

Student Guide

Short: You're a New FSO: Now What?

Objective	Identify the basic responsibilities of a Facility Security Officer (FSO) in the NISP
Estimated completion time	10 minutes

Introduction

As the FSO for your company, you know you are responsible for a number of security-related tasks. But when questions come up, do you know which ones you are responsible for handling?

Let's find out!

For each scenario, select the best answer. Check your answers in the Answer Key that follows the activity.

Scenario 1

You have a new email. You see it's from HR. It says Jamie Noguchi is leaving the company – and she happens to be a cleared employee.

From: Mary Wilson
Subject: Employee leaving company

Jamie Noguchi's last day is today. Please note that she is a cleared employee.

Mary Wilson
Human Resources

As the company's FSO, do you have any responsibilities in this situation?

Yes

No

Scenario 2

You overhear Nancy and Susan discussing another employee at your company. Nancy says, "Did you hear what happened to Joseph?" and Susan responds, "No, what!?" You then hear Nancy explain, "I heard from Sally that he filed for bankruptcy."

You work with Joseph, and you know he doesn't have a clearance.

As the company's FSO, do you have any responsibilities when an uncleared employee files for bankruptcy?

Yes

No

Scenario 3

Your phone rings. When you answer it, you hear: "Hi George. This is Robert from building operations. I just want to let you know Maria reported she lost her badge. We'll have a new one for her by tomorrow."

When an employee loses her badge do you have any responsibilities as the company's FSO?

Yes

No

Scenario 4

You find a memo on your chair when you return to your desk.

To: All Employees

Please join me in congratulating Edward Brown on his promotion to company President. Mr. Brown has been with us for 12 years and has done an outstanding job.

Please join us to celebrate in Conference Room 1303 D on Friday at 4:30pm.

Jane Smith
Chair of the Board of Directors

Wow - big changes are underway! Ed Brown has been promoted to company President!

When there is a change in any of your company's senior management positions do you have any responsibilities as the company's FSO?

Yes

No

Scenario 5

Susan stops by your desk and asks: "Hi, there. Do you have a minute?" You ask her to sit down, and she says, "I just wanted to let you know that we're setting up a classified visit next week with our government customer to provide them the latest updates on our R&D program."

When cleared individuals from your government customer or prime contractor visit your facility to discuss or access classified information, do you, as the FSO, have any responsibilities?

Yes

No

Answer Key

Scenario 1

You have a new email. You see it's from HR. It says Jamie Noguchi is leaving the company – and she happens to be a cleared employee.

From: Mary Wilson
Subject: Employee leaving company

Jamie Noguchi's last day is today. Please note that she is a cleared employee.

Mary Wilson
Human Resources

As the company's FSO, do you have any responsibilities in this situation?

- Yes
 No

Rationale: As the FSO, you *are* responsible for reporting changes in your company's cleared personnel. Additionally, you will have to provide a security debriefing to Ms. Noguchi prior to her leaving your company.

Scenario 2

You overhear Nancy and Susan discussing another employee at your company. Nancy says, "Did you hear what happened to Joseph?" and Susan responds, "No, what!?" You then hear Nancy explain, "I heard from Sally that he filed for bankruptcy."

You work with Joseph, and you know he doesn't have a clearance.

As the company's FSO, do you have any responsibilities when an uncleared employee files for bankruptcy?

- Yes
 No

Rationale: Because Joseph does not hold a security clearance, his bankruptcy does not require you to take any action as FSO. However, if he had been cleared, once you verified this hearsay information to be true, you'd be required to report his bankruptcy to the Personnel Security Management Oversight for Industry (PSMO-I) office.

Scenario 3

Your phone rings. When you answer it, you hear: "Hi George. This is Robert from building operations. I just want to let you know Maria reported she lost her badge. We'll have a new one for her by tomorrow."

When an employee loses her badge do you have any responsibilities as the company's FSO?

- Yes
- No

Rationale: Although your company may assign handling lost employee badges as an additional duty, this is *not* part of your FSO responsibilities.

Scenario 4

You find a memo on your chair when you return to your desk.

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Jane Smith
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Wow - big changes are underway! Ed Brown has been promoted to company President!

When there is a change in any of your company's senior management positions do you have any responsibilities as the company's FSO?

- Yes
- No

Rationale: As FSO, you are responsible for reporting any changes in your key management personnel. These changes could affect your company's ability to maintain its facility security clearance!

Scenario 5

Susan stops by your desk and asks: “Hi, there. Do you have a minute?” You ask her to sit down, and she says, “I just wanted to let you know that we're setting up a classified visit next week with our government customer to provide them the latest updates on our R&D program.”

When cleared individuals from your government customer or prime contractor visit your facility to discuss or access classified information, do you, as the FSO, have any responsibilities?

Yes

No

Rationale: Because this will be a classified visit, you have quite a few responsibilities as FSO to make it happen.

You are going to be busy!

Activity Conclusion

Now that you've seen the kinds of questions you might field, you'd probably like to know a little more about what your responsibilities actually are.

1. FSO Responsibilities

The National Industrial Security Program (NISP) is a government-industry partnership that was created to safeguard classified information entrusted to industry. Under the auspices of the NISP, the government establishes classified information requirements that industry must comply with. To help industry implement these requirements, the government provides advice, assistance, and oversight.

As an FSO, you play a crucial role in the NISP. In this capacity, you represent your company on all security-related matters and are considered one of your company's key management personnel or KMP. Serving as your company's liaison between industry and government, your key responsibilities are protecting our national security and upholding the National Industrial Security Program Operating Manual (NISPOM) requirements.

As the FSO, your security responsibilities can be grouped into several categories. In administering your company's security program, you are responsible for obtaining and maintaining the company's facility security clearance and for assisting employees with obtaining and maintaining personnel security clearances. You are also responsible for providing security education, training, and awareness and play a crucial role in safeguarding classified information. Another FSO responsibility you have is conducting self-inspections. You must also report certain types of events back to the government and oversee classified visits that occur at your facility.

You are not expected to perform all these roles on your own. It's important to keep in mind, that the government can provide advice and assistance in addition to oversight.

a. Facility Clearance

Before a company can work with classified materials, a facility security clearance, or FCL, must be granted. Once the FCL is granted, it is the responsibility of the FSO to maintain the FCL. As the FSO, you will be responsible for maintaining your company's facility clearance by complying with government requirements. In this capacity, the FSO must maintain all facility clearance records such as the, the DD Form 441 and 444-1 and the SF-328. It is important to ensure that these documents, along with the list of key management personnel, are updated to reflect any changes, since failure to do so could impact the company's facility clearance.

b. Personnel Clearance

Individuals need to acquire personnel clearances before they can work with classified information. Assisting employees in acquiring and keeping their

personnel security clearances is another of your FSO responsibilities. Remember employees are only eligible for accessing classified information up to the level of the FCL even if they might hold an eligibility at a higher level.

c. Security Education

A key FSO task is providing an initial briefing to all newly cleared employees and educating them on potential security threats, defensive security measures, security classification, and reporting requirements. It is also your responsibility to ensure employees receive necessary security training specific to their jobs and understand how to handle certain types of classified information. In addition, you must provide annual refresher briefings to all cleared employees, as well as debriefings when employees no longer require access to classified information.

As an FSO, there is required FSO training for you to complete within one year of your appointment. A link to the complete list of required courses is provided later in this Student Guide.

d. Safeguarding

Safeguarding, which is the protection of classified materials from unauthorized disclosure, is a crucial FSO task. Your safeguarding responsibilities will depend on your facility's classified involvement in the NISP. Cleared employees should follow the NISPOM requirements regarding the handling and disclosure of classified information. Training on derivative classification and markings must occur if a company is authorized to generate classified material. If maintenance and storage of classified materials and information systems is an activity conducted in your company, you must ensure their proper safeguarding. Transmission of classified materials must also follow NISPOM requirements if done at your company.

e. Self-Inspection

Government representatives will conduct periodic security vulnerability assessments of your company to ensure that it remains in compliance with NISPOM requirements. Conducting self-inspections enables you to review your security program and make improvements. By reviewing your security program on a recurring basis and carrying out periodic self-inspections, you will ensure compliance with the applicable requirements of the NISP, ensure classified material is adequately protected, and validate your established security procedures.

f. Reporting

As the FSO, you are responsible for reporting to the government a number of actions, events, or status changes which may affect your company and its employees' ability to safeguard classified information.

g. Classified Visits

When classified information is disclosed during a visit to a cleared contractor, it is known as a classified visit. As the FSO, it is your responsibility to ensure that the number of classified visits is kept to a minimum in accordance with the NISPOM. For each classified visit, the FSO needs to confirm the level of clearance or the eligibility/access of the visitor. Prior to granting access to classified information, the FSO or the cleared employee hosting the visit must confirm the visitor's identification and verify his or her need-to-know.

2. FSO Resources

As you can see, you have a wide variety of responsibilities as an FSO. But don't worry. Even though you play such a key role in your company's security program, you do not have to go it alone. By working with others, both inside and outside your company, you can enhance and strengthen the overall effectiveness of your security program.

Let's start with your own company. There are several groups, at all levels, where you can find support and assistance. Developing relationships with company executives will help you keep abreast of essential company activities and changes you must report to the Government. They can also provide key support for your security program; for example, by investing in training opportunities for employees and providing resources necessary to maintain a successful security program.

You should also develop an alliance with your company's information systems personnel. You can work together to safeguard your company's accredited computer systems. Working regularly with your company's cleared employees will keep you informed about how well your security program is running, and whether there are any problems you need to address. Cleared employees can also be a big help with security education and awareness activities. You should also connect with uncleared employees at your company. Even though they don't have clearances, they can help identify important security threats and issues you may not be aware of.

There are also a number of external relationships you can build to complement your security program. Your relationships with your Government customers are key. They understand the classified contracting environment. They also provide and can answer questions about the specific information your company accesses.

You know the Defense Security Service provides oversight of your security program. But it also serves as a resource to help you maintain your company's compliance with security requirements. Your DSS Industrial Security Representative will be a key resource for you. Other external partners include local law enforcement agencies and building security. These partners can provide additional support in the physical security of your facility.

In addition, you can always look to other FSOs for advice, assistance, education, and training. A good way to meet them is to join professional security organizations. You can also use the Office of Personnel Management's Extranet for Security Professionals.

Additional FSO resources can be found on several websites:

- DSS website: <http://www.dss.mil/>
- CDSE website and training: <http://www.cdse.edu/index.html>

Internal Relationships

Executives

- Senior Management Officials
- Corporate Officers and Directors
- Director of Human Resources
- Executive Assistant/Secretary to Senior Management Official\

Information Systems personnel

- Network Administrator
- Information System Security Manager (ISSM)
- Information System Security Officer (ISSO)

Cleared Employees

- Program/project manager
- Lead engineer/technical specialist
- Others

Uncleared Employees

- Facilities/building manager and staff
- Receptionist
- Website administrator
- Marketing staff
- Others

External Relationships

Customer Relationships

- Security manager at government facility
- Contracting Officer's Technical Representative (COTR)
- Government Contracting Activity (GCA) Contracting Officer
- FSO at sub-contractor facilities

Defense Security Service (DSS)

- DSS Industrial Security Rep (IS Rep)
 - Implement NISP requirements
 - Develop and maintain security program in compliance with the NISP
- DSS Information Systems Security Professional (ISSP)
- DSS Counterintelligence (CI) Specialist

Law Enforcement and Building Security

- Local law enforcement
- Security/Law Enforcement
- FBI= Infraguard and Domain Initiative
- Alarm Company

Other FSOs, via:

- Industrial Security Awareness Council (ISAC)
- American Society for Industrial Security (ASIS)
- National Classification Management Society (NCMS)
- OPM Extranet for Security Professionals

3. What's Next?

Now that you have a better idea of the range of responsibilities you have as an FSO and you can see the important role you play in protecting our national security. What's next?

The DSS Center for Development of Security Excellence, or CDSE, offers an entire curriculum you are required to complete within one year of being appointed a Facility Security Officer: http://www.cdse.edu/documents/cdse/FSO_brochure.pdf

Please visit CDSE's online Security Training, Education and Professionalization Portal, or STEPP, to take a closer look at the offerings for FSOs, and to register for your first course: <http://www.cdse.edu/index.html>