



Common Analytic Standards: Intelligence Community Directive # 203 and U.S. Marine Corps Intelligence

Von H. Pigg

On 21 June 2007, the Director of National Intelligence (DNI), signed and implemented Intelligence Community Directive (ICD) Number 203, “Analytic Standards,” governing the production and evaluation of intelligence analysis and analytical products. ICD 203 articulates the mission and commitment of all analytic elements of the Intelligence Community (IC) to meet the highest standards of integrity and rigorous analytical thinking.¹ The DNI, via ICD 203, established doctrinal requirements designed to improve the quality, relevance of and confidence in the analysis and conclusions of intelligence products produced for policy makers and military commanders. As the Marine Corps’ service component intelligence agency and member of the IC, the Marine Corps Intelligence Activity (MCIA) at Quantico adopted the promulgated analytic standards, along with a required self-evaluation program. Rigid application of the standards, combined with critical self and other IC evaluations will ensure MCIA and the entire USMC intelligence apparatus consistently produces timely, objective, multi-source based intelligence products resulting from sound analytic tradecraft practices. The purpose of this article is to examine the reasoning and rationale for prescribed IC Analytical Standards and how MCIA is implementing the standards and overcoming implementation challenges for the purpose of improving intelligence support to the Commandant of the Marine Corps, Marine Air Ground Task Force(s) (MAGTFs), USMC supporting establishments as well as the IC at large.

Intelligence can be thought of in general terms as a body of information and the conclusions drawn from that body and furnished in response to known or perceived requirements of customers; often derived from information that is concealed or not intended to be available for use by the acquirer. The intelligence cycle is a requirements driven process that involves issuance of requirements by decision makers, collection, processing, analysis, and publication of finished intelligence products. Key among the development of “Intelligence” is analysis. Analytic efforts cover a wide range of topics including: political, military, economic, social, scientific and technical, Homeland security, etc. Analysis is the “thinking” part of the intelligence process. Intelligence analysis is a professional discipline based on strong critical thinking skills, in-depth substantive expertise, and a keen understanding of United States or specific agency interests. Analysis involves identifying and interpreting the meaning and significance of key pieces of information; establishing trends, patterns, and relationships; and forming well-reasoned and well-supported arguments.

Why Does the IC Need Common Analytical Standards?

The IC endured a thorough wire-brushing from perceived and documented failures with regards to the September 11, 2001 terrorist attacks and the erroneous conclusions from the 2002 National Intelligence Estimate regarding Iraq's Weapons of Mass Destruction (WMD) program. The analytic community was specifically called to task in the *WMD Commission Report*:

“Perhaps most troubling, we found an Intelligence Community in which analysts had a difficult time stating their assumptions up front, explicitly explaining their logic, and, in the end, identifying unambiguously for policy makers what they do not know, in sum, we found that many of the most basic processes and functions for producing accurate and reliable intelligence are broken and underutilized.”ⁱⁱ

The WMD Commission Report, Congressional commissions and other studies identified intelligence shortcomings and recommended dramatic IC overhauls. The fallout of these reports challenged the analytic community to develop and implement new tools and processes to better support the Nation's policy makers. As the United States faces challenges from a variety of non-traditional and evolving threats, including terrorism, WMD, cyber attacks, infectious diseases, proliferation and illegal trafficking, the IC's analytic transformation efforts represent a forward looking effort at improving support to a wide range of customers and partners, contribute to national security priorities and reduce the risks the nation faces today and in the future.ⁱⁱⁱ

In addition to restructuring the IC and directing the creation of the Office of the Director of National Intelligence (ODNI), the *Intelligence Reform and Terrorism Prevention Act* (IRTPA) mandated the ODNI perform the functions of evaluating analytic integrity, ensure alternative analysis is conducted, and to safeguard objectivity in intelligence analysis. Specifically, the IRTPA states:

“The Director of National Intelligence shall assign an individual or entity to be responsible for ensuring that finished intelligence products produced by any element or elements of the intelligence community are timely, objective, independent of political considerations, based upon all sources of available intelligence, and employ the standards of proper analytic tradecraft.”^{iv}

The IC analytic transformation efforts were assigned to the Deputy Director for National Intelligence for Analysis (DDNI/A). In a recent speech to the 2008 Intelligence and National Security Alliance, Analytic Transformation Conference, Dr. Thomas Fingar, the DDNI/A, added context to the transformation efforts by discussing IC customer confidence issues:

“...one of my highest priorities was to restore confidence, customer confidence, congressional confidence, the self confidence of the analysts in our community... We seriously had had to tackle the tradecraft issues, the collaboration issues, the sharing issues, in order to produce better support, better analytic support, more timely support from the collectors to military forces in the field” as well as law enforcement, first responders and policy makers.^v

Analytic Standards

ICD 203 introduces quantifiable and qualifiable standards in the overall analytic transformation process to which intelligence products can be evaluated. The Analytic Standards as specified in ICD #203 are:

Objectivity: This standard requires that analysts and managers perform their analytic and informational functions from an unbiased perspective. Analysis should be free of emotional content, give due regard to alternative perspectives and contrary reporting, and acknowledge developments that necessitate adjustments to analytic judgments.

Independent of Political Considerations: Analysts and managers should provide objective assessments informed by available information that are not distorted or altered with the intent of supporting or advocating a particular policy, political view point, or audience.

Timeliness: Analytic products that arrive too late to support the work of consumers weaken utility and impact. Analysts will strive to deliver their products in time for them to be actionable by customers. Analytic elements have a responsibility to be aware of the schedules and requirements of consumers.

Based on All Available Sources of Intelligence: Analysis should be informed by all relevant information that is available to the analytic effort. Where critical gaps exist, analytic elements should work with collectors to develop appropriate collection, dissemination and access strategies.

Exhibits Proper Standards of Analytical Tradecraft. The analytic tradecraft standards and the required evaluation of intelligence products are the heart of the Analytical Standards directive. The Standards of Analytical Tradecraft and evaluation criteria will be examined in later paragraphs describing MCIA's implementation of ICD 203. Those analytical standards are:

- Properly describes quality and reliability of underlying sources.
- Properly caveats and expresses uncertainties or confidence in analytic judgments.
- Properly distinguishes between underlying intelligence and analysts' assumptions and judgments.
- Incorporates alternative analysis where appropriate.
- Relevance to US national security.
- Uses logical argumentation.
- Exhibits consistency of analysis over time, or highlights changes and explains rationale.
- Makes accurate judgments and assessments.

MCIA formally adopted the Analytical Standards for all finished or published intelligence products in the summer of 2008. MCIA produces intelligence products and services providing HQ USMC, USMC operating forces and supporting establishment components with the following types of support:

- Threat assessments, estimates, and intelligence for service planning and decision making.

- Intelligence support for doctrine, force structure development, systems and acquisitions.
- War gaming.
- Training and education.
- Pre-deployment planning, training and exercise support for operating forces.

ODNI's Office of Analytic Integrity and Standards (AIS)^{vi} provided training on the analytical standards to MCIA analysts in July of 2008. MCIA analysts and supervisors hosted the three-day training evolution consisting of basic "Analytical Standard" definitions and concepts, examples of intelligence products meeting the standards and evaluations of both "good" and "not so good" intelligence products in order to reinforce the concepts. During the evaluation phase of the training, MCIA analysts evaluated other IC agencies' intelligence products against the prescribed IC standards prior to evaluating MCIA products. While conducting the intelligence product evaluations, the analysts were exposed to the evaluation tools MCIA subsequently adopted.

AIS provided MCIA with a QA evaluation tool to help satisfy self-evaluation requirements as specified in ICD 203.^{vii} Each agency within the IC is responsible for administering its own analytic and self-evaluation programs. The QA evaluation tool, a Microsoft Access database program which can be modified to meet specific agency needs, allows MCIA to evaluate intelligence products against the prescribed analytical standards and tradecraft requirements. Using the QA evaluation tool as its benchmark MCIA's QA evaluation program is a 4-step process to ensure MCIA disseminated intelligence products adhere to IC analytical standards.^{viii}

- Prior to publication or release, each MCIA intelligence product is reviewed by the publishing analyst's Branch Head to ensure compliance with IC standards as well as MCIA specific analytical guidance.
- MCIA's Senior Intelligence Analyst (SIA) leads a monthly QA panel reviewing 20% of all MCIA disseminated intelligence products published during the month. The 3-person panel utilizes the AIS QA evaluation tool and independently scores and comments on each analytic standard and applicable analytical tradecraft standard. The panel forms a consensus score and written comments for the purpose of identifying ways to improve the analyst's intelligence products. The SIA debriefs the analyst and the analyst's Branch Head and provides the panel's consensus comments for the purpose of improving future products, analytic techniques and writing skills.
- The SIA heads a separate panel conducting quarterly reviews of the monthly QA scoring looking for analytic trends requiring adjustments or additional training.
- An internal audit group conducts annual reviews of the QA process.

Standards of Analytic Tradecraft

The driving force behind the Analytic Standards directive and QA evaluation program is to ensure the IC is utilizing effective analytic tradecraft tools. The following paragraphs summarize the analytic tradecraft standards as prescribed in ICD 203 and describe implementation and evaluation challenges representing evaluation criteria that allow the analyst's Branch Head and the QA panel to score and comment on the application of each analytical tradecraft element:

- Properly describes the quality and reliability of underlying sources.
 - *Standard:* This analytical trademark element requires the analyst to tie specific information and specific sources to key analytical judgments. Analysis should provide a weighting factor to information that drives the intelligence product's assessment. Analysts need to comment on the susceptibility of the information to denial and deception or on the source's motivations and potential biases.
 - *Challenges:* All disciplines of intelligence (HUMINT, SIGINT, IMINT, etc) have strengths and weaknesses. Failure to evaluate the quality or reliability of a source can negatively impact an intelligence product's judgments as was the case of the now declassified 2002 National Intelligence Estimate of Iraq's WMD capability. Overreliance of a single human intelligence (HUMINT) source contributed significantly, though not completely, to the faulty assessment of Iraq's WMD program in the waning months of 2002: The WMD Commission report stated: "The IC, in the 2002 National Intelligence Estimate (NIE), assessed with "high confidence" that Iraq "has" biological weapons (BW), and that "all key aspects" of Iraq's offensive BW program "are active and that most elements are larger and more advanced than they were before the Gulf War (1991)." This assessment was based largely on reporting from a single human source, codenamed Curveball.^{ix} The WMD Commission would further report: "The October 2002 NIE failed to adequately communicate to policy makers both the ICs near-total reliance on Curveball for its BW judgments, and the serious problems that characterized Curveball as the source."^x Curveball's reporting, which was initially deemed credible, came into question in 2002. Curveball was later determined to be a fabricator of information concerning Iraq's BW program.^{xi} Evaluating sources and corroborating their information allows analysts to identify specific intelligence gaps and/or opportunities requiring further collection efforts.

- Properly caveats and expresses uncertainties of confidence in analytic judgments.
 - *Standard:* Analytic products should express a level of confidence in the judgments and explain a basis for ascribing to it. The intelligence product should highlight intelligence gaps and contrary reporting. The product should identify indicators that would enhance or reduce confidence or prompt a revision of existing judgments.
 - *Challenge:* How analysts express judgments of uncertainty and how policy makers interpret the judgments has long tormented and continues to torment both the IC and policy makers. Verbal expressions of uncertainty—such as "possible," "probable," "unlikely," "may," and "could" are a form of subjective probability judgment, but they have long been recognized as sources of ambiguity and misunderstanding.^{xii} Unfortunately the IC does not have set standards for expressing uncertainty and the definitions for a term such a "probable" can have widely different variations amongst analysts and policy makers.

- Properly distinguishes between underlying intelligence and analyst assumptions and judgments.
 - *Standard:* Assumptions are defined as “explicit or implicit hypotheses that may affect the way in which information is interpreted or weighed.” Assumptions comprise the foundational premises on which the information and logical argumentation build to reach analytic conclusions. Judgments are defined as logical inferences from the available information or the results of explicit hypothesis testing and comprise the conclusions of the analysis.
 - *Challenge:* An assumption is any hypothesis that analysts have accepted to be true and which forms the basis of the assessment. Evaluating and re-evaluating an assumption is valuable at any time prior to finalizing a judgment to insure the assessment does not rest on a flawed premise. By explicitly stating the assumptions utilized by the analysts, the consumers of the intelligence product can help focus follow-on intelligence collection efforts to build confidence in or negate assessments or judgments.

- Incorporates alternative analysis where appropriate.
 - *Standard:* Analytic products should identify and explain strengths and weaknesses of alternative hypothesis, viewpoints, or outcomes in light of both available information and information gaps. Analysts should incorporate insights from the application of structured analytic techniques including argument mapping, comparative analysis and analysis of competing hypotheses to determine if an alternative hypothesis or outcome is more likely or is becoming more likely.
 - *Challenge:* The IRTPA required the DNI to create a process to ensure the effective use of alternative analysis to combat a tendency for analysts to focus their efforts down a single path of reasoning. Alternative analysis, such as the analysis of competing hypotheses, includes a range of alternative possibilities to a given scenario. Evaluating evidence and facts in a structured analysis of competing hypotheses helps to eliminate a majority of the alternative hypotheses leaving the most likely hypothesis as the one with the least amount of evidence against it. The incorporation of alternative analytical methods has been the most difficult of the Analytical Tradecraft Standards to incorporate.^{xiii} Alternative analysis techniques such as competing hypotheses require mental agility, on-the-job experience and a willingness to examine and accept non-intuitive possibilities or answers to a problem. Developing alternative hypothesis and comparing evidence sets against each potential hypothesis take time. Conducting quality alternative analysis and developing competing hypothesis competes with and can detract from the analytical standard of timeliness.

- Demonstrates relevance to US national security (USMC requirements).
 - *Standard:* Analytic products should provide information and insights on issues relevant to the products’ intended customers. Intelligence products should

explicitly address direct or near-term implications of the information and judgments for the intended audience and address long-term implications or identify potential indirect or second and third order effects.

- *Challenge:* The intelligence product should have a purpose. For example, the product should be in response to a request for information (RFI), part of the Marine Corps Planning Process or an update to a previous product. Without a purpose, the intelligence product is nothing more than trivia. The information provided should provide context, warning, or open up avenues for opportunity analysis. Above all, the intelligence product should tell the policy maker or military commander something he or she does not already know.

➤ Uses logical argumentation.

- *Standard:* The intelligence product should facilitate a clear understanding of the information and reasoning underlying analytic judgments. Language and syntax should convey meaning unambiguously. Graphics and images should be readily understandable and should illustrate, support, or summarize key information or analytic judgments.
- *Challenge:* Logical argumentation and effectively conveying information requires a combination of education and on-the-job experience. Analysts at MCIA and across the IC have a wide variety of experience levels and related job effectiveness. Nearly 50% of all analysts IC wide have less than 5 years of IC analytic experience. Although the IC boasts a substantial catalogue of available intelligence and analysis courseware, the ODNI has instituted a wide variety of “joint” intelligence and analytic training to bolster the educational foundation of a young analytic corps. Courses such as the ODNI sponsored ‘Analysis 101’ provide an IC wide baseline standard for young analysts to launch their careers. Planned follow-on courses such as the CIA University sponsored Analysis 201 will build upon entry-level training and help develop IC analytic managers.^{xiv} The effectiveness of the IC’s ability to measurably improve logical argumentation and conveying information will take effort, community collaboration and experience.

➤ Exhibits consistency of analysis over time, or highlights changes and explains rationale.

- *Standard:* Analytic products should deliver a key message that is either consistent with previous production on the topic from the same analytic element or, if the key analytic message has changed, highlights the change and explains its rationale and implications
- *Challenge:* Consistency of analysis over time is directly related to the analytic tradecraft standards of expressing uncertainties and expressing relevance. Consistency over time builds trust and credibility. Highlighting changes and admission of previous erroneous judgments demonstrates a desire get an answer right during dynamic, information intensive environments.

- Makes accurate judgments and assessments.
 - *Standard:* Analytic elements should apply expertise and logic to make the most accurate judgments and assessments possible given the information available to the analytical element and known information gaps. Accuracy is sometimes difficult to establish and can only be evaluated retrospectively if necessary information is collected and available.
 - *Challenge:* Intelligence analysts want to be right. The IC understands the importance of their work and the impact intelligence products can have on national policy decisions and military operations. Unfortunately, IC failures will always receive more public attention than the successes. As the IC applies proper analytic tradecraft, standards and integrity IC failures should decline. By demonstrating relevance, explicitly stating information gaps and admitting to inherent weaknesses in key sources that form the basis for the products assessments and judgments, the IC is setting itself up for success and taking preventive steps to reduce failures.

What are the Benefits of IC Wide Standards?

MCIA has stepped up to the task of producing intelligence products that meet or exceed IC standards. Although ICD 203 is only a small portion of the overall effort to improve intelligence analysis, reviewing and comparing various intelligence products produced prior to ICD 203's release and to those produced after August 2008 reveal noticeable improvement in the presentation of MCIA intelligence products. After reviewing numerous MCIA intelligence products of all classification levels I determined that MCIA, in most incidences, has incorporated the analytical standards specified by ICD 203. These products evaluate and document source information; contain relevance and/or purpose statements; list gaps in intelligence which helps highlight areas for further collection; and incorporate alternative analysis scenarios. These products have immediate benefits to customers. Discussion of source credibility inspires confidence in finished products by decision makers. The listing of intelligence gaps allows for prioritized and focused collection efforts that may yield nuggets of information that confirm or negate assessments and judgments. By establishing relevance or explicitly stating the purpose of the product MCIA is enhancing its credibility in supporting operating forces and the supporting establishment.

Additionally, ICD 203 implicitly empowers analysts from across the IC to communicate more directly with each other by utilizing the same standards, tools and data as well as enabling analytic collaboration across the community. Common IC standards for producing and evaluating intelligence products allows MCIA to leverage the analysis of other national or defense intelligence agencies, as needed, to meet the needs of MCIA's intelligence customers.

Improved analytical production and evaluation from the CIA, NGA, NSA and DIA allows MCIA to capitalize IC efforts and subsequently produce quality intelligence products for its specific customers.

Although long-term benefits will take months or years to evaluate, the standards articulated in ICD 203 when combined with numerous other analytical initiatives will enhance the overall intelligence support to the nation's policy makers and military commanders. MCIA and the entire IC are on the right track towards enhancing national security and achieving national policy objectives.

Lieutenant Colonel Von Pigg is currently assigned as an Aviation Command and Control Officer at Headquarters, US Marine Corps. He has commanded Marines conducting Aviation C2 and Air Space Management missions in both Afghanistan (2005) and Iraq (2007). He recently completed a Commandant of the Marine Corps Fellowship with the Office of the Director of National Intelligence where he studied and researched Information Operations and the role of IO in the USMC Vision and Strategy 2025.

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Notes:

ⁱ Office of the Director of National Intelligence, *Analytic Standards*, Intelligence Community Directive 203 (ICD 203), June 21, 2007, 1.

ⁱⁱ Commission on the Intelligence Capabilities of the United States Regarding Weapons of Mass Destruction, *Report to the President of the United States* (Washington, DC: Government Printing Office, 2005) (hereafter, WMD Commission Report), 389; emphasis in the original.

ⁱⁱⁱ Office of the Director of National Intelligence, *United States Intelligence Community 500 Day Plan: Intelligence and Collaboration*; (Washington, DC: Director of National Intelligence, 2007), Introduction.

^{iv} Intellipedia contributors, *History*, Intellipedia, https://www.intelink.gov/wiki/Office_of_the_Assistant_Deputy_Director_of_National_Intelligence_for_Analytic_Integrity_and_Standards, (NIPR).

^v Dr. Thomas Fingar, 2008 INSA Analytic Transformation Conference, Orlando Florida, Morning Keynote Address, 4 September, 2008.

^{vi} The Office of Analytic Integrity and Standards is a sub-office of the DDNI/A.

^{vii} ICD 203, pg. 5

^{viii} Mr. Donald Bellah, SIA, PAC, MCIA, interview with author, 8 October, 2008.

^{ix} WMD Commission Report, pg 80.

^x *Ibid.*, 93.

^{xi} *Ibid.*, 87.

^{xii} Richards J. Heuer, *Psychology of Intelligence Analysis*, (CIA: Center for the Study of Intelligence, 1999), 152.

^{xiii} Ms. Rebecca Strode, Deputy ADDNI for Analytic Integrity and Standards, interview with author, 15 Oct 2008.

^{xiv} *Ibid.*