

Top 10 findings from the NIGC Fingerprint MOU / CJIS Checklists as of October 6, 2020

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

For more information about outsourcing agreements, please refer to the Revised Clarification on Submission of Outsourcing Agreements at:

<https://www.nigc.gov/compliance/CJIS-Training-Materials>

2. Q40. Have all Authorized Personnel signed the Tribe's Acknowledgement Statement?
3. Q44. Has the LASO ensured all Authorized Personnel have received internal training on approved policies and procedures regarding CHRI within 6 months of being placed on the Authorized Personnel List or their date of hire and every two years thereafter?
4. 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 or their date of hire and every two years thereafter?
5. 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?
6. Q3. Have all Authorized Personnel who access CHRI received and reviewed the MOU?
7. Q4. Does your TGRA audit or review to ensure only fingerprint are submitted for employees of the gaming operation who are classified as Key Employees or Primary Management Officials as defined in 25 C.F.R. 502.14 (a-c) or 502.19 (a-c)?
8. Q7. Are there applicant positions that require additional TGRA review or consideration by the NIGC?
9. Q8. Are there applicant positions that are not classified as Key Employees or Primary Management Officials as defined in 25 C.F.R. 502.14 (a-c) or 502.19 (a-c) which are still being fingerprinted?
10. Q13. Prior to submitting the fingerprints, does the TGRA ensure the applicant receives the FBI Privacy Act notice that is dated 2013 or later?