
EVALUATION OF MARYLAND'S USE OF RAP BACK

SEPTEMBER 2026



OFFICE OF PROGRAM EVALUATION AND GOVERNMENT ACCOUNTABILITY
DEPARTMENT OF LEGISLATIVE SERVICES
MARYLAND GENERAL ASSEMBLY

Evaluation of Maryland's Use of Rap Back

**Department of Legislative Services
Office of Program Evaluation and Government Accountability
Annapolis, Maryland**

September 2026

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Executive Director



Michael Powell
Director

DEPARTMENT OF LEGISLATIVE SERVICES
OFFICE OF PROGRAM EVALUATION AND
GOVERNMENT ACCOUNTABILITY
MARYLAND GENERAL ASSEMBLY

September 1, 2026

Senator Shelly Hettleman, Senate Chair, Joint Audit and Evaluation Committee
Delegate Jared Solomon, House Chair, Joint Audit and Evaluation Committee
Members of the Joint Audit and Evaluation Committee

Dear Senator Hettleman, Delegate Solomon, and Members:

At the request of the Executive Director of the Department of Legislative Services, the Office of Program Evaluation and Government Accountability has conducted an evaluation of Maryland's use of Rap Back, a federal criminal background monitoring service. In Maryland the Criminal Justice Information Service, a unit of the Department of Public Safety and Correctional Services (DPSCS), is agencies' link to the Federal Bureau of Investigation for Rap Back subscriptions and notifications.

Recommendations are on page 13. The response from DPSCS is Appendix A.

We wish to express our appreciation for the cooperation and assistance provided by DPSCS.

Respectfully submitted,

Michael Powell
Director

MP/mpd

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Chapter 1.

Introduction to Rap Back

Rap (Record of Arrest and Prosecution) Back is a continuous criminal background monitoring service managed by the Federal Bureau of Investigation (FBI). The FBI operates separate services for criminal justice and noncriminal justice purposes, though the former is not used in Maryland. This evaluation focuses specifically on the noncriminal justice Rap Back service and its implementation in Maryland.

Rap Back for Noncriminal Justice Purposes

Noncriminal justice government entities receive criminal history record information for the employment or licensing of individuals in positions of public trust (e.g., teachers, child care staff, physicians).

Rap Back for Criminal Justice Purposes

Criminal justice government entities receive criminal history record information to monitor individuals on parole or probation. Rap Back is not used for criminal justice purposes in Maryland.

Rap Back notifies authorized¹ government agencies when the retained fingerprints of someone they currently employ or license are connected to new criminal activity reported to the FBI. Rap Back enables agencies to continuously monitor and vet these individuals' ongoing suitability for their positions of trust by notifying them of potentially disqualifying offenses committed in other states. Examples of criminal activity monitored through Rap Back include criminal arrests, dispositions, warrants, and federal sex offender registry modifications.

As of 2026 Maryland was 1 of 16 states using Rap Back. Procedures for Maryland's participation in Rap Back were established in 2015; the State began receiving notifications in 2022. There were 2,170 Rap Back notifications from 2022 to 2025. According to Maryland's Criminal Justice Information System (CJIS), the most frequent types of criminal activity flagged through Rap Back were related to court dispositions and criminal arrests.

Some agencies thought they subscribed to Rap Back, but they were not.

Rap Back notifies agencies of criminal activity outside of Maryland. The Rap Back service is sometimes confused with Maryland's State Alerts (*i.e.*, State Notifications) system. Maryland State Alerts are sent to authorized² agencies when retained fingerprints of someone they currently employ or license are connected to criminal activity in Maryland.

¹ Requires language in statute, approval from the FBI, an assigned FBI identification number (Z-ORI), and an individual's physically signed Privacy Act Statement and Noncriminal Justice Applicant's Privacy Rights.

² Requires language in statute and an individual's physically signed Privacy Act Statement and Noncriminal Justice Applicant's Privacy Rights.

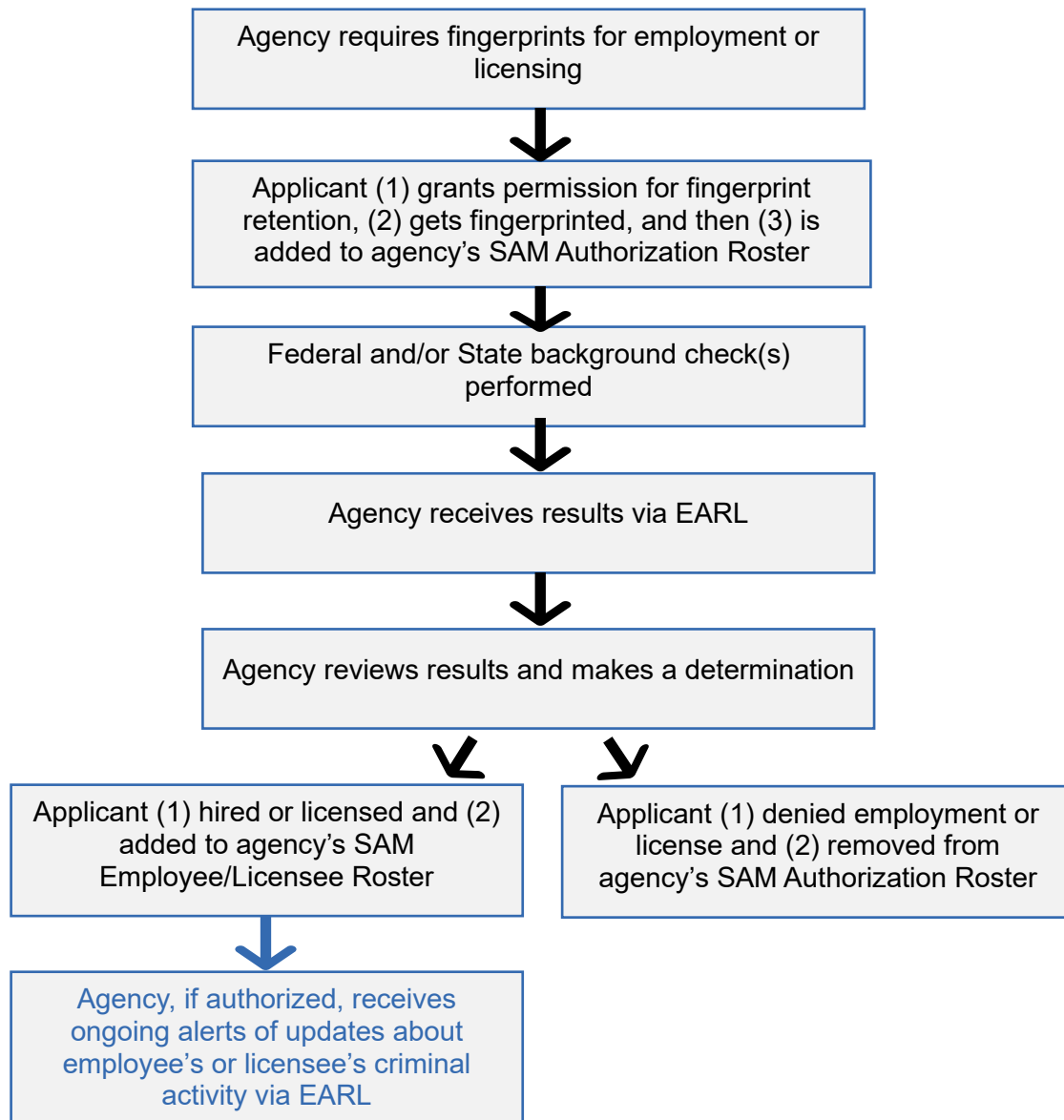
Based on interviews with stakeholders, the following may contribute to the confusion between Rap Back and State Alerts:

- There are limited references to Rap Back in the Code of Maryland Regulations to learn about Rap Back and its definition.
- Alert notifications for both services are typically sent via the secure Electronic Applicant Response Letter (EARL) email system.
- “Rap Back” is sometimes informally used to describe any (state or federal) continuous monitoring of criminal history.
- Subscription to State Alerts is automatic, provided the agency has authority to receive the alerts. Agencies must request to be subscribed to Rap Back through Maryland’s CJIS.
- There is currently no method for agencies to verify they are subscribed to either service, aside from contacting CJIS.

If an agency mistakenly believes it is subscribed to Rap Back, it could assume the lack of Rap Back notifications means no criminal activity occurred. Rather, the agency may only learn of any out-of-state criminal activity through self-disclosure, complaints against the employee or licensee, and/or the news media. This gap in monitoring would persist, as the agency would not (without intervention) know to request a Rap Back subscription.

Rap Back is distinct from an initial background check.

Rap Back is used in conjunction with, not in place of, background checks. Background checks are the initial, point-in-time review of a person’s criminal history and suitability for positions of public trust, whereas Rap Back provides continuous updates about their suitability throughout their employment or license tenure (see **Exhibit 1** for an illustration of these processes).

Exhibit 1: Maryland Background Check Process

EARL: Electronic Applicant Response Letter email system

SAM: Subscription Application Manager

Source: CJIS; Office of Program Evaluation and Government Accountability (OPEGA)

Not all Maryland agencies are eligible to participate in Rap Back.

Public Law 92-544 provides the basis for states to access and exchange federal criminal history record information (CHRI) for noncriminal justice purposes (e.g., employment, licensing). Maryland agencies must have Public Law 92-544 language in State statute to be eligible for participation in Rap Back. In addition, the statute must authorize the use of FBI records for the screening of applicants. Once eligible, agencies must request to be

subscribed through Maryland's CJIS – subscription is not automatic. Once approved by CJIS the request is sent to the FBI, which reviews State statute and decides whether the agency can subscribe. There are agencies with employees or licensees in positions of trust that could use Rap Back but have either not received authorization in State law or have not requested to be subscribed.

Private entities are not allowed to receive federal CHRI; however, their employees' CHRI may be monitored through an authorized government agency. For example, CHRI of staff in licensed, privately operated childcare facilities are monitored through the Maryland State Department of Education's (MSDE) Office of Child Care (OCC). If a child care worker committed a triggering offense outside Maryland:

- the facility the individual works at would receive a notice to contact its licensing regional office; and
- the licensing regional office would receive the detailed Rap Back notification.

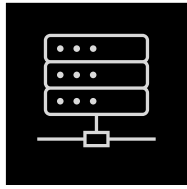
Chapter 2.

Rap Back Implementation in Maryland

CJIS is responsible for providing Rap Back access to authorized Maryland agencies.

The Department of Public Safety and Correctional Service's (DPSCS) CJIS is Maryland agencies' link to the FBI for Rap Back subscriptions and notifications. CJIS enables the notifications to go to subscribers and provides training on relevant FBI policies and criminal activity monitoring tools. These tools include Subscription Application Manager (SAM) and secure email portals. Once subscribed, agencies are responsible for maintaining their Rap Back subscription. This includes maintaining the SAM portal, reviewing Rap Back notifications, and acting on the notifications (see **Exhibit 2**).

Exhibit 2: Rap Back Responsibilities



CJIS Responsibilities

- Facilitating agencies' Rap Back subscriptions
- Training and support to Rap Back subscribers
- Maintaining system infrastructure
- Submitting authorized fingerprinting to the FBI
- Auditing compliance with FBI regulations



Agency Responsibilities

- Requesting subscription to Rap Back
- Meeting the FBI's authorization requirements (*i.e.*, having Public Law 92-544 language in statute)
- Managing SAM rosters
- Monitoring and reviewing Rap Back notifications
- Determining suitability of individuals' employment or licenses

Source: CJIS; OPEGA

CJIS cannot unilaterally subscribe agencies to Rap Back.

CJIS is mandated to enroll agencies in Rap Back if they have approval to receive federal background checks. However, CJIS does not know which agencies are either eligible to subscribe to Rap Back or have expressed interest in subscribing. This prevents CJIS from proactively working with agencies to subscribe to Rap Back.

Other barriers potentially hindering CJIS in fulfilling its mandate are that CJIS cannot:

- force agencies to subscribe to the service. Unless mandated to subscribe, agencies must voluntarily choose to subscribe to the service;
- make agencies meet the FBI's Rap Back subscription requirements. These requirements include having Public Law 92-544 language in State law, collecting signed privacy forms, and taking steps to protect personal information; or
- maintain SAM rosters on behalf of agencies. Agencies must manage their SAM rosters themselves. If employees are not in SAM or are on the wrong roster, the agency will not receive Rap Back notifications for them.

No one is currently responsible for informing state agencies about Rap Back.

CJIS largely focuses on overseeing technological aspects underlying Rap Back. CJIS does not promote the service to agencies that have not subscribed. Agencies must know about Rap Back to consider subscribing. Although some information about Rap Back was available on DPSCS's website:

- details on how to subscribe and who to contact with questions were minimal;
- one of the two hyperlinks to CJIS's Rap Back enrollment form was broken; and
- information presented in the "Background Check FAQs" page could be improved.

The FAQs page includes several questions and answers about Rap Back and agencies' participation in it. Some of the answers on this FAQ page could be misleading (see **Exhibit 3**). For example, agencies are advised:

- to check with their legal counsel to see if Rap Back is "mandated by law and/or regulation." It is not clear that agencies could voluntarily subscribe to Rap Back if eligible; and
- that their "employees and/or licensees should be...enrolled in Rap Back." Agencies' roles in requesting Rap Back subscriptions were not mentioned. How to request a subscription and the CJIS's contact information for questions were also not provided.

Exhibit 3: DPSCS's Background Checks FAQs Web Page

2. How do I know if my agency may be able to participate in Rap Back?

In order to be eligible to participate in Rap Back, your governmental agency must have a current Public Law 92-544 Maryland Statute. Please check with your legal counsel to determine if your participation in Rap Back is mandated by law and/or regulation.

3. What do governmental agencies that receive criminal history background results from CJIS need to do?

If allowed by law, have their employees and/or licensees fingerprinted and enroll in the Rap Back service.

Under the Privacy Act, an applicant is entitled to receive notification of the retention of fingerprints by the FBI and CJIS and a summary of intended uses. The future uses include the searching of latent fingerprints against retained civil fingerprints.

Source: CJIS; OPEGA

Chapter 3.

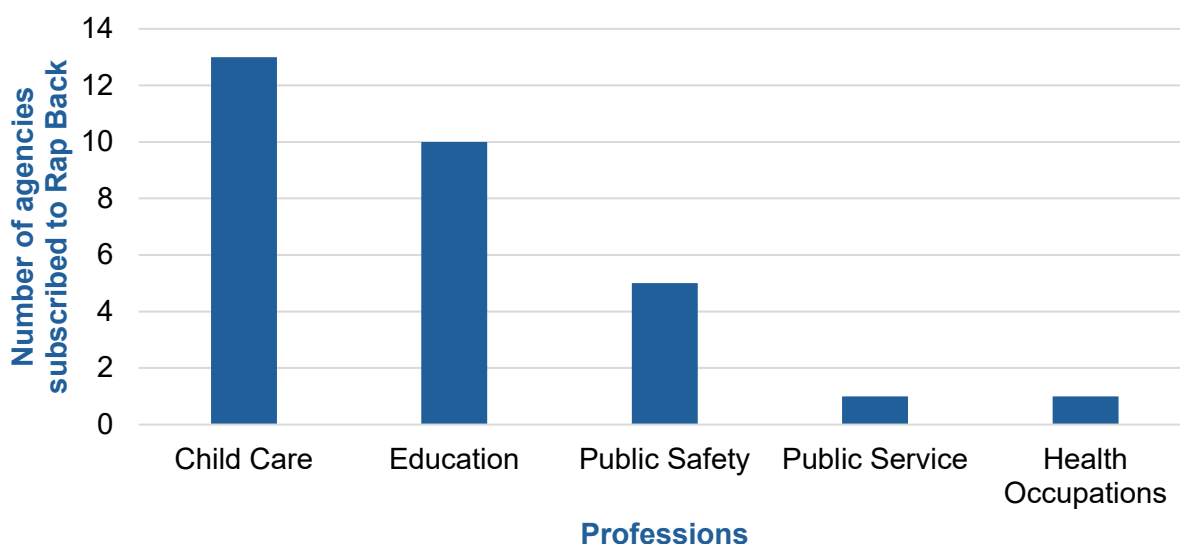
Rap Back is Underutilized in Maryland

Few agencies are subscribed to Rap Back.

There were 30 State agencies subscribed to Rap Back in Maryland as of March 2026. Most of these agencies were connected to either education or child care (see **Exhibit 4**). Professions with one or more Rap Back subscriptions include:

- Child Care (*i.e.*, Maryland State Department of Education's Office of Child Care regional licensing offices);
- Education (*i.e.*, select local education agencies);
- Public Safety (*i.e.*, DPSCS, Office of the State Prosecutor, Howard County Department of Corrections);
- Public Service (*i.e.*, Public Safety Commission's Transportation Division); and
- Health Occupations (*i.e.*, Board of Physicians).

Exhibit 4: Number of State Agencies Subscribed to Rap Back by Profession



Note: Number of State agencies subscribed to Rap Back as of March 2026. Although child care has 13 State agency subscriptions (one for each regional licensing office), there are over 3,000 private entities subscribed to Rap Back through them. Each of these private entities *should* be a licensed child care facility that regional offices receive Rap Back notifications for.

Source: CJIS; OPEGA

Maryland's Rap Back system was designed for child care and its specific needs.

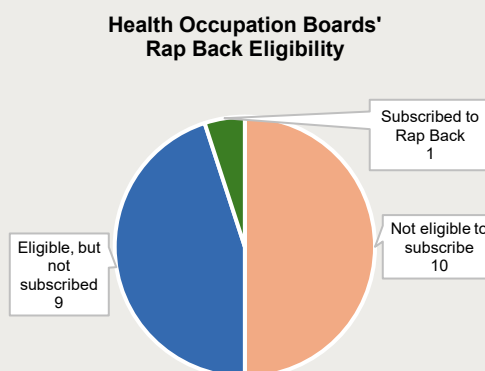
MSDE's OCC was the first and remains the biggest user of Rap Back. Adults interacting with children at child care facilities licensed by OCC should pass a background check and be in Rap Back. However, child care facilities, as private entities, cannot subscribe directly to Rap Back. Facilities must subscribe through their regional licensing office. The licensing office then receives detailed notifications on behalf of facilities, whereas the facilities receive a notification to contact their regional licensing office.

Maryland's Rap Back system infrastructure was funded by OCC and developed with child care regional offices and facilities in mind. As the number and type of agencies subscribing to Rap Back increases, CJIS will need to consider what, if any, system changes are needed.

Efforts to increase Rap Back Participation: A case study of Maryland's health occupation boards.

Maryland's Office of Legislative Audits found that health occupation boards had different rules for checking the criminal backgrounds of their licensees. Half (10 of 20) of the boards were ineligible to enroll in Rap Back.

- Four boards were not permitted to continuously monitor criminal activity.
- Six boards were not permitted to receive background checks or to continuously monitor criminal activity.



The Office of Program Evaluation and Government Accountability (OPEGA) interviewed 6 of the 20 health occupation boards. At the time of the interviews, only 1 of the 20 Maryland health occupation boards had subscribed to Rap Back. The only board subscribed to Rap Back was unaware they were subscribed. All the interviewed boards expressed that Rap Back could (1) be a useful, efficient tool to help support public safety and (2) save applicants' time and money by reducing the need for frequent re-fingerprinting.

Effective June 1, 2026, Chapter 371 of 2026 established and altered requirements related to criminal history records checks for various health occupations boards. These changes should result in all health occupation boards having the statutory language needed to be eligible to subscribe to Rap Back. However, there are other requirements for subscribing that boards may not be able to meet without additional support.

Some Maryland agencies need additional support to participate in Rap Back.

Several boards that were eligible for, but not subscribed to, Rap Back discussed barriers to using the service. Concerns included staffing, a backlog of background checks to review, application process to subscribe to Rap Back, and misinformation about the service (see **Exhibit 5**).

Exhibit 5: Barriers to Rap Back

Barrier	Description	Potential Impact on Rap Back
Staffing	• Staff must be trained on, have access to, and periodically check criminal activity monitoring tools. • Staff turnover can lead to loss of information about how to access these systems. • New staff may not know how to reach out to CJIS. • CJIS cannot proactively reach out to new staff to set up training and access if they are not aware of the turnover.	• Delay in agency's notification monitoring • No notifications received by agency
Background check backlog	• Some boards struggle to process and make determinations on initial background checks for their employees or licensees. • Initial background checks must be done before continuous monitoring can happen.	• Out-of-date SAM rosters • Inconsistent monitoring of criminal activity (Rap Back only works if SAM rosters are current)
Application process	• Some boards did not know about Rap Back and how to subscribe to it. • This was a particular concern for newer staff without connections to either: • peers who had information on or experience with Rap Back; or • CJIS staff.	• Limited uptake of Rap Back
Misinformation	• Some boards thought they were subscribed to Rap Back, only to find out they were not.	• Inadequate criminal activity monitoring • Limited uptake of Rap Back

Source: CJIS; OPEGA

The implementation and management of Rap Back requires Maryland agencies to have dedicated staff resources. Inadequate staffing can lead to a backlog of processing applications and reviewing criminal histories, which contributes to out-of-date information in the systems Rap Back depends on to function properly.

Chapter 4.

Rap Back has Limitations

Rap Back is reliant on fingerprints.

Rap Back notifications are only sent if individuals' fingerprints are captured following criminal activity. Fingerprints can be captured during booking (after an arrest or summons) or at court. Whether and when fingerprints are taken can depend on the nature of someone's crime (e.g., cite and release offenses) or administrative oversight.

There were over 2,000 instances of criminal activity between 2022 and 2025 that (1) included fingerprints and (2) triggered a Rap Back notification. The number of potential triggering events that occurred without the capture of fingerprints is unknown.

Users never received nearly a quarter of Rap Back notifications.

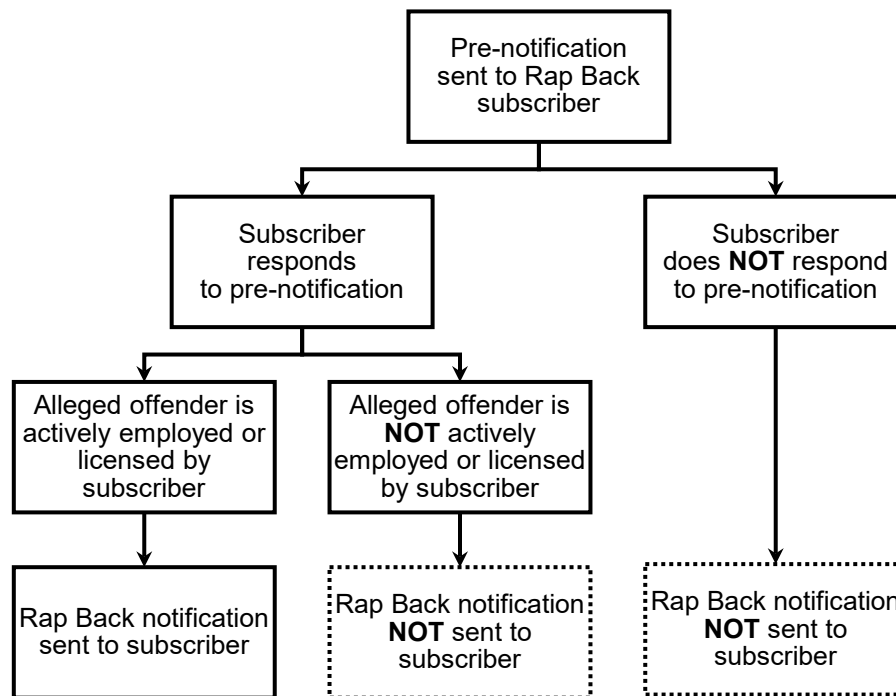
Before receiving a full notification when a triggering event happens, Rap Back subscribers must first respond to a "pre-notification" email. About 24% of pre-notifications were not responded to by subscribers.

The pre-notification step is a privacy risk mitigation strategy, required by the FBI. This step ensures that subscribers do not receive criminal history information that they legally should not have. Pre-notifications are emails that require subscribers to verify whether:

- the subscriber is still authorized to receive criminal activity information; and
- the individual associated with the triggering event is either still employed or licensed by the subscriber.

If subscribers do not respond to the pre-notification, the Rap Back alert notification is not sent to the agency/employer (see **Exhibit 6**). Subscribers' responsiveness to pre-notifications depend on how well (1) secure email addresses, where pre-notifications are sent, are monitored and (2) SAM rosters maintained.

1. **Secure email monitoring.** Subscribers' monitoring of pre-notification alert messages affects whether they are alerted of potentially disqualifying offenses. Some agencies have a designated person to monitor alerts and ensure they are acted on, others reported not having the necessary staff, resources, or knowledge (e.g., how to access the secure email account).
2. **SAM roster maintenance.** SAM includes the names of all individuals that have been fingerprinted using an agency's authorization number – including individuals who may not follow through with receiving a license or being employed. The status of individuals in SAM must be manually updated to reflect whether the individual was hired or licensed. During interviews, some agencies cited challenges with maintaining rosters in SAM and working to reduce the backlog of SAM roster updates. Best practices of some agencies included updating rosters periodically and setting calendar reminders.

Exhibit 6: Rap Back Notification Process

Source: CJIS; OPEGA

CJIS selectively sends reminders to Rap Back subscribers who have not responded to pre-notifications.

CJIS sent reminders for 720 (about 29%) of the over 2,400 pre-notifications sent to subscribers between 2022 and 2025. Although 80% of those reminders were sent within 21 days of the subscriber being sent the pre-notification, the number of days ranged from 20 to 114. There were about 320 pre-notifications that subscribers did not respond to and that CJIS did not send reminders about.

CJIS mentioned in interviews that reminders were sent for more egregious criminal activity, such as alleged sexual assault. However, there was no protocol provided to OPEGA that listed what criminal activity warranted reminders and the timeframe within which those reminders should be sent.

Some Rap Back alert notifications are not being sent to the right Maryland agency.

Each agency subscribed to Rap Back must have a designated Originating Agency Identifier (ORI) number. The ORI number tells the FBI and CJIS which agency the Rap Back alert notification should be sent to. The use of wrong ORI numbers during the fingerprinting process results in agencies receiving pre-notifications for individuals they do not employ or license.

When an individual gets fingerprinted for either a license or employment, they must either provide the fingerprint vendor with their respective agency's ORI number or provide the vendor with a form from the agency website.

OPEGA went on the website of a Maryland board to review the background check instructions for an individual seeking a license. The ITCD-16 Live-Scan Pre-Registration Application on the board's website revealed two errors (see **Exhibit 7**).

1. Wrong ORI number. The correct ORI number for the board was different from the ORI number listed on the board's ITCD-16 Live-Scan Pre-Registration Application. The board is not approved for Rap Back, yet the ORI number they were using is associated with an agency approved for Rap Back.
2. Wrong Agency marked. Under the Agency section, Child Care was selected. The board does not fall under child care; the Government Licensing or Certification block should be selected.

Exhibit 7: ITCD-16 Live-Scan Pre-Registration Application, Agency Section

AGENCY		
Please select from the following (*ORI Required):		
☐ Adult Dependent Care ☒ Child Care* ☐ Criminal Justice*	☐ Government Employment* ☒ Government Licensing or Certification* ☐ Maryland State Police Licensing*	☐ Private Party Petition** ☐ Public Housing
Agency Authorization Number: 0800001123		
*ORI Number: MD920523Z		
**Position Applied:		

ITCD-16 LIVE-SCAN PRE-REGISTRATION APPLICATION
June 2019

Source: CJIS; OPEGA

OPEGA discovered that 35% of licensed providers from the Department of Human Services³ were connected to OCC's Rap Back subscriptions despite not being child care providers licensed by OCC⁴. If an entity is erroneously listed under OCC, it will not receive Rap Back notifications even if it responds to pre-notifications; instead, the Rap Back notifications go to an OCC regional licensing office. The regional licensing office is then tasked with ensuring the individual is not associated with a licensed child care facility. The appropriate party may never receive the Rap Back notification, as OCC is, understandably, not permitted to share the information.

³ Providers (e.g., group homes, independent living programs) listed in the provider directory for the Department of Human Services' Office of Licensing and Monitoring as of April 2026.

⁴ Providers did not appear when searched for in the Maryland State Department of Education's directory of licensed or formerly licensed providers (Check CCMD) in April 2026.

Recommendations

DPSCS should report to the Maryland General Assembly on what changes would be needed for it to fulfill its mandate to subscribe eligible agencies to Rap Back.

There is no entity responsible for promoting Rap Back or doing outreach to agencies who could, or should, subscribe to it.

- CJIS is mandated to subscribe agencies to Rap Back if the agencies have approval to receive federal background checks. However, CJIS does not know which agencies are eligible to subscribe to Rap Back and is not structured to gather that information.
- DPSCS's Information Technology and Communications Division (ITCD), which houses CJIS, maintains a directory of agencies with approval to receive federal background checks and employs the State's FBI Compact Officer.

DPSCS should consider what steps would need to be taken to strengthen its implementation of Rap Back and whether DPSCS (through CJIS, ITCD, or another division) or separate agency might be better fit to address the gaps identified in this evaluation.

CJIS should consider creating a way for agencies to independently check their Rap Back subscription status.

Agencies currently lack a way to verify whether they are subscribed to Rap Back without communicating with someone at CJIS. Agencies' access to information about their Rap Back subscription status could help improve use of the service, as agencies would know, rather than assume, whether they were subscribed. This information could be shared with agencies in different ways, such as by adding the information into SAM or creating a directory that agencies can access.

CJIS should provide basic training materials and guides, as well as information about procedures and regulations on its website for agencies interested in Rap Back.

OPEGA discovered that some agencies face challenges contacting CJIS and locating information that explain Rap Back's program requirements, enrollment processes, user responsibilities, and best practices. Providing comprehensive and easily accessible online information and training resources would help agencies better understand and comply with procedures while reducing some of the administrative burdens of CJIS.

CJIS should send reminders to all subscribers who have not responded to pre-notification emails, regardless of offense severity.

CJIS should consider developing and implementing an official protocol for sending reminders to Rap Back subscribers that have not responded to pre-notification emails. Historically, CJIS decided which triggering events warranted sending subscribers a reminder to respond. However, disqualifying offenses vary by profession. A protocol that requires sending pre-notification reminders to all subscribers would ensure all potentially disqualifying offenses are treated with the same level of scrutiny.

Appendix A.
Response from the Department of Public Safety
and Correctional Services



Department of Public Safety and Correctional Services

Information Technology & Communications Division

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August 5, 2026

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Mr. Michael Powell, Director
Office of Program Evaluation and Government Accountability (OPEGA)
Department of Legislative Services
90 State Circle
Annapolis, Maryland 21401

Dear Mr. Powell,

The Department of Public Safety and Correctional Services has reviewed the OPEGA Evaluation of Maryland's Use of Rap Back Final Report dated July 2026. We appreciate the observations and recommendations that were made as the result of this evaluation and the opportunity to work with your office. To that end, I want to assure you that the Department is committed to continuing to improve the Rap Back program.

The FBI's NGI Rap Back system is a valuable component to Maryland Public Safety. It has proved essential for notifying authorized agencies when persons hired for positions of trust are arrested for offenses that violate that trust.

We support the report's observations/findings and are actively working to implement the four (4) recommendations within our existing operational capacity. However, full and sustained implementation of these recommendations will require additional staffing and financial resources beyond our current capacity. We also recognize that implementation of the four recommendations, while important for strengthening our processes and readiness, does not in itself guarantee agency enrollment.

Please find attached the Department's itemized responses to the recommendations included in the report and some additional information relevant to staffing.

If you have any questions regarding this response, please contact me.

Sincerely,

Amaro Thiam
Chief Information Officer, DPSCS


Amaro Thiam (Aug 6, 2026 09:58:48 EDT)

08/06/2026

Attachment

cc: Carolyn Scruggs, Secretary
Oluwatoyin Bakare, Deputy Secretary of Administration
Alec Wheaden Jr., Director of Policy Management
Lawrence Mendez, Acting Director
Benjamin Friend, Chief Information Security Officer
Joseph M. Perry, Inspector General

DPSCS Response to the OPEGA Rap Back Audit Report

Recommendation 1: DPSCS should report to the Maryland General Assembly on what changes would be needed for it to fulfill its mandate to subscribe eligible agencies to Rap Back.

DPSCS Response: The Department agrees in part/disagrees in part.

As indicated in the report, DPSCS-ITCD-CJIS oversees the technological aspects of the Rap Back system only. Rap Back is a voluntary FBI service. Consequently, the Department lacks the authority to require agency enrollment. The enrollment process begins when an agency submits a request. The Department then reviews it and prepares an FBI application on the agency's behalf. Only the FBI has the authority to officially approve and include an agency into the Rap Back program.

Recommendation 2: CJIS should consider creating a way for agencies to independently check their Rap Back subscription status.

DPSCS Response: The Department agrees.

In Progress - A helpdesk ticket is currently in place to create an Agency Status Dashboard within the Subscription Application Manager (SAM) system. This dashboard will provide logged-in agencies with a centralized view of their overall system status, specifically highlighting Rap Back Enrollment Status alongside other high-value agency metrics. This shall be built on a modular layout that easily scales for future feature additions.

Recommendation 3: CJIS should provide basic training materials and guides, as well as information about procedures and regulations on its website for agencies interested in Rap Back.

DPSCS Response: The Department agrees.

Developing these materials requires close coordination with Maryland Police and Correctional Training Commissions (MPCTC) and other Outreach and Training subject matter experts. Beyond basic Rap Back education and FAQs, the content will also cover practical system usage, including the Subscription Application Manager and the Rap Back Enrollment Portal. This is resource dependent. Please see requirements for system and staffing below.

Recommendation 4: CJIS should send reminders to all subscribers who have not responded to pre-notification emails, regardless of offense severity.

DPSCS Response: The Department agrees.

In Progress - High priority recommendation - A helpdesk ticket is open to update SAM to send 24-hour Rap Back pre-notification alerts, reminding agencies to open time-sensitive emails

affecting individuals in positions of trust. To ensure compliance, CJIS Customer Service plans to establish a dedicated unit to monitor unopened alerts and follow up directly with non-compliant agencies via email and mail. This is resource dependent. Please see requirements for staffing below.

ITCD believes the following additional staffing is required to fulfill OPEGA recommendations:

1. Outreach, Engagement & Adoption:

- Constituent/Stakeholder Liaison: Policy Management Admin - Coordination of increased enrollment with the FBI.
- Outreach & Communications Specialist: Business Analyst – Outreach.

2. Training & Enablement:

- Instructional Designer: Business Analyst - Creates formal learning curricula. Development of system and training documentation.
- Trainer: MPCTC Certified Instructor.
- Technical Writer: Translates complex technical workflows into plain-language knowledge base articles, downloadable user guides, Quick-Start PDFs, and searchable FAQs.

3. Design & Development (*Upgrades to the current Subscription Application Manager (SAM) and other system enhancements for enrollment purposes*):

- UX/UI Designer: Focuses heavily on making the system intuitive.
- Software & DevOps Engineers: Design, write, test, and host the software backend, database, and front-end interfaces.
- Quality Assurance (QA) / Usability Tester: Tests for bugs, security vulnerabilities, and system stability.

4. Operations & Ongoing Support:

- CJIS Customer Service Representatives: Once the system goes live, operational staff keep external users supported and engaged. Dedicated to the handling of continuous Rap Back alerts serving as emergency communication to agencies non-responsive to their pre-notification alerts.

Additional Notes:

- Please note, implementation of these recommendations does not guarantee agency enrollment into the Rap Back service.
- The current regulations do not include an incentive or penalty for agency Rap Back enrollment.
- The Department may make the alert processes more robust; however, cannot force agencies or employers to perform all necessary Rap Back alert follow-up actions.
- Per OPEGA findings:
 - Broken hyperlinks are now fully functional; and
 - Rap Back FAQ has been revised.