Personnel

Background Information Handling and Personnel Sanctions AR 4112.5(a) 4212.5(a) 4312.5(a)

1. **Overview & Purpose**

   The overriding goal of this policy is to comply with the Department of Public Safety (DPS) Criminal Justice Information Services (CJIS) System Agency (CSA) Security Policy and the Federal Bureau of Investigation (FBI) CJIS Security Policy requirements on Information Handling and Personnel Sanctions. Due to the nature of the CJIS Security Policies, it is necessary to distinguish within the Sitka School District a policy and procedure to clarify the handling of criminal justice information received as a result of fingerprint submissions to DPS. This policy is adopted into the existing School Board Policies to ensure Sitka School District personnel understand and adhere to this policy.

2. **Scope**

   This policy applies to all facilities, offices, locations and equipment owned or leased by the Sitka School District and all employees, contractors, consultants, temporary staff, and other workers at the Sitka School District, who work with, handle or have unescorted access to State and/or FBI criminal justice information (CJI) received from DPS as a result of applicant fingerprint card submissions for State and/or National (FBI) criminal record checks.

3. **Policy: Information Handling**

   **A. Official Purpose**
   
   Information obtained from the criminal justice information (CJI) systems, namely the Department of Public Safety and the FBI, from fingerprint based criminal history checks must only be used for the official purpose for which it was requested. For the Sitka School District this authority is AS 12.62.160 for the purpose of employment or a volunteer with discipline or control over minor or dependent adult.

   **B. Authorized Personnel**
   
   Authorized Personnel is any individual with an official business need for unescorted access to CJI. Authorized Sitka School District personnel must follow the FBI and CSA (DPS) CJIS Security Policies and state and federal rules and regulations regarding CJI and criminal history record information (CHRI), which is a subset of CJI. All authorized personnel shall only access CJI or CHRI when there is an official purpose to do so and it falls within the authority listed in 3A. All agency personnel authorized by the Sitka School District to handle CJI or CHRI shall complete Security Awareness Training prior to being provided access to CJI or CHRI.
C. **Physical Information Storage**

A significant security risk emerges when CJI or CHRI is transferred from a secure location to a less secure location or is disposed of improperly. All physical files that contain CJI or CHRI shall only be stored in the manner outlined in this policy when not being actively handled by authorized personnel. All CJI is stored in a locked filing cabinet marked ‘for authorized personnel only’ and only authorized personnel have access to keys for the cabinet.

CJI or CHRI will not be handled, stored or processed in a digital format; or handled in any location outside of the physically secure and/or controlled access location included in this policy and as defined in the FBI CJIS Security Policy. CJI shall not be sent through any form of digital communication such as email or text messaging. Original documents containing CHRI or CJI will be destroyed when no longer needed. Documents containing CJI or CHRI will be destroyed as directed following the Sitka School District Media Destruction Policy and as outlined in the FBI CJIS Security Policy.

D. **Access to CJI**

Access to CJI is only permissible when the CJI is needed to perform Sitka School District official duties and shall only be utilized for official purposes outlined in this policy. The CJI may be removed from the locked CJI filing cabinet by authorized personnel for the official purpose outlined in this policy. When CJI is removed from the filing, the CJI shall be handled only by authorized individual(s), and the CJI shall always be within the physical control of an authorized individual when it is outside of the filing cabinet. When the CJI is no longer needed for the official purpose, the CJI will be returned to the locked filing cabinet.

E. **Personnel Sanctions**

Any personnel covered under this policy who violates any portion of this policy may be subject to the disciplinary processes in place with the Sitka School District. Misuse of CJI or unauthorized access to CJI may result in sanctions against this agency as well as the personnel that violate this policy. Violations of this policy may include disciplinary action up to and including loss of authorization to handle CJI, suspension, or termination of employment based on offense severity; misuse of CJI could also include result in criminal prosecution under state and/or federal laws.

**Legal Reference**

*AS § 12.62.160 - Release and Use of Criminal Justice Information*