

ARIC Privacy Policy Committee Report

The ARIC Privacy Policy Committee's recommended changes are as follows:

- (1) Deletion of subsection (D) in section VIII, "Dissemination of Information" that the committee believes limits the ARIC partners' ability to share information with each other. Subsection (D) is a one-sentence subsection.

Response: Staff agrees with this recommendation, but instead of deleting the sentence, we have added language that clarifies the intent of the provision (see page 11 of the policy).

- (2) Clarify the process for handling Public Information Requests.

Response: Staff agrees with this recommendation, and we have added a new subsection (I) to section VIII "Dissemination of Information" on 12.

- (3) Clarification in Subsection (E) of section XII "Compliance, Accountability, and Enforcement" (page 15) that annual audits be a peer-to-peer audit of information in the criminal intelligence system database.

Response: Staff agrees with this recommendation, and we have added a definition of "Peer Fusion Center" to the "Definitions" section and we have added language to Subsection (E) of section XII that makes clear each annual audit will be a peer audit conducted by a peer fusion center.

- (4) In section XIII (page 16) "Training," specify the subject matter of required training and maintain documentation of all training received by personnel required to receive training.

Response: Staff agrees with this recommendation, and we have added language in subsection (A) of the "Training" section that specifies the subject matter required and we have added a new subsection (D) that requires training of all new personnel and refresher training for everyone else, and that requires the Privacy Officer to maintain all training documentation.