



# Oregon

Kate Brown, Governor

Department of State Police

Headquarters

3565 Trelstad Ave SE

Salem, OR 97317-9614

(503) 378-3720

November 9, 2017

To: Agency Administrators and LEDS Representatives

Re: CJIS Data Security and Outsourcing Standard

As you may know, the FBI in recent years began an audit program specific to access and use of criminal offender record information by authorized agencies for non-criminal justice (NCJ) purposes.

In 2015 the FBI conducted a zero cycle audit of Oregon NCJ agencies. Among the outcomes were findings of unauthorized parties, mainly involving contractors and vendors providing administrative services to authorized non-criminal agencies.

Prior to the 2015 FBI audits in Oregon and as recent as earlier this year, guidance had been given by OSP that an agency could comply with the CJIS Security Policy in these instances by implementing a Security Addendum with a vendor/contractor.

After further consultation and clarification with the FBI's security audit staff, the above guidance was determined to be inaccurate. An executed Security Addendum only applies to the administration of criminal justice functions. In fact, states are required to implement the National Crime Prevention and Privacy Compact Outsourcing Standard when these instances involve the access to and handling of CHRI for a non-criminal justice function, regardless of the agency type.

During the Oregon State Police 2017 CJIS Statewide Training Conference held in Bend, Oregon, OSP facilitated discussions within several of the breakout sessions regarding the need to implement a statewide Outsourcing Standard process to appropriately address all third-party access to CHRI for non-criminal justice purposes as soon as possible.

As an initial step in the start-up process, OSP audit staff have constructed a survey questionnaire for the purpose of making a preliminary assessment regarding how many and which agencies will be impacted by this change, in order to achieve full compliance with the CJIS Security Policy.

The following OSP web page location is being established to post reference information and tools that will assist as we begin moving agencies toward compliance, this can be viewed at [www.oregon.gov/osp/CJIS/pages/index.aspx](http://www.oregon.gov/osp/CJIS/pages/index.aspx) . Please watch for updates and additional documents which will include:

- Outsourcing Standard Overview and Responsibilities
- FBI CJIS Security Policy
- Process Workflow document
- Agency Checklist of Steps for achieving compliance
- Agency/Vendor Contract Amendment template
- Agency Request Letter template
- Audit reference documents

In the coming months, OSP will be working with all applicable agencies to begin implementing this change. Some agencies will be able to reach compliance in a short time while others will likely have a longer transition. Our target is to implement the Outsourcing Standard process and complete as many of the required steps as possible for all applicable agencies by October 2018, and achieve 100% compliance statewide no later than October 2020. OSP CJIS Audit staff is here to assist, where needed.

Please review these materials to assess your current status and contact your designated OSP Auditor or myself if you have any questions or would like to discuss further. Please return your completed survey questionnaire by Monday November 27, 2017.

Noncriminal Justice Agencies, please send your responses to CJIS Auditor Leah Bernards at [leah.bernards@state.or.us](mailto:leah.bernards@state.or.us), and if you have any questions, please call Leah at 503 947-8582.

Sincerely,



Patricia Whitfield, Director  
Criminal Justice Information Services Division  
Oregon State Police  
503-934-2305  
[Patricia.Whitfield@state.or.us](mailto:Patricia.Whitfield@state.or.us)