

***You're a New FSO: Now
What? V3***
Student Guide

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Center for Development of Security Excellence

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Lesson 1: You're A New FSO: Now What?

Introduction

Introduction

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

Let's find out!

Select the best answer for each scenario. Check your answers in the Answer Key that follows the activity.

Scenario 1

You have a new email. You see it is from Human Resources. It says Jamie Noguchi is leaving the company and she holds a favorable national security eligibility determination, also referred to as a Personnel Security Clearance, or PCL. The email states:

From: Mary Wilson

To: All Employees

Subject: Employee leaving company

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

Mary Wilson

Human Resources

Question: As the company's FSO, do you have any responsibilities in this situation? Select the best response.

- 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 has a PCL.

Question: As the company's FSO, do you have any responsibilities when a cleared 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.”

Question: When an employee loses their company identification, or ID 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. The letter, which is on company letterhead, states:

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 4:30 pm.

From: Jane Smith, Chair of the Board of Directors

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

Question: When there is a change in any of your company's Senior Management Officials or SMOs, 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."

Question: As FSO, do you have any responsibilities related to visits to your facility that include discussion of, or access to, classified information?

- Yes
- No

Scenario Answers

Scenario 1

Question: As the company's FSO, do you have any responsibilities in this situation? Select the best response.

- Yes
- No

Feedback: *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 has a PCL.

Question: As the company's FSO, do you have any responsibilities when a cleared employee files for bankruptcy?

- Yes
- No

Feedback: *Since Joseph is a cleared employee, you are required to report his bankruptcy to the Defense Counterintelligence and Security Agency, or DCSA, via the DOD, personnel security system of record once you verify this hearsay information is true.*

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."

Question: When an employee loses their company identification, or ID badge, do you have any responsibilities as the company's FSO?

- Yes
- No

Feedback: *Although your company may have a policy about lost company identification badges and assign the FSO to handle this task as an additional duty, this is not part of your FSO responsibilities per the National Industrial Security Program Operating Manual, or NISPOM.*

Scenario 4

You find a memo on your chair when you return to your desk. The letter, which is on company letterhead, states:

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 4:30 pm.

From: Jane Smith, Chair of the Board of Directors

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

Question: When there is a change in any of your company's Senior Management Officials, or SMOs, do you have any responsibilities as the company's FSO?

- Yes
- No

Feedback: *As FSO, you are responsible for reporting any changes in your Key Management Personnel, or KMP. These changes could affect your company's ability to maintain its favorable entity eligibility determination, also referred to as a Facility Clearance, or FCL.*

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."

Question: As FSO, do you have any responsibilities related to visits to your facility that include discussion of or access to classified information?

- Yes
- No

Feedback: *Any visit that involves discussing or accessing classified information is a classified visit, and you will need to perform a number of tasks before it takes place.*

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.

FSO Responsibilities

The National Industrial Security Program (NISP) is a Government-industry partnership created to safeguard classified information entrusted to industry. Under the auspices of the NISP, the government establishes classified information requirements that industry must follow. 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 KMP. Serving as your company's liaison between industry and Government, your key responsibilities include protecting classified information entrusted to your company and ensuring compliance with the applicable NISPOM security requirements.

As the FSO, your security responsibilities can be grouped into several categories. In administering your company's Industrial Security Program, you are responsible for obtaining and maintaining the company's FCL and for assisting employees with obtaining and maintaining PCLs. 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 responsibilities on your own. Keep in mind that the Government can provide advice and assistance in addition to oversight.

Facility Clearance

Before a company can work with classified information, an 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 FCL by complying with government requirements. In this capacity, the FSO must maintain all FCL records via the FCL system of record, such as:

- DOD Security Agreement, or DD Form 441;
- DOD Appendage to DoD Security Agreement, or DOD 444-1 – if applicable;
- Certificate Pertaining to Foreign Interests, or SF328

It is important to ensure that these documents, along with the list of KMPs, are updated to reflect any changes, since failure to do so could impact the company's FCL.

Personnel Clearance

Individuals need to acquire a PCL before they can access classified information. Assisting employees in acquiring and keeping their PCL is another of your FSO responsibilities.

Remember, employees may only access classified information up to the level of the FCL, even if they hold an eligibility at a higher level.

Security Education

A key FSO task is providing an initial briefing to all newly cleared employees that includes awareness and insider threat, counterintelligence awareness, an overview of the information security classification system, reporting obligations and requirements, including insider threat, and cybersecurity training for all authorized information system users.

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 security education and training to all cleared employees, as well as debriefings when cleared employees no longer require access to classified information.

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

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 and the approved level of storage at your facility. 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 storage of classified material is approved, and information systems are authorized to process classified information at your company, you must ensure there is proper safeguarding. Transmission of classified materials must also follow NISPOM requirements if done at your company.

Self-Inspection

Government representatives will conduct a security review of your company to ensure that it remains in compliance with NISPOM requirements. Conducting required 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.

See the Self-Inspection Handbook for NISP Contractors for more information.

Reporting

As the FSO, you are responsible for reporting certain events to the Government that may effect the status of your company or an employee's eligibility for access to classified information; indicate an insider threat; or affect proper safeguarding of classified information.

Classified Visits

A visit that will require, or is expected to require, the visitor to access classified information, is a classified visit. As the FSO, it is your responsibility to ensure that the number of classified visits will be held to a minimum in accordance with the NISPOM.

For each classified visit, the FSO needs to confirm the level of clearance, or eligibility, and/or 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.

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 you company's Information Systems Personnel. You can work together on cybersecurity awareness and to safeguard your company's authorized computer systems for classified information. 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 and can answer questions about the specific information your company accesses.

The DCSA not only 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 DCSA Industrial Security Representative, or IS Rep, 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, or OPM, Extranet for Security Professionals.

Additional FSO resources can be found on several websites:

- DCSA website
- CDSE website and training
- FSO Toolkit

Information on each of these can be found on the course resource page at <https://www.cdse.edu/Training/Security-Shorts/ISS0047-resources/>

Internal Relationships

Executives

- SMO
- Corporate Officers and Directors
- Director of Human Resources
- Executive Assistance/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 Representative (COR)
- Government Contracting Activity (GCA) Contracting Officer
- FSO at sub-contractor facilities

Defense Counterintelligence and Security Agency (DCSA)

- Industrial Security Rep (DCSA IS Rep)
 - Implement NISP requirements
 - Develop and maintain security program in compliance with the NISP
- DCSA Information Systems Security Professional/Security Control Assessor (SSP/SCA)
- DCSA Counterintelligence (CI) Special Agent (CISA)

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

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 DCSA Center for Development of Security Excellence, or CDSE, offers an entire curriculum you are required to complete within six months of being appointed an FSO: https://www.cdse.edu/Portals/124/Documents/jobaids/industrial/FSO_brochure.pdf?ver=JuKMyy2QAfi9lpMr5kB39A%3d%3d.

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: https://cdse.usalearning.gov/local/pwt_privacy_policy/view.php.