### PAUSE <u>⊤</u>○ Protect

## **Temporary Storage Locker Standard Operating Procedures (SOP)**

### (Form 4473 and Background Check Not Required)

The process described below must be followed each time a customer wants to rent a secure storage locker on premises.

- Check locker availability before proceeding (if none are available, recommend another option from the program, e.g., gunsmith or engraving services with 30-day hold requirement).
- Have customer read through the agreement, fill out information and sign where necessary.
- Things to point out include length of storage term, per diem charge thereafter if firearms aren't picked up, re-key fee, and what happens if firearms are deemed abandoned.
- Copy Driver's License and credit card information (recommend using a credit card authorization sheet). Both need to be valid for at least 6 months from the start of the agreement.
- Write a note in customer's profile stating the date they are starting the locker storage (this will vary depending on POS system).
- Give keys to customer.
- Remind customer that only firearms, no ammunition may be stored.
- Put storage agreement with DL and CC authorization in file cabinet (will vary based on location's filing system).
- Call customer a week prior to the expiration date to remind them to come pick the contents up. You may need to set external reminders if your POS system does not offer this feature. If the customer asks for an extension, the default should be to grant it. Always check with your supervisor with regards to space and other circumstances that may be at play.
- No 4473 or background check required upon pick up.
- Customer must return both keys when locker is vacated, otherwise they will be charged the rekey fee.
- Put completed storage agreement with DL and CC authorization in file cabinet.
- If the location has a Pause to Protect Liaison, they should perform a bi-weekly check of the files
  (again, external reminders may need to be set) to ensure outreach to customers whose
  agreements are about to or have expired, as well as log in any abandoned firearms to the bound
  book. Outreach on potentially abandoned firearms should be frequent and include a reference to
  the date the facility will take possession of the firearm if no response.

## **Temporary Storage Lockers SOP (continued)**

# Additional BATFE Guidance

The BATFE guidelines, outlined in an open letter published in July 2023, provide guidance on how to facilitate temporary storage at your facility:

#### https://www.atf.gov/firearms/docs/open-letter/all-ffls-july-2023-open-letter-safe-storage/download

#### Some additional notes:

- It is recommended that staff members take a photocopy of the driver's license for anyone storing firearms in lockers. If the driver's license expires in less than 6 months, it is recommended that the facility not accept the firearms for storage via the lockers. In a scenario like this, there is a higher risk that this customers firearms, if deemed abandoned, would not be able to be taken on to the facility's A&D record without a valid ID on file. The customer in this scenario can be accommodated under other temporary storage solutions Temporary Storage Program (scenario #2 in the BATFE open letter), gunsmith solutions or by distributing devices.
- If it is determined that the firearms being stored in a locker have been abandoned and you are therefore required to enter the locker and acquire the firearms onto your A&D book, a current driver's license is needed to ensure that the BATFE records are correct. If the customer does retrieve their firearms after they have been removed from the locker and acquired on to your A&D book, the customer will need to successfully complete Form 4473 and a background check before the firearms can be returned.
- After a firearm(s) is deemed abandoned under the terms of the agreement for this program, the facility can decide to attempt to resell the firearm(s). It is recommended that the facility wait an additional two months and attempt resale only if the firearms are safe, operational, and in re-sale condition. Any firearms that cannot be resold can be considered for parts. For any firearms that cannot be resold or repurposed for parts and need to be destroyed, follow the proper procedures outlined by the ATF: <u>How to Properly Destroy Firearms</u>, and write "destroyed" in the disposition field for the associated log numbers in the A&D book, per ATF recordkeeping requirements: <u>ATF Recordkeeping Requirments</u>.