



Lodi Police Department  
215 West Elm Street  
Lodi, CA 95240  
(209) 333-6731 / (209) 333-6792 fax

Tod Patterson  
Interim Chief of  
Police

OCT 27 2015

October 8, 2015,

Keith Dann, Assistant Chief  
Bureau of Criminal Information and Analysis  
P.O. Box 903387  
Sacramento, CA 94203-3870

Re: Status update regarding our Federal Bureau of Investigation (FBI), Criminal Justice Information Services (CJIS) Division, Information Technology Security Audit (ITSA) Report implementation plan.

Dear Assistant Chief Dann:

The Lodi Police Department received the FBI's CJIS Division audit results identifying areas where our agency was not in compliance with the FBI CJIS Security Policy. This letter is intended to outline updates regarding our implementation plan, identifying what steps will be taken to resolve each audit finding identified below as not meeting the requirements:

- 1. Noncriminal Justice Agency:** *The Lodi Police Department received Information Technology services from its respective noncriminal justice agency without a current Management Control Agreement on file with the City of Lodi Information Technology (IT) Department; Completed. CLETS Management Control Agreement completed and signed by all parties on February 9, 2015. Copy of the MCA attached as attachment 1.*
- 2. Private Contactors:** *The Lodi Police Department receives information technology services from private contactor(s) without obtaining an FBI CJIS Security Addendum with the required certification of private contractor personnel and their representative (SunGard, Capture Technologies, Interwest, and Delta Wireless); Completed. CLETS Private Contractor Management Control Agreement forms signed by those contractors who have a need to access our systems or networks on our behalf.*

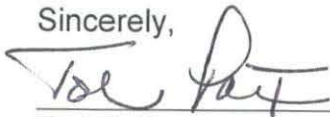
3. **Personnel Security:** *The Lodi Police Department does not fingerprint all personnel, who have unescorted access within the perimeter of their physically secure location, with access to criminal justice information (city IT staff, OSSI, Secure Link, and Delta Wireless); Completed. All personnel who have not been fingerprinted are no longer allowed unescorted access within the perimeter of our physically secure location, with access to criminal justice information. All personnel are checked in, provided an identification badge, and assigned an escort. We have also identified personnel who require frequent access and have had them fingerprinted.*
  
4. **Security Awareness Training Records:** *The Lodi Police Department does not ensure personnel, who manage or have access to criminal justice information receive the required security awareness training within six months of initial assignment, and biennially thereafter (local agency personnel, city IT staff, OSSI, Secure Link, and Delta Wireless); Completed. Our department utilizes NexTest to provide CLETS training. Our trainers were certified on March 10, 2015 after attending training at the Elk Grove Police Department.*
  
5. **Physical Security:** *The Lodi Police Department does not have a written physical protection policy. Completed. Department policy completed. Building Access and Facility Security policy (LPD policy 209) attached for review.*
  
6. **Media Protection:** *The Lodi Police Department does not have a written policy for electronic and physical media that restricts access to authorized individuals; Completed. The City of Lodi does have written policy for electronic and physical media that restricts access to authorized individuals. City of Lodi Information Services policy section number 1, Electronic Media Acceptable Usage, has been attached as attachment 2 SECTION 1.doc for review.*
  
7. **Media Disposal:** *The Lodi Police Department does not have 1) written policy for sanitization and destruction of electronic media, and 2) written procedures for physical media disposal; Completed. The City of Lodi does have written policy for sanitization and destruction of electronic media and written procedures for physical media disposal. City of Lodi Information Services policy section number 8, E-Waste Disposal, has been attached as attachment 3 SECTION 8.doc for review.*

Information Services is in the process of purchasing a drive duplicator that meets D.O.D. 5520.22-M certification for sanitizing hard drives for disposal. Once sanitized the serial number of each hard drive is recorded and they are processed through an e-waste shredder of a certified company contracted with by the city. The entire process is recorded and the city is provided with video documentation to verify that the hard drives have been destroyed. Information Services completed the purchase of a D.O.D. 5520.22-M certified sanitizer for hard drives. Information Services will contract with a certified e-waste shredding company who will record the process and provide documentation verifying that the hard drives have been destroyed.

8. **Network Configuration:** *The Lodi Police Department does not have a current network diagram; Completed. Information Services completed a network diagram.*
  
9. **System Use Notification:** *The Lodi Police Department does not display an approved system use notification message to identify the device restrictions and consent on all information systems accessing criminal justice information; Completed. Law enforcement System Use Notification message enabled. System Use Notification attached as attachment 4 Electronic Media Use Notice.doc for review.*
  
10. **Identification/Userid:** *The Lodi Police Department does not document the validation process of system accounts; Completed. Information Systems does have a process for account validation. There are two ways a user can access CLETS and each is logged through respected routes.*
  1. *There is a CLETS client (a terminal program) that accesses the San Joaquin County system and routes the request from the County's system to DOJ. The user must have an account setup by the County to access their system. The computer must be registered with the County. The computer has a terminal ID is associated with an IP address and MAC address and is given a unique mnemonic.*
  2. *The other way is through the SunGard/OSSI CAD program. A user must be in the NCIC security group in order to access CLETS information. The SunGard/OSSI server has a direct communication line to DOJ. Also, the computer accessing CAD must have a Terminal ID that has been registered with DOJ. The terminal ID is associated with an IP address and MAC address. A unique mnemonic is assigned to the computer.*

- 11. Authentication:** *The Lodi Police Department's passwords were less than eight characters and did not have a password history of at least ten; Completed. All passwords expire in 90 days and are now required to meet the listed standards including a history of at least ten.*
- 12. Event Logging:** *The Lodi Police Department does not log successful and unsuccessful attempts to access, create, write, delete or change permission on user account, file, directory or other system resource for all information systems accessing criminal justice information; Completed. San Joaquin County IT handles event logging for our system.*
- 13. Advanced Authentication:** *The Lodi Police Department does not provide advanced authentication for remote access to criminal justice information from non-secure locations, for information technology staff and private contractors; Completed. 2FA installed in all vehicles equipped with mobile devices with CLETS access.*
- 14. Advanced Authentication:** *The Lodi Police Department does not provide advanced authentication for remote access to criminal justice information from non-secure locations, for information technology staff and private contractors; Completed. 2FA installed in all vehicles equipped with mobile devices with CLETS access.*
- 15. Encryption:** *The Lodi Police Department does not encrypt its data backup and was unable to provide verification that the encryption used on the wireless and Internet network segments were at least 128-bit NIST certified; Completed. Wireless and Internet segments are 128-bit NIST 140-2 verified.*
- 16. Personal Firewalls:** *The Lodi Police Department did not implement personal firewalls on their wireless access devices. Completed. NetMotion and Windows 7 firewall protection is now installed on all wireless access devices. Personal Firewalls completed.*

Sincerely,



Tod Patterson  
Interim Chief of Police



# City of Anaheim POLICE DEPARTMENT

October 28, 2015

Keith Dann, Assistant Chief  
CLETS Executive Secretary  
CA Department of Justice  
Bureau of Criminal Information & Analysis  
Sacramento, CA 94203-3870

Re: Federal Bureau of Investigation (FBI), Criminal Justice Information Services (CJIS)  
Division, Information Technology Security Audit (ITSA)  
Quarterly Compliance Report – October 2015 -- Administrative

Dear Assistant Chief Dann:

As previously arranged with your staff member Maria Cranston, this serves as our third quarter Compliance report of our pending Administrative item.

**Item #3 - Security Awareness Training Records:** *The Anaheim Police Department does not ensure personnel, who manage or have access to criminal justice information receive the required security awareness training within six months of initial assignment, and biennially thereafter. (Versaterm, HP Enterprises, Cogent and RCS Investigations and Consulting)*

**RESPONSE:** The Anaheim Police Department was working with a team of Law Enforcement Agencies (LEA's) from throughout Orange County to design compliant online Security Awareness Training that would be accessed via a secure connection. Unforeseen technical challenges hampered the implementation of this training and to avoid additional delays, APD will be using "nexTEST," the online training and testing system to deliver the required Criminal Justice Information Services (CJIS) material and test the users' knowledge and use parameters of the various databases.

Our Agency CLETS Coordinator (ACC) participated in the September 10, 2015 instructional webinar. We have submitted the registration of our department personnel via the nexTEST portal and we just received confirmation of their registration. We will begin training process in November. Our RMS/CAD vendor, Versaterm, has provided the certificates for all of their employees who either do or potentially could have logical access to our system.

We continue to work towards completion of Security Awareness Training by the January 2016 Quarterly Compliance Report.

Assistant Chief Keith Dann  
October 28, 2015  
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The Anaheim Police Department will continue to work toward resolution of this remaining administrative issue to bring us into full compliance. It is our understanding that our next deadline is submission of the January 2016 Quarterly Report.

If any further information is needed, please contact our Agency CLETS Coordinator (AAC), Charmaine Darmour, at 714-765-1838 or [cdarmour@anaheim.net](mailto:cdarmour@anaheim.net).

Sincerely,



Shelley L. McKerren  
Support Services Division Commander