

Top 10 findings from the NIGC Fingerprint MOU / CJIS Checklists [07/30/2021]

1. Q48. Does the TGRA have an FBI Compact Council approved outsourcing agreements for all entities with access to CHRI? [89]

NOTE: This question and the frequency of findings is related to Q49, as noted here as #7.

2. Q47. Does the LASO ensure audits are conducted to verify fingerprint submissions comply with NIGC regulations, 25 C.F.R. 502.14(a-c) and 502.19(a-c)? Specifically, do the audits confirm that fingerprints are submitted for Key Employees and Primary Management Officials who satisfy the duties, functions, responsibilities, authority, access rights or compensation levels as set forth in 25 C.F.R. 502.14(a-c) and 502.19(a-c)? [49]

NOTE: This question and the frequency of findings is related to Q4, as noted here as #10.

3. Q44. Has the LASO ensured that all Authorized Personnel (meaning those individuals with access to CHRI<sup>1</sup>) have received training on approved internal policies and procedures regarding CHRI within 6 months of being placed on the Authorized Personnel List or their date of initial assignment? Also, have all Authorized Personnel received this training every two years thereafter? [48]

NOTE: This question and the frequency of findings is related to Q46 and Q42, as noted here as #6 and #8.

4. Q40. Have all Authorized Personnel signed the Tribe's Acknowledgement Statement<sup>2</sup>? [43]
5. Q45. Has the LASO implemented a security incident handling and reporting policy which requires notification of findings be reported to the NIGC within the required time limits? [43] Please note that initial reports of security incidents shall be made to the NIGC ISO ([iso@nigc.gov](mailto:iso@nigc.gov)) within 24 hours of detection.

NOTE: This question and the frequency of findings is related to #Q43, as noted here at #9

NOTE: Demonstrated compliance for this question must include that "[w]ithin six (6) months of executing the NIGC MOU, the LASO shall implement the Incident Handling procedures, reporting incidents to the NIGC ISO ([iso@nigc.gov](mailto:iso@nigc.gov)), using Policy Appendix F.1, Security Incident Response Form"? This is set forth in the guidance appendix to the CHRI MOU

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<sup>1</sup> All persons who - access, process, read, maintain CJJ and/or CHRI or the systems used to process, transmit, or store CJJ / CHRI or have unescorted access to a secure location with CJJ / CHRI – must complete the appropriate level of CJIS security awareness training required for each person's access and duties. Level One is for persons with unescorted access to a physically secure location; Level Two is for all authorized personnel with access to CJJ; Level Three is for all authorized personnel with both physical and logical access to CJJ; and Level Four is for all Information Technology personnel.

<sup>2</sup> All authorized personnel must sign a statement acknowledging notification of the penalties for misuse of the CJJ and CHRI. There is no standard format for the Acknowledgement Statement. It must state at a minimum that the undersigned "acknowledges notification for the penalties for misuse of criminal justice and criminal history record information," but ideally it contains a summary of state, federal, and tribal consequences. TGRAs may choose to add a short training outline to the statement so that the employee specifically acknowledges their training as well.

6. Q46. Does the LASO complete a training documentation form for the above trainings and retain the document for audit purposes? Are Security Awareness Training records maintained for a minimum of two years from the date(s) of the training(s)? [40]
7. Q49. Does the TGRA audit the entity's compliance with the CJIS Security Policy within 90 days of entering the outsourcing agreement? [39]
8. Q42. Has the LASO ensured all Authorized Personnel have received FBI Security Awareness Training within 6 months of: being placed on the Authorized Personnel List, their initial assignment, having CJ/CHRI access or having unescorted access to a physically secure location? Are such personnel given training every two years thereafter? [37]

NOTE: The guidance appendix to the CHRI MOU directs that "security awareness training must be completed for all individuals identified in the paragraph above *within six (6) months of executing the NIGC MOU*"?

9. Q43. Has the LASO ensured the Tribe has adequate policies and procedures related to access, use, handling, dissemination and destruction of CJ/CHRI? [33]
10. Q4. Has TGRA conducted an initial review to ensure fingerprints are only submitted for Key Employees or Primary Management Officials as defined in 25 C.F.R. 502.14 (a-c) or 502.19 (a-c)? [33]