Using National Instant Criminal Background Check Data for Gun Policy Analysis

A Discussion of Available Data and Their Limitations

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About This Tool

The RAND Corporation launched the Gun Policy in America initiative in January 2016 with the goal of creating objective, factual resources for policymakers and the public on the effects of gun laws (RAND Corporation, undated). As part of this mission, we have investigated a variety of data sources that could help shed light on key questions about whether and how gun laws affect important public health and criminal justice outcomes. One of those data sources is the National Instant Criminal Background Check System (NICS). In this document and the accompanying data set, we provide detailed information about data associated with NICS and discuss their strengths and weaknesses for various gun policy evaluation objectives. This tool will be of interest to researchers who wish to use NICS data to characterize firearm markets, the firearm background check process, and background check denials.

Justice Policy Program

RAND Social and Economic Well-Being is a division of the RAND Corporation that seeks to actively improve the health and social and economic well-being of populations and communities throughout the world. This research was conducted in the Justice Policy Program within RAND Social and Economic Well-Being. The program focuses on such topics as access to justice, policing, corrections, drug policy, and court system reform, as well as other policy concerns pertaining to public safety and criminal and civil justice. For more information, email justicepolicy@rand.org.

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Summary

Despite the significant toll firearm violence takes on the American public, we know little about the effects of laws regulating firearms on a variety of important outcomes (Smart et al., 2020). One reason for this is a lack of data that are needed to evaluate policies. The data produced by the National Instant Criminal Background Check System (NICS) represent one possible source for researchers. The purpose of this RAND Corporation tool is to walk researchers through how the NICS system works and how state policies and other factors interact with NICS to shape the data it produces. In the Excel spreadsheet paired with this document, we compiled several types of NICS data, including NICS background checks by time and state, NICS Indices metadata, and the number and type of NICS denials (i.e., numbers of individuals and reasons why those individuals failed to pass a background check for a firearm purchase). However, an understanding of differences in state laws and in the implementation of background checks, as well as information about some of the limitations of data from the NICS system, are important for interpreting NICS data for policy analysis. These data can be found at www.rand.org/pubs/tools/TLA243-4.

Approach

To support researchers who are interested in evaluating the effectiveness of the NICS background check system, we outline the results of our own investigation into how NICS works, describe how state policies interact with NICS, and discuss the implications of these interactions on the use of NICS data for policy research. We leveraged government sources, reports, the RAND State Firearm Law Database, and academic literature to develop the following insights and recommendations.

Key Findings

NICS Firearms Checks

It is almost certainly true that the volume of new sales of firearms will be correlated with the volume of background checks, but it also is likely that this relationship will be inconsistent across states. These differences arise from multiple causes, including whether a state uses a permit system for firearm purchases that exempts permit holders from background checks, prohibits the purchase of multiple firearms in one month, or requires background checks for private purchases (i.e., universal background checks). Researchers must look closely at such policies to accurately use NICS counts of background checks in their work. See Table A.1 in Appendix A for a summary of these policies across states as of 2021.

NICS Indices Data

The NICS Indices data include records provided by states and federal agencies that disqualify individuals from firearm possession. Interpreting analyses that use these data requires considering differences over time and between states that may affect counts of prohibitors. For example, any analysis that seeks to estimate the relationship between a state policy and prohibited possessor records should consider the impact of federal incentives on state participation in NICS over time and how states determine prohibiting events,[1] which varies across states.

NICS Denials Data

NICS data on background check denials could be used to gauge the effect of new state policies on firearm access or as an indicator of the level of difficulty experienced by prohibited possessors when they try to access firearms through private or illegal sales. However, when using these data, researchers should consider two facts: (1) Denials recorded by NICS may represent only a subset of denials for some states that use resources outside NICS to conduct checks and (2) the association between denials and obtaining firearms may be less strong in states that conduct high volumes of permit rechecks.

Conclusions

The NICS Indices data represent one of the few sources of secondary data related to firearm markets and firearm policy implementation and outcomes. However, the use and interpretation of data generated by NICS are not straightforward. In particular, state variation in laws and in the implementation of NICS can make it challenging for researchers to interpret available NICS data. By accounting for these differences, researchers may develop innovative ways to use what could be a rich data source for firearm policy analysis.

[1] *Prohibiting events* include certain criminal histories, and mental illness or substance use disorder.

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1. Introduction

Despite the high rates of firearm violence in the United States, we know surprisingly little about the effects of laws regulating firearms on a variety of important outcomes (Smart et al., 2020). In many cases, the data required to evaluate policies are unavailable because the United States does not systematically collect or report many of the measures that would be helpful for evaluating the effects of policies, such as rates of household or individual gun ownership, number of firearm injuries, or the number and types of firearm sales. Nevertheless, the federal government manages the background check system that is designed to prevent purchases by prohibited possessors and it publishes several types of data, including the number and types of background checks completed in each state and month, the number of these checks that identify purchasers as prohibited from having a firearm, and the number of each type of prohibited possessor whose information is submitted from each state.

Data from or related to the National Instant Criminal Background Check System (NICS) have been used to support important research on

- how gun policies, politics, mass shootings, or economic changes affect demand for firearms (as proxied by background checks) (Brock and Routon, 2020; Koenig and Schindler, 2018; Liu and Wiebe, 2019; Schleimer et al., 2020; Wallace, 2015)[2]
- how changes in demand for firearms (as proxied by background checks) affect violent crime, suicide, police shootings, or other outcomes (Bleyer, Siegel, and Thomas, 2021; Lang, 2013; Lang, 2016)
- how improvements in state-level NICS record completeness affect violence, suicide, or other outcomes (Swanson et al., 2016; Swanson et al., 2013; Vars, Meadows, and Edwards, 2022)
- how much compliance there is with laws requiring background checks on private sales (Castillo-Carniglia et al., 2018; Castillo-Carniglia, Webster, and Wintemute, 2019).

Other types of questions that might be answerable with NICS data include the following:

- How many legal gun buyers later become prohibited possessors (which can be measured, for instance, by looking at denial rates for permit rechecks)?
- How difficult is it for prohibited possessors to obtain firearms through informal transactions (as proxied by the proportion of background checks denied)?

[2] Note that demand is a concept that incorporates both purchases and prices, making NICS background checks a less straightforward proxy for it. To measure *demand* for firearms across states and over time, a researcher would need information about the prices of firearms in each location. This would allow the researcher to understand whether variation in purchases reflects variation in *demand* across states versus variation in *prices* (e.g., Do Californians demand fewer firearms than Texans, or are firearms just more expensive in California than in Texas?). Using NICS background checks as a proxy for purchases does not have this problem (although, of course, there are other problems).

- How do improvements in state NICS record completeness affect (1) rates of denials or (2) the number of NICS checks that cannot be completed within the three days that federal law allows for the check to be completed before the firearm can be transferred, even if the background check is not complete?
- How do incentives for states to keep their records up to date increase the number of records reported to NICS Indices?

These are not, of course, exhaustive lists of the ways in which NICS data have been or could be used. However, they do suggest the promise that such a system as NICS may hold for supporting important studies of firearm policies. Nevertheless, NICS is a law enforcement system, not a platform designed for collecting useful research data, and the data it generates are subject to a wide variety of state and federal policies and procedures that make these data challenging to work with for research purposes.

In the course of trying to use NICS data to understand whether firearm violence is associated with differences in state implementation of background checks, we came to appreciate many of the idiosyncratic features of the NICS data that are related to the complex policy landscape that shapes the records included in NICS, if and when individuals are processed by NICS, and who is denied through NICS. We realized that there was no existing resource that could have prepared us for these complexities. This tool endeavors to be that resource by documenting the knowledge we gained while working with the data and detailing our observations about NICS data, including some interpretational challenges that the data present and some proposals for addressing those challenges.

We begin with an overview of how the NICS system works and some of the major differences in state policies that affect the interpretation of NICS data from those states. In Chapter 2, we discuss how NICS background check data differ by state and propose strategies to account for some of those differences. In Chapter 3, we discuss NICS data on background check denials and metadata on some of the records that NICS collects to establish that individuals should be prohibited from possessing a firearm. Accompanying this document is a data set we assembled that includes some published NICS data in a convenient digital format; it also includes some NICS data that are not routinely made publicly available and were obtained by Freedom of Information Act requests. We describe these data in Chapter 4.

How NICS Works

NICS was implemented in 1998, when the permanent provisions of the Brady Act came into full effect (Pub. L. 103-159, 1993). NICS allows the Federal Bureau of Investigation (FBI) and states to check whether a person is eligible to purchase firearms through a single, computerized search. The following four data sources make up the universe of NICS background check information, one of which is checked only under specific circumstances (FBI, undated):

1. The National Crime Information Center (NCIC) is the country's most comprehensive computerized criminal justice information system. The NCIC indexes criminal record

histories; fugitives; and other information, typically including persons under protection or restraining orders. All of this information could cause an individual to be prohibited from buying or possessing a firearm.
2. The Interstate Identification Index (III) is a criminal justice information exchange system that provides access to information on persons arrested or convicted of felony, misdemeanor criminal offenses, or both.
3. The NICS Indices were created specifically for use in the NICS background check system and contain information provided by federal and state agencies to identify persons prohibited under federal law from receiving or possessing a firearm. This information, such as a person's history of involuntary commitment to a psychiatric hospital or dishonorable discharge from the military, may not be present in other databases. We refer to the types of records that disqualify individuals from firearm possession as *prohibitors*.
4. The U.S. Department of Homeland Security's (DHS's) U.S. Immigration and Customs Enforcement databases contain information regarding non-U.S. citizens. The relevant databases are searched when a non-U.S. citizen attempts to purchase or receive a firearm; foreigners residing in the United States illegally or under a nonimmigrant visa and individuals who have voluntarily renounced their U.S. citizenship are prohibited possessors under federal law.[3]

When a person attempts to purchase a firearm from a licensed firearm dealer (known as a *federal firearms licensee* [FFL]),[4] they first fill out a Firearms Transaction Record, also known as the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Form 4473 (ATF, 2022b). The prospective purchaser gives this form—which contains the person's name, address, and such identifying information as height, weight, and date of birth—and valid identification to the dealer. The dealer then contacts either the state office serving as the point of contact for NICS background checks or the FBI's NICS Operation Center by phone or online via the E-Check system.

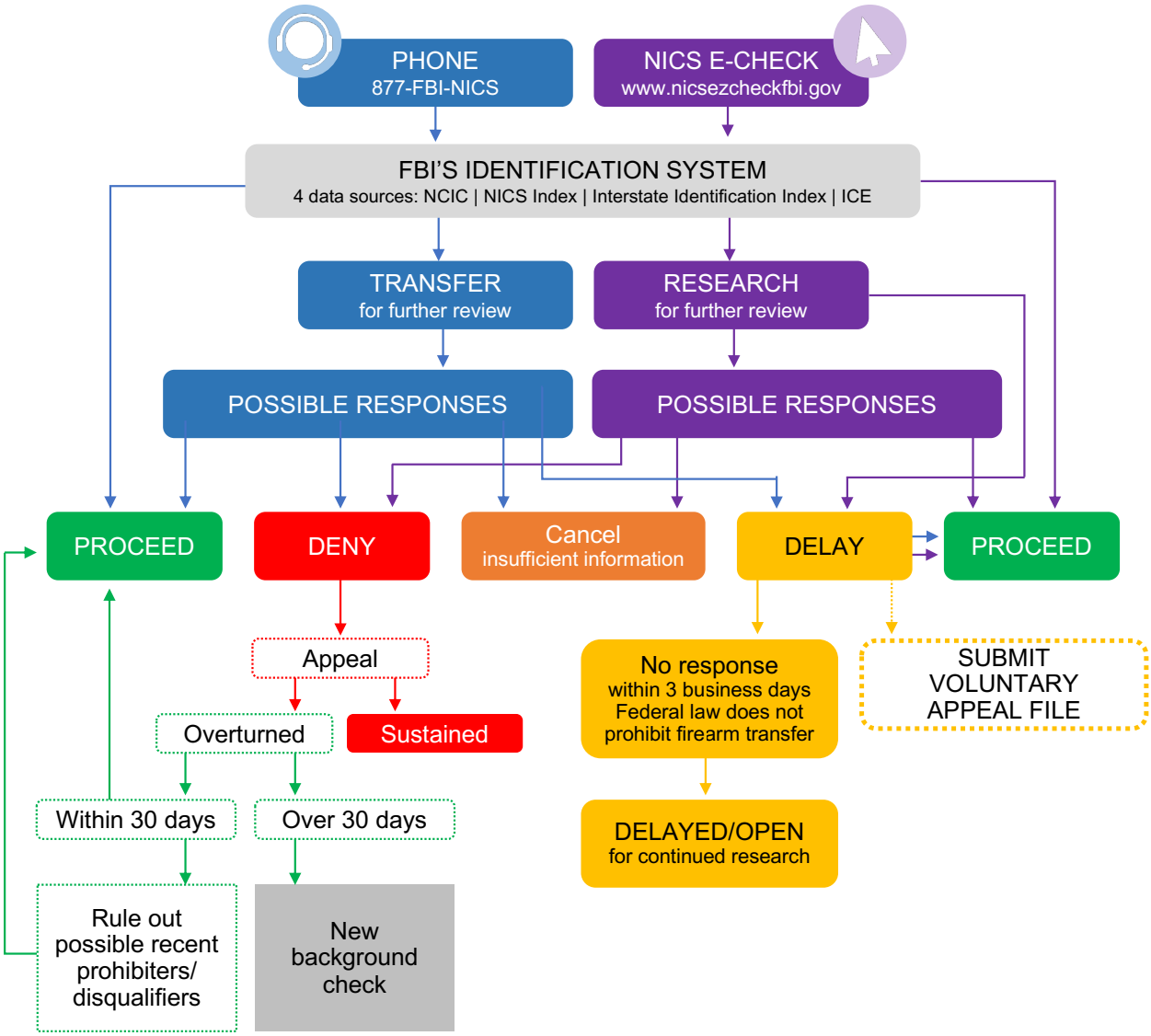
In a large majority of cases, NICS immediately provides a determination of eligibility for firearm ownership (92 percent of all checks were resolved within 20 seconds in 2019; Criminal Justice Information Services Division, 2019). If a determination cannot be made immediately, the FBI can delay the sale and, under federal law, has three business days to investigate the person's eligibility. After those three days, the transfer of the firearm can proceed by default unless the state has either a law extending the three-day "default proceed" period or a required

[3] There are exceptions to the stipulation that non-U.S. citizens admitted to the United States under a nonimmigrant visa may not purchase a firearm, including (1) persons admitted to the United States for lawful hunting or sporting purposes or persons who are in possession of a hunting license or permit that was lawfully issued in the United States and (2) official representatives of foreign governments who are accredited to the U.S. mission to an international organization with headquarters in the United States or en route to or from another country to which that person is accredited. Distinguished foreign visitors, designated by the Department of State, and foreign law enforcement officers of friendly foreign governments on official business are also exempt (18 U.S.C. 922 (d)(5), (g)(5), and (y)(2); 27 C.F.R. 478.11 and 478.32(a)(5)).

[4] This process applies *only* to sales through FFLs. States must write their own legislation to require background checks for non-FFL sales (e.g., private transfers). We discuss the impact of this fact on the utility of NICS data for research in Chapter 2.

waiting period that is longer than three days before the firearm can be transferred (18 U.S.C. 922(t)(1)). A NICS "proceed" determination allows the firearm sale to be completed and is valid for up to 30 days from the date NICS was initially contacted. If there is insufficient information from the prospective seller on their ATF Form 4473, the background check is canceled and must start again. Individuals whose firearm purchases are denied by the NICS check can appeal this denial. If the denial is overturned, the sale can proceed. Figure 1.1 is based on an FBI visualization and represents this process.

Figure 1.1. The NICS Background Check Process



SOURCE: Adapted from FBI, undated.
NOTE: ICE = U.S. Immigration and Customs Enforcement.

In most states, FFLs contact NICS directly to initiate a background check. These checks are sometimes fully automated or are passed to NICS section analysts to resolve. However, in 13 point-of-contact (POC) states and another six partial POC states, some or all NICS background checks are conducted by state agencies rather than directly by the FFL. Because state entities may possess records that are relevant to firearm prohibitors and that are not available to NICS and because they are familiar with state and local firearm laws limiting sales, POC states perform their own background checks, supplemented by the NICS checks conducted by the FBI (Ekstrand, 2000). These state agencies have access to NICS and are required by law to conduct a NICS background check before issuing a proceed determination. However, they may deny applications based on other data before or after accessing NICS. FFLs in these states initiate background checks by contacting the state agency serving as the point of contact with NICS rather than by contacting NICS directly.

Full POC states manage background checks for handguns and long guns. Partial POC states manage background checks for handguns only, and FFLs contact NICS directly for background checks on long guns. Although states may have more-complete data on prohibitors that are not available to the NICS system (Ekstrand, 2000), NICS is designed to allow states to upload information on state-specific prohibitors. This means that other states (including non-POC states) can use NICS to check for state prohibiting conditions when conducting firearm licensing checks (Krouse, 2019).

Data Produced by the NICS System

Although Form 4473 includes information on the buyer and seller of weapons, the type and serial number of the weapons purchased, and other information, the FBI is prohibited by law from retaining this information after determining that a sale may proceed and must destroy it within 24 hours of that determination (28 C.F.R. 25.9).[5] The only data the FBI may retain from these checks are the date on which the inquiry was made and the NICS transaction number, which is provided to the seller along with the determination to proceed.

Despite this requirement to delete data collected through NICS checks, the system produces metadata on the volume of checks of different types and their outcomes. In addition, NICS publishes information on how many prohibiting records are maintained in the NICS Indices by type of prohibition. Finally, NICS produces summaries of the reasons for denials. These data are included in the data set linked to this tool.

In the remainder of this tool, we examine these data sources, discuss their strengths and weaknesses for policy analysis research, and recommend approaches for addressing some of the obstacles to using them for research.

[5] The same regulations allow records from denied transactions to be retained for ten years. Records from open or unresolved transactions must be destroyed after 90 days.

2. NICS Counts of Background Checks

The NICS data point that is most frequently used for research on gun policy is the number of NICS background checks completed across states over time, usually as a proxy measure for the number of sales of new firearms (Bleyer, Siegel, and Thomas, 2021; Liu and Wiebe, 2019). State firearm policies and practices vary, however, which likely leads to systematic variation in the magnitude of the correlation between counts of background checks and firearm sales. In this chapter, we discuss some of the differences among states' policies and NICS background check numbers, how these differences might affect the interpretation of these data, and how the data are best analyzed.

Laws and Policies That Differ Across States

It is almost certainly true that the volume of new sales of firearms will be correlated with background checks, but there is not a one-to-one relationship between background checks and sales, and this relationship is inconsistent across states. These differences arise from multiple causes. Table A.1 in Appendix A summarizes several laws and policies that we believe are likely to cause these associations to differ, some of which we describe in detail in the following sections.

Brady Exemptions

Brady-exempt states have permit or licensing systems that require a background check to obtain a firearm purchase permit or a concealed-carry permit, but holders of those permits can purchase new firearms for up to five years without an additional background check. As of 2020, 24 states have a Brady exemption that removes the requirement for a background check at the time of sale for some types of sales.[6] However, implementation of these exemptions varies dramatically across the states with Brady-exempt status. In some states, holders of concealed-carry permits can buy firearms for up to five years without a new background check and all firearm purchases require a permit that entitles the holder to make additional purchases without additional background checks for up to five years. At the other extreme, Hawaii's Brady-exempt permits allow the one-time purchase of a single handgun and are good for only a year, and California's exemption is for the loan of firearms to entertainers as production props.

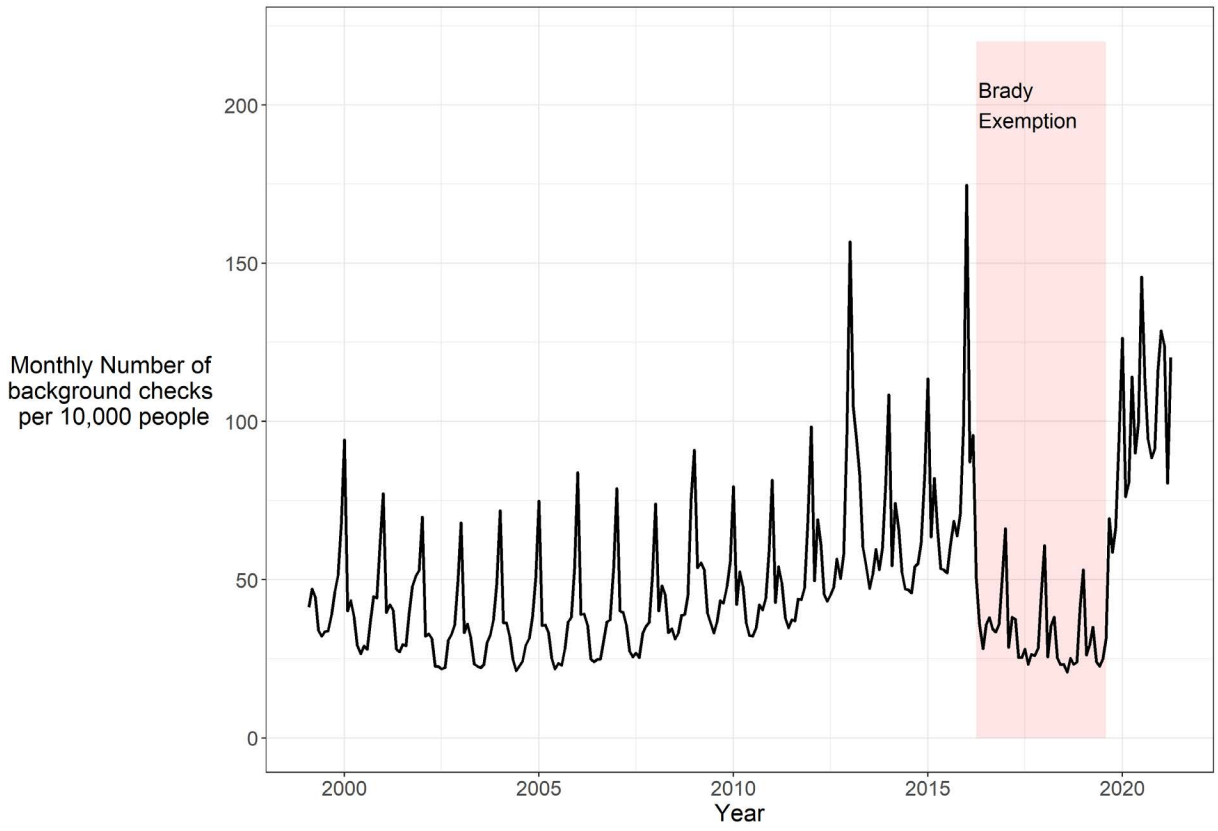
Therefore, a single background check may correspond to multiple guns purchased over many years in some states or to the purchase of one gun (or fewer) in other states. Thus, the

[6] This number excludes California, which has a Brady-exempt permit system that is used exclusively for the purpose of loaning firearms to entertainment professionals for use as props in a performance.

relationship between NICS checks performed and the number of firearms purchased is likely to differ substantially between states with and without Brady-exempt permits—and even among states with such permits. It is likely that the proportion of permits representing the purchase of a single firearm will vary systematically with the number of permits issued that exempt purchases from background check requirements. The number of permits issued will depend, in part, on the specifics of each state's policies. For example, a change in a state law to allow the concealed carrying of firearms without any permit may change the proportion of firearm sales that occur without a background check by reducing the number of individuals who were exempted because they had a concealed-carry permit. Thus, changes in state gun laws or regulations may have substantial effects on the proportion of firearm purchases that require a background check.

Indeed, some evidence of the possible magnitude of the effects of Brady exemptions on background checks can be found in Figure 2.1. This figure displays the monthly NICS background check rate per 10,000 individuals in Alabama between 1999 and 2021. The red background displays the period during which Alabama had a Brady-exempt status, from March 2016 to August 2019 (Alabama Attorney General, 2016; Richardson, 2019). On average, in the one-year periods before and after Alabama's Brady exemption, 73,452 NICS checks occurred per month. During the Brady exemption, there were just 43,099 NICS checks per month, which suggests that each NICS check under Alabama's Brady exemption replaced 1.7 NICS checks that might have occurred had there been no exemption (Alabama Attorney General, 2016; Richardson, 2019).

Figure 2.1. Background Checks in Alabama Before, During, and After Its Brady Exemption



SOURCE: RAND analysis of NICS background check data.
NOTE: The area with the red shading indicates the years during which Alabama's Brady exemption was in effect (March 2016 to August 2019).

One-Handgun-per-Month Laws

States vary in how many guns may be sold to an individual in a single transaction. Although most states allow multiple firearm purchases with one background check, as of 2021, several states have one-handgun-per-month laws. In these states, handgun background checks and handgun sales are more likely to have a one-to-one relationship, so they should be closely correlated. In states that place no restrictions on the number of firearms purchased in any transaction, the correlation will be substantially lower.

Unreported and Duplicate Background Checks

Because POC states may deny applications before conducting a NICS check, FBI statistics on NICS checks may undercount some of the demand for firearms in these states. However, checks by POC state agencies that take days or weeks might involve multiple NICS checks for a single application in contrast to checks conducted by the NICS section of the FBI, for which

there is a one-to-one association between applications and NICS checks (Krouse, 2019; Tien et al., 2008).

The Bureau of Justice Statistics periodically conducts a survey, the Firearm Inquiry Statistics (FIST) program, of state agencies to estimate the true number of applications for permits and firearm purchases. FIST shows that approximately half of all NICS checks are conducted by local agencies. However, because FBI NICS check reporting does not distinguish between NICS checks conducted by a state agency and NICS checks conducted by the NICS section at the state level, it is unclear how to use FIST data to estimate how many of the NICS checks for full and partial POC states might be duplicates for a single application.

In theory, all NICS checks for full POC states should be conducted by the state. If that is true, the FIST data suggest that there may be a large number of duplicate NICS checks for single applications for permits or transfers. For instance, FIST estimates that there were 883,000 applications for permits or transfers in California in 2017, whereas the count of NICS checks in that year was 78 percent higher (1.57 million). This suggests that for each permit or transfer application handled by California, it made 1.8 NICS checks. Therefore, counts of NICS checks in some POC states may be higher per firearm application than in non-POC states, where a single check typically would be performed by a licensed gun dealer for each sale.

Universal Background Check Laws

States with universal background check laws will have NICS background check numbers that include not only new sales of firearms but also private gun transfers and sales, making their NICS checks systematically different than those of states without such laws. As of this writing, we are not aware of any way to estimate what percentage of all gun sales occur outside FFLs or how that percentage varies across states that do and do not require checks for private sales. However, it appears likely that the ratio of firearms purchased to NICS background checks may be substantially lower in those states and during years in which a background check is required for private sales.

Idiosyncratic State Reporting Procedures

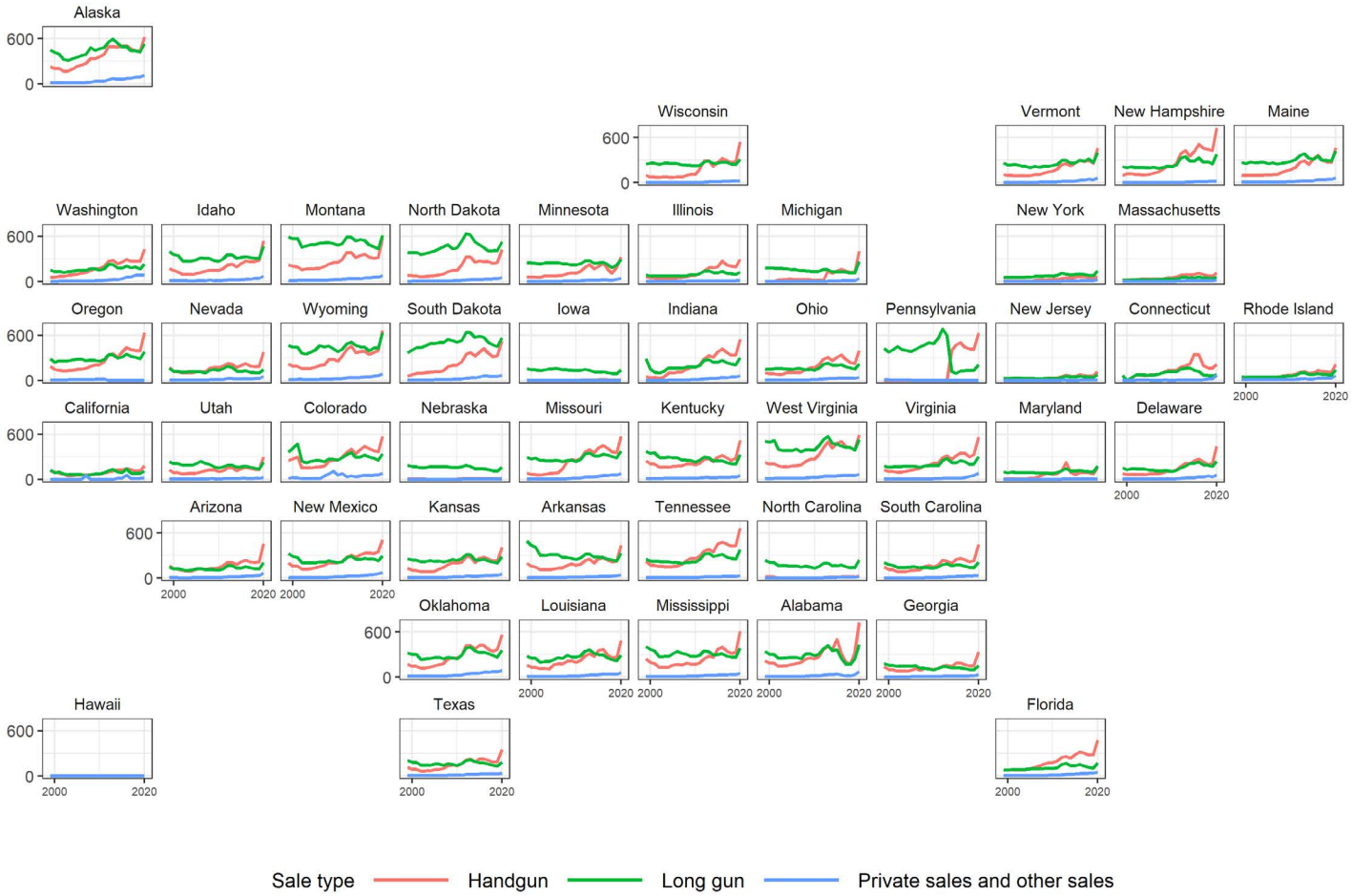
Figure 2.2 displays the NICS background check data as a rate per 10,000 people for each U.S. state from 2000 to 2020. The different trend lines displayed in the plots depict the background check rate for each firearm sale type (handgun, long gun, or private sales) As shown in this figure, the data reveal abrupt changes and state differences that are attributable to idiosyncratic policies and procedures. For instance, Pennsylvania, a POC state that conducts its own background checks, appears to have treated nearly all NICS check requests as though they were for long guns until early 2014, at which point it began differentiating long gun checks from handgun background checks. Hawaii, another POC state, has no firearm sales background check information in NICS because throughout this period, Hawaii required a permit to purchase or possess all firearms in the state. Therefore, all checks leading to sales are counted in the NICS

permit check counts.[7] Similarly, in Iowa, North Carolina, and Nebraska, which are all partial POC states, no handgun sales checks are recorded by NICS, and only long gun checks are found because these states use a permit-to-purchase system for handguns. In these states, permit checks will be a better proxy for handgun sales than new purchase background checks.[8]

[7] On request, Hawaii provided data on the number of permit checks conducted for the purpose of possession and the number that represent purchases. These data are included.

[8] We requested and received data from Iowa on the number of permit checks conducted for permits to purchase firearms, the number for concealed weapons permits, and other permit types. This information is included in the accompanying data set. North Carolina and Nebraska conduct permit checks at the county level and do not maintain aggregate state data on their permit checks.

Figure 2.2. Trends in NICS Background Checks per 10,000 People, by Firearm Sale Type and State, 2000–2020



SOURCE: RAND analysis of NICS background check data.
NOTE: Data for Washington, D.C., are not shown here. We provide information for Washington, D.C., in Table A.1 in Appendix A.

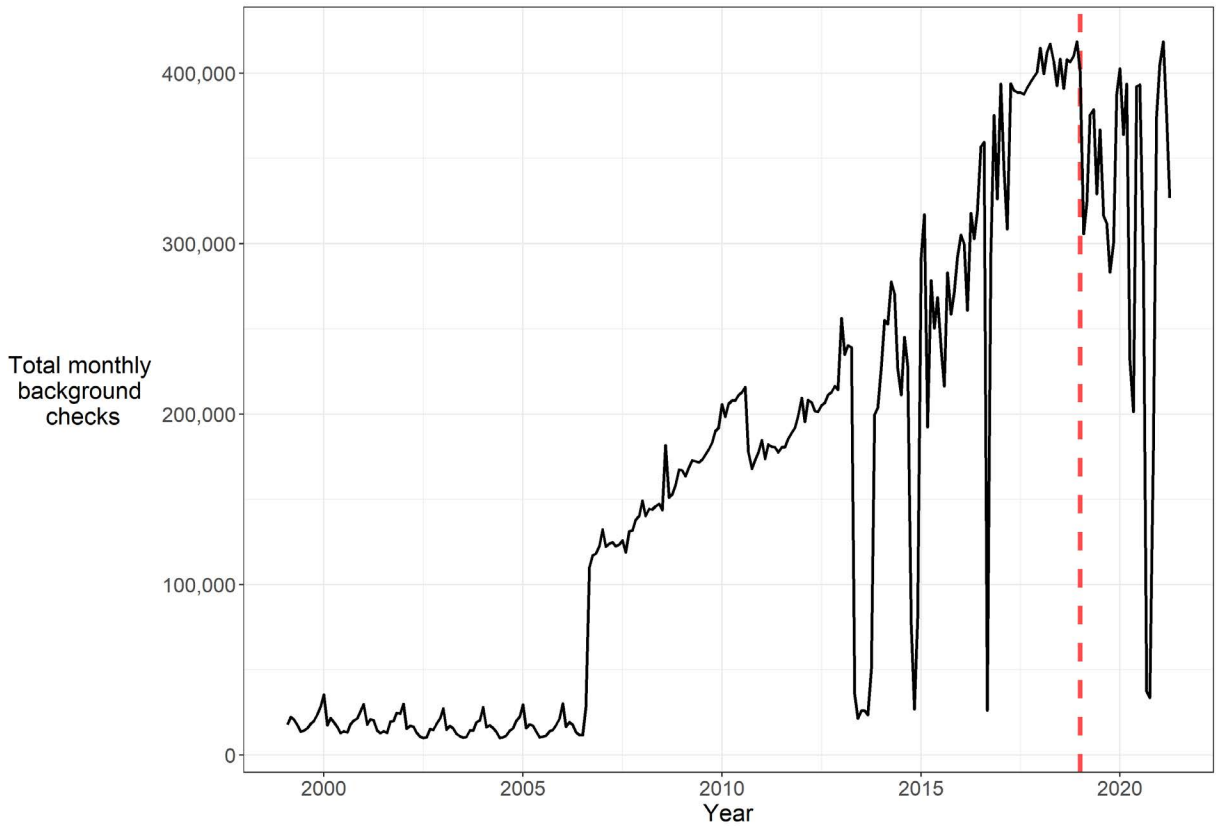
Permit Rechecks

Several states routinely conduct NICS checks on all or a subset of permit holders. However, this may not be reflected accurately in the NICS data over time. For instance, Figure 2.3 shows monthly NICS background checks in Kentucky between 2000 and 2021. The red line indicates June 2019, the first time the FBI's NICS data categorized checks in Kentucky as permit rechecks. It seems probable, given how similar the overall estimates of background checks are before and after this date, that permit rechecks began much earlier. Kentucky had been averaging about 13,000 checks per month until June 2006, after which NICS counts were consistently above 110,000 within two months. However, because the FBI data record these rechecks as beginning in 2019, it may be best to treat all permit checks from Kentucky as though they are rechecks. Other states, such as Illinois, show patterns suggesting that permit-recheck programs had been in effect long before the FBI data distinguished those checks from permit checks.[9]

Although it is plausible that permit checks and NICS checks for sales or transfers are associated with demand for firearms, there is no good reason why permit rechecks conducted annually by the state are a good proxy for demand. Nevertheless, as these examples illustrate, permit rechecks can swamp other checks tabulated for a state and, because of changes in record-keeping practices, they may not be distinguishable from other types of NICS checks until long after the state's recheck program began.

[9] The first recheck recorded by the FBI for Illinois occurred in July 2016. In August 2016, Illinois conducted 75,000 rechecks, and its permit check counts dropped to just 14 percent of the same number two months earlier (a decline of 110,000 checks). Total checks for Illinois have since grown exponentially, with close to 1.5 million completed in March 2021.

Figure 2.3. Monthly NICS Checks in Kentucky, 2000–2020



SOURCE: RAND analysis of NICS background check data.
NOTE: The red line indicates the date when NICS data first record any permit rechecks in the state (June 2019).

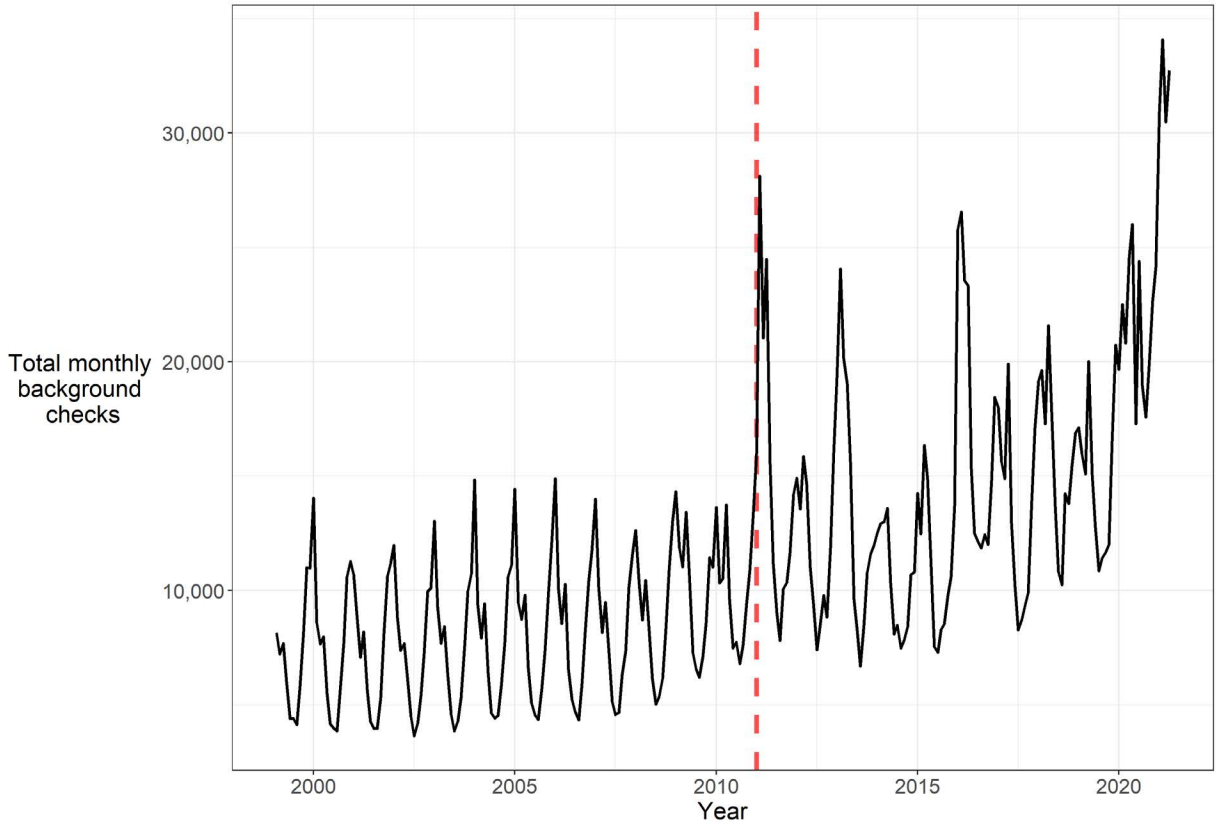
Permit Renewals

Concealed-carry permits, permits to purchase, and some other permits do not last indefinitely; they must be renewed periodically. These renewals require a NICS check that is counted as a permit check (not a permit recheck), so they are indistinguishable in NICS data from checks for new permits. However, like permit rechecks, they are not an indicator of demand for new firearms. They only signal interest to, for instance, continue to have the right to carry a concealed weapon, which depends heavily on the particular concealed-carry laws of the state. The proportion of permit checks that is made up of renewals differs by state and by renewal period. For instance, in such states as California and Maryland where the renewal period is two years, 100,000 concealed-carry holders would account for 500,000 permit checks over a decade. In many other states, the renewal period is five years, meaning that the same 100,000 permit holders would account for just 200,000 renewals.

Permit renewals are associated with periodic surges in NICS checks in some states. For example, Figure 2.4 displays monthly background checks of firearm permits in Iowa between

2000 and 2021. The red line in the figure indicates January 1, 2011, when a law requiring permit renewals was implemented (Iowa Code 724.7), which caused a large number of previously issued permits to need renewal within a short period of time. Accordingly, NICS data show a surge in permit checks early in 2011 and periodic surges thereafter. These surges are most pronounced at five-year intervals because the permits expire after five years.

Figure 2.4. Permit Checks Before and After Iowa Required Permit Renewals, 2000–2021



SOURCE: RAND analysis of NICS background check data.
NOTE: The red line indicates the date on which Iowa implemented its permit renewal law (January 1, 2011).

We requested information from the Iowa Department of Public Safety on the number of permit checks that were attributable to concealed-carry permit requests and permits to acquire firearms. They were able to provide counts of these checks from 2017 to the middle of 2020 (these data are included in the data set accompanying this report). Comparing these requests with permit checks reported for Iowa by NICS suggests that between 25 and 37 percent of all permit checks recorded in NICS from 2017 to 2019 are for checks other than for permits to acquire or carry firearms. These checks likely are for permit renewals.

Using Background Checks as a Proxy for Sales or Firearm Demand

Most commonly, research that employs NICS background checks as a proxy for firearm sales or demand uses counts of all NICS checks for each state, combining permit checks, sales checks, and sometimes permit rechecks. This measure may well be correlated with demand for firearms across states or over time but is almost certainly a noisy measure that varies in its association with demand across states. This may be a problem for some analyses that seek to compare outcomes across states; for instance, to identify the effects of a gun policy. Because NICS background check data come from an administrative data system rather than one designed for research, some inconsistencies may be impossible to correct. Nevertheless, there may be ways of improving how NICS checks are used for research that address some of the problematic variation.

For states where some or all handgun purchases are made through Brady-exempt permits, a better measure of demand for handguns may be the number of NICS checks conducted for new sales plus some percentage of permit checks, which is another category of background checks reported by NICS. Depending on the state, permit checks will include permits to carry concealed weapons, periodic renewals of concealed-carry permits, permits for peace officers to carry firearms, permits to purchase handguns, and permits to purchase any firearm.

Because demand for firearms may be better illustrated by new sales permit checks in some states and permits in other states, many studies using NICS checks as a proxy for sales have used aggregate measures of all NICS checks, including permit checks. Ideally, these analyses would exclude a substantial majority of permit rechecks, which are performed by some states to confirm the continued eligibility of permit holders. These rechecks are not likely to be strongly associated with demand for firearms—particularly in states that run background checks on permit holders monthly or annually—and are highly variable by year and state, which contributes a good deal of unwanted variability to the proxy measure.[10]

However, even with the exclusion of permit rechecks from state NICS counts, NICS background checks remain a fairly noisy measure of firearm sales that should be interpreted cautiously when comparing sales across states because of the many ways in which this measure differs by state. One way to account for this noise is to incorporate the most-likely sources of error into a model. This would help researchers control for some of the policies that may be driving the variability in background checks across states and over time. For example, a researcher could control for whether states are full POC, partial POC, or non-POC; whether they use a Brady exemption (and the frequency with which background checks are conducted on permitted individuals within the state and how many people have such an exemption, if

[10] It would be useful, however, to know how many people have permits and—if they are Brady-exempt—can purchase firearms without additional NICS checks. Although one would be unable to determine how many of these people purchased a firearm during an analysis period with NICS data, variation in the number of permits across states could explain some of the variation in NICS background checks.

available); whether they require background checks on private sales; and whether they restrict the number of guns that can be purchased with a single background check. Depending on the research question, the approach could include stratifying states by policy features or interacting policies with NICS data.

Researchers also could decide to change the data to account for errors created by differences in state background check policies and procedures. For example, a researcher could use NICS data to develop state-specific proxies of firearm purchases that consider the multiple state policies and procedures that affect the relationship between NICS checks and firearm demand and how they have changed over time. Such an approach might, for instance, create a demand index that counts a large percentage of permit checks as probable sales for such states as Iowa or Nebraska—which have no handgun sales checks in NICS—but excludes most permit checks and rechecks in other states where the researcher believes that those background checks are less likely to be associated with a gun sale. Again, the researcher could consider multiple strategies for creating such a model, depending on the research question at hand.

Few studies have used procedures similar to those we propose here (Schell et al., 2020). Future efforts should include producing proxies of firearm demand that can be used for comparative purposes across states.

3. NICS Denials and Indices

Compared with NICS background check counts, NICS denial counts and NICS Indices data are used less commonly in gun policy research. However, these data sets may hold some promise for evaluations of how many legal gun buyers later become prohibited possessors (e.g., by looking at denial rates for permit rechecks); how difficult it is for prohibited possessors to obtain firearms through informal transactions (as proxied by the proportion of background checks denied); or how improvements in state NICS record completeness affect firearm crime rates, rates of denials, default proceeds, or NICS checks that cannot be completed within 90 days. In this chapter, we discuss the reliability and consistency of these data and how they might be used and interpreted for policy analysis research.

What NICS Indices Data Contain and How Researchers Could Use Them

The NICS Indices data set is designed to hold only biographical information about individuals that does *not* already appear in the other databases searched by NICS (i.e., NCIC, III, and the DHS database; see Appendix B for more information on where prohibiting records are stored). The NICS Indices were designed to store information that is not available in other federal databases, such as information on mental health histories that may be disqualifying, information on illegal drug use, and any additional biographical information that could be relevant to state prohibitors of firearm ownership.

Nevertheless, information on most types of federal prohibitors may be included in the NICS Indices if, for some reason, it is not available through III, NCIC, or the DHS database (Gallegos and Goggins, 2016). For instance, NCIC is the most appropriate place for states to file information about protection orders, but the data entry and validation procedures required by NCIC are sufficiently onerous that a large proportion of protection orders are not recorded there. In such cases, states still can ensure that protection orders are considered in background checks by submitting information to the NICS Indices. The NICS Indices include records provided by states and federal agencies. As noted earlier, we refer to the types of records that disqualify individuals from firearm possession as *prohibitors*. Numbers of prohibitors by type in the NICS Indices (e.g., felonies, mental health prohibitors, drug abuse prohibitors, dishonorable discharge prohibitors) are regularly reported by the FBI.

Researchers might use numbers of prohibitors supplied by states to assess states' compliance with NICS or how changes in state laws concerning some classes of prohibited possessors changed the number of prohibitors recorded in the NICS Indices. For example, one might expect the passage of a law barring individuals with qualifying mental health adjudication (e.g., those who are involuntarily committed to a mental health treatment program) from owning firearms to

affect the number of mental health records submitted to the NICS Indices. Interpreting such analyses as these will require consideration of how state participation in the NICS Indices has evolved over time and how state record collection and reporting processes affect NICS prohibitors.

Until the passage of the NICS Improvements Amendment Act of 2007 and the introduction of the Fix NICS Act in 2017, there were no national guidelines for reporting prohibiting events to the NICS Indices (Bureau of Justice Statistics, 2021; Pub. L. 110-180, 2008; U.S. House of Representatives, 2017).[11] Although the 2008 law provided additional incentives for reporting prohibiting events and estimates of the number of records available to NICS, it did not standardize reporting procedures. Any analysis that seeks to estimate the relationship between a state policy and prohibited possessor records should consider the impact of federal incentives on state participation in the NICS Indices over time.

The determination of prohibiting events under federal law can vary between states because of how the prohibiting event is defined, evaluated, or tracked within states. In addition, some states have prohibitions for possession that go beyond federal requirements. For example, whereas some states retain administrative records of involuntary commitments to mental institutions, between 2000 and 2007, Florida identified individuals as prohibited possessors on the grounds of their prior adjudicated mental illness by having gun buyers fill out a voluntary form (Swanson et al., 2016). Close attention to such variations in state policies related to record submission is needed to understand what NICS Indices data reflect across states and over time.

Researchers also might want to use NICS Indices data as a proxy for the number of people in a state with a specific prohibitor, such as a mental health prohibitor. This would be particularly useful if the researcher were focusing on mental health prohibitions or other prohibitors found exclusively in the NICS Indices (e.g., state prohibitors, such federal prohibitors as dishonorable discharge) rather than those that may be distributed across other databases searched as part of a NICS check (e.g., felony convictions). It is important to note, however, that records in the NICS Indices can be difficult to interpret. For example, it appears that there are more felony conviction records than existing estimates of felons in each state according to other data sources (Shannon et al., 2017).[12] Furthermore, it is unclear whether individuals who are charged with multiple prohibiting records (e.g., domestic violence misdemeanor, mental health adjudication) are entered into the NICS Indices multiple times. If this is the case, multiple prohibitions could refer to the same person. Thus, careful consideration of *which* NICS Indices records to use, based on the likelihood that the data are complete and interpretable, will be important for those hoping to learn something using these data.

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[11] *Prohibiting events* include certain criminal histories, and mental illness or substance use disorder.

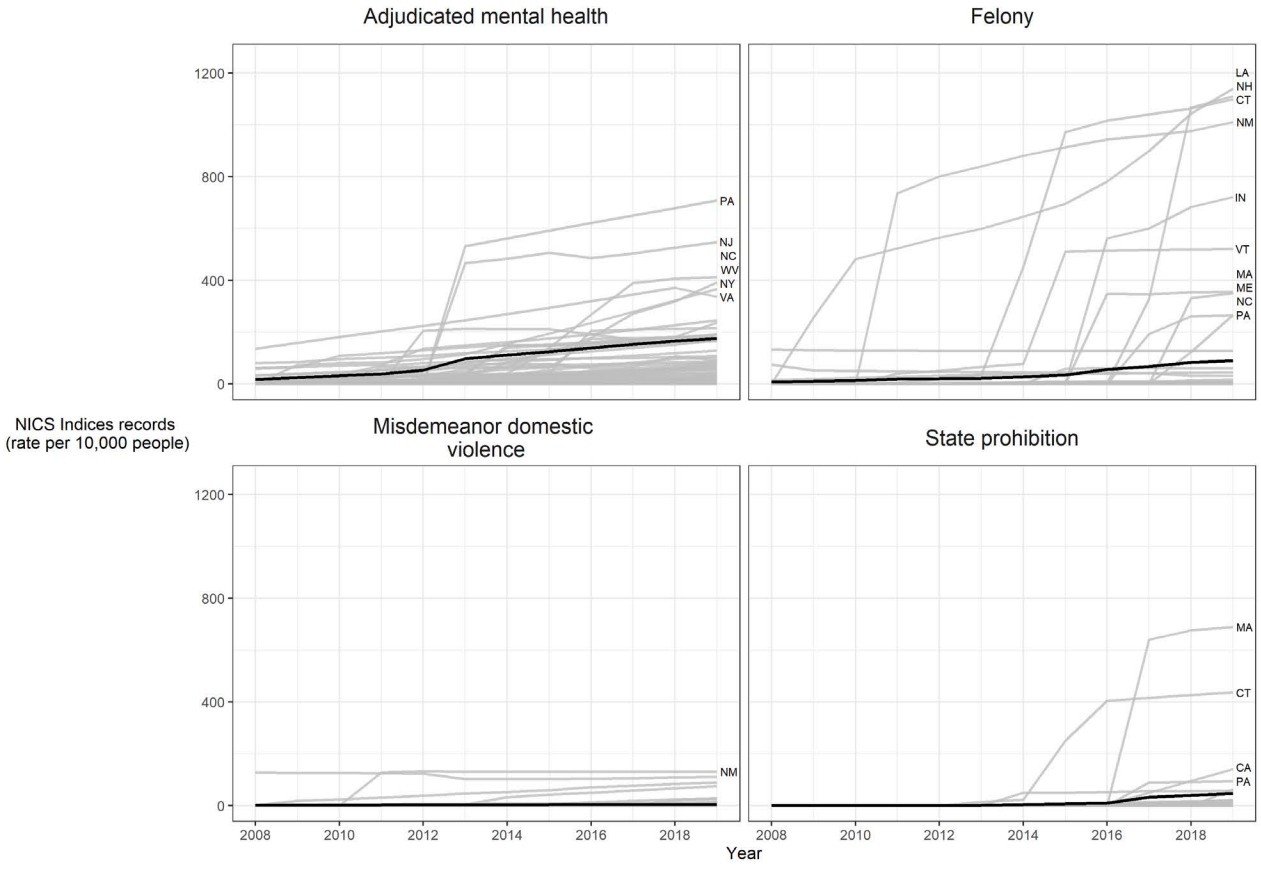
[12] For example, Shannon et al., 2017, estimates that the number of adults with felony convictions in Louisiana is 6–7 percent, but if one used the NICS Indices records for 2020, it would appear that at least 12 percent of the population had a felony conviction. Understanding why these estimates differ will be critical for using the NICS Indices as a measure.

As noted earlier, state participation in the NICS Indices has grown over time as new incentives have been offered for their participation. The result is that there is considerable heterogeneity across states in the number and type of prohibitors they contribute and when they began contributing records. Figure 3.1 shows the growth in NICS Indices records across states (as a rate per 10,000 people in the state) from 2008 to 2018 for four types of prohibitors: misdemeanor domestic violence offenses; state prohibitors, or offenses that bar individuals from firearm ownership because of state rather than federal laws; felony convictions that are not included in III; and adjudicated mental health records. (See Appendix B for definitions of these categories.) The trend lines display records for individual states. The bold black line in each figure displays the average number of prohibitor records submitted by states to the NICS Indices. This figure suggests that although several states in the past decade have substantially increased the number of records they share with NICS, others have many fewer records as a percentage of the population than might be expected. For example, at the end of 2020, Montana had 36 active records in the NICS Indices under the mental health adjudication category, while Vermont, a state with a smaller population than Montana, had 2,436 records. Similarly, Wyoming had 16 active mental health records, while Maine had 5,544 records. Moreover, states are only now beginning to add some types of records. For example, the FBI reports that in 2019, records on drug abuse prohibitors increased by 48 percent (Criminal Justice Information Services Division, 2019). Although the reasons for these differences are not well documented, one likely explanation is that states and court staff lack the capacity and resources to keep the NICS Indices up to date.[13]

State record-keeping procedures also affect the completeness of some NICS Indices data. This is especially true for such prohibitions as misdemeanor crimes of domestic violence. Some states' criminal codes do not include the relationship between the victim and offender, which means that some assaults cannot be easily identified as meeting the definition of domestic violence used in federal firearm laws (Gallegos and Goggins, 2016). However, replacing or revising state record-keeping systems is costly, and not all such gaps have been remedied (Gallegos and Goggins, 2016). Similarly, cite-and-release practices for misdemeanor offenses, including those related to domestic violence, do not lead to fingerprinted arrest records that would be included in the III (Cha and Larence, 2012). As a result, some states rely on federal funding to enter these records into the NICS Indices.

[13] Some states have argued that patient confidentiality bars them from reporting mental health records to the NICS Indices. However, on January 4, 2016, the U.S. Department of Health and Human Services amended the Health Insurance Portability and Accountability Act Privacy Rule to expressly permit certain covered entities to disclose to NICS the identities of those individuals who, for mental health reasons, already are prohibited by federal law from having a firearm (U.S. Department of Health and Human Services, 2017).

Figure 3.1. Growth in NICS Indices Record Holdings per Capita for Four Prohibitors, 2008–2018



SOURCE: RAND analysis of NICS Indices data.
NOTE: Each line corresponds to a single state's total number of records of each type found in NICS from 2008 to 2018. *State prohibitions* are offenses that bar individuals from firearm ownership because of state rather than federal laws.

Researchers also should account for the fact that, depending on state resources, the NICS Indices might not be a complete representation of records that *should* be included in the database. Some federal prohibitors have not consistently been included in NICS Indices, likely either because of limited state resources or because state laws prohibit the sharing of some information. Similarly, prohibitors known to federal agencies may also be incomplete. For instance, the lack of reporting of dishonorable discharges to the NICS Indices was cited as a cause of a recent mass shooting by a former member of the U.S. Air Force, who passed a background check because information about his discharge was not shared with the NICS Indices (McNeil, 2020). This problem may be exacerbated in POC states. Because POC states use their own databases for background checks, they do not have the same incentive to spend resources updating the NICS Indices, which could make these records available to other states but would be redundant to the POC state's background check system (Tien et al., 2008).

Despite some of these differences in state prohibitor data, the fact that many states have substantially improved their participation in the NICS Indices over the past two decades provides a natural experiment that might be used to better understand the effectiveness of NICS background checks. That is, because states have substantially improved their reporting for each type of prohibitor (as illustrated in Figure 3.1), we might expect firearm crimes or suicides to decline or denials to increase if NICS background checks are effective in reducing the access high-risk people have to firearms.

What NICS Denials Data Are and How Researchers Could Use Them

The NICS system tracks the number of background checks that result in a denial, meaning that the applicant is determined to be a prohibited possessor. Data on these NICS denials could be used to gauge the effect of new state policies on firearm access or as a candidate indicator of the difficulty that prohibited possessors have in accessing firearms through private or illegal sales. For instance, in states with universal background checks, if firearms are more difficult to obtain through illegal sales, it may push prohibited possessors to attempt to purchase firearms from dealers, resulting in increased rates of NICS denials. Unfortunately, NICS does not report all denials data; it also does not routinely report denials by state. Instead, detailed data on denials must be requested through Freedom of Information Act requests. The data set accompanying this document includes denials by state and year obtained through a Freedom of Information Act request made by Everytown for Gun Safety.

Denials known to the FBI represent a subset of denials for some states.[14] This can occur in POC states because denials may be made before NICS checks are run and in non-POC states that have permit-to-purchase systems requiring the licensing authority to review state records as part of the permitting process. Comparisons of denial numbers provided by the FBI with denials that are publicly reported by some states demonstrate significant discrepancies. For instance, in 2020, Utah's Department of Public Safety reported 25 percent more denials than were recorded in the FBI's denials data, and Colorado reported 60 percent more denials than the FBI.[15]

Moreover, it is unclear whether people who have multiple prohibiting records are recorded as being denied under each prohibitor or just one. If the former is true, the data would represent an overcount of the *number* of prohibited possessors in the state (i.e., one person could represent a count for domestic offender and undocumented immigrant prohibitors); if the latter is true, it would be an undercount of the types of prohibitors accounted for in the data (i.e., someone who

[14] In partial POC states, it may be the case that the state denials reflect attempted handgun purchases, while NICS denials represent attempted long gun purchases. One would need to investigate state reporting practices further than we have here to understand these dynamics.

[15] As of September 2021, Colorado reported 14,227 denials in 2020, compared with 8,856 in the FBI data (Colorado Bureau of Investigation, undated). Utah reported 2,136 denials in 2020, compared with the 1,714 found in FBI data (Utah Department of Public Safety, undated).

is both a domestic violence offender and an undocumented immigrant would be counted under only one type).

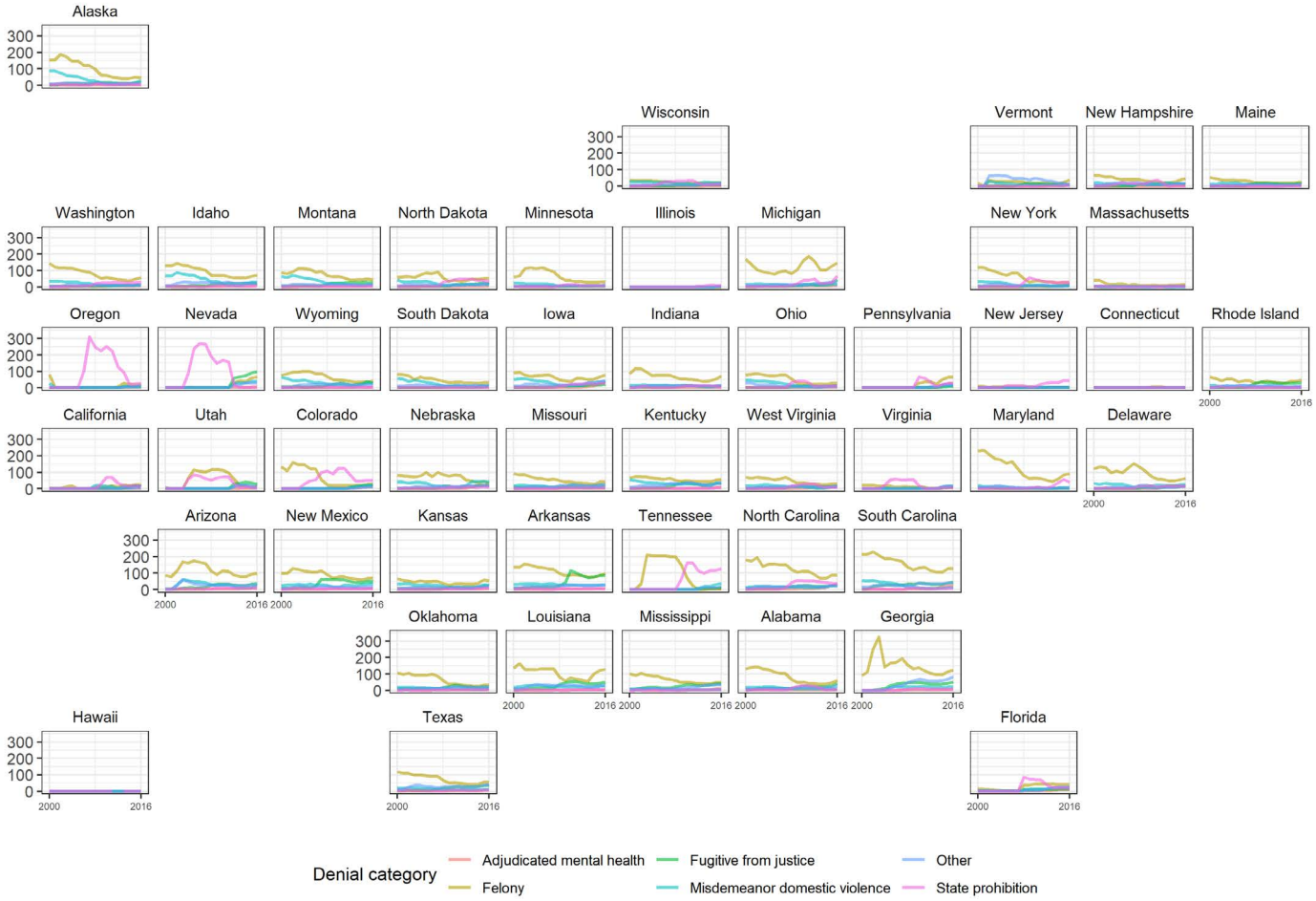
The association of denials with the difficulty of obtaining firearms may be less strong in states conducting high volumes of permit rechecks. In such a state as Illinois, with nearly half a million rechecks per month, a substantial percentage of denials likely will be for permit holders who have become prohibited possessors rather than prohibited possessors seeking to purchase a new firearm.

POC states also may have changing procedures in how denials are classified. Figure 3.2 displays NICS denial data (as a rate per 10,000 people) between 2000 and 2016 for each U.S. state. The trend lines for each state are colored by the denial category (adjudicated mental health; felony; misdemeanor domestic violence; fugitive; state prohibited; and a residual "other" category, which includes all other denial types, as discussed in Appendix B). This figure suggests, for instance, that

- Tennessee and Colorado attributed most denials to criminal histories (felony) until midway through the time series, after which most denials were attributed to prohibitors.
- Florida and Pennsylvania had remarkably low denial rates in the 2000s, possibly because they were not sharing denial information with the FBI until more recently.
- Oregon and Nevada had extremely high denial rates in the middle years of this series, and nearly all denials were attributed to state prohibitors. It appears that Nevada began to differentiate its categorization of prohibitors more recently, and the same could be true of Oregon.

Among non-POC states, there are also interesting patterns that might reveal useful information about demand for firearms, the effectiveness of NICS, or other issues. For instance, there appears to be a general decline in denials over time, which could reflect growing certainty among prohibited possessors that they will not be successful in "lying and buying;" alternatively, it could mean that firearms are increasingly available through private transactions not subject to background checks.

Figure 3.2. Trends in NICS Denials per 10,000 People, by State and Type of Denial, 2000–2016



SOURCE: RAND analysis of NICS denials data.
NOTE: The "other" category includes denials for undocumented immigrants, renounced citizenship, dishonorable discharge, substance use, federally denied persons, and people under indictment. Data for Washington, D.C., are not shown here. We provide information for Washington, D.C., in Table A.1 in Appendix A.

Conflicts between state and federal law can also shape denials data. For example, although federal law has included a misdemeanor domestic violence prohibition since 1996, state statutes do not always distinguish misdemeanor crimes of domestic violence from more-general charges (e.g., simple assault), allowing some offenders to purchase firearms because their records are not included in a NICS background check. This issue was not addressed until 2009, when the U.S. Supreme Court held that any defendant found guilty of a general assault or domestic assault statute was barred from owning a firearm as long as they shared a federally defined relationship with the victim (Raissian, 2016; *United States v. Hayes*, 2009). Therefore, any researcher using denials data as a proxy for the number of prohibited possessors must also know which states have domestic violence–specific statutes and which just have assault statutes prior to 2009.

Summary

NICS Indices data on prohibitors may be a good indicator of compliance with NICS and could be used to evaluate the effects of background checks on state violence, health, and other outcomes. NICS denials data—and perhaps especially FBI denials data from non-POC states—might be useful for answering similar questions and in studies considering how difficult it is for prohibited possessors to obtain firearms through formal transactions.

4. A New Compilation of Background Check Data

With all the intricacies of the NICS system and its interaction with state-level policies in mind, we encourage researchers to dig into the possible uses of the data the NICS system produces for policy analysis. To that end, we have compiled four types of annual state-level data related to background checks to make these data readily available to researchers. The first and second types of data—monthly counts of background checks and denials by state—are produced by the NICS process. Monthly counts of background checks are made publicly available by the FBI in PDF files that were parsed by the data editor for BuzzFeed News (BuzzFeed News, 2021). Background checks are categorized by type (e.g., permit, long gun or handgun purchase, private sale). Denials are categorized by prohibiting event category (see Table B.1 in Appendix B) and the data were obtained through Freedom of Information Act requests by Everytown for Gun Safety.

The third type of data included in the RAND compilation is *total* counts of records of prohibiting events by prohibition category that were captured by the NICS Indices between 2008 and 2018 (FBI, 2020). The NICS Indices are one of three main sources of information consulted by a NICS check to determine whether a person is prohibited from purchasing a firearm. As described in Chapter 3, the primary purpose of the NICS Indices is to cover prohibiting events not included in NCIC or III, but there can be overlap among the three data sources. NCIC and III data are not included here, and reporting to the NICS Indices by state agencies is voluntary. The data also include indicators for POC status by state and year.

Finally, the RAND compilation also includes separate tables of supplemental information for Hawaii and Iowa. The Hawaii Police Department provided annual counts of applications for firearm purchases, registrations for firearm possession, and imported firearms from 2000 to mid-2020. The Iowa Department of Public Safety provided annual counts of permits to acquire firearms and nonprofessional permits to carry firearms from 2017 to mid-2020.

Researchers working with these data should consult the included data dictionary. The data can be downloaded here: www.rand.org/pubs/tools/TLA243-4. It is important to note that while this is the most up-to-date information we have as of this writing, it will quickly be outdated and should be supplemented with new years of data going forward. Regardless, we hope that this compilation will allow researchers to explore patterns across the four data sources and to answer questions about policy changes during the periods covered.

Appendix A. State Policies That Affect NICS Data

Table A.1 provides information on variation in state background check policies and the implications of that variation on research.

Table A.1. Variation in State Background Check Policies and Procedures as of July 2021: Implications for Data Collection and Use in Research

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Impact on NICS data	Determines which purchases of firearms correspond with a BC in NICS	Any time between BC and obtaining a firearm could shift data	Will affect how closely a BC corresponds to the sale of *one* firearm versus *multiple* firearms	Determines whether a purchaser who has a permit needs to go through another BC to buy a firearm Partially determines how many people can purchase a firearm without a BC	Determines how often a person needs to get another BC before buying firearms with a permit	Determines whether NICS denials data are complete; POC states often use their own databases and may not report denials to NICS	Will affect the strength of the NICS database system in the state	Will affect the relationship between firearm purchases and the number of BCs	
Federal law	BC required for each firearm purchase if purchased through a federally licensed firearm dealer (i.e., an FFL) Some state permit systems can stand in for BC requirements	The FBI has three days to complete the BC before the transfer can proceed	Federal law does not limit the number of guns a person may buy in any given period	The federal government does not have a permitting system but respects permitting systems from several states and does not require a BC if a person has one of these permits			Federal govern-ment provided funding to several states (Bureau of Justice Statistics, undated)	Private sales are exempt from NICS BCs	
Alabama	Federal law applies There are no BCs or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, from 2016 to 2019. In 2016, Alabama's concealed-carry permits exempted holders from a NICS BC, but in 2019, ATF reversed that decision	From 2016 to 2019, a permit lasted 1–5 years, as requested by the person seeking the permit	Non-POC	Y	N	Alabama Law Enforcement Agency, undated; Richardson, 2019; USA Carry, undated

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Alaska	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual. Private individuals must keep a record of the sale	None	Unlimited per transaction	Yes, for concealed weapon permits marked NICS-exempt	5 years	Non-POC	Y	N	
Arizona	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-weapon permits	5 years	Non-POC	Y	N	City of Phoenix, undated
Arkansas	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-weapon permits	5 years	Non-POC	N	N	Arkansas Department of Public Safety, 2020

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
California	In addition to federal requirements, California requires that *all* firearm transfers include a BC, with some very limited exceptions All BCs are processed by the California DOJ	30 days	One per month (handguns or semiautomatic centerfire rifle) This does not apply to sales between unlicensed parties	Yes, for entertainment firearm permits	1 year	POC	N	Y	NICS exemption: Raden, 2004 Calif. Penal Code § 28220(f)(4)
Colorado	In addition to federal requirements, private sellers must perform a BC Exemptions include family members and temporary transfers All BCs are processed by the Colorado Bureau of Investigation	30 days, if subject of indictment[a]	Unlimited per transaction	No	N/A	POC	N	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Connecticut	In addition to federal requirements, all firearm sales require a BC, including private sales and gun show sales All BCs are processed by the Connecticut Department of Emergency Services and Public Protection	None	Unlimited per transaction	No	N/A	POC	N	Y	Connecticut State Police, Special Licensing and Firearms Unit, 2016
Delaware	In addition to federal requirements, Delaware requires unlicensed sellers to request a licensed dealer to facilitate a firearms transaction, including conducting a BC, prior to transferring a firearm to another unlicensed person Exceptions include religious beliefs concerning photographs, transfers between family members, and for temporary loans of firearms All BCs are processed by the FBI	25 days	Unlimited per transaction	No	N/A	Non-POC	Y	Y	Default proceed: Del. Code Ann. Tit. 11, § 1448A(b)

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Florida	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	No time limit on BC[b]	Unlimited per transaction	No	N/A	POC	Y	N	
Georgia	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits	5 years	Non-POC	N	N	
Hawaii	In additional to federal requirements, firearm purchases require a permit, which requires a BC BCs are performed by local law enforcement	None	Unlimited per transaction	Yes, for all firearm permits	1 year	POC	Y	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Idaho	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits	5 years	Non-POC	Y	N	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Illinois	In addition to federal requirements, firearm purchases require a Firearm Owner's Identification card (which requires an additional BC) and a state BC All firearm sales from unlicensed sellers must include a review of a potential purchaser's Firearm Owner's Identification card (which requires a BC to obtain) In addition, all sellers are required to conduct BCs on prospective firearm purchasers at gun shows State BCs are processed by the Department of State Police	None	Unlimited per transaction	No	N/A	POC	Y	N	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Indiana	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	No	N/A	Non-POC	Y	N	
Iowa	In addition to federal requirements, all ***handgun*** firearm purchases require a permit, which requires a BC every five years However, private transfers of long guns do not require a BC BCs are performed by county sheriff's departments	3 days (handguns)	Unlimited per transaction	Yes, for concealed-carry permits	5 years	Partial POC (handguns)	Y	Partial (BCs are required for private sales of handguns)	
Kansas	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed carry (but only if issued after July 1, 2010)	4 years	Non-POC	N	N	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Kentucky	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed deadly weapons permits and judicial special status permits, if issued after July 12, 2006	5 years	Non-POC	Y	N	
Louisiana	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits, if issued after March 9, 2015	5 years	Non-POC	Y	N	
Maine	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	No	N/A	Non-POC	N	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Maryland	In addition to federal law, all firearm purchases require a NICS BC BCs for handguns are conducted through the Secretary of the Maryland State Police	None	One per month	No	N/A	Partial POC (handguns and assault weapons)	Y	Y	
Massachu-setts	In addition to federal law, purchasers must obtain a firearm identification card or a license to carry, which includes a NICS BC These both require a BC through the Massachusetts Department of Criminal Justice	None	Unlimited per transaction	No	N/A	Non-POC	Y	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Michigan	In addition to federal law, a "license to purchase a pistol" permit is required for handgun purchases. This permit entails an additional state BC Sales through private individuals require a "license to purchase a pistol" permit BCs are processed through the Michigan Department of State Police	None	Unlimited per transaction	Yes, for "license to purchase a pistol" permits	5 years	Partial POC (handguns)	N	Partial (BCs are required for handguns)	
Minnesota	In addition to federal law, a BC for handguns is required if the purchaser does not have a transferee permit or concealed-weapon permit BCs are conducted through the local police or sheriff's department	None	Unlimited per transaction	No	N/A	Non-POC	N	N	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Mississippi	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits	5 years	Non-POC	N	N	
Missouri	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	No	N/A	Non-POC	Y	N	
Montana	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits	4 years	Non-POC	N	N	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Nebraska	In addition to federal law, a "handgun purchase certificate" is required for purchasing handguns. This certificate requires a state BC Handguns purchased through private individuals require a state BC as well State BCs are processed through the local chief of police or sheriff	None	Unlimited per transaction	Yes, for concealed-carry permits and handgun purchase certificates	5 years	Partial POC (handguns)	Y	Partial (BCs are required for handguns)	
Nevada	In addition to federal law, a state BC is required BCs are required when buying a handgun from a private individual State BCs are conducted by the Department of Public Safety	None	Unlimited per transaction	Yes, for concealed-carry permits (but only if permit was issued after July 1, 2011)	5 years	POC	Y	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
New Hampshire	In addition to federal law, state BCs are required for handgun purchases There are no BCs or firearms or permit registrations required when buying a handgun from a private individual State BCs are processed through the New Hampshire Department of Safety	None	Unlimited per transaction	No	N/A	Partial POC (handguns)	N	N	
New Jersey	In addition to federal law, purchaser must have a handgun permit or Firearms Purchaser Identification card (for long guns). These permits require a state BC Permits are required for private sales State BCs are processed by the New Jersey State Police	None	One per month	No	N/A	POC	Y	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
New Mexico	Federal law applies Private sales require BCs	N/A	Unlimited per transaction	No	N/A	Non-POC	N	Y	
New York	In addition to federal law, purchasing a handgun requires a license to purchase a handgun, which requires a BC Private sales require BCs	30 days	Unlimited per transaction (one per 90 days in New York City)	No	N/A	Non-POC	Y	Y	N.Y. Penal Law § 400.20
North Carolina	In addition to federal law, a concealed-carry permit or a permit to purchase a handgun is required for handgun purchases. These require an additional state BC There are no BCs or firearms or permit registrations required when buying a handgun from a private individual State BCs are processed through the local county sheriff	14 days	Unlimited per transaction	Yes, for concealed-carry permits and permits to purchase a handgun	5 years	Partial POC (handguns)	N	N	Modification to default proceed law: N.C. Gen. Stat. § 14-404(f)

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
North Dakota	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-weapon permits issued on or after December 1, 1999 (Certain permits issued prior to November 30, 1998, were grandfathered as alternatives to a BC requirement, but none of these permits were valid as of November 30, 2003)	5 years	Non-POC	Y	N	
Ohio	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits (but only if they were issued after March 23, 2015)	5 years	Non-POC	N	N	
Oklahoma	Federal law applies There are no BCs or firearms or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	No (Certain permits issued prior to November 30, 1998, were grandfathered as alternatives to a BC requirement, but none of these permits are valid as of November 30, 2003)	N/A	Non-POC	Y	N	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Oregon	In addition to federal law, state BCs are required for firearm purchases Private sales require a BC State BCs are processed through the Oregon Department of State Police	None	Unlimited per transaction	No (Certain permits issued prior to November 30, 1998, were grandfathered as alternatives to a BC requirement, but none of these permits are valid as of November 30, 2003)	N/A	POC	Y	Y	
Pennsyl-vania	In addition to federal law, state BCs are required for firearm purchases Private sales of long guns do not require BC. Private sales of handguns do require a state BC State BCs are processed through the Pennsylvania State Police	Indefinite, in certain cases[c]	Unlimited per transaction	No	N/A	POC	Y	Partial (BCs are required for handguns)	
Rhode Island	Federal law applies Private sales require a BC	None	Unlimited per transaction	No	N/A	Non-POC	N	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
South Carolina	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits	5 years	Non-POC	Y	N	
South Dakota	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for Gold Card concealed permits and enhanced permits to carry a concealed pistol, if issued on or after January 1, 2017	5 years	Non-POC	N	N	
Tennessee	In addition to federal law, purchases require a state BC Private sales require a state BC State BCs are processed through the Tennessee Bureau of Investigation	15 days, if the individual has been charged with a crime that could affect eligibility	Unlimited per transaction	No	N/A	POC	Y	N	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Texas	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits	4 years	Non-POC	Y	N	
Utah	In addition to federal law, state BCs are required There are no BCs or firearms or permit registrations required when buying a firearm from a private individual State BCs are processed through the Department of Public Safety	Indefinite	Unlimited per transaction	Yes, for concealed-carry permits	5 years	POC	Y	N	
Vermont	Federal law applies Private sales require a BC	None	Unlimited per transaction	No	N/A	Non-POC	N	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
Virginia	In addition to federal law, state BCs are required for firearm purchases Private sales require a BC State BCs are processed through the Department of State Police	None	One per month (does not apply to law enforcement or those with concealed-carry permits)	No	N/A	Non-POC	Y	Y	
Washington	In addition to federal law, state BCs are required for all firearm purchases Private sales require a BC The law is very recent (2020), and Washington is still setting up the organization to manage BCs (it will be a department within the Washington State Patrol). For now, state BCs are processed through local law enforcement	Variable[d]	Unlimited per transaction	No	N/A	POC	N	Y	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
West Virginia	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed carry, if issued after June 4, 2014	5 years	Non-POC	Y	N	
Wisconsin	In addition to federal law, handgun purchases require a state BC There are no BCs or firearms or permit registrations required when buying a handgun from a private individual State BCs are processed through the Wisconsin DOJ	None	Unlimited per transaction	No	N/A	Partial POC (handguns)	Y	N	
Wyoming	Federal law applies There are no BCs, firearm registrations, or permit registrations required when buying a handgun from a private individual	None	Unlimited per transaction	Yes, for concealed-carry permits	5 years	Non-POC	N	N	

	Background Check Requirements for Firearm Purchases or Transfers	Time Allowed for Background Check (modify the default proceed law)	Number of Firearms per Sale	States with Brady Permit Exemptions	Duration of Permit	POC Status	NARIP Funding	Universal Background Checks	Additional References
D.C.	Federal law applies Private sales require a BC	10 days	Unlimited per transaction	No	N/A	Non-POC	N	Y	

SOURCES: ATF, 2020; ATF, 2022a; Giffords Law Center to Prevent Gun Violence, undated-a, undated-b, and undated-c.
NOTES: BC = background check. DOJ = Department of Justice. N/A = not applicable. NARIP = NICS Act Record Improvement Program. Y = Yes. N = No.
[a] Modification to default proceed law: Transfer must be denied if the purchaser "[h]as been arrested for or charged with a crime" that would prohibit him or her "from purchasing, receiving, or possessing a firearm" under state or federal law; or "is the subject of an indictment, an information, or a felony complaint alleging that the prospective transferee has committed a crime punishable by imprisonment for a term exceeding one year" and there is no final disposition in the case or it is not noted in state or federal databases (Colo. Rev. Stat. § 24-33.5-424(3)(b)). However, whenever a person is denied, he or she "may request a review of the denial," and the bureau has 30 days to "render a final administrative decision regarding the denial" (Colo. Rev. Stat. § 24-33.5-424(5)(b)). If the bureau is unable to obtain the final disposition of a case that is no longer pending within the 30-day period, the dealer may proceed with the transfer.
[b] Modification to default proceed law: Fla. Stat. § 790.0655(1). Florida's waiting period applies only to sales at retail by licensed firearm dealers and does not apply to people with concealed handgun permits, certain other exempt individuals, or trade-ins of firearms (Fla. Stat. § 790.0655(3)).
[c] Modification to default proceed law: "For purposes of the enforcement of 18 U.S.C. § 922(d)(9), (g)(1) and (s)(1) (relating to unlawful acts), in the event the criminal history or juvenile delinquency background check indicates a conviction for a misdemeanor that the Pennsylvania State Police cannot determine is or is not related to an act of domestic violence, the Pennsylvania State Police shall issue a temporary delay of the approval of the purchase or transfer. During the temporary delay, the Pennsylvania State Police shall conduct a review or investigation of the conviction with courts, local police departments, district attorneys, and other law enforcement or related institutions as necessary to determine whether the misdemeanor conviction involved an act of domestic violence. The Pennsylvania State Police shall conduct the review or investigation as expeditiously as possible. No firearm may be transferred by the dealer to the purchaser who is the subject of the investigation during the temporary delay" (Pa. Stat. § 6111(b)(7)).
[d] Modification to default proceed law: Ten days for long guns; ten, 30, or 60 days for handguns. "If records indicate that a prospective handgun purchaser has an arrest for a potentially disqualifying offense, the purchase may not proceed without a completed background check for 30 days pending receipt of the disposition, or longer upon a judicial order for good cause. If a handgun purchaser does not have a valid permanent Washington driver's license or state identification card or has not been a resident of the state for the previous consecutive 90 days, the purchase may not proceed without a completed background check for 60 days" (Giffords Law Center to Prevent Gun Violence, undated-a, adapted from Wash. Rev. Code Ann. §§ 9.41.092(1)(b); 9.41.090(5)).

Appendix B. Prohibiting Events in the NICS Indices

In Tables B.1 and B.2, we provide categories and descriptions of prohibiting events in the NICS Indices, respectively. These prohibitions would prevent someone from purchasing a firearm.

Table B.1. Categories of Prohibiting Events in the NICS Indices

NICS Indices Prohibition Category	Additional Data Sources	Details
Felonies	III	May be included in the NICS Indices when fingerprints are not captured at the time of arrest
Persons under indictment or information[a]	III (often not included)	The NICS Indices are an alternative repository, but this is a temporary state that often goes unreported
Unlawful user or addicted to a controlled substance	III	The NICS Indices are an alternative when prohibition is established without a conviction
Adjudicated mental health		Most information is not available in III;[b] high counts in the NICS Indices as a result
Illegal or unlawful alien		U.S. Immigration and Customs Enforcement makes the majority of these entries
Dishonorable discharge		The U.S. Department of Defense makes these entries
Renounced U.S. citizenship		The U.S. Department of State makes these entries
Protection/restraining order for domestic violence	NCIC	The NICS Indices are an alternative if NCIC requirements are not met
Misdemeanor domestic violence	III	The NICS Indices are an alternative when information cannot be updated in III
State prohibitors		Unique to each state based on prohibitions established by state law
Fugitive from justice	NCIC	The NICS Indices are an alternative if NCIC requirements are not met

SOURCE: FBI, 2020.

[a] This applies specifically to those under indictment or information for a crime punishable by imprisonment for more than one year.

[b] Many mental health prohibitions (e.g., involuntary commitment to mental institutions for treatment) may not be associated with a crime and therefore should be recorded in the NICS Indices. However, individuals who are found not guilty by reason of insanity or adjudicated to be incompetent to stand trial should be recorded in III so that they are available for other criminal justice purposes, but they may be recorded in the NICS Indices if otherwise unavailable in III (Mental Health Records in NICS Focus Group, 2015).

Table B.2. Prohibition Descriptions from Active Records in the NICS Indices, by State

Prohibition Category	NICS Indices Description
Felony	"Persons who have been convicted in any court of a crime punishable by imprisonment for a term exceeding one year; or any state offense classified by the laws of the state as a misdemeanor and is punishable by imprisonment for a term exceeding two years, should be submitted to the III to update the identity history summary with the level of conviction. In the event fingerprints are not captured at the time of arrest, entry into the NICS Indices is an alternative. If the arrest includes the submission of fingerprints, this information should be contained in the III; therefore, there may be a low number or no entries in this category. The Department of Justice (DOJ) is undertaking the administrative burden for federal agencies by submitting convictions processed/prosecuted at the federal level to the NICS Indices" (p. 6).
Under indictment or information	"Persons under indictment or information for a crime punishable by imprisonment for a term exceeding one year, may be found in the III or entered into the NICS Indices. However, information regarding individuals under indictment or information is not often found in the III. Therefore, the NICS Indices is an alternative. Although this is a prohibitor, some states may have limited resources to make and maintain the NICS Indices entry for this temporary prohibition. The DOJ is undertaking the administrative burden for federal agencies by submitting indictments and informations [sic] processed/prosecuted to the NICS Indices" (p. 6).
Fugitive from justice	"The 18 U.S.C. § 922 (g)(2) prohibition refers to persons who are fugitives from justice and includes active misdemeanor or felony criminal warrants. All warrants should be entered into the NCIC, but when the NCIC requirements are not met, and a wanted person has met the fugitive from justice criteria, entry into the NICS Indices is an alternative. Therefore, there may be a low number or no entries in this category. The DOJ is undertaking the administrative burden for federal agencies by submitting felony warrants processed to the NICS Indices" (p. 6).
Unlawful user or addicted to a controlled substance	"Persons who are unlawful users of or addicted to any controlled substance are potential candidates for the NICS Indices. This prohibitor may be found in the III when there is a qualifying conviction. For controlled substance charges without a qualifying conviction, it must be established that the substance was a controlled substance (positive drug test or self-admitted use). This information, (such as an incident/arrest report showing drug test results) often not found within the III, may necessitate an entry into the NICS Indices. Since this is a temporary prohibition (one year), an expiration date is required to be established in the NICS Indices" (p. 6).
Adjudicated mental health	"Information on persons adjudicated as a mental defective or involuntarily committed to a mental institution for treatment may be entered into the NICS Indices. Criminal cases with "Not Guilty by Reason of Insanity" qualify for entry into the III. If this information is not made available on the III, entry into the NICS Indices is an alternative. Civil cases would not be available on the III and would qualify for entry into the NICS Indices. Documents relevant to this prohibitor include judgment and commitment orders, sentencing orders, and court agency records of adjudications of the individual's inability to manage his or her own affairs if such adjudication is based on marked subnormal intelligence or mental illness, incompetency, condition, or disease. Medical records containing mental health information are not required for this prohibitor" (p. 6).
Illegal or unlawful alien	"Illegal and Unlawful Alien entries into the NICS Indices are typically made by [U.S. Immigration and Customs Enforcement]. Therefore, entry by other federal agencies or the states would be minimal to nonexistent in this category, unless additional information was discovered during research" (p. 7).
Dishonorable discharge	"Dishonorable Discharge is a military disqualification and is either found on the III or typically entered into the NICS Indices by the [U.S. Department of Defense] or the appropriate branch of the military. Therefore, entry by other federal agencies or the states would be minimal to nonexistent in this category, unless additional information was discovered during research" (p. 7).

Prohibition Category	NICS Indices Description
Renounced U.S. citizenship	"Renounced Citizenship submissions into the NICS Indices are typically made by the [U.S. Department of State]. Therefore, entry by other federal agencies or the states would be minimal to nonexistent in this category" (p. 7).
Protection or restraining order for domestic violence	"Protection or Restraining Order information is to be entered into the NCIC; however, if all NCIC requirements are unable to be met, entry into the NICS Indices is an alternative and may include an expiration date. If a state submits Protection/Restraining Order information to the NCIC, the NICS Indices entry is not necessary; therefore, there may be a low number or no entries in this category" (p. 7).
Misdemeanor domestic violence	"In order to determine the prohibition for [misdemeanor crime of domestic violence], the convicting statute, subsection, and qualifying relationship of the individual to the victim are required. This information may be posted to the III. When the information is unable to be posted to the III, entry into the NICS Indices is an alternative. If an agency posts the final disposition and relationship information to the III, there may be a low number or no entries in this NICS Indices category. However, if it is difficult to post this information (especially the relationship) to the III, the NICS Indices is an alternative, which in turn may increase the number of entries in this category" (p. 7).
State prohibitors	"These prohibitors include individuals who are prohibited based on state law only. This category is unique to each state/territory and dependent upon state law" (p. 7).

SOURCE: These descriptions are from FBI, 2020.

Abbreviations

ATF	Bureau of Alcohol, Tobacco, Firearms and Explosives
BC	background check
DHS	U.S. Department of Homeland Security
DOJ	Department of Justice
FBI	Federal Bureau of Investigation
FFL	federal firearms licensee
FIST	Firearms Inquiry Statistics
III	Interstate Identification Index
NCIC	National Crime Information Center
NICS	National Instant Criminal Background Check System
POC	point of contact

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