Standard Operating Procedures
For Channelers

Updated
November 4, 2015
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The Standard Operating Procedures (SOP) for Channelers provides direction to the FBI-approved Channelers regarding the outsourcing requirements and procedures. It is not to be disseminated or used outside the scope of the current FBI Channeling Contract. This SOP is a living document and is not to be considered an all-inclusive document. As relevant changes occur, an updated version will be provided. Additional questions should be directed to Ms. Diane M. Shaffer at (304) 625-2615 or via e-mail at <diane.shaffer@ic.fbi.gov>, Ms. Sandra J. Bajus at (304) 625-3516 or via e-mail at <sandra.bajus@ic.fbi.gov>, or Mr. Jarrod M. Marozzi at (304) 625-2129 or via e-mail at <jarrod.marozzi@ic.fbi.gov>.

**Background Check Requirements**

Prior to working on the Channeling contract, all personnel with access to criminal history record information (CHRI) must first submit all required FBI fingerprint-based background check documents and be approved by the FBI. The background check procedures and forms are included as Appendices 1 and 2. All forms must be signed and mailed with the understanding that they will expire at the end of 30 days. Notification, via e-mail or telephone call, will be provided to the point of contact within each agency. The point of contact is responsible for reaching out to the individual to obtain updated documentation.

Please be advised the Compact Team is not provided any information should an individual be denied by the Security Division.

**Notification of Foreign Travel, Name Changes and Departures**

The FBI must be notified of any foreign travel that occurs from personnel approved to work on the Channeling contract prior to leaving the Country. The applicable form(s) need to be submitted and upon return, the Security Division will reach out for a debriefing. It is the responsibility of the Channeler to ensure that all personnel are aware of this process.

Following a change in a person’s name, the appropriate forms will need to be submitted to the FBI within 60 days.

Notification to the FBI of an employee’s departure from your organization is required within 24 hours. Written correspondence (e-mail) is the preferred method of notification. Should you be unable to respond in writing, a voicemail, followed up with the written documentation is acceptable.

Failure to follow the processes could result in suspension or removal of the individual from the list of authorized personnel allowed to work on the Channeling contract.

**Authorized Recipient Request Letter**

Section 2.01 of the Security and Management Control Outsourcing Standard for Channelers (Outsourcing Standard) provides that, “Prior to engaging in outsourcing any noncriminal justice administrative functions, the Authorized Recipient (AR) shall: (a) request and receive written permission from (1) the State Compact Officer/Chief Administrator or (2) the FBI Compact Officer.” A sample request letter from an AR, requesting permission from the FBI Compact Officer to outsource noncriminal justice administrative functions to an FBI-approved Channeler, is attached as Appendix 3. This request letter should be sent to Mr. Gary Barron, FBI Compact
Officer, by the requesting entity, not the Channeler. They may send their request to Mr. Barron by U.S. postal mail, fax or e-mail. The address to submit a request by mail is: FBI CJIS Division, Attn: Gary Barron, Mod D3, 1000 Custer Hollow Road, Clarksburg, WV 26306. To submit via fax, the request can be sent to: (304) 625-2706 or (304) 625-2868, and for requests sent via e-mail: <gary.barron@ic.fbi.gov>.

**FBI Response Letter**

The FBI Compact Officer will provide a documented response to the written request from the AR. See Appendix 4 for an example of a typical response for a channeling request. Most approval letters will be sent via fax to the AR, with a copy to the Channeler. The FBI does not follow up with a mailed copy of the approval.

All denial letters and unique approval letters will be mailed and/or e-mailed to the AR and the Channeler.

**Contract Language Between an Authorized Recipient and Channeler**

Section 2.02 of the Outsourcing Standard states that “the authorized recipient shall execute a contract or agreement prior to providing a Contractor access to CHRI.” The contract shall, at a minimum, incorporate by reference and have appended thereto this Outsourcing Standard.” The FBI requires a draft contract between the Channeler and AR be sent to the FBI (email is preferred) for approval prior to executing the first contract. Sample contract language is provided in Appendix 5. Please forward the contract for review and approval to Ms. Shaffer and Ms. Bajus.

If subsequent contracts contain the same language as the one approved by the FBI, it is not necessary to provide the additional contracts, unless requested by the FBI Compact Officer.

**Quarterly Report**

Quarterly reports are due to Mr. Stephen Mayers at <stephen.mayers@ic.fbi.gov>, Ms. Shaffer and Mr. Marozzi within ten days of the 1st for the following months: March, June, September, and December. Please list all ARs (with contract dates) for all submissions processed during the requested quarter. An example of the Quarterly Report is provided in Appendix 6.

**Subcontracting**

Pursuant to Section 7.5 of the Request for Proposal (RFP), “the Contractor shall not enter into a subcontract for any of the services performed under this Contract without obtaining the prior written approval of the FBI Contracting Officer.” Please forward all requests to subcontract to Mr. Mayers, with a copy to Ms. Shaffer. The FBI will respond in writing to your request to use a subcontractor.
**Electronic Biometric Transmission Specification (EBTS)**

The FBI CJIS Division utilizes the EBTS for Data Format for the Interchange of Fingerprints and related data. The EBTS Version 10.0.5, released on June 13, 2015 is the latest upgrade. Due to the increased emphasis placed on communicating interface formats and guidelines, Next Generation Identification (NGI) users are encouraged to register with the website below to receive future notifications on FBI Biometric Standards, NGI enhancements, and EBTS updates. A copy of the most current EBTS can be found at: <www.fbibiospecs.org>.

The minimum record set includes Type 1, 2, and 4 or 14 records for each submission. All EBTS mandatory fields must be complete. In addition, the following EBTS fields should contain the provided data elements to meet the Channeler requirements approved requests:

1.004 TOT Type of Transaction - Must be NFUF/DOCE.

1.007 DAI Destination Agency Identifier - Must contain the value “WVIAFIS0Z”. NOTE: The character before the Z is a numeric zero (0).

1.008 ORI Originating Agency Identifier - Must contain the ORI designated by the FBI.

1.009 TCN Transaction Control Number - This is a unique number assigned to the record by the Channeler.

1.010 TCR Transaction Control Reference field - This field shall be used in responses only to refer to the TCN of a previous transaction involving an inquiry or other action that required a response. For resubmissions due to poor image quality, use the received TCN in the TCR field.

2.005 RET Retention Code - “N” for No

2.009 OCA Originating Agency Case Number – Currently an optional field, however the FBI is moving towards providing this identifier to the Channeler. This field will be used to identify each AR. (The FBI will use valid ORI numbers where applicable for this field.)

2.037 RFP Reason Fingerprinted – The FBI will provide the RFP based on the AR.

<table>
<thead>
<tr>
<th>Type of Authorized Recipient</th>
<th>Reason Fingerprinted (RFP) Field</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Institution (Bank/Credit Union)</td>
<td>Other Employment and Licensing</td>
</tr>
<tr>
<td>Public Housing</td>
<td>Public Housing</td>
</tr>
<tr>
<td>Indian Public Housing</td>
<td>Indian Public Housing</td>
</tr>
<tr>
<td>Indian Tribe (Public Law 101-630)</td>
<td>Indian Child Care or Indian Child Care/Foster Care</td>
</tr>
<tr>
<td>Individuals using the Departmental Order</td>
<td>DOCE</td>
</tr>
</tbody>
</table>

*The FBI will assign the RFP for all AR’s. Other RFP's may be assigned as necessary.*

The RFP must be verbatim or the submission will be rejected by NGI.
2.070 RAP  Rap Sheet - Request for Electronic Rap Sheet – “Y” for Yes.

2.073 CRI  Controlling Agency Identifier - Must enter the same identifier that is used in the ORI field.
*CJIS has the right to assign a number at any time during the contract. The Channeler will be notified if such change occurs.*

2.009 OCA  The Channeler shall list the number provided by the FBI for this field. The FBI will utilize valid ORI numbers where applicable for this field.

The Channeler must assign a unique number for each AR to identify and track submissions, send responses, and collect fees. The FBI CJIS Division recommends using the Originating Agency Case (OCA) Number (2.009) field or the second occurrence of the Controlling Agency Identifier (CRI) (2.073) field. The OCA alphanumeric-special field contains one to twenty characters and any printable 7-bit ASCII character with the exception of the period (.) or a blank in the first position. The second CRI field must be a nine-byte alphanumeric field.

The Channeler shall not retain fingerprint cards and images used for submissions, unless directed so by the AR under contract, for longer than 30 calendar days. NOTE: All fingerprints cards and images used for DO 556-73 submissions may not be retained for a period longer than 30 calendar days or upon successful dissemination, whichever is shorter. All fingerprint cards and fingerprint images must be destroyed/deleted in a manner consistent with the Outsourcing Standard and the FBI CJIS Security Policy.

**Fingerprint Responses**

1) The FBI will return the results of each fingerprint-based national criminal history record check electronically to the Channeler. The FBI’s NGI will process each transaction and send the Channeler an NGI Tenprint Response, the Submission Results-Electronic (SRE). The SRE will contain the ident/non-ident response, the rap sheet (when applicable), or a Reject Message (ERRT). A list of ERRT’s can be found in the EBTS. Sample SREs are available upon request.

***A Channeler may not maintain the SRE in their dissemination log.***

2) A Channeler shall expeditiously disseminate the criminal history record (CHR) check results to the individual/authorized agency making the request as specified in the Outsourcing Standard (currently Section 5.0). All electronic dissemination (email or through a website) must meet or exceed the requirements outlined in the FBI CJIS Security Policy for encryption. CHRI disseminated by a Channeler via an authorized website shall remain on such website only for the time necessary to meet the individual’s requirements but in no event shall that time exceed 30 calendar days.

3) All FBI responses shall be provided in the exact format it was received by a Channeler with no deviation or changes made to the document(s).
4) A Channeler shall establish a system that ensures that each SRE andrap sheet (when applicable), either paper or electronic, cannot be altered or copied without detection. A Channeler shall maintain CHRI only for the period of time necessary to fulfill its contractual obligations.

5) A Channeler’s security system shall comply with the FBI CJIS Security Policy and the Outsourcing Standard. A Channeler is responsible for protecting CHRI with firewall-type devices for the prevention of unauthorized access. Data encryption shall be required throughout the network passing CHRI through a shared public carrier network.

6) CHRI shall be destroyed by a Channeler immediately after confirmation of successful receipt by the individual, regardless of mode. CHRI must be destroyed in compliance with the criteria in the Outsourcing Standard (currently Sections 7.02 (b) and (c)). The manner and time period for CHRI dissemination by a Channeler to an individual shall be defined in the relevant contract.

NGI Reject Codes

The most common NGI reject codes include the following:

- **L0008** - "The quality of characteristics is too low to be used." This reject occurs when the image quality score is below the acceptable threshold as determined by NGI. You can prevent this reject by ensuring each fingerprint is rolled fully and clearly. Ensure delta(s) and core(s) are present for each fingerprint.

- **L0116** - "Fingerprint pattern(s) not discernible." This reject occurs when the images are poor quality as determined by an FBI Fingerprint Examiner. You can prevent this reject by ensuring each fingerprint is rolled fully and clearly. Ensure delta(s) and core(s) are present for each fingerprint.

- **L0118** - "Erroneous or incomplete fingerprint(s) on images: fingers or hands out of sequence, printed twice, missing, and no reason given." This reject occurs when the fingers are not in the correct sequence or images are missing without a reason given. The two acceptable reasons for missing images are Amputation or Unable to Print. You can prevent this reject by ensuring each rolled fingerprint is in the correct position by comparing with the fingerprint impressions taken simultaneously (plain/flat impressions). Ensure a reason is provided for any missing images. Use either Amputation or Unable to Print.

The top ten NGI Reject Codes may be found at the FBI’s website at <www.fbi.gov>. Select Fingerprints, then NGI, then select the topic (How to Prevent NGI Ten-Print Rejects).

Resubmission Guidelines

- If a submission rejects for fingerprint image quality, a second submission of the same individual may be processed at no charge by following the FBI CJIS Division's resubmission guidelines. The Channeler must place the received Transaction Control
Number (TCN) (1.009) field from the electronic fingerprint response of the original rejected submission in the Transaction Control Reference (TCR) (1.010) field of the new submission. Time restrictions apply for this service; the second submission must be within one calendar year after the original fingerprint submission was rejected.

- For additional information, please contact the FBI CJIS Division Customer Service Group (CSG) at (304) 625-5590 {8:00 a.m. - 8:00 p.m., Monday-Friday, Eastern Standard Time}.

**Name Check Procedures**

- The Name Check service is a process performed for civil fingerprint submissions for noncriminal justice purposes **only** after two fingerprint submissions for the same individual have been rejected due to poor image quality. Time restrictions apply for this service; a name check request must be within 90 days after the second submission was rejected. The agency submits a request via the CJIS Name Check Request form. The form may be found at the FBI’s website at <www.fbi.gov>. Select Fingerprints, and then select the topic (FBI Name Checks for Fingerprint Submissions). The FBI notes they can neither confirm nor deny positive identification based on a name check. See Appendix 7 for instructions and Appendix 8 for the name check request form).

- A Channeler may only submit a name check request form **at the request** of the AR.

- A name check may **NOT** be submitted for individuals processed under the Departmental Order request pursuant to Section 9.9 of the RFP, “the Contractor shall not submit a name check for an authorized individual(s) requesting a national noncriminal justice criminal history record check under the authority of the DO 556-73.”

**U.S. Departmental Order (DO) 556-73 (DO 556-73) Submissions - Background**

The federal regulations pertaining to the DO 556-73 process are found at 28 Code of Federal Regulations 16.30-16.34. These regulations establish procedures to be followed when the subject of a requests a copy of such records production of that record to review it or to obtain a change, correction, or updating of that record. The specific procedures and forms used to process a DO 556-73 request may be found on the FBI’s website (www.fbi.gov).

Pursuant to the regulations and FBI policy, the current procedures for an individual requesting a copy of his/her Identification Record are as follows:

1) Complete and submit the written applicant information form;
2) Obtain and submit a complete set of the individual’s fingerprints;
3) Submit $18¹ (U.S.) per request, via money order, cashier check or credit card, made payable to the Treasury of the U.S.;
4) Review the FBI Identification Records request checklist; and
5) Mail the above items to the FBI Criminal Justice Information Services (CJIS) Division.

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¹ Fee must be for the exact amount and is established pursuant to the provisions of 31 U.S.C. 9701.
DO 556-73 Channeler Policy Requirements

A Channeler, with the intention of processing DO 556-73 requests, is expected to follow the same regulatory and policy requirements regarding the receipt of the written information form, complete set of fingerprints, and appropriate fee from the individual as the FBI.

A Channeler submitting DO 556-73 transactions on behalf of individuals must first request a unique Originating Agency Identifier (ORI) from the FBI. After a Channeler has requested and acquired a unique ORI for processing DO 556-73 requests, specific security and privacy requirements must be maintained and adhered to for processing DO 556-73 requests at all times.

The most current versions of the Outsourcing Standard and the FBI CJIS Security Policy provide the specific requirements needed for a Channeler to ensure they are complying with site security, personnel security, data security, system security, and dissemination safeguards.

DO 556-73 Channeler Processing Requirements

1) A Channeler may only submit requests for a U.S. person (who is a citizen of the U.S. or a lawful permanent resident of the U.S.).

2) The fingerprint submission must include the individual’s complete legal name (to include first, middle, and last name); date of birth; signature; descriptive data, such as sex, race, gender; date fingerprinted; and the reason fingerprinted (RFP). The RFP literal must state “DO 556-73 REQUEST.”

3) A Channeler shall ensure the fingerprint submission includes ten rolled fingerprint impressions and ten plain fingerprint impressions or ten flat fingerprint impressions segmented as outlined in the EBTS, Version 10.0.5, released on June 13, 2015.

4) Each set of fingerprints must be accompanied by a signed DO Applicant Information Form, filled out in its entirety, from the individual seeking his/her FBI Identification Record pursuant to DO 566-73. DO Applicant Information Forms will be provided to the Channeler by the FBI and a copy of the form is enclosed as Appendix 9. A Channeler may change the format of the DO Applicant Information Form; however, all required fields must be included on the Channeler’s form and must be approved by the FBI prior to use. Any and all subsequent revisions must also be reviewed and approved by the FBI prior to use.

5) A Channeler must maintain each DO Applicant Information Form with the original signature from each individual, for a period of three (3) years or upon termination of the contract, whichever is shorter. Maintenance of the DO Applicant Information Forms may be in digitized or hard copy format.

6) At the end of the mandatory retention period, all DO Applicant Information Forms must be destroyed in accordance with the provisions outlined in the most current versions of the Outsourcing Standard and the FBI CJIS Security Policy for fixed storage media and disposal of all non-fixed storage media of CHRI.
7) Fingerprints must be captured by a law enforcement agency, a Channeler or an agent of the Channeler. An individual may not capture his/her own fingerprints for a fingerprint card.

8) Individuals who submits fingerprints in person must meet the following requirements:
   a) The individual’s identity must be verified by two forms of identification (at least one of which must be a government issued photo ID).
   b) The mailing address of the individual making the request must match at least one form of identification provided to a Channeler as listed on the DO Applicant Information Form.

   *Please refer to the Identity Verification Guide for additional information: <www.fbi.gov/about-us/cjis/cc>*

9) If a DO 556-73 request is made through an attorney, the request shall be submitted on attorney letterhead with both the individual and the attorney signatures, and shall contain a release statement.

10) Fingerprint cards and fingerprint images used for submission of DO 556-73 requests may not be retained by a Channeler for a period longer than 30 calendar days or upon successful dissemination, whichever is shorter. All fingerprint cards and images must be destroyed/deleted in a manner meeting the same criteria as destruction of CHRI listed in the Outsourcing Standard.

11) The same fingerprint images may not be used for more than one submission per individual. In cases of fingerprint quality rejects, a Channeler should initially obtain two sets of fingerprint images for an individual for resubmission purposes.

Please note: All FBI DO responses received by the Channeler in pdf format are considered authenticated by the FBI. Only the Department of State may apostille FBI DO responses.

**DO 556-73 Channeler Restricted Requests**

1) Any non U.S. person making a request for his/her FBI Identification Record must submit his/her request directly to the FBI CJIS Division to be processed.

2) Individuals requesting an apostille are required to follow the instructions under the FBI Option, listed on the DO website.

3) An individual making a request for employment or licensing purposes should be directed to the list of State Identification Bureaus on the DO website.

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2 An apostille is a certification that a document that has been “legalized” or “authenticated” by the issuing agency through a process in which various seals are placed on the document.
DO 556-73 Causes for Contract Termination

1) Failure to comply with any applicable federal law or regulation, as well as all requirements and policies explained in this document.

2) Notifying an individual of a law enforcement agency inquiry regarding an NCIC hot check notification.

3) Knowingly processing DO 556-73 requests for individuals who are not U.S. persons.

4) Knowingly processing DO 556-73 requests for employment and/or licensing purposes.

5) Knowingly processing DO 556-73 requests to mail out of the country.

6) Advertising, soliciting, proposing, or utilizing the DO 556-73 process for employment and/or licensing or any other unauthorized purpose.

7) Submitting a name check for an individual requesting a DO 556-73 request.

Financial Processes

Reference is made to Section 9.0 – Requirements and Section 15.0 – FBI Responsibilities of the Request for Proposal.

Although these sections provide pertinent information on the billing processes, the following will further assist with the FBI CJIS Division billing procedures.

The FBI CJIS Division has assigned your agency, by request, Originating Agency Identifiers (ORIs) for non-federal noncriminal justice applicant fingerprint submissions and/or departmental order fingerprint submissions.

Fees

<table>
<thead>
<tr>
<th>Type of Submission</th>
<th>Fee Amount Submitted to the FBI</th>
<th>Additional Fee which may be charged by Channeler</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Federal Applicant</td>
<td>$14.75</td>
<td>Subject to contract with AuthorizedRecipient</td>
</tr>
<tr>
<td>Departmental Order</td>
<td>$18</td>
<td></td>
</tr>
</tbody>
</table>

Channelers will be notified of changes 90 days prior to the effective date, either in writing from the FBI or through publication in the Federal Register. Any additional fee authority shall be pursuant to the Channeler’s contract with the AR(s).
The charges that appear on the bill will reflect those transactions that are completed. Each non-federal and/or departmental order bill will contain a Central Agency Summary page, Remittance page, ORI Summary page, and a compact disk, with the detailed transaction listing for that billing period. A separate bill will be sent to the Channeler for each ORI assigned. Please remit separate checks for each bill received.

The FBI charges a fee for the processing of each civil applicant fingerprint submission and each departmental order fingerprint submission. The FBI will not charge the Channeler for the first NFUF type of transaction resubmission of image quality rejected submissions, providing the resubmission policy is followed. A fee will be charged for subsequent (multiple) submissions of an applicant’s fingerprints. To avoid incurring additional charges when resubmitting fingerprints electronically, the Channeler must follow the resubmission procedures provided in the EBTS.

To ensure compliance with U.S. Treasury regulations, a Channeler shall submit payment to the FBI within thirty (30) days. A Channeler shall be responsible for all collections from an individual/authorized agency making a CHRI check. The FBI CJIS Division will not assist a Channeler in collecting “bad” debts or grant billing adjustments for any such failed collection.

A Channeler may remit payment electronically through U. S. Treasury’s pay.gov website. This is the preferred method of payment. For assistance establishing electronic payments please contact Heather Blizzard at 304-625-5255, <Heather.Blizzard@ic.fbi.gov>, or the FBI CJIS Division, Fee Programs Unit, at 304-625-2360, <fee_programs_unit@ic.fbi.gov> (please note underscores between words).

Checks should be made payable and sent to the following address:

Federal Bureau of Investigation
Criminal Justice Information Services Division
1000 Custer Hollow Road
Clarksburg, WV 26506
Attention: Fee Programs Unit

If you dispute a transaction, please contact the FBI CJIS Division’s Customer Service Group at (304) 625-5590. Please DO NOT deduct any disputed amount from your bill or payment without notifying the FBI CJIS Division. *Billing adjustments will be made on a limited and extenuating circumstance basis.*

Current FBI policy allows the Channeler six (6) months from the date the FBI CJIS Division completed the fingerprint processing to request billing adjustments. If the contractor is aware of a potential billing error prior to receipt of the bill from the FBI CJIS Division, the contractor should contact the FBI CJIS Division immediately at (304) 625-5590 to correct the error.

If the contractor has any questions concerning payments or a change of an address, please contact Fee Programs Unit at (304) 625-2360 or <fee_programs_unit@ic.fbi.gov>.
Audit Responsibilities

The FBI shall conduct an audit of a Channeler within 90 days of the date a Channeler first receives CHRI under the terms of the Outsourcing Standard. In addition, the FBI shall conduct one year and triennial audits of a Channeler thereafter.

A Channeler shall provide all logs required to be maintained by a Channeler as listed in the Outsourcing Standard to the FBI during announced and unannounced audits, to include but not limited to, dissemination of CHRI.

The FBI Compact Officer, National Crime Prevention and Privacy Compact Council (Compact Council), and the U.S. Attorney General reserve the right to audit a Channeler’s operations and procedures at scheduled or unscheduled times.

The Compact Council and the U.S. Attorney General are authorized to perform a final audit of a Channeler’s system after termination and/or conclusion of the contract between the FBI and a Channeler. Please refer to the Outsourcing Standard for more specific requirements and responsibilities.

Security Requirements

A Channeler shall develop, document, administer, and maintain a Security Program (to include physical, personnel, and information technology) that complies with the most current versions of the Outsourcing Standard and the FBI CJIS Security Policy. The Security Program shall describe the implementation of the security requirements described in the Outsourcing Standard and the FBI CJIS Security Policy. In addition, the Channeler is also responsible to set, maintain, and enforce the standards for the selection, supervision, and separation of personnel who have access to CHRI. The FBI shall provide the written approval of a Channeler's Security Program.

The requirements for a Security Program should include, at a minimum:

a) description of the implementation of the security requirements explained in the Outsourcing Standard and the FBI CJIS Security Policy,
b) security training,
c) guidelines for documentation of security violations, and
d) standards for the selection, supervision, and separation of personnel with access to CHRI.

*If a Channeler follows a corporate security policy, it must meet or incorporate the requirements outlined in the Outsourcing Standard and the FBI CJIS Security Policy.*

The FBI shall ensure that a Channeler’s site is a physically secure location to protect against unauthorized access to CHRI. All visitors to computer centers and/or terminal areas shall be escorted by authorized personnel at all times.

The FBI shall conduct criminal history record checks of Channeler (and approved sub-contractor) personnel having access to CHRI. A Channeler shall confirm in writing that each employee has certified that he/she understands all requirements and laws that apply to his/her responsibilities and maintain that list upon request by the FBI. Criminal history record checks and the certification must be completed prior to accessing CHRI.
All Channeler (and approved sub-contractor) personnel must complete, and verify to the FBI upon request, any mandatory training provided by the FBI. A list of Channeler personnel who have access to CHRI shall be maintained by the FBI, with updates provided by the Channeler within 24 hours to the FBI when changes occur. All access to, and dissemination of, CHRI and associated PII is for official purposes only.

If CHRI can be accessed via Wide Area Network/Local Area Network or the Internet, then the Channeler shall protect the CHRI with firewall-type devices to prevent unauthorized access. In addition, data encryption shall be required throughout the network passing CHRI through a shared public carrier network.

An up-to-date log concerning dissemination of CHRI shall be maintained by a Channeler for a minimum one year retention period. This log must clearly identify: (a) the individual and the secondary recipient, with assigned unique identifying numbers; (b) that the record was disseminated; (c) the date of dissemination; (d) the statutory authority for dissemination; and (e) the means of dissemination.

**Channelers may NOT maintain the information in the “Response SRE” field.**

If CHRI is stored or disseminated in an electronic format, a Channeler shall protect against any unauthorized persons gaining access to the equipment and any of the data. In no event shall responses containing CHRI be disseminated other than governed by the Outsourcing Standard and more stringent contract requirements.

All access attempts are subject to recording and routine review for detection of inappropriate or illegal activity. A Channeler’s system shall be supported by a documented contingency plan as defined in the FBI CJIS Security Policy and approved by the FBI.

A Channeler shall provide for the secure storage and disposal of all hard copy and media associated with the system to prevent access by unauthorized personnel. The FBI shall ensure that a procedure is in place for sanitizing all fixed storage media (e.g., disks, drives, backup storage) at the completion of the contract. The FBI shall ensure that a procedure is in place for the disposal or return of all non-fixed storage media (e.g., hard copies).

A Channeler shall maintain a written policy for discipline of employees who violates any security or privacy provisions of these requirements, the relevant contract, the Outsourcing Standard, and the FBI CJIS Security Policy. A Channeler shall not permit any employee suspected of committing a violation to have access to CHRI.

A Channeler shall immediately (within four hours) notify the FBI of any security violation to include unauthorized access to CHRI. Within five calendar days of such notification, the Channeler shall provide the FBI with a written report documenting such security violation, any corrective actions taken by the Channeler to resolve such violation, and the date, time, and summary of the prior notification.

The FBI Compact Officer, Compact Council and the U.S. Attorney General reserve the right to investigate or decline to investigate any report of unauthorized access to CHRI.
Hot Checks Notifications/Wanted Person Identification

- The FBI CJIS Division conducts automated name-based searches (“Hot Checks”) in all National Crime Information Center (NCIC) Persons Files except the Unidentified and NICS Denied Transaction files for all ten-print fingerprint submissions.

- Law Enforcement agencies may contact the submitting agency (Channeler) for applicant information if the agency receives information through the FBI's Hot Check service. The Channeler should provide the law enforcement agency with any and all information they have on file in a timely manner.

  Do not advise the applicant!

Personally Identifiable Information (PII) Breaches

The FBI and all federal executive agencies define PII as “information that can be used to distinguish or trace an individual's identity, such as name, social security number, or biometric records, alone or when combined with other personal or identifying information that is linked or linkable to a specific individual, such as date and place of birth or mother’s maiden name.” Therefore, the DO Applicant Form, the fingerprint card, and the SRE for an individual (to include the rap sheet) all contain PII. Other information submitted by the individual may also contain PII, such as personal information provided when making payment for a DO 556-73 request.

A PII breach occurs when there is a loss of control, compromise, unauthorized disclosure, unauthorized acquisition, unauthorized access, or any situation where persons other than the authorized users, and for other than authorized purposes, have access or potential access to PII, whether physical or electronic. A PII breach may be accidental or purposeful.

Pursuant to the Department of Justice (DOJ) Memorandum, the loss of any sensitive FBI information must be reported to the FBI immediately so steps may be taken to investigate and mitigate the loss. The FBI is required to report breaches to the DOJ within one hour of discovery of the loss. Because of these requirements, it is necessary for a Channeler to contact the FBI CJIS Division as soon as any PII breach occurs so that the FBI may determine the severity of the breach and the associated reporting requirements. All PII breaches or questions concerning possible PII breaches may be directed to the Customer Service Group by calling (304) 625-5590 and requesting to speak with a PII point of contact.

A Channeler is responsible for protecting all PII in its possession and control during the processing of all requests. In addition, a Channeler should notify individuals making DO 556-73 requests of his/her right (via language approved by the FBI) to report PII breaches to the FBI should he/she believe personal information has been compromised.
Information Resources/Training

For fingerprint processing questions (i.e., submission status inquiries, rejections), please contact the FBI CJIS CSG at (304) 625-5590 (8 a.m. – 8 p.m., Monday-Friday, EST).

For policy and procedural questions, please contact Ms. Shaffer at (304) 625-2615 or via e-mail at <diane.shaffer@ic.fbi.gov>, Ms. Bajus at (304) 625-3516 or via e-mail at <sandra.bajus@ic.fbi.gov>, or Mr. Marozzi at (304) 625-2129 or via e-mail at <jarrod.marozzi@ic.fbi.gov>.

For technical or hardware issues (i.e., management of lines, connection problems), please contact the FBI CJIS Division Help Desk at (304) 625-4357 (24 hours a day, 7 days a week).

Limited courses are offered by the FBI on “Fingerprint and CHR Training” and “Recording Legible Fingerprints.” Requests for such courses may be sent to <liaison@leo.gov> for more information.

Authorized Recipients should contact Ms. Shaffer, Ms. Bajus, Mr. Marozzi, or Mr. Barron with questions on channeling requests.