



## OUR VALUE STATEMENT

“A Proud Tradition of Service through Excellence, Integrity, and Courtesy”

## CUSTOMERS

The Noncriminal Justice Auditors serve noncriminal justice and governmental agencies, Michigan State Police managers, peers, and the general public who have access to criminal justice information.

## MISSION

To provide exceptional audit and training service through reviewing and evaluating agency records, policies, and practices to ensure understanding, compliance and success for our customers as they perform their respective missions.

## OUR STAFF

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# Noncriminal Justice Agency School Compliance Audits

Dear Agency:

The Federal Bureau of Investigation (FBI) Criminal Justice Information Services (CJIS) Division is empowered with the authority to allow the exchange of Criminal History Record Information (CHRI) for the purposes of licensing and employment, if authorized by a state statute and approved by the Attorney General of the United States.

The FBI CJIS Audit & Integrity Unit conducts a triennial audit of the State of Michigan, which includes noncriminal justice agencies (NCJAs) use of CHRI. For our state to be in compliance with 42 U.S.C. Chapter 140, the Michigan State Police (MSP) must conduct audits of all the NCJAs that receive fingerprint based CHRI for the purposes of employment suitability and licensing determinations.

The purpose of the audit is to assess compliance with noncriminal justice use pertaining to the security, maintenance, and dissemination of CHRI. The FBI has designated the MSP as the CJIS Systems Agency (CSA) that is duly authorized to oversee the security management of all criminal justice information (CJI) exchanges within its state. The CSA is responsible for setting, maintaining, enforcing, and reporting compliance to the FBI CJIS Division for such exchanges, through the audit process.

In September 2010, the MSP, Criminal Justice Information Center (CJIC), Audit & Training Section (ATS) began traveling to various parts of Michigan, to learn as much as it could about the hiring, licensing, and volunteer processes within schools in preparation for the compliance audits.

This handout is being provided to you so that you can better understand the compliance audit process and requirements.

The MSP thanks you for your time and cooperation. We look forward to working with your agency in the future.

For further details, questions, or comments contact us at  
[MSP-CJIC-ATS@michigan.gov](mailto:MSP-CJIC-ATS@michigan.gov).

Sincerely,

The NCJA Auditors  
Criminal Justice Information Center  
Michigan State Police



## OBJECTIVES

To create and implement audit guidelines and cycles that meet the FBI CJIS triennial audit of the MSP.

To review the NCJAs CJ handling processes and determine if applicable state and federal statutory requirements are met.

To provide any necessary statutory mandates to NCJAs.

To assist NCJAs by providing recommendations for the proper use, dissemination, storage, and destruction of CJ.

To establish quality working relationships with all NCJAs within the State of Michigan.

## TRAINING

Option 1: On-site with a minimum of 20 participants.

Option 2: Via Webinar E-mail ATS for further information.

## What this means for you, the NCJA

- NCJAs (a school district, intermediate school district, governing body of a public school academy, or nonpublic school) are subject to audit as well as contractors that are providing an administrative function to the NCJA.
- NCJAs receiving CHRI are subject to audit and must complete a NCJA User Agreement for Release of CHRI, RI-087 and return to MSP immediately ([www.michigan.gov/cjicats](http://www.michigan.gov/cjicats)).
- NCJA schools in a working relationship with a NCJA contractor must have a user agreement according to the Security & Management Control Outsourcing Standard (OS) for Non-Channelers, and ensure the contractor is operating in compliance with the CJIS Security Policy and the OS.
- NCJA contractors cannot legally share with NCJA schools without an OS agreement in place.
- NCJA contractors cannot legally share with other NCJA contractors under any circumstance.
- NCJAs are subject to audit.
- NCJAs must complete a Local Agency Security Office (LASO) Appointment form ([www.michigan.gov/cjicats](http://www.michigan.gov/cjicats)).

## Auditable Areas

(References include section numbers to the FBI CJIS Security Policy and/or applicable statute)

- Supporting Documentation
  - Position Description
  - Fingerprint Reason Code
  - Applicant Consent
- User Agreements (5.1 & Title 28, Ch. IX Part 906)
- Local Agency Security Officer (LASO) (3.2.9)
- Personnel Security (5.12)
- Media Protection (5.8)
- Controlled Area (5.9.2)
- Standard Authentication (5.6.2.1)
- Secondary Dissemination (5.1.3)
- Audit Record Retention (5.4.6)
- Incident Response (5.2)
- Security Awareness Training (5.3)

## Applicable Areas of Law

The Revised School Code, MCL 380.1230a

National Child Protection Act, 42 USC 5119 § 320928

The FBI CJIS Security Policy, v.5.0  
[www.michigan.gov/cjicats](http://www.michigan.gov/cjicats)

Security & Management Control Outsourcing Standard for Non-Channelers  
[www.michigan.gov/cjicats](http://www.michigan.gov/cjicats)

## Additional Resource

School Guidance  
[www.michigan.gov/cjicats](http://www.michigan.gov/cjicats)