Webinar guests submitted several questions before and during the April 24, 2014 Standard Practice Procedures session. The following responses are provided by the Center for Development of Security Excellence (CDSE).

Question: If you hold a classified government contract, at a minimum are you required to have SPP?

Answer: For the duration of the facility clearance, at a minimum, contractors are required to implement all applicable terms of the National Industrial Security Program Operating Manual (NISPOM) at each cleared facility. Per NISPOM 1-202, written procedures should be prepared when the Facility Security Officer (FSO) believes that they are necessary for effective implementation of the NISPOM or when the Cognizant Security Agency (CSA) determines they are necessary to reasonably exclude the possibility of loss or compromise of classified information.

Question: Are SPPs purposed for all employees or just those who have been determined to obtain and/or have a security clearance?

Answer: The purpose of the SPP is to protect the classified information and effectively implement the NISPOM requirements at the specific facility for which it is written. The SPP should be viewed as the “how-to” guide for employees to understand the security ground rules. While the rules may be different depending on the employee’s involvement with classified information, all employees play a role in the success of the security program.

Question: At what point is an SPP required?

Answer: The SPP is required when either the FSO or the CSA deems it necessary to effectively safeguard classified information at the contractor’s facility.

Question: My facility is non-possessing. Is an SPP ever required for a non-possessing facility?

Answer: Yes, an SPP could be required for a non-possessing facility if it is determined necessary to reasonably exclude the possibility of loss or compromise of classified information.

Question: Is there any requirement for an SPP to be approved by a member of senior management?

Answer: While there is no specific policy requirement regarding approval, management
support is essential to ensure that the SPP is effective. Without management support, the FSO may have difficulty implementing the procedures within the company.

**Question:** If there is no safeguarding, is an SPP needed?

**Answer:** Even if there is no safeguarding approved at your facility, the FSO may believe an SPP is needed to effectively implement the NISPOM.