

National Sex Offender Registry Audit

Audit Objective(s)/Scope

In November 2008, the U. S. Department of Justice, Office of the Inspector General recommended that the FBI ensure that the National Sex Offender Registry (NSOR) has more complete and accurate information by designing and implementing a new audit of jurisdiction registries' compliance with FBI NSOR procedures. Consequently, the CJIS Division developed the NSOR Audit. The NSOR Audit is designed to assess policy compliance through a review and analysis of the CSA and registry's administrative policies and data quality procedures, as they relate specifically to the NSOR. Particular emphasis is placed on the validity, accuracy, and completeness of NSOR records because they are accessed by governmental agencies responsible for implementing the Sex Offender Registration and Notification Act (SORNA) and law enforcement agencies responsible for identifying, registering, monitoring, apprehending, and tracking sex offenders. Although compliance with all NCIC, Interstate Identification Index (III), and CJIS policies is not assessed, adherence with all policies and procedures is required to be an NCIC participant.

Compliance with SORNA is not assessed by the CJIS Division. The provisions of SORNA specifically designate the U.S. Department of Justice's Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking as the entity which determines SORNA compliance.

Overview of the Process

Pre-audit

Prior to the on-site audits, the CAU auditors contact the CSO and/or registry POC to schedule the audit date and to give an overview of the audit process. Additionally, CAU auditors gather preliminary audit information to determine whether the CSA's registry audit will be a centralized or decentralized audit and discuss pre-audit responsibilities.

The SOR pre-audit questionnaire is used to assist the audit manager in gathering pertinent information prior to the on-site visit. Information gathered from the pre-audit questionnaire is used to formulate additional questions to be answered during the on-site visit and to assist in determining policy compliance. Additionally, the pre-audit questionnaire is used as a tool by audit managers to prepare information sheets for local auditors, outlining/summarizing the CSA's audit program and procedures.

Assessment

The CAU's audit manager will visit the registry to interview the CSO and/or registry POC to determine the CSA's adherence to NCIC policies and procedures, as they relate specifically to the NSOR.

Local agency audits are only necessary for decentralized audits when case file information cannot be viewed electronically at the CSA/registry. During local audits, auditors conduct interviews with local agency representatives to determine the agency's adherence to NCIC policies and procedures. Additionally, an on-site data quality review is conducted to determine the validity, accuracy, completeness, and timely entry/modification/removal of NSOR records. Auditors compare NSOR records against agency case files and document audit findings. Upon completion of the on-site interviews and data quality reviews, auditors determine overall compliance with FBI NCIC policies and procedures.

Post-audit

After the audit, a draft FBI NSOR Audit report is forwarded to the CSO for review and comment. The report includes findings from the on-site interviews, the data quality reviews, and provides required actions for compliance, when necessary.

CSOs are requested to review the draft report and respond to required actions, if any, by indicating corrective actions. The CSO's response is appended to the back of the report. Once the response is appended to the report, a final report is prepared and sent to the CSO.

The CAU provides the Executive Summary of the final report, which includes the CSO's response to the required actions, to the CJIS APB's CES for review and appropriate action. The CES will continue to monitor the audit required actions until appropriate remedial action has been taken.