



Safeguards  
+ Security

# Non-Possessor Self-Assessment Checklist

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Facility Name: \_\_\_\_\_



Controlled by: Sandia National Laboratories, \_\_\_\_\_



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**Facility Name:** \_\_\_\_\_

**Facility Code:** \_\_\_\_\_

**Facility Security Officer:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Sandia National Laboratories (SNL) subcontractor facilities are required to conduct a periodic review of their security programs. The Facility Security Officer (FSO) should use this guide to conduct the security review, with particular focus on SNL and Department of Energy (DOE) security requirements associated with SNL contracts. Refer to the **Security Toolcart** where you will find the **SNL Non-Possessor Security Requirements Plan (NPSRP)**, instructions, forms and additional resources to assist you in conducting the most thorough security review possible. Also, conducting interviews with your personnel is useful in gauging the effectiveness of your security program and identifying areas for improvement. As you work through the guide, answer each question that applies to your security program. Questions? Contact Contract Security Management at [farateam@sandia.gov](mailto:farateam@sandia.gov).

Unless otherwise specified, all question references can be found in the S&S-PLN-120, Non-Possessing Subcontractor Security Requirements Plan.

### PROGRAM MANAGEMENT OPERATIONS

1.1 Overview	<p>1. What is the date on the latest executed Non-Possessor Security Requirements Plan (NPSRP) and who signed it?</p> <p><b>Date:</b></p> <p><b>Signatories:</b></p>		
1.1 Overview	<p>2. What is your understanding of the purpose of the Non-Possessing Security Requirements Plan?</p>		
1.1 Overview	<p>3. Are you aware of the contractually binding nature of the Non-Possessing Security Requirements Plan?</p>	<p>YES</p> <p><input type="radio"/></p>	<p>NO</p> <p><input type="radio"/></p>



1.1 Overview	4. Where can you find the most recent version of Non- Possessing Security Requirements Plan to ensure that your staff follow the requirements within?		
1.1 Overview	5. As designated as a “non-possessing” facility, please describe your understanding of your responsibilities of handling and processing classified matter or nuclear material:		
1.1 Overview	6. Where are you authorized to perform classified work?		
<b>FACILITY SECURITY OFFICER (FSO)</b>			
2.1.1 Program Management and Administration	7. Please provide a brief description of the responsibilities of the FSO:		
2.2.1 Self-Assessment Program	8. Do you conduct self-assessment activities outside of this periodic security review?	YES  <input type="radio"/>  If YES, answer the following questions.	NO  <input type="radio"/>  If NO, continue to question 9.
	a. Who conducted the assessment? (Please include name(s) and position title(s))		
	b. What security program areas were addressed in the assessment?		
	c. What was included in your assessment? (i.e. Interviews, walkdown of space, document reviews, etc.)		



	d. When did you conduct the assessment?			
	e. What were your results?			
	f. How did you mitigate any issues found during the assessment?			
<b>FOREIGN OWNERSHIP, CONTROL OR INFLUENCE (FOCI)</b>				
<i>2.3.1 Foreign Ownership, Control or Influence (FOCI)</i>	9. Why does DOE review and determine the Foreign Ownership, Control or Influence (FOCI) of your company?			
<i>2.3.1 Foreign Ownership, Control or Influence (FOCI)</i>	10. What is the date of your favorable FOCI determination?			
<i>2.3.1 Foreign Ownership, Control or Influence (FOCI)</i>	11. What are your responsibilities as Facility Security Officer regarding FOCI?			
<b>FOCI REPORTING REQUIREMENTS</b>				
SF-328	12. If your company issues stock: Do any foreign person(s), directly or indirectly, own or have beneficial ownership of 5 percent or more of the outstanding shares of any class of your organization's equity securities?	<table border="1" style="width: 100%;"> <tr> <td style="text-align: center;">YES <input type="radio"/></td> <td style="text-align: center;">NO <input type="radio"/></td> </tr> </table>	YES <input type="radio"/>	NO <input type="radio"/>
YES <input type="radio"/>	NO <input type="radio"/>			
	If yes, please provide more detailed information here:	<table border="1" style="width: 100%;"> <tr> <td style="text-align: center;">N/A Company does not issue stock <input type="radio"/></td> </tr> </table>	N/A Company does not issue stock <input type="radio"/>	
N/A Company does not issue stock <input type="radio"/>				



<p>SF-328</p>	<p>13. If your company does not issue stock: Has any foreign person directly or indirectly subscribed 5 percent or more of your organization's total capital commitment?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
		<p>N/A Company does not issue stock <input type="radio"/></p>	
<p>SF-328</p>	<p>14. Does your organization directly, or indirectly through your subsidiaries and/or affiliates, own 10 percent or more of any foreign interest?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
<p>SF-328</p>	<p>15. Do any non-U.S. citizens serve as members of your organization's board of directors (or similar governing body), officers, executive personnel, general partners, regents, trustees or senior management officials?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
<p>SF-328</p>	<p>16. Does any foreign person(s) have the power, direct or indirect, to control the election, appointment, or tenure of members of your organization's board of directors (or similar governing body) or other management positions of your organization, or have the power to control or cause the direction of other decisions or activities or your organization?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>



SF-328	<p>17. Does your organization have any contracts, agreements, understandings, or arrangements with a foreign person(s)?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
SF-328	<p>18. Does your organization, whether as a borrower, surety, guarantor or otherwise have any indebtedness, liabilities or obligations to a foreign person(s)?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
SF-328	<p>19. During your last fiscal year, did your organization derive 5 percent or more of its total revenues or net income from any single foreign person?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
SF-328	<p>20. During your last fiscal year, is the aggregate 30 percent or more of its revenues or net income from foreign persons?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
SF-328	<p>21. Is 10 percent or more of any class of your organization's voting securities held in "nominees" shares, in "street names" or in some other method which does not identify the beneficial owner?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>



SF-328	<p>22. Do any of the members of your organization's board directors (or similar governing body), officers, executive personnel, general partners, regents, trustees or senior management officials hold any positions with, or serve as consultants for, any foreign person(s)?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p> <input type="radio"/>	<p>NO</p> <input type="radio"/>
SF-328	<p>23. Is there any other factor(s) that indicates or demonstrates a capability on the part of foreign persons to control or influence the operations or management of your organization?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p> <input type="radio"/>	<p>NO</p> <input type="radio"/>
<b>FACILITY APPROVAL AND REGISTRATION OF ACTIVITIES</b>			
2.3.2 Facility Approval and Registration of Activities	<p>24. What are the six components that make up your Facility Security Clearance?</p> <ol style="list-style-type: none"> <li>1.</li> <li>2.</li> <li>3.</li> <li>4.</li> <li>5.</li> <li>6.</li> </ol>		
2.3.2 Facility Approval and Registration of Activities	<p>25. Have you ever used your facility clearance as a way to advertise or promote your business?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p> <input type="radio"/>	<p>NO</p> <input type="radio"/>



<p>2.3.2.5 <i>DOE Facility Clearance Suspensions</i></p>	<p>26. Are you aware of the circumstances that may lead to your facility clearance being suspended?</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
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**KEY MANAGEMENT PERSONNEL (KMP)**

<p>2.3.2.1 <i>Key Management Personnel</i></p>	<p>27. Provide a list of your current Key Management Personnel determined by NNSA to require have a personnel clearance and the level of that clearance:</p>	
	KMP	Clearance Level
	<p>If applicable, provide details on any upcoming/in-progress KMP changes:</p>	

**FACILITY DATA AND APPROVAL RECORD**

<p>2.3.2.3 <i>Facility Data and Approval Record</i></p>	<p>28. Please provide a brief description of your understanding of the purpose of a Facility Data and Approval Record (FDAR).</p>
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<p>2.3.2.3 <i>Facility Data and Approval Record</i></p>	<p>29. Our team has provided a copy of your Facility Data Approval Record (FDAR). Does all the information on your FDAR match your records?</p> <p>If no, please provide a description of the discrepancies:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
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2.3.2.3 Facility Data and Approval Record	30. What is the level of classification for your company's facility clearance? <b>Level/Category:</b>		
<b>CONTRACT SECURITY CLASSIFICATION SPECIFICATION (CSCS)</b>			
2.3.2.4 Contract Security Classification Specification	31. Please provide a description of your understanding of the purpose of a CSCS form.		
<b>FACILITY CLEARANCE REPORTING REQUIREMENTS</b>			
2.3.3.2 Reporting Anticipated Changes	32. Has your company made any action to terminate business, operations of your subcontractor(s), or any parent companies?  If yes, please provide more detailed information here:	YES <input type="radio"/>	NO <input type="radio"/>
2.3.3.2 Reporting Anticipated Changes	33. Is your company looking into entering negotiations for a merger, acquisition, takeover or restructure?  If yes, please provide more detailed information here:	YES <input type="radio"/>	NO <input type="radio"/>
2.3.3.2 Reporting Anticipated Changes	34. Has your company taken legal actions to initiate bankruptcy? To include any subcontractor or parent companies?  If yes, please provide more detailed information here:	YES <input type="radio"/>	NO <input type="radio"/>
2.3.3.2 Reporting Anticipated Changes	35. Have you had any changes in operating name or address of your company?  If yes, please provide more detailed information here:	YES <input type="radio"/>	NO <input type="radio"/>



<p>2.3.3.3 <i>Reporting Other Changes</i></p>	<p>36. Have you entered into any pre-subcontract negotiations or award that may involve (1) the release or disclosure of U.S. classified information to a foreign interest or (2) access to classified information furnished by a foreign interest?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
<p>2.3.3.1 <i>Reporting Significant Changes</i></p>	<p>37. If you were to have a significant change, or anticipated changes that would affect your most recent FOCI submission, what action(s) would you take?</p>		
<p><b>SECURITY MANAGEMENT IN CONTRACTING</b></p>			
<p>2.3.2.4 <i>Contract Security Classification Specification</i></p>	<p>38. Do you further subcontract with companies that require personnel clearances to perform work on SNL contracts?</p>	<p>YES <input type="radio"/></p> <p>If YES, answer questions below</p>	<p>NO <input type="radio"/></p> <p>If NO, continue to question 43</p>
<p>2.3.2.4 <i>Contract Security Classification Specification</i></p>	<p>39. Please provide a list of the companies you further subcontract with:</p>		
<p>2.3.2.4 <i>Contract Security Classification Specification</i></p>	<p>40. How do you ensure security requirements are flowed down in a contractually binding manner?</p>		
<p>2.3.4 <i>Security Management in Contracting</i></p>	<p>41. If your subcontracting company no longer needs personnel security clearances, what actions would you take?</p>		
<p>2.3.4 <i>Security Management in Contracting</i></p>	<p>42. If lower-tier subcontracts have expired, have been terminated and/or a Facility Clearance is no longer necessary, what actions would you take?</p>		



SAFEGUARDS & SECURITY PROGRAMS			
PERSONNEL SECURITY			
PERSONNEL CLEARANCES AND BADGING			
5.3 <i>DOE/SNL- Individual Reporting Requirements</i>	43. Are you aware of the DOE reporting requirements for all applicants and all holders of DOE personnel security clearances? (Refer to the <a href="#">SNL Security Toolcart</a> )	YES <input type="radio"/>	NO <input type="radio"/>
3.3.5 <i>Subcontractor Personnel Reviews</i>	44. Prior to submitting an employee for a DOE security clearance, do you conduct a background review on the clearance applicant?	YES <input type="radio"/>	NO <input type="radio"/>
3.3.5 <i>Subcontractor Personnel Reviews</i>	45. When you conduct background reviews, what elements do you include as part of the review (i.e. Credit checks, etc.)?		
3.3.5 <i>Subcontractor Personnel Reviews</i>	46. Do you maintain a record of the background review on clearance applicants?	YES <input type="radio"/>	NO <input type="radio"/>
3.3.3 <i>Clearance Action FSO Responsibilities</i>	47. Do you maintain personnel clearance information, including name, clearance type and contracts to which the clearance is tied?	YES <input type="radio"/>	NO <input type="radio"/>
3.3. <i>DOE Personnel Security Clearances</i>	48. How do you ensure the number of personnel clearances requested are held to a minimum consistent with contractual requirements?		
3.3. <i>DOE Personnel Security Clearances</i>	49. Is the DOE clearance type (i.e., L or Q) appropriate for each individual as required for performance of the contract?	YES <input type="radio"/>	NO <input type="radio"/>



<p>3.3.3 <i>Clearance Action FSO Responsibilities</i></p>	<p>50. Do you assist in the timely processing of DOE personnel clearances by facilitating the completion of forms, appointments for substance testing, fingerprinting, interviews by investigative agencies, attending required briefings, and other related tasks?</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
<p>3.3.6 <i>Clearance Termination</i></p>	<p>51. When an employee clearance holder or applicant no longer requires a clearance (e.g., due to termination, reassignment, other change), do you ensure completion of the DOE Security Termination Statement (DOE F 5631.29) and its prompt submission to the SNL Clearance Office?</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
<p>3.2.1 <i>Badge Types</i></p>	<p>52. Do employees that work at SNL possess the proper SNL- issued badge needed to perform their job duties?</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
<p>3.2.4 <i>Returning Badges</i></p>	<p>53. Are personnel aware of the requirement to report lost, stolen, or forgotten SNL-issued badges to the SNL Badge Office within required timeframes?</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
<p>3.2.4 <i>Returning Badges</i></p>	<p>54. Are SNL-issued badges retrieved and returned promptly to the SNL Badge Office upon termination, deactivation, clearance suspension or when no longer needed to perform duties?</p>	<p>YES <input type="radio"/></p>	<p>NO <input type="radio"/></p>
<p>3.2.2 <i>Badge Request Process</i></p>	<p>55. In the event of a contract renewal/extension, please describe the actions you take as well as the Sandia Point of Contact(s) work with during the process.</p> <p>Action(s):</p> <p>POC(s):</p>		



<b>CONTROL OF CLASSIFIED VISITS</b>			
<i>3.4.1 SNL Outgoing Classified Visits</i>	56. Are your personnel familiar with the process to request an SNL Outgoing Classified Visit?	YES <input type="radio"/>	NO <input type="radio"/>
<b>FOREIGN VISITS AND ASSIGNMENTS</b>			
<i>3.5 Unclassified Visits and Assignments by Foreign Nationals</i>	57. Are your personnel familiar with the process for Unclassified Visits and Assignments for Foreign Nationals?	YES <input type="radio"/>	NO <input type="radio"/>
<b>SECURITY AWARENESS</b>			
<i>5.2 Classified Information Nondisclosure Agreement</i>	58. Are you familiar with your responsibilities regarding the SF-312, Classified Information Nondisclosure Agreement form?	YES <input type="radio"/>	NO <input type="radio"/>
<b>SAFEGUARDS &amp; SECURITY OPERATIONS</b>			
<b>PHYSICAL SECURITY</b>			
<i>8.1 Security Areas</i>	59. Do your employees ensure they follow all access controls of the limited area? (i.e. Wearing badges at all time, presenting badges, following proper escorting rules, etc.)	YES <input type="radio"/>	NO <input type="radio"/>
<i>8.1 Security Areas</i>	60. Are your employees aware of the escorting rules/responsibilities and allowed ratios?	YES <input type="radio"/>	NO <input type="radio"/>
<b>INFORMATION SECURITY PROGRAMS</b>			
<b>SECURITY INCIDENT MANAGEMENT PROGRAM (SIMP)</b>			
<i>2.2.3 Incident Reporting and Management</i>	61. What is your understanding of an Incident of Security Concern (IOSC)?		



2.2.3 <i>Incident Reporting and Management</i>	62. How do you ensure all employees are aware of their responsibility to report incidents
2.2.3 <i>Incident Reporting and Management</i>	63. What guidance would you provide to your employee if they were involved in a situation that could constitute as an IOSC and were unsure how to proceed?
2.2.3 <i>Incident Reporting and Management</i>	64. If one of your employees was involved in an IOSC, are you notified by your personnel? By SNL management?
7.3 <i>Classified Matter Protection and Control</i>	65. For personnel who work with classified, how do you ensure they have access to all applicable briefings and trainings for the type of classified matter they work with?
7.3 <i>Classified Matter Protection and Control</i>	66. What safeguards and controls (administrative or engineered) do you have in place to ensure your personnel only access classified matter at Sandia or other approved cleared facilities?
7.3 <i>Classified Matter Protection and Control</i>	67. How do you ensure your personnel comply with Sandia's policies for the protection and control of classified matter?
7.3 <i>Classified Matter Protection and Control</i>	68. What local/internal processes do your staff follow if they need to report any issues related to the control or protection of classified matter?
7.3 <i>Classified Matter Protection and Control</i>	69. For personnel who work with classified, what policies, resources, and/or points of contact do they use if they have questions or need more information/clarification?