

Student Guide

Short: KMP: To Clear, or Not to Clear?

Objective	<ul style="list-style-type: none">Given information about a business (structure and facts), identify the key management personnel (KMPs) who need to be cleared or excluded in connection with the facility security clearance.
Estimated completion time	10 minutes

Introduction

Your Field Office Chief says:

Good morning. Now that you've had some experience in the field, today you are going to handle three site visits on your own. I want you to look at this documentation for facility clearances from the three contractors you'll be visiting.

When you get to each one, I need you to review and validate their key management personnel. When you get back, let's meet to go over your findings. That way, I'll see how well you can do on your own.

Activity: Company Site Visits

For each company, determine whether identified personnel are:

- Key management personnel (KMP) requiring a personnel security clearance (PCL)*
- Key management personnel (KMP) requiring an exclusion*
- Not key management personnel*

Check your answers in the Answer Key that follows the activity.

Company 1: Limited Liability Company

You arrive at your first appointment – a limited liability company named IntelTech, which designs thermal imaging systems. After you sign in, you are escorted to Glenda Sharratt's office. You verify the information the company submitted and check the list of key management personnel.

Company Profile: IntelTech, LLC.

- Designs and manufactures thermal imaging systems for Homeland Security ground-based surveillance operations
- Founded in 1996
- Duration: 30 years
- Registered agent: Carlos Mendez

Company Personnel

Glenda Sharratt is the company's Management Officer in Charge and Insider Threat Program Senior Official. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Bernard Jones is the Facility Security Officer. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Carlos Mendez is an LLC member with a majority interest and minimal operational responsibilities. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Patricia Brennan is an LLC member with a minority interest and significant operational responsibilities. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Martina Serrani is an LLC member with a minority interest, minimal operational responsibilities, and no access or influence on classified contracts. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Company 2: General Partnership

You arrive at your second appointment – a general partnership named Parker Industries, which develops software for command and control systems. You are greeted by Bud Symanski, Building Security Manager. He tells you that the partners are waiting for you in the executive conference room. After meeting the partners, you verify the information the company information submitted and check the list of key management personnel.

Company Profile: Parker Industries

- Develops software for command and control systems
- Has an Executive Committee that exercises management control and supervision

Company Personnel

Connie Parker is a General Partner who sits on the Executive Committee and has an on-site office. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Marcus Diamond is a General Partner who does not sit on the Executive Committee and does not have an on-site office. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Gary Johnson is a General Partner who does not sit on the Executive Committee and is the company's Facility Security Officer and Insider Threat Program Senior Official. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Jonathan Serra is an IT Manager who sits on the Executive Committee and is responsible for the company's technical/data infrastructure. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Bud Symanski is the Building Security Manager and is responsible for physical security of the facility. He does not sit on the Executive Committee. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Company 3: Private Corporation

You arrive at your third appointment – a private corporation named Firth Aeronautical Consulting, Inc., which provides consulting services for unmanned aerial vehicles. You are met by Eleanor Mclean, the FSO. Eleanor shows you to a conference room. In the conference room, you verify the information the company submitted and check the list of key management personnel.

Company Profile: Firth Aeronautical Consulting, Inc.

- Provides consulting services for unmanned aerial vehicles
- Single entity corporation
- Board has a rotating Chair

Company Personnel

Dr. Hal Firth Jr., is the company President, and sits on the Board of Directors. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Hal Firth, Sr., is Chairman of the Board of Directors, but does not have an on-site office. He is a retired General, and lives in Florida. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Eleanor Mclean is the company's Facility Security Officer, and does not sit on the Board of Directors. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Ronald Carver is the Assistant Facility Security Officer. He does not sit on the Board of Directors. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Ursula Bernhard is the Corporate Secretary and sits on the Board of Directors. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

José Rivera is the Corporate Treasurer and sits on the Board of Directors. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Robert Johnson is the Vice President of the company. He does not sit on the Board of Directors and has no role with respect to classified contracts. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Julianne Sims is the company's Insider Threat Program Senior Official, and does not sit on the Board of Directors. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Answer Key

Company 1: Limited Liability Company

Glenda Sharratt is the company's Management Officer in Charge and Insider Threat Senior Program Official. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: Glenda is a KMP; the management official in charge and the ITPSO must be cleared.

Bernard Jones is the Facility Security Officer. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: Bernard is a KMP; the FSO must be cleared.

Carlos Mendez is an LLC member with a majority interest and minimal operational responsibilities. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: Carlos is a KMP; even though he has little impact on day-to-day operations, Carlos has control of the company as with a majority interest and needs to be cleared.

Patricia Brennan is an LLC member with a minority interest and significant operational responsibilities. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: Although Patricia holds a minority interest, she has a significant impact on business operations. Therefore, she is a KMP and must be cleared.

Martina Serrani is an LLC member with a minority interest, minimal operational responsibilities, and no access or influence on classified contracts. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: With a minority interest, Martina is a KMP. But with no requirement to access classified information, she does not need to be cleared, but must be excluded.

Company 2: General Partnership

Connie Parker is a General Partner who sits on the Executive Committee and has an on-site office. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As a general partner and a member of the Executive Committee, Connie is a KMP and must be cleared.

Marcus Diamond is a General Partner who does not sit on the Executive Committee and does not have an on-site office. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: Marcus is a general partner and therefore a KMP. But he must be excluded since Parker has an Executive Committee with authority to exercise management control and supervision.

Gary Johnson is a General Partner who does not sit on the Executive Committee and is the company's Facility Security Officer and Insider Threat Program Senior Official. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As the FSO and ITPSO, Gary is a KMP and must be cleared.

Jonathan Serra is an IT Manager who sits on the Executive Committee and is responsible for the company's technical/data infrastructure. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: Although not a partner, Jonathan is a KMP and must be cleared because he sits on the Executive Committee.

Bud Symanski is the Building Security Manager and is responsible for physical security of the facility. He does not sit on the Executive Committee. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: With no authority to act on behalf of the partnership Bud is not a KMP and therefore does not need to be cleared.

Company 3: Private Corporation

Dr. Hal Firth Jr., is the company President, and sits on the Board of Directors. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As the senior management official, Dr. Firth is a KMP and must be cleared.

Hal Firth, Sr., is Chairman of the Board of Directors, but does not have an on-site office. He is a retired General, and lives in Florida. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: Even though he does not impact day-to-day operations, as Chairman of the Board Howard is a KMP and must be cleared.

Eleanor Mclean is the company's Facility Security Officer, and does not sit on the Board of Directors. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As the FSO, Eleanor is a KMP and must be cleared.

Ronald Carver is the Assistant Facility Security Officer. He does not sit on the Board of Directors. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As an assistant FSO with no decision-making authority, Ronald is not a KMP and does not need to be cleared.

Ursula Bernhard is the Corporate Secretary and sits on the Board of Directors. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As a director who could fill the rotating chairman position, Ursula is a KMP and must be cleared.

José Rivera is the Corporate Treasurer and sits on the Board of Directors. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As a director who could fill the rotating chairman position, José is a KMP and must be cleared.

Julianne Sims is the company's Insider Threat Program Senior Official (ITPSO), and does not sit on the Board of Directors. She is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As the ITPSO, Julianne is a KMP and must be cleared.

Robert Johnson is the Vice President. He does not sit on the Board of Directors and has no role with respect to classified contracts. He is...

- A KMP requiring a personnel security clearance
- A KMP requiring an exclusion
- Not a KMP

Rationale: As Vice President of the company, Robert is a KMP. However, since he does not sit on the Board of Directors and has no role with respect to classified contracts, he must be excluded.

Conclusion

Welcome back! How'd you feel about doing those visits on your own?

If you did well, plan on doing more site visits on your own!

If you had trouble, you may want to take another look at Business Structures in the NISP. It will refresh you and improve your ability to evaluate KMPs in the different business structures you'll come across.