#	*QUESTION*	*YES*	*NO*	*N/A*	*STANDARD*	*COMMENT*
	Personnel Security (PS)[1]					
1.	Based on inquiry and record examination, has the Tribe or TGRA developed, documented, and disseminated to organizational personnel with personnel security responsibilities an agency-level personnel security policy that:					
	• Addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance?	____	____	____	PS-1, a.1.a	
	• Is consistent with applicable laws, executive orders, directives, regulations, policies, standards, and guidelines?	____	____	____	PS-1, a.1.b	
2.	Does the Tribe or TGRA have procedures to facilitate the implementation of the personnel security policy and the associated personnel security controls?	____	____	____	PS-1, a.2	
3.	Has the Tribe or TGRA designated organizational personnel with information security responsibilities to manage the development, documentation, and dissemination of the personnel security policy and procedures?	____	____	____	PS-1, b	
4.	Based on inquiry and record examination, does the Tribe or TGRA review and update the current personnel security:					
	• Policy annually and following assessment or audit findings, security incidents or breaches, or changes in applicable laws, executive orders, directives, regulations, policies, standards, and guidelines?					
	• Procedures annually and following assessment or audit findings, security incidents or breaches, or changes in applicable laws, executive orders, directives, regulations, policies, standards, and guidelines?	____	____	____	PS-1, c.1	
		____	____	____	PS-1, c.2	

[1] Having proper security measures against the insider threat is a critical component for the CJIS Security Policy. This section's security terms and requirements apply to all personnel who have unescorted access to unencrypted CJI. Regardless of the implementation model – physical data center, virtual cloud solution, or a hybrid model – unescorted access to unencrypted CJI must be determined by the criminal and noncriminal justice agency taking into consideration if those individuals have unescorted logical or physical access to any information system resulting in the ability, right, or privilege to view, modify, or make use of unencrypted CJI

#	*QUESTION*	*YES*	*NO*	*N/A*	*STANDARD*	*COMMENT*
5.	Based on inquiry and record examination, has the Tribe or TGRA assigned a risk designation to all organizational positions?	____	____	____	PS-2, a	
6.	Based on inquiry and record examination, has the Tribe or TGRA established screening criteria for individuals filling those positions?	____	____	____	PS-2, b	
7.	Based on inquiry and record examination, does the Tribe or TGRA review and update position risk designations as required?	____	____	____	PS-2, c	

#	*QUESTION*	*YES*	*NO*	*N/A*	*STANDARD*	*COMMENT*
8.	Based on inquiry and record examination, does the Tribe or TGRA screen individuals prior to authorizing access to the information system which contain CJI / CHRI?	____	____		2021 CHRI MOU V.B.17 25 C.F.R. § 502.14 (d) 25 C.F.R § 502.19 (e) 25 C.F.R. § 502.25	
	If the Tribe or TGRA documents TGRA staff with access to CHRI as a § 502.14 (d) Key employee Key employee[2] or a § 502.19 (e) Primary Management Official[3] of the Gaming Enterprise[4], does the Tribe or TGRA conduct a national fingerprint-based record check of each individual?	____	____	____	PS-3, a.1.c	
	• If a felony conviction of any kind exists, did the Tribe or TGRA deny the individual access to CJI / CHRI[5]?	____	____	____	PS-3, a.3.a	
	• If a misdemeanor conviction of any kind exists, did the Tribe or TGRA determine the nature or severity of the misdemeanor offense(s) did not warrant disqualification[6]?	____	____	____	PS-3, a.3.b	
	• If the person appears to be a fugitive or has an arrest history without conviction, did the Tribe or TGRA review the matter to determine if access to CJI / CHRI is appropriate[7]?	____	____	____	PS-3, a.4	
	• If the person already has access to CJI / CHRI and is subsequently arrested and or convicted, did the Tribe or TGRA determine whether continued access to CJI/CHRI is appropriate[8]?	____	____	____	PS-3, a.5	
	• If the Tribe or TGRA determines access to CJI / CHRI by the person would not be in the public interest, access shall be denied.	____	____	____	PS-3, a.6	

[2] *See* 25 C.F.R. § 502.14 (d).
[3] *See* 25 C.F.R § 502.19.
[4] *See* 25 C.F.R. § 502.25 ("*Gaming Enterprise* means the entities through which Tribe conducts, regulates, and secures gaming on Indian lands within such tribe's jurisdiction pursuant to the Indian Gaming Regulatory Act.).
[5] The Tribe or TGRA "may ask" for a review by the Authorized Recipient (TGRA) designee and NIGC designee in extenuating circumstances where the severity of the offense and the time that has passed would support a possible variance.
[6] The TGRA may request the NIGC designee review a denial of access determination.
[7] The TGRA may request the NIGC designee to determine whether access is "appropriate."
[8] Continued access to CJI / CHRI shall be determined by the Authorized Recipient (TGRA) designee unless the TGRA wants the NIGC designee to make the determination. This does not grant NIGC hiring/firing authority, only the authority to approve or deny access to NIGC CJI / CHRI from the FBI. For "offenses other than felonies," Authorized Recipient (TGRA) designee has the "latitude to delegate continued access determinations."

#	QUESTION	YES	NO	N/A	STANDARD	COMMENT
9.	Based on inquiry and record examination, does the Tribe or TGRA maintain a list of personnel who have been authorized unescorted access to unencrypted CJI / CHRI and provide a current copy of the access list to the NIGC ISO (iso@nigc.gov)?	____	____	____	PS-3, a.7 2021 CHRI MOU Guidance Appendix, 4.b	
10.	Based on inquiry and record examination, does the Tribe or TGRA, upon termination of individual employment:					
	a. Disable system access within twenty-four (24) hours?	____	____	____	PS-4, a	
	b. Terminate or revoke any authenticators and credentials associated with the individual?	____	____	____	PS-4, b	
	c. Conduct exit interviews that include a discussion of non-disclosure of CJI / CHRI and PII?	____	____	____	PS-4, c	
	d. Retrieve all security-related organizational system-related property?	____	____	____	PS-4, d	
	e. Retain access to organizational information and systems formerly controlled by the terminated individual?	____	____	____	PS-4, e	
11.	Based on inquiry and record examination, does the Tribe or TGRA review and confirm ongoing operational need for current logical and physical access authorizations to CJI / CHRI systems and physically secure locations and/or controlled areas when individuals are reassigned or transferred to other positions within the organization?	____	____	____	PS-5, a	
12.	Based on inquiry and record examination, does the Tribe or TGRA initiate appropriate actions such as closing and establishing accounts and changing system access authorizations within twenty-four (24) hours?	____	____	____	PS-5, b	
13.	Based on inquiry and record examination, does the Tribe or TGRA modify access authorization as needed to correspond with any changes in operational need due to reassignment or transfer?	____	____	____	PS-5, c	

#	*QUESTION*	*YES*	*NO*	*N/A*	*STANDARD*	*COMMENT*
14.	Based on inquiry and record examination, does the Tribe or TGRA notify organizational personnel with information security responsibilities, organizational personnel with personnel security responsibilities, system/network administrators, and organizational personnel with account management responsibilities prior to personnel transfer?	____	____	____	PS-5, d	
15.	Based on inquiry and record examination, has the Tribe or TGRA developed and documented access agreements for CJI / CHRI organizational systems?	____	____	____	PS-6, a	
16.	Based on inquiry and record examination, does the Tribe or TGRA review and update the access agreements at least annually?	____	____	____	PS-6, b	
17.	Based on inquiry and record examination, does the Tribe or TGRA verify that individuals requiring access to organizational information and systems:					
	1. Sign appropriate access agreements prior to being granted access?	____	____	____	PS-6, c.1	
	2. Re-sign access agreements to maintain access to CJI / CHRI organizational systems when access agreements have been updated or when signatories change?	____	____	____	PS-6, c.2	
18.	Based on inquiry and record examination, has the Tribe or TGRA established personnel security requirements, including security roles and responsibilities for external providers?	____	____	____	PS-7, a	
19.	Based on inquiry and record examination, does the Tribe or TGRA require external providers to comply with personnel security policies and procedures established by the organization?	____	____	____	PS-7, b	
20.	Based on inquiry and record examination, does the Tribe or TGRA document personnel security requirements?	____	____	____	PS-7, c	

#	*QUESTION*	*YES*	*NO*	*N/A*	*STANDARD*	*COMMENT*
21.	Based on inquiry and record examination, does the Tribe or TGRA require external providers to notify organizational personnel with information security responsibilities, organizational personnel with personnel security responsibilities, system/network administrators, or organizational personnel with account management responsibilities of any personnel transfers or terminations of external personnel who possess organizational credentials and/or badges, or who have system privileges within twenty-four (24) hours?	____	____	____	PS-7, d	
22.	Based on inquiry and record examination, does the Tribe or TGRA monitor provider compliance with personnel security requirements?	____	____	____	PS-7, e	
23.	Based on inquiry and record examination, does the Tribe or TGRA employ a formal sanctions process for individuals failing to comply with established information security and privacy policies and procedures?	____	____	____	PS-8, a	
24.	Based on inquiry and record examination, does the Tribe or TGRA notify organizational personnel with information security responsibilities, organizational personnel with personnel security responsibilities, system/network administrators, or organizational personnel with account management responsibilities within twenty-four (24) hours when a formal employee sanctions process is initiated, identifying the individual sanctioned and the reason for the sanction?	____	____	____	PS-8, b	
25.	Based on inquiry and record examination, does the Tribe or TGRA incorporate security and privacy roles and responsibilities into organizational position descriptions?	____	____	____	PS-9	