

A PERSON-CENTRIC FIREARMS ELIGIBILITY FRAMEWORK

Stabilizing California's Firearms Systems Through Governance, Not Replacement

Prepared for policy and budget consideration
January 2026

EXECUTIVE SUMMARY

California's firearms regulatory infrastructure is experiencing increasing operational strain. The Department of Justice has acknowledged in budget documentation that the current DROS Entry System is fragile, transaction heavy, and approaching end of life. The proposed response is a large scale, custom IT replacement estimated at approximately four hundred fifty million dollars.

This paper argues that the core problem is not hardware capacity or software age, but workflow design. California's firearms system is transaction centric rather than person centric. It repeatedly re adjudicates eligibility for individuals who are already known to the state and continuously monitored. This creates unnecessary system load, increases failure risk, and drives escalating costs.

This paper proposes an alternative approach that stabilizes operations by reusing existing eligibility infrastructure, centering eligibility at the person level, and implementing a tiered, objective licensing framework. The proposal avoids a full system rebuild, reduces transaction volume, and provides a governance based solution aligned with system capacity and fiscal discipline.

THE CURRENT ARCHITECTURE PROBLEM

Transaction Centric Design

Under the current model, each firearm transfer is treated as an independent investigative event. The DROS transaction record functions as the primary organizing key, and eligibility checks are re-run for each transaction regardless of prior determinations.

This design produces several systemic consequences.

- Eligibility determinations are duplicated across transactions for the same individual.
- System load spikes during predictable purchase surges.
- Exemptions and special cases are implemented as transaction level logic.
- Each new statute adds complexity rather than reducing it.
- The system scales by accumulating rules instead of simplifying eligibility.

EXISTING ELIGIBILITY INFRASTRUCTURE

Certificate of Eligibility and CFARS

California already operates a person centric eligibility system through the Certificate of Eligibility program, administered via the California Firearms Application Reporting System.

A Certificate of Eligibility is not a one time clearance. It represents continuous eligibility monitoring derived from Department of Justice criminal history systems, prohibiting event feeds, court order databases, and relevant federal disqualifiers. Eligibility status changes automatically when a prohibiting event occurs.

From a systems perspective, CFARS already functions as an eligibility broker. It aggregates authoritative signals and produces a binary eligibility outcome.

Despite this, the DROS system does not treat COE status as authoritative. Instead, eligibility is reconstructed at the transaction layer each time a firearm is transferred.

PROPOSED ARCHITECTURAL SHIFT

Person Centric Eligibility Model

The proposed reform is to refactor DROS to function as an authorization system rather than an investigative system.

Eligibility would be resolved at the person level rather than the transaction level.

Active COE status would serve as the primary eligibility flag.

Transaction processing would reference cached eligibility determinations.

Eligibility refresh would occur only upon credential change or prohibiting event.

This converts DROS from a system that repeatedly investigates known individuals into one that verifies eligibility tokens.

TIERED LICENSING FRAMEWORK

Eligibility determines whether a person may participate in the firearms system. Tiers determine what that eligible person may access.

Tier 1 Base Eligibility

Credential: Certificate of Eligibility

Firearm Safety Certificate: Integrated knowledge assessment folded into the COE process

Access: Manual action long guns and shotguns

Constraints: Existing waiting periods and purchase limits

Tier 2 Enhanced Safety

Credential: Certificate of Eligibility plus approved training

Training: In person or approved online safety course through NRA or hunter's safety

Access: Handguns and California compliant semi-automatic and/or centerfire rifles

Incentive: One time \$200 rebate on purchase of a qualifying safe for storage incentive

Tier 3 Collector

Credential: Certificate of Eligibility plus federal Curio and Relic FFL03

Access: Tier 1 and Tier 2 firearms

Privileges: Direct shipment of ammunition and regulated components (including barrels), exemption from purchase rationing

Compliance: Federal bound book functions as the primary audit trail (digital bound book expanded to CFARS?)

Tier 4 Trusted Licensee

Tier 4A

Credential: Certificate of Eligibility, CCW, and FFL03

Privilege: Limited off roster handgun acquisition

Restriction: purchase of two off roster handguns per year, no resale within California for 5 years, unless sold out of state

Tier 4B Pilot

Credential: Certificate of Eligibility, carry license, and references/extra vetting

Privilege: Authorization to possess one duty configured rifle

Restrictions: No magazine capacity exemptions unless they were already legally possessed.

Scope: Pilot program subject to reporting and review

All tiers, except for the 4B Pilot tier, are shall issue except for upon satisfaction of objective criteria. 4B is discretionary, and is subject to Good Moral Character review for initial phase-in.

SYSTEM IMPACT AND COST IMPLICATIONS

System Load Reduction

- Eligibility is resolved once rather than repeatedly.
- Tier 3 removes large volumes of low risk data from state systems.
- Transaction throughput becomes predictable and stable.

Cost Avoidance

No end to end platform replacement is required.

No new vendor ecosystem is necessary.

Limited API integration between existing systems suffices.

Modernization occurs incrementally rather than through a multi year rebuild.

This directly addresses the Department's stated concerns regarding fragility without repeating prior large scale IT failures.

STATUTORY GOVERNANCE RECOMMENDATION

Implementation Authority

This framework is strengthened by granting the Department of Justice permanent statutory authority to sequence, condition, or delay implementation of firearms related statutes when those statutes are operationally infeasible or would materially destabilize enforcement systems.

- This authority would apply only to implementation timing and enforcement mechanics.
- It would require written findings.
- It would preserve legislative policy intent.
- It would prevent system failure caused by unrealistic timelines.

Unenforceable law is itself a public safety risk.

WHY THIS WORKS

- It uses systems California already operates.
- It aligns enforcement with system capacity.
- It reduces complexity instead of scaling it.
- It creates objective, reviewable standards.
- It improves public safety by preserving functional systems.

This proposal treats firearms governance as a systems engineering problem rather than a political one.

CONCLUSION

Before committing hundreds of millions of dollars to a custom IT rebuild, California should correct the workflow failures driving system instability. A person centric eligibility model anchored in the Certificate of Eligibility, supported by tiered licensing, and paired with statutory implementation authority offers a lower cost, lower risk path forward.

The state does not need a new computer.
It needs a better way to use the ones it already has.