun.	Jul.–Dec.	2025
Controls Affirmed	209	298	507
Additional Privacy Safeguards Applied	49	63	112
Total NSA/CSS Systems Reviewed	**258**	**361**	**619**



Civil Liberties and Privacy Assessments help ensure that NSA/CSS missions, programs, policies, and technologies appropriately address civil liberties and privacy considerations. These assessments include an initial review of an ongoing or proposed activity to determine if a more detailed assessment is necessary. Assessments that analyze the sufficiency of safeguards applied to an activity are based on the federal government's Fair Information Practice Principles (FIPPs), and may also examine how NSA/CSS accesses data for national security purposes in accordance with legal or policy requirements.

Other types of reviews undertaken by the CLPT Office in 2025 included:

Risk Assessments play a critical role in providing NSA/CSS leadership with a comprehensive analysis of potential risks for certain activities and enable informed, timely, and defensible decisions. The CLPT Office plays a key role in the NSA/CSS Enterprise Risk process, which is overseen by the NSA/CSS Chief Risk Officer and the Office of Enterprise Risk Management (OERM) in accordance with Office of Management and Budget Circular No. A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control."

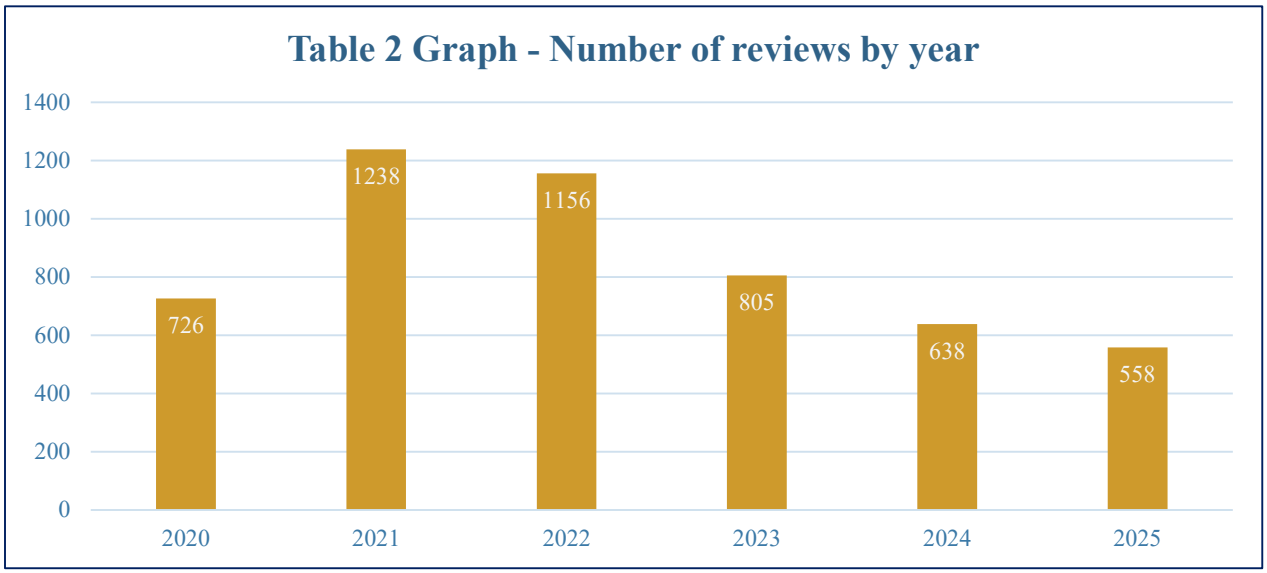
The framework is applied to assess the risks associated with activities that could pose a threat to life or limb, major new programs or initiatives, significant changes in direction, and activities with strategic implications. Civil Liberties, Privacy, and Transparency are explicitly included as risk categories. If an activity may implicate civil liberties or privacy, such as intrusion into the personal lives of individuals, the CLPT Office provides advice to help the assessment team evaluate the likelihood and severity of these risks and proposed mitigations.

Data Protection Reviews involve examining system or data analytics, commercial agreements, and computer security incident reports. These reviews are a combined total of several different types of assessments completed by the CLPT Office in conjunction with NSA/CSS mission elements. Performed as part of established governance processes, Data Protection Reviews may evaluate privacy safeguards, potential data breaches, and other incidents involving PII. They also incorporate requests made outside of standard processes.

Classified Document Reviews are another crucial aspect of the CLPT Office's responsibilities. The CLPT Office serves as the focal point and coordinator for the review of classified documents prior to their release to the public or intelligence oversight bodies. These documents often pertain to NSA's mission activities, such as the Intelligence Community Annual Statistical Transparency Report (ASTR) and the Intelligence Oversight Quarterly (IOQ) report to the Department of War (DoW) Senior Intelligence Oversight Official. The CLPT Office may also review other classified documents containing national security information, which require review by Original Classification Authorities in accordance with Executive Order 13526, "Classified National Security Information," such as reports by the U.S. Privacy and Civil Liberties Oversight Board (PCLOB). Additionally, the CLPT Office coordinates the NSA/CSS reviews of materials subject to mandatory declassification reviews pursuant to the Foreign Intelligence Surveillance Act (FISA).

Table 2 – Number and types of reviews

Types of Reviews	Jan.–Jun.	Jul.–Dec.	2025
Civil Liberties and Privacy Assessments	1	0	1
Risk Assessments	35	30	65
Data Protection Reviews	185	150	335
Classified Document Reviews	108	49	161
Total	**329**	**229**	**558**



III. SUMMARY OF ADVICE PROVIDED AND RESPONSES TO ADVICE

The CLPT Office advises NSA/CSS on required and recommended practices to protect civil liberties and privacy throughout its operations. In accordance with Section 803, which mandates public disclosure of the CLPT Office's activities while respecting classified information and applicable laws, this section provides unclassified examples of significant advice given by the CLPT Office in 2025 and summarizes the responsiveness of NSA/CSS officials in implementing that advice.

- **CLPT Advisories –** In 2025, the CLPT Office issued two formal advisories to the NSA/CSS workforce, providing instruction on the appropriate identification of PII and the requirements for proper handling and protection of PII. These advisories were distributed to the entire NSA/CSS workforce and made available through an internal webpage. The agency's responsiveness to CLPT advice has resolved common questions and guided proper PII practices.

- **Executive Order 14086 Redress Process –** E.O. 14086 includes a mechanism through which individuals in the European Union may submit qualifying complaints to NSA through the Office of the Director of National Intelligence for investigation and redress. In 2025, the NSA CLPT Office updated standard procedures and processed all E.O. 14086 complaints received. Agency compliance with this requirement is also subject to independent oversight by the PCLOB. The CLPT Office provided the PCLOB with all NSA documents or information requested regarding this process to assist in facilitating its independent oversight.

- **Data Breach Exercise –** Consistent with DoW requirements that support compliance with the Federal Information Security Management Act (FISMA), the CLPT Office coordinated and led an exercise to test readiness and response for an unexpected data breach. The exercise included roles for the NSA Chief Information Officer, the NSA Office of General Counsel, and the Office of Strategic Communications, among others. Results of the exercise were documented and resulted in updates to NSA's Breach Response Plan.

IV. NUMBER AND NATURE OF COMPLAINTS RECEIVED

The CLPT Office receives various questions, complaints, and inquiries, collectively termed "submissions," from both the public and the NSA/CSS civilian, military, and contractor workforce (hereinafter collectively referred to as NSA/CSS workforce). To be included in this report, a submission must be documented in writing and relate to allegations of harm, civil liberties or privacy violations, or concerns regarding NSA/CSS program administration or operation. This section presents metrics detailing the total volume and resolution of these submissions, as further broken down in Tables 3 and 4.

Table 3 shows the total number of submissions, both open and anonymous, sent to the CLPT Office during the reporting period by members of the public and NSA/CSS workforce. The public can contact the CLPT Office via mail or a form on the NSA/CSS public website (nsa.gov). Notably, most submissions from the public come through the NSA/CSS website. The NSA/CSS workforce can submit inquiries, including those involving classified information, through an internal email alias or an anonymous form. The total count, which includes repeated submissions, does not reflect the number of unique individuals who contacted the CLPT Office.

Since the CLPT Office began tracking the number of public submissions in 2023, there has been an upward trend each year. Analysis of this trend demonstrated that more than 70% of the total public submissions received in calendar year 2025 were submitted by fewer than 18 named individuals or accounts.

Common themes from the NSA/CSS workforce include protecting PII within Agency systems or communications, handling sensitive PII information, reporting potential PII breaches, and inquiries about the collection or storage of Social Security numbers according to DoW guidelines. Additionally, NSA/CSS workforce often seek help in preparing Privacy Act Statements.

The CLPT Office initially reviews each public submission to assess its relevance to civil liberties or privacy matters. Common submission topics include perceived injustices and broad complaints of government activities, alleged government fraud, waste, or resource abuse, Freedom of Information or Privacy Act requests, potential civil liberties and privacy abuse in NSA/CSS programs, and information on filing a complaint under Executive Order 14086. Many public web form submissions are neither credible nor related to NSA/CSS activities. Those lacking an actionable question, complaint, or request for redress are closed upon review, and misdirected submissions are forwarded to the appropriate organization.

The CLPT Office provides written guidance in response to allegations of civil liberties or privacy violations and may directly respond to individuals who provide contact information as appropriate. The CLPT Office may also publish general guidance to address anonymous submissions or to inform the NSA/CSS workforce about commonly identified systemic issues. The CLPT Office collaborates with the Office of General Counsel and the relevant organization for further assessment of submissions which indicate a potential PII incident or breach. Moreover, the CLPT Office is responsible for alerting the DoW Senior Agency Official for Privacy of certain data breaches, following federal guidelines.

Additionally, under the Privacy Act of 1974, individuals can request copies of their personal records, including any item, collection, or grouping of information maintained by NSA/CSS and retrieved using the individual's name or personal identifier. As reflected in Table 5 (below), the CLPT Director serves as the Agency's final adjudicator in cases where the submitter has appealed the NSA/CSS response to their initial request. The NSA/CSS Privacy Act Office notifies each individual in writing of the final adjudication of their request and their legal right to seek judicial review in a United States District Court.

Table 3 – Types of Submissions

Source	Jan.–Jun.	Jul.–Dec.	2025
Public	3244	2437	5681
NSA/CSS Workforce	59	68	127
Total Received	3303	2505	5808

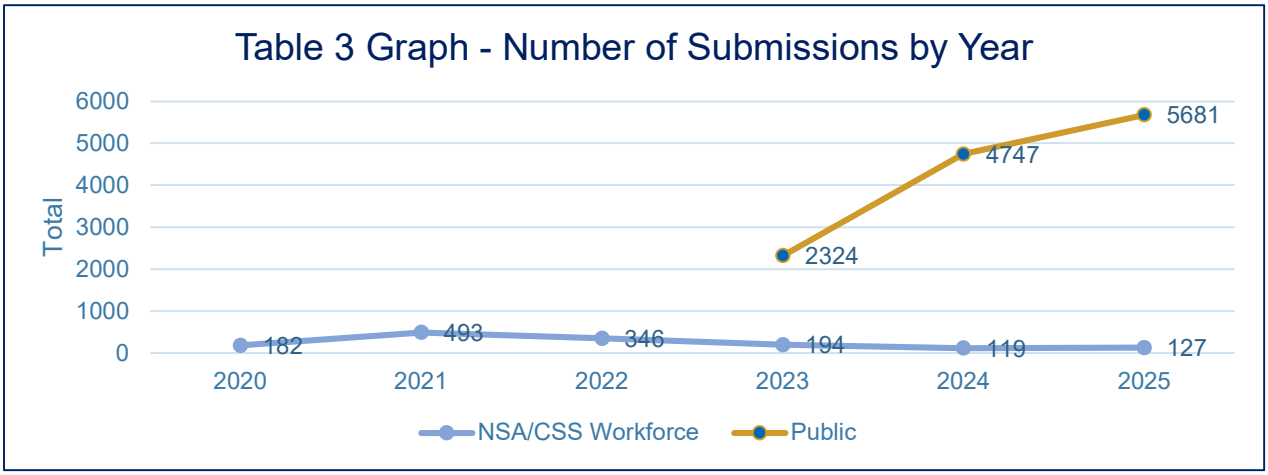


Table 4 – Disposition of Public Submissions

Disposition	Jan.–Jun.	Jul.–Dec.	2025
Referred to the NSA Inspector General	1	0	1
Referred to Other Offices	3	0	3
Public Response	9	7	16
Addressed/Reviewed and Closed	3244	2437	5681
Total Closed	3257	2444	5701

Table 5 – Privacy Act Appeals

Disposition	Jan.–Jun.	Jul.–Dec.	2025
Adjudicated Responses	7	10	17
Appeals Granted	2	1	3

V. CONCLUSION

This report summarizes the activities of the NSA/CSS CLPT Office for 2025. Reports summarizing activities from prior reporting periods, as well as more information on the NSA/CSS Civil Liberties and Privacy Program, are available at www.nsa.gov.