Initial Steps to CJIS Compliance
(Estimated Days to Complete Task)

1. Review Memorandum of Understanding with NIGC (10 days)
   a. Ensure most recent version is in use (current version 2017);
   b. Ensure current TGRA head or authorized official has executed agreement; and
   c. Ensure all staff subject to agreement and using CHRI has reviewed its contents.

   a. Designate Local Agency Security Officer (LASO);
   b. List all personnel with access to FBI CHRI received from NIGC; and
   c. Send authorized personnel list to NIGC Information Security Officer (ISO) at ISO@nigc.gov.
   d. Maintain up-to-date authorized personnel list on site and on record with NIGC ISO.

3. Complete and document initial CJIS Security Awareness Training within next 6 months via (30-60 days):
   a. PowerPoint presentation;
   b. Video presentation; or
   c. Online.

   b. Criminal Justice Information Services (CJIS) Security Policy
   c. NIGC Fingerprint site (https://www.nigc.gov/finance/fingerprint-process); and
   d. TRGA internal policies.

   a. Determine readiness/compliance level; and
   b. Begin improving network hardware, software and policy to achieve compliance (6-12 months).

6. Develop/refine written internal TGRA policies to meet CJIS requirements including (6-12 months):
   a. Use of fingerprint based CHRI;
   b. Applicants Rights Notice/FBI Privacy Act Notice/Opportunity to Correct/Copy of CHRI;
   c. Security Awareness Training;
   d. Incident Response Policy;
   e. Auditing and Accountability;
   f. Access Control;
   g. Identification and Authentication;
   h. Configuration Management;
   i. Media Protection;
   j. Physical Protection;
   k. System and Communication Protection and Information Integrity;
   l. Formal Audits;
   m. Personnel Security; and
   n. Mobile Devices;

7. Complete and document internal training on TGRA policies (following timeline of Step 6, 30-60 days).

8. Authorized personnel sign training/penalty acknowledgement statements for TGRA policies (following Step 7).

9. Outsourcing Agreements for non-channelers (6-9 months):
   a. Identify all IT service providers with access to electronic media containing FBI CHRI;
   b. Identify other service providers with access to physical copies of CHRI (shredding services, storage facilities);
   c. Submit request letter to FBI Compact Officer for outsourcing contract approval;
   d. Execute contract;
   e. Complete 90-day audit of contractor; and
   f. Provide certification to FBI Compact Officer that contractor meets CJIS Security Policy.

11. Continue internal auditing/monitoring to maintain compliance with FBI requirements (on-going).
12. Complete biennial training for users and annually for outsourced non-channelers (on-going).

FBI CJIS Auditor will select three to four tribes Summer/Fall of 2021 for testing against full compliance with NIS and CJIS Security Policy standards as they apply to non-criminal justice agencies and the NIGC MOU.