

RHODE ISLAND
CRIMINAL HISTORY RECORD INFORMATION PLAN

(76-SS-99-6015)

Rhode Island Governor's Justice Commission

47115

June 2, 1976

NCJRS

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TABLE OF CONTENTS

I.	<u>INTRODUCTION</u>	1
	OBJECTIVES.....	1
	RESPONSIBILITY.....	2
	CURRENT CRIMINAL HISTORY SYSTEMS.....	3
	EXISTING DISPOSITION REPORTING SYSTEMS.....	5
II.	<u>APPROACH TO MEETING OBJECTIVES</u>	9
	CENTRAL STATE REPOSITORY.....	9
	SECURITY AND PRIVACY SUBCOMMITTEE.....	10
	DEFINITIONS.....	10
	CRIMINAL HISTORY RECORD INFORMATION GUIDELINES.....	13
	AUDIT RESPONSIBILITY.....	19
	CERTIFICATION PROCESS.....	20
	COST ESTIMATE.....	21
III.	<u>INDIVIDUAL ACCESS AND REVIEW</u>	22
IV.	<u>MAJOR IMPLEMENTATION MILESTONES AND RESPONSIBILITIES</u>	29
	IMPLEMENT INDIVIDUAL ACCESS AND REVIEW PROCEDURE...	29
	ESTABLISH SECURITY AND PRIVACY SUBCOMMITTEE.....	29
	DESIGN CONCEPTUAL CJIS REPORTING AND DISSEMINATION SUBSYSTEMS.....	29
	SUBMIT CRIMINAL HISTORY INFORMATION LEGISLATION....	30
	IMPLEMENT CJIS SUBSYSTEMS.....	30
	IMPLEMENT FINAL CRIMINAL HISTORY RECORD INFORMATION GUIDELINES.....	31
V.	<u>IMPLEMENTATION TIME SCHEDULE</u>	32

I. INTRODUCTION

Rhode Island's Criminal History Record Information Plan establishes statewide guidelines and procedures to ensure the security and privacy of an individual's criminal history record information. The Plan will be implemented to incorporate new guidelines for completeness and accuracy, dissemination and security of criminal history record information.

Due to Rhode Island's size and criminal justice organizational structure, the concept of a Central State Repository best facilitates the implementation of the major elements of federal security and privacy regulations. This Plan outlines Rhode Island's approach for implementation of the central repository function within the Department of the Attorney General and defines a new organizational structure, the Security and Privacy Subcommittee, to coordinate the security and privacy effort.

The Plan conforms to Department of Justice Criminal Justice Information Systems guidelines dated May 20, 1975, with the exception of hardware dedication requirements and dissemination provisions, which are re-defined in Section II.

OBJECTIVES

The objectives of Rhode Island's Criminal History Record Information Plan are as follows:

- To implement procedures for individual access and review of criminal history record information.
- To establish statewide guidelines for handling criminal history record information; and,

- To outline the major milestones necessary to implement these guidelines by December 31, 1977.

While federal regulations address only LEAA funded record systems, Rhode Island's Plan is intended as an action document for all areas of criminal history record handling.

It is Rhode Island's intention to implement the total Criminal History Record Plan prior to December 31, 1977.

RESPONSIBILITY

The Rhode Island Governor's Justice Commission (GJC) has responsibility for overall Plan development. The Justice Information Systems Task Force, established by the GJC Supervisory Board, has acted in an advisory capacity during the planning process. Task force representation included:

- Governor's Justice Commission
- Court Administrator
- Department of the Attorney General
- Rhode Island State Police
- Rhode Island Police Chief's Association
- Department of Corrections

Staff members of the Legislative Commission on Criminal Procedure and the GJC assisted the task force. Representatives of the Governor's office and the Department of Administration were also advised of task force activities during the planning process.

Plan implementation will be the responsibility of the Department of Attorney General working with the Security and Privacy Subcommittee. This Subcommittee will be established as a first step in the implementation process.

CURRENT CRIMINAL HISTORY SYSTEMS

Rhode Island's current criminal history systems are decentralized with each criminal justice agency maintaining independent files of its disposition activity. Duplicate felony arrest and fingerprint data is maintained by the Department of the Attorney General's Division of Criminal Identification (DCI); however, no offender history files within the State currently meet the requirements for completeness and accuracy with regard to dissemination as outlined in Section II.

Police arrest files are kept at the agency level with duplicate felony records forwarded to the DCI. Court disposition data is maintained in sequential case records at the local court level. Corrections and probation data is maintained in manual files at the agency level. Parole data is forwarded to the DCI as part of Parole Board administrative procedure.

The Department of the Attorney General has responsibility for all Superior Court prosecutions and maintains, through in-process case files and its DCI, the State's most complete file on felony offenders. Misdemeanor data is not a formal part of the DCI except for State agency arrests which are under the Department of the Attorney General's jurisdiction.

Rhode Island's juvenile data is strictly controlled under the jurisdiction of the Family Court. Existing history data is controlled at a single court level.

Criminal history dissemination, particularly relating to police requirements, is handled on a decentralized basis among local police agencies, State Police, and the DCI. The majority of industrial and individual dissemination is referred to the DCI by local police;

however, no uniform policy or procedure for local agencies is in effect to control the process, particularly as it relates to state and federal agency dissemination.

No part of Rhode Island's current disposition reporting system is automated. The Department of the Attorney General's PROMIS system, which is planned for operation during the second quarter of 1976, will provide the State CJIS an automated basis for the prosecutor and court felony disposition.

Rhode Island believes that any system developed to meet requirements for completeness and accuracy must first meet the operational needs of police agencies. Additionally, non-criminal justice agency and individual dissemination must be under adequate central control to provide procedural uniformity as well as ease of operation.

The State recognizes, however, that to merely legislate a central dissemination concept without providing an operational framework to meet criminal justice agency needs would be unrealistic, since the LEAA Guidelines M4100-1E require that the State develop a multi-year State Comprehensive Criminal Justice Information System Master Plan, and that:

"The Comprehensive State Plan must contain a strategy and plans for the development and implementation of a criminal justice information system and for the development and funding of such communications and telecommunications systems and projects as are required by the State and its subdivisions to meet the goals and objectives of the State."

The CJIS Plan will reflect the State's systems approach to support a centralized repository function and will include an integrated approach.

for statewide offender disposition reporting and criminal history dissemination that meets the guidelines established in Section II of this Plan.

This Plan will require modification of the existing DCI function to accommodate an expanded centralized record storage and dissemination process. This will also require a change in DCI statutes to reflect its expanded role, its relationship to a State Security and Privacy Subcommittee, and a mandatory disposition reporting requirement that will include misdemeanor as well as felony offenses.

EXISTING DISPOSITION REPORTING SYSTEMS

In order to describe the existing disposition reporting systems in a comprehensive manner, our approach will be a two-fold path:

- 1) A review of the statutes applicable to the Division of Criminal Identification (DCI). See Appendix A for full texts.
- 2) A review of the actual procedures used to report dispositions.

A. DCI Statutes

Section 12-1-4 establishes the DCI with its Chief serving at the pleasure of the Attorney General. It also indicates that the Chief may have staff as needed to fulfill the duties of Sections 12-1-5 to 12-1-12.

Section 12-1-5 locates the DCI in Providence County Courthouse.

Section 12-1-6 defines the responsibility of the General Assembly to appropriate funds for the DCI functions on an annual basis.

Section 12-1-7 indicates that DCI must maintain information on all persons who have been or shall be convicted of any felony, or imprisoned for any violation of the criminal laws of this State,

the military, or the United States, as well as maintaining records on well-known and habitual offenders. This is primarily arrest data.

Section 12-1-8 establishes a method for identifying those fingerprints submitted to the DCI.

Section 12-1-9 outlines DCI's duties with relation to assisting local and State Police in the identification function. DCI also must cooperate with the FBI and other states.

Section 12-1-10 outlines the duty of all police agencies to submit fingerprints to DCI for all those persons who, in their opinion, are wanted for serious crimes, are fugitives from justice, or have committed a felony offense. This statute specifically excludes submission of fingerprints for violations of city ordinances or convictions for similar minor offenses.

Section 12-1-11 indicates that DCI shall maintain a file on all convicted felons and all those persons imprisoned for six months or more.

Section 12-1-12 specifies that all records must be destroyed if a person is acquitted, and has no other crime of moral turpitude on his record, upon his request.

The statutes, summarized above, delineate the structure within which any criminal record history is obtained by DCI. However, by looking at the actual procedures, the methods of reporting dispositions may be better analyzed.

B. Actual Reporting Procedures

When a person is arrested on a felony charge, the police department fingerprints the defendant three times as part of the arrest/

booking procedure. One set of fingerprints remains in the department files, one is sent to the FBI, and one is sent to DCI. In the case of a misdemeanor offense, a defendant may or may not be fingerprinted, depending on the arresting department's policies, its manpower, and its practices.

The fingerprint cards, once received by DCI, are identified and crosscompared with a master file of fingerprint cards that are arranged by fingerprint identification. Depending upon whether the prints are new, or match an existing set of prints, a new record is set up or charges are added to an old record.

When the prosecutor disposes of the case in Superior Court, he sends a copy of the disposition to DCI and to the arresting agency.

In the case of misdemeanor offenses in which there is no fingerprint taken, or there are fingerprints taken and the police do not submit the cards to DCI, the police obtain the dispositions in District Court at the hearings and maintain the responsibility for updating their case files and docket books. In some cases of misdemeanor offenses where no fingerprints are taken, the police do send an arrest card to DCI indicating the date and nature of a person's arrest and the date and nature of the disposition. Corrections interacts with DCI by requesting record checks and by sending commitment sheets to the jail list clerk. Lists of potential parolees are sent to the DCI to determine if there are other cases pending against the given defendant, and if there are other cases pending, then this information is given to the Parole Board. Once a person is paroled, a list is sent to the DCI for updating its information. Probation and Parole record all dispositions for compiling internal criminal statistics.

However, at this point in time, they do not use any data that is essential to tracking a defendant.

CRITIQUE OF DISPOSITION REPORTING SYSTEMS

The existing disposition reporting system is not operating in a consistent manner, nor is it followed by all agencies. For example, the police do not always send notices of misdemeanor arrests to DCI and there is no uniform fingerprinting of arrestees throughout the State. If a man is arrested on a misdemeanor offense, and he makes bail that same night, a police department may not fingerprint the man, due to a lack of resources. In addition, the police do not always receive reports of dispositions on their misdemeanor cases, unless their personnel are in court. As a result, both police and DCI records are incomplete. The prosecutor subsystem does report dispositions efficiently, but at present the Courts do not report dispositions to any central agency. Corrections obtains only certain information on the inmates, while Probation and Parole does not collect arrest data. DCI itself does not forward dispositions to the FBI, other than upon specific requests. Through the establishment of this PLAN, and the implementation of the State's CJIS Plan, those items critiqued above will be further examined in an effort to improve the disposition reporting system in the State, to insure accurate and complete disposition reporting on all criminal cases.

II. APPROACH TO MEETING OBJECTIVES

This section describes Rhode Island's approach to meeting the objectives outlined in Section I. It is organized as follows:

1. Central State Repository
2. Security and Privacy Subcommittee
3. Definitions
4. Criminal History Record Information Guidelines
5. Audit Responsibility
6. Certification Process
7. Cost Estimates

CENTRAL STATE REPOSITORY

The Department of the Attorney General's central state repository will control and handle all dissemination of criminal history record information to criminal justice agencies, non-criminal justice agencies and the private sector in accordance with dissemination guidelines established by this Plan. The repository will also act as the central point for all individual access and review of criminal history records. Repository procedures, as well as the criteria for disposition reporting and dissemination, will be developed by the Security and Privacy Subcommittee and the Department of the Attorney General.

Through the Subcommittee and the Department of the Attorney General, Rhode Island will create a central focal point for criminal history record matters and establish a straightforward mechanism for policy and administration. A major element of repository operations will be its internal systems for record access and storage. These elements provide the responsiveness and reliability necessary for the repository to assume operational responsibility for timely, accurate dissemination to criminal justice agencies.

SECURITY AND PRIVACY SUBCOMMITTEE

The Security and Privacy Subcommittee will develop initial policy guidelines for the administration of the CHRIP. The Department of the Attorney General will be responsible for implementation of procedures internal to its operation, including the Central State Repository. Other criminal justice agencies participating in the CHRIP will develop internal procedures to meet the policy guidelines of the Security and Privacy Subcommittee. The Security and Privacy Subcommittee will function permanently in an advisory capacity in matters of policy to the Department of the Attorney General, the Supervisory Board of the Governor's Justice Commission, and the other participating agencies.

The Security and Privacy Subcommittee will be a nine member body composed of representatives from the five user agencies: The Office of the Attorney General, the Courts, Department of Corrections, the State Police, and Rhode Island Association of Police Chiefs, and four representatives from the membership of the Supervisory Board of the Governor's Justice Commission to be appointed by the Planning and Administration Subcommittee of that Board.

DEFINITIONS

The following definitions apply to the criminal history portion of Rhode Island's CJIS.

1. Criminal History Sub-System:

The CJIS Sub-System including equipment, facilities, procedures, agreements, and organizations thereof used for the collection, processing, preservation, or dissemination of criminal history record information.

2. Criminal History Record Information

Information collected by criminal justice agencies on

individuals consisting of identifiable descriptions and notations of arrests, detentions, indictments, informations, or other formal criminal charges, and any disposition arising therefrom, sentencing, correctional supervision, and release. The term does not include identification information such as fingerprint records to the extent that such information does not indicate involvement of the individual in the criminal justice system.

3. Criminal Justice Agency:

(1) Courts; (2) a government agency or any sub-unit thereof which performs the administration of criminal justice pursuant to a statute or executive order, and which allocates a substantial part of its annual budget to the administration of criminal justice.

4. Criminal Justice:

Performance of any of the following activities: detection, apprehension, detention, pretrial release, post-trial release, prosecution, adjudication, correctional supervision, or rehabilitation of accused persons or criminal offenders. The administration of criminal justice shall include criminal identification activities and the collection, storage, and dissemination of criminal history record information.

5. Disposition:

Information disclosing that criminal proceedings have been concluded, including information disclosing that the

police have elected not to refer a matter to a prosecutor or that a prosecutor has elected not to commence criminal proceedings, and also disclosing the nature of the termination in the proceedings; or information disclosing that proceedings have been indefinitely postponed and also disclosing the reason for such postponement. Dispositions shall include, but not be limited to, acquittal, acquittal by reason of insanity, acquittal by reason of mental incompetence, case continued without finding, charge dismissed, charge dismissed due to insanity, charge dismissed due to mental incompetency, charge still pending due to insanity, charge still pending due to mental incompetence, guilty plea, nolle prosequi, no paper, nolo contendere plea, convicted, youthful offender determination, deceased, deferred disposition, dismissed - civil action, found insane, found mentally incompetent, pardoned, probation before conviction, sentence commuted, adjudication withheld, mistrial - defendant discharged, executive clemency, placed on probation, paroled, released from correctional supervision, escaped from detention, or returned.

6. Conviction Data:

Information indicating that an individual pleaded guilty or nolo contendere to criminal charges or was convicted.

7. Non-Conviction Data:

Arrest information without disposition if an interval of one year has elapsed from the date of arrest and no active prosecution of the charge is pending; or information disclosing that the police have elected not to refer a matter to a prosecutor; or that a prosecutor has elected not to commence criminal proceedings; or that proceedings have been indefinitely postponed as well as all acquittals and all dismissals.

CRIMINAL HISTORY RECORD INFORMATION GUIDELINES

The following guidelines underlie Rhode Island's Criminal Justice Information System. They apply to all state agencies handling criminal history record information and the central state repository as the focal point for dissemination of record information:

1. Completeness and Accuracy

(a) Disseminated records must contain information of any dispositions within the State within 90 (calendar) days after disposition has occurred.

(b) If disseminated criminal history record information is found to be erroneous, it must be corrected. Record reconstruction will be the responsibility of the central state repository.

2. Dissemination - Limits

Dissemination means transmission of criminal history record information to individuals and agencies other than the criminal justice agency which maintains the criminal history records.

Dissemination includes confirmation of the existence or non-existence of a criminal history record and thus such a confirmation may not be communicated to anyone who would not be eligible to receive the records themselves.

There are no federal or Rhode Island state limits on the dissemination of conviction data, that is information indicating that an individual pleaded guilty or nolo contendere to criminal charges or was convicted. Nor are there any limitations that prohibit the release of information concerning cases that are pending in some stage of processing or prosecution. Therefore, all such information will be available for dissemination both to criminal justice agencies and non-criminal justice agencies as long as the requirements of completeness and accuracy are met.

Since there are currently no Rhode Island laws limiting the dissemination of criminal history information, the only governing regulations are federal regulations. The dissemination limits imposed by the regulations relate only to non-conviction data.

By December 31, 1977, dissemination of non-conviction data will be limited to:

- A. Criminal justice agencies when the information is to be used for administration of criminal justice purposes and criminal justice employment.
- B. Individuals and agencies pursuant to a specific agreement with a criminal justice agency to provide services required for the administration of justice.
- C. Individuals and agencies for the express purpose of research evaluative or statistical activities pursuant to

an agreement with a criminal justice agency. A sample non-disclosure agreement to be used by researchers is included in Appendix B.

- D. Individuals and agencies for any purpose authorized by statute, ordinance, executive order or court rule decision or order as construed by appropriate State or local officials or agencies. A search of the general laws of Rhode Island reveals a number of licensing statutes that would authorize dissemination. These are enumerated in Appendix C.

Although these limitations on dissemination do not become effective until December 31, 1977, Rhode Island has already adopted a restrictive attitude towards dissemination. The Bureau of Criminal Identification under the direction of the Attorney General has stopped all dissemination to non-criminal justice agencies unless receipt of criminal history data has the personal, specific, prior approval of the Attorney General. This restrictive policy will remain in effect until the Privacy and Security Subcommittee establishes specific guidelines, or until the State Legislature passes comprehensive legislation concerning the dissemination of criminal history record information.

In order to insure that dissemination of non-conviction data is limited only to criminal justice agencies and the specifically permitted non-criminal justice agencies and individuals, the office of the Attorney General will require that each requesting agency or individual sign a user agreement. In lieu of a comprehensive state statute in this area, the user agreement is designed to guarantee the integrity of the system. A signed user agreement is required of

any party receiving criminal history information, whether the information is received directly from the DCI or through some intermediary user agency. With the advice of the Privacy and Security Subcommittee, the office of the Attorney General will develop the procedures and forms used for implementing the user agreements.

3. Juvenile Records

Agencies must insure that dissemination of records concerning proceedings relating to the adjudication of a juvenile as delinquent, or in need of supervision (or the equivalent), to non-criminal justice agencies is prohibited, unless a statute or Federal Executive Order specifically authorizes dissemination of juvenile records. These guidelines supplement, but do not supplant, existing state laws and procedures for control of juvenile records.

4. Security

In order to insure confidentiality and security of criminal history record information, a criminal justice agency shall insure the following:

(a) General

- (1) Select and supervise all personnel authorized to have direct access to such information;
- (2) Assure that an individual or agency authorized direct access is administratively held responsible for (i) the physical security of criminal history record information under its control or in its custody and (ii) the protection of such information from unauthorized accesses, disclosure, or dissemination;

- (3) Institute procedures to reasonably protect criminal history record information from unauthorized access, theft, sabotage, fire, flood, wind, or other natural or man-made disasters;
- (4) Provide that each employee working with or having access to criminal history record information should be made familiar with the substance and intent of these regulations; and
- (5) Provide that direct access to criminal history record information shall be available only to authorized officers or employees of a criminal justice agency.

Although hard decisions cannot be made at this time concerning security at the Central State Repository, Rhode Island has been preparing for any contingencies that might arise. Appendix D contains a description of security measures that will be considered as the security needs of the repository are determined.

(b) Computer Processing

If an agency's criminal history record information is processed on an electronic data processing (EDP) system, the Security and Privacy Subcommittee shall:

- (1) Insure where computerized data processing is employed, effective and technologically advanced software and hardware designs are used to prevent unauthorized access to such information;

- (2) Have authority to develop policy and priorities concerning criminal history computer operations, within guidelines established by the Criminal Justice Information System Subcommittee;
- (3) Have power to advise agencies on qualifications for personnel who are permitted to work in a defined area where such information is stored, collected, processed or disseminated; and
- (4) Confer with the Criminal Justice Information System Subcommittee of the Governor's Justice Commission on matters affecting the development and management of computerized data operations.

(c) Dedicated Hardware

Rhode Island believes that the Federally legislated requirement for "dedicated hardware" without regard for system design or cost implications does not reflect a sound system development approach. The use of hardware, whether shared or used solely for criminal justice processing shall be the decision of the Criminal Justice Information Subcommittee based on the system's approach, but requiring that criminal justice agencies continue to be the responsible management concerning the processing and control of criminal history record information. Determination of a specific hardware approach will be made after a CJIS systems Master Plan has been developed that reflects user needs, operational costs, and adherence to security criteria for information control and handling.

AUDIT RESPONSIBILITY

In addition to the procedures instituted by each agency and its administrative responsibility to insure the accuracy and completeness of all data reported to the central state repository, the State shall provide for an annual audit of participating agencies in order to insure that regulations regarding collection, use, and dissemination of criminal history records are being adhered to. Throughout this process, the Security and Privacy Subcommittee will have overall audit responsibility.

Rhode Island recognizes the desirability of conducting, on an annual basis, an operational audit of the following:

- . . actual records utilized for reporting information to the Central State Repository,
- . dissemination and use of criminal history information,
- . other procedures established in accordance with these regulations, such as individual record review and appeal procedure, system security, and management control, (generally, the procedures utilized in conducting an operational audit of this sort should include documentation of the source documents used, such as police blotters and request log books, preparation of flow charts which depict how documents relate to one another (audit trail), selection and use of a random sample for each process defined to track information through those processes, and interviews and observations of the processes in actual daily operation).

It is, therefore, the intention of Rhode Island to meet the requirements for auditing as follows:

- An annual audit of court records and court information use and dissemination will be conducted for a statistically significant number of court locations under the direction of the State Court Administrator.
- An annual audit of police, prosecution, and correction records and information use and dissemination will be conducted by the Central State Repository for a statistically significant number of these agencies under the direction of the policy guidelines established by the Security and Privacy Subcommittee.
- A periodic (biannual) audit will be conducted by an independent, outside agency or vendor regarding the internal and management control procedures of the Central State Repository, individual record review and appeal procedures, and overall system security. This auditor will be selected by the Security and Privacy Subcommittee.

CERTIFICATION PROCESS

This Plan, in its entirety, represents Rhode Island's certification to implement its security and privacy guidelines for criminal history record information by December 31, 1977. The certification process for the Central State Repository and supporting systems will be the responsibility of the Security and Privacy Subcommittee once established. In the interim, the Justice Information System Task

Force, by virtue of its authority for plan development, will issue this first-certification statement. The initial certification statement is contained in Appendix E.

COST ESTIMATE

The cost for implementation of the criminal history record information guidelines is directly related to the type systems, hardware and organizational structure employed. These costs will be estimated in detail after a CJIS and central repository design approach has been developed. Cost ranges for major implementation milestones are included in Section V, Implementation Time Schedule. The success of this Plan will depend on receiving substantial financial assistance from LEAA.

III. INDIVIDUAL ACCESS AND REVIEW

This section outlines Rhode Island's procedure for individual access and review of criminal history record information. The procedure will be implemented and controlled by the Division of Criminal Identification until the central state repository has been established.

A citizen has the right to review and question information which is collected, stored, and disseminated about himself and/or his actions - especially when that information could be utilized to damage his reputation or to confine his activities. The following procedure is to be followed when an individual wishes to access and review his criminal history record, and after such review of his record, the individual feels that this record contains inaccurate or incomplete information.

The Rhode Island General Laws, Title 42, Chapter 35, also known as the Administrative Procedures Act, establish the authority for state and quasi-state agencies to promulgate rules and mechanisms for administrative reviews of agency matters. Only after a complaint has been processed through an agency's administrative review procedures shall the matter be appealable to the Superior Court of Rhode Island. The procedures contained in the remainder of this section, then, are for promulgation by the yet-to-be-established Security and Privacy Subcommittee. Whatever procedures are finally placed on file with the Secretary of State and implemented shall be in full compliance with the guidelines established by the Administrative Procedures Act.

As described in other sections of this Criminal History Record Information Plan, criminal history records will be disseminated from one central site, the central state repository. An individual or his attorney may, upon proper identification and submission of a formal request, review his criminal history record at the central state repository, and obtain a photocopy of the record for his own use if he wishes.

If the individual indicates a desire to contest the accuracy or the completeness of this record, he may do so by submitting a formal complaint. If, after tracing the items of information in question to their source, the central state repository can determine no error in the transfer of this data to the criminal history record, a hearing will be scheduled before a three-member panel of the Record Review Committee, established for the sole purpose of reviewing and resolving complaints about individual criminal history records. The Record Review Committees will be comprised of members from the Security and Privacy Subcommittee and will be appointed by the Chairman of that Subcommittee. The individual contesting the record may be represented by counsel and may cross-examine witnesses. Appeals from this hearing may be taken to the Superior Court, as outlined in Rhode Island's Administrative Procedures Act.

DETAILED PROCEDURES

Individual Or His Attorney

1. Appears in person at the Central State Repository and fills out request form to review criminal history record. If attorney, must prove same by signed affidavit from individual being represented.

Central State Repository

2. Verifies identity of individual through review of at least two items which indicate the individual's name and address, such as credit card, driver's license, preprinted checkbook or a fingerprint card. At least one of these items must contain the individual's signature. The individual is asked to sign his name on the log sheet and a visual check made between this signature and that put forward on the item of identification.

3. Enters request to review record in log.

4. Obtains criminal history record for that individual's review.

Individual

5. Reviews record; takes notes if necessary.

6. If individual desires photocopy of record, he may request and obtain a copy by signing to that effect on an original request log.

Central State Repository

7. Makes photocopy of record for individual and stamps "No Complaint Filed" on the face of this record.

8. Refiles criminal history record.

Individual Or His Attorney

9. Requests complaint form if record is found to be incomplete or inaccurate. Fills out, signs, and obtains photocopy of record.

Central State Repository

Agency with Original Documents

Central State Repository

Central State Repository

10. Prepares self-addressed envelope for future notification of results of complaint.
11. Provides complaint form, envelope, photocopy of record, and copy of description of complaint and hearing process to individual.
12. Stamps "Complaint Filed" on face of the photocopy of the record.
13. Ascertains agency with original documents containing challenged information; sends original complaint form, photocopy of criminal history record, and notice requesting return of complaint within 20 days to agency.
14. Refiles original criminal history record with flag indicating that the record is "Under Challenge".
15. Files complaint copy and envelope in 20-day tickler file.
16. Enters fact that complaint was filed, date, and agency to which complaint was sent in log book.
17. Compares contested items on the criminal history record with original documentation; certifies either that information is correct, or that the criminal history record should be changed; signs and returns complaint form to Central State Repository.
18. Assures that complaints are returned within a 20-day time period by use of tickler file and telephone notification of the originating agency.
19. If error was found and corrected, pulls original criminal history record and enters correct information thereon; removes flag; refiles record with original complaint attached.

- a. Notifies all criminal justice and non-criminal justice agencies to which record was disseminated of accurate information.
- b. Enters in log the date and resolution of the complaint.
- c. Notifies individual. Provides individual, if requested, with a list of non-criminal justice agencies which have received record.

20. If error was not found and/or not corrected by original entering agency, Central Repository sends original complaint, notification envelope, and photocopy of record to the Record Review Committee; refiles complaint copy in tickler file for 60 days hence.

21. Establishes date for hearing before Record Review Committee not more than 40 days hence nor less than 20 days hence.

- a. Notifies individual and/or his attorney; sends photocopy of complaint and instructions.
- b. Notifies agency with original documentation as above.
- c. Notifies Record Review Committee; makes administrative preparations for hearing.

Individual

22. Appears at hearing with or without counsel; cross-examines witnesses; presents evidence, if he wishes.

Original Entering Agency

23. Has the burden of proof to demonstrate that the record entries in question were made in compliance with accuracy procedures, and are, in fact, correct.

Record Review Committee

24. Decides a contested case by either stipulation of the parties, or agreed settlement, or default, or findings of fact and conclusions of law.
25. When the disposition is an informal one (default, stipulation, settlement), enters disposition on original complaint and signs; makes out order and hands, or mails, to all parties.
26. When disposition is not an informal one, prepares separate findings of fact, conclusions of law, and disposition order, based on majority opinion of the Committee. Copies of these documents will be sent to all parties in the case within 30 days from the conclusion of the hearing.

Central State Repository

27. Receives copies of all disposition orders; updates all criminal history records as appropriate.
28. Ascertains from logs the agencies or individuals who have received inaccurate information, and notifies as needed.
29. Enters disposition in log.
30. Files complaint and records of hearings in appropriate closed files.

Individual Or His Attorney

31. May file an appeal from the decision of the Record Review Committee within 30 days from receipt of the disposition order in Superior Court, in accordance with Rhode Island's Administrative Procedures Act, Title 42, Chapter 35, Sections 16 to 18 of the General Laws of Rhode Island. A copy of the appeal will be sent to the Record Review Committee.

Record Review Committee

32. Prepares and transmits the original or certified copy of the transcript of the hearing under review to the Clerk of the Court in which appeal was filed.

IV. MAJOR IMPLEMENTATION MILESTONES AND RESPONSIBILITIES

The major purpose of Rhode Island's Plan is to establish a rational approach for implementation of criminal history record information guidelines. The following major milestones are designed to implement Rhode Island's criminal history record information guidelines:

Implement Individual Access and Review Procedure - 3/76

The Department of the Attorney General through its Division of Criminal Identification will be responsible to implement operational procedures for Individual Access and Review until the Central State Repository is established. The Subcommittee will appoint a Record Review Committee to perform the review process called for in the procedure.

Establish Security and Privacy Subcommittee - 3/76

The Supervisory Board of the Governor's Justice Commission will appoint a Rhode Island Security and Privacy Subcommittee to develop security and privacy guidelines. (See Page 10)

Design Conceptual CJIS Reporting and Dissemination Sub-Systems - 5/76

The CJIS Subcommittee will assist the Security and Privacy Subcommittee in the development of a conceptual design and implementation plan for a statewide disposition reporting and dissemination system. This element will become a key part of the State's overall CJIS Plan. Rhode Island's estimate of cost for implementation of criminal history record information guidelines will be developed after design approval of the disposition and reporting sub-systems. The Governor's Justice Commission will provide coordination of contractors that may be required to support this recently developed

implementation plan, and will also provide investigation and reporting on financial resources to accomplish these tasks.

Prepare Criminal History Legislation - 1/77

The Legislative Commission on Criminal Procedure will prepare legislation establishing a central state repository based on the recommendations of the Security and Privacy Subcommittee after systems relationships have been approved for implementation. Central Repository Legislation shall include:

1. Establishment of the central state repository within the Department of the Attorney General, to include added jurisdiction and administrative responsibility beyond current Division of Criminal Identification Responsibilities.
2. Expanded mandatory disposition reporting requirements for misdemeanors.
3. Legislation on non-criminal justice uses of criminal history record information.
4. Penalties for violation of criminal history record information guidelines.

Implement CJIS Sub-Systems - 6/76 to 10/77

The Criminal Justice Information Subcommittee and Security and Privacy Subcommittee will work with the responsible agencies in the planning and implementation of Rhode Island's CJIS sub-systems for criminal history processing. Implementation includes:

- . Design
- . Software development

- . Hardware
- . Record conversion
- . Staffing
- . Physical facility conversion
- . Disposition Reporting Systems
 - . Design
 - . Software development
 - . Hardware requirements
- . Agency Procedures/User Agreements
- . Audit Procedures
- . Training

Implement Final Criminal History Record Information Guidelines - 10/77

The Security and Privacy Subcommittee, in conjunction with the Department of the Attorney General, will develop and evaluate implementation of Criminal History Record Information Guidelines after supporting CJIS sub-systems and agency procedures have been developed.



**RHODE ISLAND
CRIMINAL HISTORY RECORD INFORMATION PLAN
IMPLEMENTATION TIME SCHEDULE**

MILESTONE	COST RANGE	DATE																							
		← 1976 →												← 1977 →											
		3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12		
I IMPLEMENT INDIVIDUAL ACCESS AND REVIEW PROCEDURE	1 man month											x													
I ESTABLISH CRIMINAL JUSTICE INFORMATION SUBCOMMITTEE AND SECURITY AND PRIVACY SUBCOMMITTEE	1 man month	x																							
II DESIGN/APPROVE CONCEPTUAL CJIS REPORTING AND DISSEMINATION SUB SYSTEMS	30 - 50K 1 man month				x																				
V PREPARE CRIMINAL HISTORY LEGISLATION	2 man months																						x		
IMPLEMENT CJIS SUB SYSTEMS																									
1. CENTRAL REPOSITORY																									
o DESIGN	40 - 60K										x														
o HARDWARE/SOFTWARE	100-150K																						x		
o CONVERSION	150-200K																						x		
o STAFF	3 - 6										x														
o PHYSICAL FACILITIES	10 - 20K											x													
2. DISPOSITION REPORTING																									
o DESIGN/SOFTWARE	150-200K																						x		
o HARDWARE	50 -100K																						x		
o CONVERSION	6 man months																						x		
3. AGENCY PROCEDURES/USER AGREEMENTS	4 man months																						x		
4. AUDIT PROCEDURES	2 man months																						x		
5. TRAINING	6 man months																						x		
IMPLEMENT CRIMINAL HISTORY RECORD INFORMATION GUIDELINES																							x		

APPENDIX A

- 12-1-4 Division of criminal identification - Chief and assistants. There shall be a division of criminal identification in the department of the attorney-general to serve at the pleasure of the attorney-general, who shall devote all his time to the duties of his office. The said chief with the approval of the attorney-general may appoint such assistants as he may deem necessary to carry out the work of the division, within the limits of any appropriation made for such purpose, and may with the approval of the attorney-general discontinue the employment of any such assistants at any time. Said chief shall perform the functions required by 12-1-5 to 12-1-12, inclusive.
- 12-1-5 Office space of division - The division shall have suitable offices in the Providence county courthouse assigned to it by the director of administration.
- 12-1-6 Appropriations for division - The general assembly shall annually appropriate such sum as it may deem necessary for the salaries of the chief and his assistants and for the expenses of maintaining the division in accordance with the provisions of this chapter.
- 12-1-7 Criminal identification records - Stolen property
It shall be the duty of the attorney-general to procure and file for record in the office of his department so far as the same can be procured, fingerprints, plates, photos, outline pictures, descriptions, information and measurements of all persons who shall be or shall have been convicted of felony, or imprisoned for violating any of the military, naval or criminal laws of the United States or of any state, and of all well-known and habitual criminals from wherever procurable. He shall procure and keep on file in the office of said department, so far as the same can be procured, fingerprints, measurements, processes, operations, signalletic cards, plates, photographs, outline pictures, measurements and descriptions of any person who shall have been or shall be confined in any penal institution of this state, taken in accordance with the system of identification in use in any such institution. He shall also keep on file in said office the reports of lost, stolen, found, pledged or pawned property required to be furnished to him under the provisions of 12-1-10.

12-1-8 Methods of identification - The department may use any of the following systems of identification: the Bertillon, the fingerprint system and any system of measurement that may be adopted by law in the various penal institutions of the state.

12-1-9 Assistance to state and local police in fingerprint identification - Enforcement powers - Cooperation with federal bureau and other states
Whenever requested by the superintendent of state police or by any superintendent or chief of police or town sergeant of any city or town, the attorney-general may assist such police officials as a criminal investigator in all criminal investigations involving identification by fingerprints. The attorney-general shall have and may exercise in any part of the state with regard to the enforcement of the criminal laws, all powers of sheriffs, deputy sheriffs, town sergeants, chiefs of police, members of the division of state police, police officers and constables. The attorney-general may send or cause to be sent to any state or national bureau of identification established for the purpose of exchanging information, according to the method of identification by fingerprint, or to any police department, whether within or without the state, the descriptions of any person who may have been fingerprinted in this state.

12-1-10 Duty of police officials to furnish fingerprints and stolen property lists - It shall be the duty of the superintendent of state police and of the superintendents or chiefs of police or town sergeants of each city or town, hereinafter referred to as police officials, to promptly furnish to the attorney-general fingerprints and descriptions of all persons arrested, who, in the judgement of such police officials, are persons wanted for serious crimes, or who are fugitives from justice, and of all persons in whose possession at the time of arrest are found goods or property reasonably believed by such police officials to have been stolen by such persons; and of all persons in whose possession are found burglar outfits or tools or keys or who have in their possession explosives reasonably believed to have been used or to be used for unlawful purposes, or who are in possession of infernal machines, bombs, or other contrivances in whole or in part and reasonably believed by said police officials to have been used or to be used for unlawful purposes, and of all persons who carry concealed firearms or other deadly weapons reasonably believed to be carried for unlawful purposes or who have in their possession

inks, dye, paper or other articles necessary in the making of counterfeit bank notes, or in the alteration of bank notes; or dies, molds or other articles necessary in the making of counterfeit money, and reasonably believed to have been used or to be used by such persons for such unlawful purposes. This section is not intended to include violators of city or town ordinances or of persons arrested for similar minor offenses. It is also made the duty of said police officials to furnish said department daily copies of the reports received by their respective offices of lost, stolen, found, pledged or pawned property.

12-1-11 Photographs and descriptive information as to persons convicted - In the case of every offense for which an indictment has been found or an information filed and in which the offender has been found guilty and sentenced, or has pleaded guilty or nolo, the attorney-general shall cause to be taken a photograph, and the name, age, weight, height, and a general description of such offender and his fingerprints in accordance with the fingerprint system of identification of criminals and a history of the offender as shown upon trial. In the case of all offenses triable in the superior court for the counties of Providence and Bristol, the attorney-general shall cause such fingerprints, photograph and other information to be taken by his department and in the case of all offenses triable in any other county he may make such arrangements for the taking of such fingerprints, photographs and information as may to him seem most desirable. In the case of offenses other than those that are indictable, for which an offender is committed under a sentence of imprisonment for a period of six (6) months or more, the warden or keeper of a place of detention or penal institution other than institutions designed primarily for the detention of juveniles, to which an offender is committed, shall cause to be taken, unless the court otherwise orders, a like description, photograph, fingerprints and history of such person. Such description, photographs, fingerprints and history shall be taken by persons in the service of the state appointed by the attorney-general for that purpose. All such descriptions, photographs, fingerprints and identifying matter shall be transmitted forthwith to the attorney-general.

12-1-12

Destruction of records of persons acquitted - Any fingerprint, photograph, physical measurements or other record of identification, heretofore or hereafter taken by or under the direction of the attorney-general, the superintendent of state police, the member or members of the police department of any city or town, or any other officer authorized by this chapter to take the same, of a person under arrest, prior to the final conviction of such person for the offense then charged, shall be destroyed by the officer or department having the custody or possession thereof upon demand of the person so photographed, measured or otherwise identified, if such person is acquitted or otherwise exonerated from the offense with which he is charged; provided, that such person shall not have been previously convicted of any offense involving moral turpitude. Any person who shall violate any provision of this section shall be fined not exceeding one hundred dollars (\$100).

RECORD MAINTENANCE STATUTE OF THE DEPARTMENT
OF CORRECTIONS

13.3.4 IDENTIFICATION AND DESCRIPTION OF INMATES - The said director shall cause prisoners confined under sentence in the adult correctional institutions to be physically and factually described in accordance with accepted criminal identification standards for the identification of criminals. The said assistant director shall cause such identification to be made by a person or persons in the official service of the state, and shall prescribe rules and regulations for keeping accurate records at such institutions, and for classifying and indexing the same.

APPENDIX B

NON-DISCLOSURE AGREEMENT

Whereas _____ (hereinafter "Researcher") has requested permission from the Rhode Island Division of Criminal Identification (hereinafter "DCI") to analyze certain criminal history data maintained by DCI in connection with a project defined in an attached letter dated _____; and

Whereas, the Director of the DCI or his authorized designee has approved said request by a letter to Researcher dated _____;

NOW, THEREFORE, in consideration of DCI's furnishing such information to Researcher, the parties agree as follows:

1. The following items of information shall be supplied by DCI to Researcher, to the extent that such items are contained in the files of DCI:

2. Researcher acknowledges the confidential nature of the criminal history data to be supplied to it and agrees to not disclose any such data in a form which is identifiable to an individual, to anyone not immediately concerned with the research project pursuant to which such data is furnished.

3. In order to conceal the identity of persons whose criminal history records are supplied to Researcher, Researcher agrees:

- a. to use the information furnished under this agreement only for the purpose described in the attached project description;
- b. to, so far as possible, replace the name and address of any record subject with an appropriate code identifier;
- c. to restrict access to all data supplied by DCI to those employees whose responsibilities cannot be accomplished without such access;
- d. to store all data received from DCI in secure facilities;
- e. to refrain from copying any data furnished by DCI; and to retain such data only so long as may be necessary to effectuate the purposes of the described project;

f. to permit DCI to monitor, audit and review the activities and policies of Researcher in implementing this agreement in order to assure compliance therewith.

4. Researcher agrees to insert in the preface to any report of the study conducted pursuant to this agreement, whether published or unpublished, a disclaimer of DCI's responsibility for the methods of statistical analysis, as well as the conclusions derived therefrom contained in such report.

5. Researcher will hold DCI harmless from any damages or other liability which might be assessed against DCI as a result of disclosure by Researcher of any information received from DCI pursuant to the terms of this agreement and the attached project description.

6. In the event that Researcher fails to comply with the terms of this agreement, DCI may cease to supply criminal histories to Researcher and may demand the return of all criminal histories previously furnished to Researcher and take such other actions as it deems appropriate.

In witness thereof the parties have signed their names hereto.

date _____

Researcher _____

Title _____

DCI _____

Title _____

APPENDIX C

Rhode Island Licensing Statutes that Authorize the Receipt of Criminal History Information.

Type I - Indicates a statutory provision that refers to a criminal offense as grounds for denying a license.

Explosives Manufacturers
Explosives Distributors
Veterinarians

Type II - Indicates a statutory provision that conditions the granting of a license on such grounds as the applicant possessing good moral character.

Accountant
Architect
Attorney
Barber
Beautician
Insurance Broker
Chauffeur
Chiropodist
Chiropractor
Dental Hygienist
Embalmer
Engineer
Funeral Director
Insurance Adjustor
Insurance Agent
Loanmaker
~~Nurse Practical~~
Nurse Registered
Optometrist
Pharmacist
Small Loan Lender

Type III - Indicates a statutory provision that conditions the granting of a license on the applicant possessing good moral character and not having a criminal record.

Osteopath
Physical Therapist
Physician
Psychologist
Social Worker

APPENDIX D

Proposed Security Measures At The Central State Repository

In order to provide proper security for information filed at the Central State Repository, several measures must be taken. These measures shall include provisions for physical security, secure personnel, software locks and procedures for user security.

Physical security includes provisions against damage and violation. Access to various sectors of the CSR will be restricted to on-duty cleared CSR personnel wearing coded badges. Visitors shall wear a visitor's badge which is issued upon their entrance and returned upon their egress. While in the secure area, visitors must be escorted by an (on-duty) CSR employee who shall insure that the visitor sign in and sign out.

A security desk shall be established and manned during working hours. This shall be at the point of entry into the CSR and shall be the point at which visitors check in and out. If other access points are deemed security-sensitive, closed circuit television monitors shall be placed to cover these areas. The closed circuit monitors shall be located at the security desk. Windows and unused doors will be secured by locks and bars and a burglar alarm system will be installed if necessary. If manual files are to leave the CSR, logs for this purpose will be maintained.

To prevent damage to the files, smoke and/or heat detectors shall be installed. Sprinklers will be installed where useful, and suitable fire extinguishers shall be maintained at strategic locations. To prevent file damage due to power interruptions, an electrical back-up system will be installed. The CSR shall be located so that

there is a minimal danger of flooding. Providence has only experienced one tornado in its history, and earthquakes are extremely rare in this area.

To prevent leakage of sensitive material, all extraneous and unwanted printed outputs must be destroyed, and output tapes must be erased. To protect files from being damaged during reformatting and reprogramming and file purging, appropriate protection procedures shall be implemented. These procedures might include the creation of duplicate files, back-up programs, and restart procedures.

In addition to the safeguards taken to insure physical security, safeguards will be taken concerning personnel. During the hiring process, a background check will be performed on each applicant interviewed. Qualifications for personnel will be recommended by the Security and Privacy Subcommittee, and hiring will be done by the Director of the CSR. It is important that the employees of the CSR have job security from year to year. It is equally important that the quality of service available from the CSR be kept to a high level. Two possible ways to insure that both of these standards are met have been proposed. The first proposal is that CSR employees become part of the State's classified service. The second proposal is that a merit system be established to insure that job security will remain proportional to job competency.

Each employee's training will include privacy and security orientation. The new employee will be formally familiarized with CSR rules and regulations concerning privacy of records, limits on dissemination and security procedures at the CSR. Employees shall be

issued a guidebook covering privacy and security regulations and procedures. In the guide, the penalties for rule violation will be set forth in detail. The exact penalties shall be determined but may include a reprimand for the first offense, then a fine not to exceed \$100, a suspension of not more than two (2) months for the third offense, demotion for the fourth and finally dismissal. All of the penalties must be preceded by a hearing.

When the files at the CSR have been computerized, additional measures will be taken to insure security. The measures will include computer software specifically designed to insure security. Software will be designed to insure that a specific agency will be able to access only that information that they have a need to know. Certain users will be limited to the inquiry of certain files. Others will be limited to update capability on certain files only.

Each terminal shall have an identification number which the computer will check against sign on I.D. number used by the agency. Each user agency shall identify individuals who will use its terminals. These individuals shall each have their own password, and software shall be designed to maintain the password's secrecy. The software will match the password to the terminal to determine its authenticity, and insure that the agency accesses only that information to which they are entitled. All inquiries will be logged along with the user's identity and the time of inquiry.

The user agencies shall agree to operate the terminal in a secure environment and shall sign a User Agreement. This Agreement shall stipulate that the terminal device be in a controlled access area

and that extraneous hard copy output from the terminals be destroyed. The Agreement shall further stipulate that all employees who will have physical access to the terminal device be subject to a background check and be subject to those same sanctions which are detailed above for CSR employees. The User Agreement shall specify the limits on and regulations for dissemination. The User Agreement shall make clear that any user agency found to be violating the terms of the agreement will be suspended from the system until such time that it shows that the cause for such violation has been discovered and corrected. Finally, all security procedures will be periodically reviewed and, if necessary, reinforced.

APPENDIX E

UNITED STATES DEPARTMENT OF JUSTICE
Law Enforcement Assistance Administration
National Criminal Justice Information and
Statistics Service
Washington, D.C. 20531

CERTIFICATION FOR A
CENTRAL STATE REPOSITORY

NAME/ADDRESS OF SUBMITTING AGENCY

Governor's Justice Commission
197 Taunton Avenue
E. Providence, RI 02914

APPLICABLE STATE

Rhode Island

DATE PREPARED

March 15, 1976

CONTACT NAME

Don Fleming

TELEPHONE NO. (Give area code)

(401) 277-3087

INSTRUCTIONS: Complete the following as appropriate.

OPERATIONAL PROCEDURES

Completeness and Accuracy

Central State Repository:

Statutory/Executive Authority
Facilities and Staff

Complete Disposition Reporting in 90 days from:

Police

Prosecutor

Trial Courts

Appellate Courts

Probation

Correctional Institutions

Parole

Query Before Dissemination:

Notices/Agreements-Criminal Justice

Systematic Audit:

Delinquent Disposition Monitoring

Accuracy Verification

Notice of Errors

Limits on Dissemination

Contractual Agreements/Notices and Sanctions
in Effect for:

Criminal Justice Agencies

Non-Criminal Justice Agencies Granted Access
by Law or Executive Order

Service Agencies Under Contract

Research Organizations

Validating Agency Right of Access Restrictions On

Juvenile Record Dissemination

Confirmation of Record Existence

Secondary Dissemination by Non-Criminal
Justice Agencies

Dissemination without Disposition

Audits and Quality Control

Audit Trail:

Recreating Data Entry

Primary Dissemination Logs

Secondary Dissemination Logs

Annual Audit

	CHECK MARKS			DATES	
	NOW IMPLEMENTED	REASONS FOR NON-IMPLEMENTATION			
		COST	TECHNICAL	LACK OF AUTHORITY	ESTIMATED IMPLEMENTATION DATE
				X	1/77
	X	X			3 77
		X		X	(1)
X					(1)
		X			(1)
		X			1
			X		12/77
			X		12/77
			X		12/77
			X	X	12/77
X					12/77
			X		2 77
			X		12/77
			X		12/77
			X		12/77
			X		12/77
			X	X	12/77



U. S. DEPARTMENT OF JUSTICE
LAW ENFORCEMENT ASSISTANCE ADMINISTRATION

DISCRETIONARY GRANT
PROGRESS REPORT **47115**

GRANTEE R.I. Governor's Justice Commission		LEAA GRANT NO. 76-3690-D2C1	DATE OF REPORT 10/27/77	REPORT NO. 8
IMPLEMENTING SUBGRANTEE R.I. Governor's Justice Commission		TYPE OF REPORT <input type="checkbox"/> REGULAR QUARTERLY <input type="checkbox"/> SPECIAL REQUEST <input checked="" type="checkbox"/> FINAL REPORT		
SHORT TITLE OF PROJECT Security and Privacy Grant		GRANT AMOUNT \$20,000		
REPORT IS SUBMITTED FOR THE PERIOD 4/1/77		THROUGH 6/30/77		
SIGNATURE OF PROJECT DIRECTOR <i>[Signature]</i>		TYPED NAME & TITLE OF PROJECT DIRECTOR Patrick J. Fingliss Executive Director		

COMMENCE REPORT HERE (Add continuation pages as required.)

SEE ATTACHED PAGES

RECEIVED BY GRANTEE STATE PLANNING AGENCY (Official) <i>[Signature]</i>	DATE <i>[Signature]</i>
--	----------------------------

SECURITY AND PRIVACY FINAL QUARTERLY REPORT

This is the final quarter of funding for the Security and Privacy Grant. The first endorsed draft of Rhode Island's Criminal History Record Information Plan has been reviewed by LEAA, which has responded with a list of specific issues which must be clarified in the Plan before final acceptance by LEAA. According to the Plan "Plan implementation will be the responsibility of the Department of the Attorney General working with the Security and Privacy Subcommittee. This Subcommittee will be established as a first step in the implementation process."

During this quarter, Mr. Ronald Acton of the Rhode Island Statistical Analysis Center Staff of the Governor's Justice Commission has prepared a report entitled "The Impact of the Security and Privacy Regulations" (see attached). This report was prepared for the Department of the Attorney General, in order to assist members of that Department in implementing the Security and Privacy Plan.

This report delineates which agencies are affected by the regulations, and which data elements are covered by the regulations and which are not. The report describes which categories of information open to the public and which ones are private. The report discusses the issues of completeness, dissemination, the use of criminal record information for research purposes, and insuring compliance with the dissemination restrictions. There is also a discussion on the impact of various possible state policies on dissemination, and a discussion on procedures for individual access and review and obtaining a copy of one's record. Finally, there is a section on audits and quality control. (See attachments)

END