

**CJIS Advisory Policy Board
Compliance Evaluation Subcommittee
Letter Scales**

NCIC / NSOR Audits

Letter Type	Number of Recommendations	Number of Recurring Recommendations	Number of Recommendations Recurring for 2 Audit Cycles
Sanction	9 or more	5 or more	4 or more
Concern (with or without follow-up)	3-8	1-4	1-3
Closure	3 or more with sufficient responses	0	0
Commendation	0-2 with sufficient responses	0	0

IT Audit

Letter Type	Number of Recommendations	Number of Recurring Recommendations	Number of Recommendations Recurring for 2 Audit Cycles
Sanction	10 or more	5 or more	3 or more
Concern (with or without follow-up)	3-10 (7 or more with sufficient responses = no follow-up)	1-4	1-2
Closure	3-6 with sufficient responses	0	0
Commendation	0-2 with sufficient responses	0	0

NICS Audit

Due to varying levels of NICS participation among states, there can be wide variance in the total number of policies assessed and corresponding recommendations made during a NICS audit. These variations preclude the development of a simple standardized numeric scale of violations used for recommending the type of sanctions letter that a state may receive. The primary source leveraged for analysis is the

“Recommended Correspondence Usage” document approved for use by the Compliance Evaluation Subcommittee, which takes into account additional factors such as the adequacy of the agency’s response, seriousness of the violation, and recurrence of violations over multiple audit cycles.

N-DEx

Letter Type	Number of Recommendations	Number of Recurring Recommendations	Number of Recommendations Recurring for 2 Audit Cycles
Sanction	4 or more	3 or more	2 or more
Concern (with or without follow-up)	3	1-2	1
Closure	2 or more with sufficient responses	0	0
Commendation	0-1 with sufficient responses	0	0

Letter scale when agencies access NCIC/III via N-DEx

Letter Type	Number of Recommendations	Number of Recurring Recommendations	Number of Recommendations Recurring for 2 Audit Cycles
Sanction	5 or more	4 or more	2 or more
Concern (with or without follow-up)	4	2-3	1
Closure	2-3 with sufficient responses	0	0
Commendation	0-1 with sufficient responses	0	0

NIS

Letter Type	Recommendation
Sanction	Severe finding without sufficient response
Concern (with or without follow-up)	Less severe finding without sufficient response (with follow-up) Severe finding with sufficient response (without follow-up)
Closure	Less severe finding with sufficient response
Commendation	No finding

Sufficient response is generally defined as a response that adequately details actions taken on a jurisdictional wide basis to rectify the audit finding, including actions taken to mitigate future reoccurrence of the audit finding, and indicates that the actions have been completed. If the audit finding is reoccurring from previous audit cycles, the sufficiency of the response also take into account actions detailed in the current response in comparison with the actions detailed in previous responses.

Severity of an audit finding is generally based on the audit finding's potential impact on system integrity as well as criminal history record accuracy, completeness, and timeliness. The severity of an audit finding may also be increased due to reoccurrence of an audit finding from previous audit cycles.

Notes:

A Letter of Sanction could be sent when the agency:

- Fails to respond to recommendations in an audit report, or
- Indicates an inability to achieve compliance with policy requirements due to extreme circumstances (e.g., if the CJIS Systems Agency has discontinued audit or training programs due to budgetary constraints).

A Letter of Closure could be sent when the Subcommittee has determined the response received to the Letter of Concern/Follow-up Letter/Letter of Sanction adequately addresses all audit findings.

5/4/18