

## **Responding to Federal Bureau of Investigation (FBI) Criminal Justice Information Services (CJIS) Division Audit Findings**

Primary audit participants (i.e., recipients of FBI CJIS audit reports) are required to provide corrective actions for all audit findings as part of procedures for finalizing audit results and facilitating formal review by the CJIS Advisory Policy Board (APB) or the National Crime Prevention and Privacy Compact Council (Council). This document describes expectations for corrective actions and associated factors to consider when preparing a response.

There are two categories of responses, the initial response to draft audit results and subsequent responses to requests from the CJIS APB or the Council. The purpose of the initial response is to describe corrective actions taken to address audit findings, and to provide operational clarifications or dispute audit findings. Subsequent responses to requests from the CJIS APB or Compact Council center on providing updates or additional information about corrective actions.

Corrective actions must include policy and procedural changes necessary to adequately resolve all aspects of an audit finding and sufficiently reduce the risk of future noncompliance. All responses should provide relevant details about the corrective actions taken by the primary audit participant. This includes specific information about what action is being taken and by whom, along with when the action is occurring and how it remedies the audit finding. In addition, responses should describe any potential shortfalls or obstacles, such as resource constraints, which may impede the audit participant's ability to implement corrective actions. It is also acceptable for primary audit participants to provide supporting documentation.

Corrective actions do not necessarily need to be fully implemented, as it is impractical to expect full resolution of some audit findings within the time currently allotted to respond. It is important for responses to distinguish between those corrective actions which have been completed and those which are planned for future implementation or not yet completed. To the greatest extent possible, all corrective actions described in responses should include specific dates and timeframes. For corrective actions which may take an extended period of time to implement, responses should also describe any interim measures.

Corrective actions must cover two distinct perspectives, jurisdiction wide and local agency specific. Jurisdiction wide corrective actions are the most important. Primary audit participants should always focus efforts toward addressing an audit finding collectively with all applicable local agencies throughout the entire jurisdiction. In addition to jurisdiction wide corrective actions targeting local agency procedures, primary audit participants should also consider strengthening their education, training, and audit programs. Local agency specific corrective actions must center on measures taken to resolve each identified finding at the local agency. Corrective actions at local agencies should be a collaborative effort by the primary audit participant and the local agency. This demonstrates the primary audit participant's ability to work with local agencies, rather than allowing each local agency to take independent corrective action and provide an independent response which may not achieve full compliance. Local agency specific corrective actions must address an audit finding for each of the individual local agencies where the finding was observed. It should be noted that the jurisdiction wide corrective actions may also cover some or all of the local agencies where an audit finding was observed. If this is the case, the response must explain how the jurisdiction wide response directly applies to each of these local agencies as part of the local agency specific response.