

Appendix 6: Use of EBTS field 2.2020: Rap Back Recipient Version 2.1 – June 1, 2014

The Rap Back Recipient (Designated Recipients) field was included in the Rap Back design as an anticipated means to easily add additional subscribers to one subscription record. This was done prior to the development of the Rap Back Privacy Risk Mitigation Strategies and the other restrictions that are now on subscriptions by policy, such as the requirement for NGI to receive the fingerprints related to the subscription event on each subscription when Event-Based Subscription Management is used. As such, Designated Recipients now has a much more limited role and can only be used by Submitters/Subscribers in the very narrow instances described below.

Fees: There are no additional fees for including/adding Designated Recipients to an NGI Rap Back subscription.

Designating Additional Rap Back Recipients – Civil Rap Back Subscriptions using Event-Based Subscription Management

Under Event-Based Subscription Management, the Subscriber may identify up to nine Designated Recipients to receive automated notification of Rap Back Activity on a specific subscription. The Designated Recipients must have FBI assigned ORIs and be authorized to receive the CHRI related to this subscription under the same conditions as the Subscriber. For example, if the FBI-approved state law allows the Department of Education (the Subscriber) to share FBI-derived CHRI regarding teachers with the employing school districts, the Department of Education could add the employing school district(s) ORIs to the Designated Recipient fields of the Subscription record. The Designated Recipients can be added with the original Rap Back Subscription Request, and Rap Back Maintenance transactions also allow for the adding and deleting of Designated Recipients.

Note: This function cannot be used to add additional recipients related to other civil events (applications, volunteering, licenses, etc.) for this person's NGI Identity, only to add additional recipients authorized to receive notifications related to this one subscription.

The participation of the Designated Recipients is totally dependent upon the Subscribing Entity maintaining the Designated Recipients' ORIs in the record. As an example, the Department of Education is responsible for the maintenance of the Designated Recipient fields. If the Department of Education subscription expires, or otherwise is removed, the Designated Recipients are removed as well, and they will not receive future notice of Rap Back Activity from this subscription.

A subscription has only one Rap Back Activity Notification Format, one set of Triggering Events, one Expiration Date, and one Privacy Risk Mitigation Strategy associated with it. The Rap Back Activity Notifications and any other Rap Back transactions will be generated to the Designated Recipients under that one set of rules. The Designated Recipients must be authorized to receive the CHRI under those stipulations, or the Subscribing Entity should not add them to the subscription record.

When a future triggering event occurs against that Subscription, NGI will generate one Rap Back Activity Notification to the Submitter, with a listing of the Designated Recipients in the Send Copy To (SCO) field. The Submitter may be able then to send the reply to the Subscribing Entity with copies to the Designated Recipients using the same methodology currently used for processing SCO recipients.

Designating Additional Recipients – Civil Rap Back Subscriptions using Category-Based Subscription Management

Submitters using Category Based Subscription Management should not use the Designated Recipients field in their NGI subscriptions. Since the state has agreed to review Rap Back Activity Notifications against the state subscription files before forwarding them to the Subscribers, it would not be appropriate to include Designated Recipients in Category Based subscriptions. The Rap Back Activity Notifications could be automatically forwarded to Subscribers when they are not authorized to receive them.