



NON-POSSESSOR SELF-ASSESSMENT CHECKLIST

COMPANY

DATE

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Department of Energy review required before public release

Name/Org: _____ Date: _____

Guidance (if applicable) _____



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. We also recommend that for each question that applies to your security program, you utilize the space titled Comments to document the actions taken to validate the answer provided. Questions? Contact Contract Security Management at farateam@sandia.gov or (505) 844-5759.

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	1. What is the date on the latest executed Non-Possessor Security Requirements Plan (NPSRP) and who signed it? Date: Signatories:		
1.1 Overview	2. What is your understanding of the purpose of the Non-Possessing Security Requirements Plan?		
1.1 Overview	3. Are you aware of the contractually binding nature of the Non-Possessing Security Requirements Plan? Comments:	YES	NO
1.1 Overview	4. How do you ensure that you are up to date with the most recent version of the 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 <u>classified</u> work?
1.1 Overview	7. Where are you authorized to perform <u>unclassified</u> work?

FACILITY SECURITY OFFICER (FSO)

2.1.1 Program Management and Administration	8. Provide the name of your Facility Security Officer (FSO), their clearance level and the company they work for. FSO: Clearance level: Company:
2.1.1 Program Management and Administration	9. Please provide a brief description of the responsibilities of the FSO:

PROGRAM WIDE SUPPORT

2.2.1 Self-Assessment Program	10. Do you conduct self-assessment activities outside of this periodic security review? Comments:	YES	NO
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If yes, please answer the following questions. If no, please continue to the next section.

	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?

FOREIGN OWNERSHIP, CONTROL OR INFLUENCE (FOCI)

<i>2.3.1 Foreign Ownership, Control or Influence (FOCI)</i>	11. 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>	12. What is the date of your favorable FOCI determination?
<i>2.3.1 Foreign Ownership, Control or Influence (FOCI)</i>	13. What are your responsibilities as Facility Security Officer regarding FOCI?

FOCI REPORTING REQUIREMENTS

<i>SF-328</i>	14. 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? If yes, please provide more detailed information here:	YES	NO
		N/A Company does not issue stock	



<p><i>SF-328</i></p>	<p>15. 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</p>	<p>NO</p>
		<p>N/A Company issues stock</p>	
<p><i>SF-328</i></p>	<p>16. 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</p>	<p>NO</p>
<p><i>SF-328</i></p>	<p>17. 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</p>	<p>NO</p>
<p><i>SF-328</i></p>	<p>18. 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 of your organization?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p>	<p>NO</p>
<p><i>SF-328</i></p>	<p>19. 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</p>	<p>NO</p>



<p>SF-328</p>	<p>20. 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</p>	<p>NO</p>
<p>SF-328</p>	<p>21. 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</p>	<p>NO</p>
<p>SF-328</p>	<p>22. During your last fiscal year, did your organization derive 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</p>	<p>NO</p>
<p>SF-328</p>	<p>23. 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</p>	<p>NO</p>
<p>SF-328</p>	<p>24. 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>	<p>NO</p>



SF-328	<p>25. 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>	YES	NO
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FACILITY APPROVAL AND REGISTRATION OF ACTIVITIES

<p>2.3.2 Facility Approval and Registration of Activities</p>	<p>26. What are the six components that make up your Facility Security Clearance?</p> <ol style="list-style-type: none"> 1. 2. 3. 4. 5. 6.
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<p>2.3.2 Facility Approval and Registration of Activities</p>	<p>27. 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>	YES	NO
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<p>2.3.2.5 DOE Facility Clearance Suspensions</p>	<p>28. Are you aware of the circumstances that may lead to your facility clearance being suspended?</p> <p>Comments:</p>	YES	NO
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KEY MANAGEMENT PERSONNEL (KMP)

2.3.2.1 Key Management Personnel

29. Provide a list of your current Key Management Personnel determined by NNSA to require have a personnel clearance and the level of that clearance:

KMP	Clearance Level

Comments:

FACILITY DATA AND APPROVAL RECORD

2.3.2.3 Facility Data and Approval Record

30. Please provide a brief description of your understanding of the purpose of a Facility Data and Approval Record (FDAR).

2.3.2.3 Facility Data and Approval Record

31. Our team has provided a copy of your Facility Data Approval Record (FDAR). Does all the information on your FDAR match your records?

YES NO

If no, please provide a description of the discrepancies:

CONTRACT SECURITY CLASSIFICATION SPECIFICATION (CSCS)

2.3.2.4 contract security classification specification

32. Please provide a description of your understanding of the purpose of a CSCS form.

FACILITY CLEARANCE REPORTING REQUIREMENTS

<p>2.3.3.2 <i>Reporting Anticipated Changes</i></p>	<p>33. Has your company made any action to terminate business, operations of your subcontractor(s), or any parent companies?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p>	<p>NO</p>
<p>2.3.3.2 <i>Reporting Anticipated Changes</i></p>	<p>34. Is your company looking into entering negotiations for a merger, acquisition, takeover or restructure?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p>	<p>NO</p>
<p>2.3.3.2 <i>Reporting Anticipated Changes</i></p>	<p>35. Has your company taken legal actions to initiate bankruptcy? To include any subcontractor or parent companies?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p>	<p>NO</p>
<p>2.3.3.2 <i>Reporting Anticipated Changes</i></p>	<p>36. Have you had any changes in operating name or address of your company?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p>	<p>NO</p>
<p>2.3.3.3 <i>Reporting Other Changes</i></p>	<p>37. Have you had any changes to your previously submitted list of Key Management Personnel (KMP)?</p> <p>If yes, please provide more detailed information here:</p>	<p>YES</p>	<p>NO</p>
<p>2.3.3.3 <i>Reporting Other Changes</i></p>	<p>38. 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</p>	<p>NO</p>



2.3.3.1 <i>Reporting Significant Changes</i>	39. 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?
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SECURITY MANAGEMENT IN CONTRACTING

2.3.2.4 <i>Contract Security Classification Specification</i>	40. Do you further subcontract with companies that require personnel clearances to perform work on SNL contracts? Comments:	YES	NO
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If yes, please answer the questions below. If no, please continue to the facility clearance reporting requirements section.

2.3.2.4 <i>Contract Security Classification Specification</i>	41. Please provide a list of the companies you further subcontract with:
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2.3.2.4 <i>Contract Security Classification Specification</i>	42. How do you ensure security requirements are flowed down in a contractually binding manner?
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2.3.4 <i>Security Management in Contracting</i>	43. If your subcontracting company no longer needs personnel security clearances, what actions would you take?
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2.3.4 <i>Security Management in Contracting</i>	44. If lower-tier subcontracts have expired, have been terminated and/or a Facility Clearance is no longer necessary, what actions would you take?
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SAFEGUARDS & SECURITY PROGRAMS

PERSONNEL SECURITY

PERSONNEL CLEARANCES AND BADGING

5.3 <i>DOE/SNL- Individual Reporting Requirements</i>	45. Are you aware of the DOE reporting requirements for all applicants and all holders of DOE personnel security clearances? Comments:	YES	NO
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<p>3.3.5 <i>Subcontractor Personnel Reviews</i></p>	<p>46. Prior to submitting an employee for a DOE security clearance, do you conduct a background review on the clearance applicant?</p> <p>Comments:</p>	<p>YES</p>	<p>NO</p>
<p>3.3.5 <i>Subcontractor Personnel Reviews</i></p>	<p>47. When you conduct background reviews, what elements do you include as part of the review (i.e. Credit checks, etc.)?</p>		
<p>3.3.3 <i>Clearance Action FSO Responsibilities</i></p>	<p>48. Do you maintain a record of the background review on clearance applicants?</p> <p>Comments</p>	<p>YES</p>	<p>NO</p>
<p>3.3.3 <i>Clearance Action FSO Responsibilities</i></p>	<p>49. Do you maintain personnel clearance information, including name, clearance type and contracts to which the clearance is tied?</p> <p>Comments</p>	<p>YES</p>	<p>NO</p>
<p>3.3. <i>DOE Personnel Security Clearances</i></p>	<p>50. How do you ensure the number of personnel clearances requested are held to a minimum consistent with contractual requirements?</p>		
<p>3.3. <i>DOE Personnel Security Clearances</i></p>	<p>51. Is the DOE clearance type (i.e., L or Q) appropriate for each individual as required for performance of the contract?</p> <p>Comments</p>	<p>YES</p>	<p>NO</p>



<p>3.3.3 Clearance Action FSO Responsibilities</p>	<p>52. 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>Comments</p>	<p>YES</p>	<p>NO</p>
<p>3.3.6 Clearance Termination</p>	<p>53. Have any of your DOE cleared employees been absent from work for 90-calendar days or more in the past 12 months?</p> <p>If yes, what actions have you taken?</p>	<p>YES</p>	<p>NO</p>
<p>3.3.6 Clearance Termination</p>	<p>54. 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>Comments</p>	<p>YES</p>	<p>NO</p>
<p>3.2.1 Badge Types</p>	<p>55. Do employees that work at SNL possess the proper SNL-issued badge needed to perform their job duties?</p> <p>Comments</p>	<p>YES</p>	<p>NO</p>
	<p>56. 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>Comments</p>	<p>YES</p>	<p>NO</p>



3.2.4 <i>Returning Badges</i>	57. 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? Comments	YES	NO
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3.2.2 <i>Badge Request Process</i>	58. 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. Action(s): POC(s):
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CONTROL OF CLASSIFIED VISITS

3.4.1 <i>SNL Outgoing Classified Visits</i>	59. Have any of your facility's personnel required an SNL Outgoing Classified Visit request? Comments	YES	NO
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3.4.1 <i>SNL Outgoing Classified Visits</i>	60. Are your personnel familiar with the process to request an SNL Outgoing Classified Visit? Comments	YES	NO
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UNCLEARED PERSONAL IDENTITY VERIFICATION (UPIV)

600.ACC <i>Personal Identity Verification for Extended Physical and Cyber Access</i>	61. Do you have personnel who work on SNL contracts who do not require a personnel clearance, but who will require uncleared SNL access for 179 calendar days or longer? If yes, how do you ensure personnel follow UPIV requirements?	YES	NO
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FOREIGN VISITS AND ASSIGNMENTS

3.5 <i>Unclassified Visits and Assignments by Foreign Nationals</i>	62. Does your facility employ foreign nationals or host foreign national visits?	YES	NO
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If yes, please answer the questions below. If no, please continue to the next section.

<p>3.5.1 Onsite SNL Work</p>	<p>a. Do any of your facility's personnel require a Foreign National Request Security Plan (FNR SP) to perform work for or at SNL?</p> <p>If yes, who do you coordinate at SNL to submit and make changes to the FNRSP?</p>	<p>YES</p>	<p>NO</p>
<p>3.5.1 Onsite SNL Work</p>	<p>b. What are the requirements to host or co-host uncleared foreign nationals at SNL?</p>		
<p>3.5.1 Onsite SNL Work</p>	<p>c. What authorizes your personnel to escort uncleared foreign nationals at SNL?</p>		
<p>3.5.1 Onsite SNL Work</p>	<p>d. Do you have any personnel who are authorized to escort uncleared foreign nationals?</p> <p>Comments:</p>	<p>YES</p>	<p>NO</p>
<p>3.5 Unclassified Visits and Assignments by Foreign Nationals</p>	<p>e. What documented procedures do you have in place to ensure that foreign nationals do not access SNL information inadvertently?</p>		
<p>3.5 Unclassified Visits and Assignments by Foreign Nationals</p>	<p>f. How do you ensure all your employees know when a foreign national is at your facility?</p>		
<p>OPERATIONS SECURITY (OPSEC)</p>			
<p>OPSEC Definitions: OPSEC – Process by which we protect critical information whether it is classified or unclassified that can be used against us. Critical information – specific friendly facts (capabilities, activities, limitation, intentions) that an adversary could use to disrupt or harm our mission(s). **Does not have to be classified, could also be proprietary/company information that allows the adversary to pull puzzle pieces together. ***</p>			
<p>7.5 Operations Security</p>	<p>63. How do you ensure your company uses the Operations Security (OPSEC) process to protect SNL classified, sensitive unclassified, proprietary, and/or critical information?</p>		



<p>7.5 Operations Security</p>	<p>64. Have you conducted a threat assessment to understand what information an adversary may want to collect (i.e. Critical Information)?</p> <p>If yes, please describe what your process for conducting a threat assessment was?</p>	<p>YES</p>	<p>NO</p>
<p>7.5 Operations Security</p>	<p>65. Does your company have a way to identify operational vulnerabilities?</p> <p>If yes, what do you do to identify operational vulnerabilities?</p>	<p>YES</p>	<p>NO</p>
<p>7.5 Operations Security</p>	<p>66. Do you have mitigations in place to reduce the risk of the release of information that adversaries may want to collect?</p> <p>Comments</p>	<p>YES</p>	<p>NO</p>
<p>7.5 Operations Security</p>	<p>67. How do you ensure all personnel receives OPSEC training specific to your facility?</p>		
<p>7.5 Operations Security</p>	<p>68. What OPSEC practices have you implemented to reduce inadvertent release of SNL critical information?</p>		
<p>7.5 Operations Security</p>	<p>69. Do you have an understanding of the types of information that an adversary or corporate espionage operative might be interested in, and are the protections in place for that information or material?</p> <p>Comments:</p>	<p>YES</p>	<p>NO</p>
<p>7.5 Operations Security</p>	<p>70. Are you aware of any threats to your Critical Information?</p> <p>If yes, what have you done to mitigate those threats?</p>	<p>YES</p>	<p>NO</p>



7.5 Operations Security	71. Where do personnel working at SNL receive OPSEC training?
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SECURITY AWARENESS

5.1.1 Initial Security Briefing (SEC050), 5.1.2 Comprehensive Security Briefing, 5.1.3 Annual Security Refresher Briefing	72. Are all DOE cleared personnel current on DOE required security briefings (SEC050, Initial Security Briefing, SEC150, Comprehensive Security Briefing, SEC100 Annual Security Refresher Briefing)? Comments:	YES	NO
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7.3 Classified Matter Protection and Control, 7.4.2 Official Use Only Information	73. Are all DOE cleared personnel current on Sandia applicable security trainings (SEC301, Classified Matter Training, SEC303, Classified Marking Training, OOU101, Understanding Official Use Only, SEC180, Vault-Type Room (VTR) Training)? Comments:	YES	NO
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5.2 Classified Information Nondisclosure Agreement	74. Please describe your understanding of your responsibilities for witnessing your DOE cleared personnel's SF-312, Classified Information Nondisclosure Agreement form.
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SAFEGUARDS & SECURITY OPERATIONS

PHYSICAL SECURITY

8.1 Security Areas	75. 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.) Comments:	YES	NO
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8.1 Security Areas	76. Are your employees aware of the escorting rules/responsibilities and allowed ratios? Comments:	YES	NO
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INFORMATION SECURITY PROGRAMS

SECURITY INCIDENT MANAGEMENT PROGRAM (SIMP)

2.2.3 <i>Incident Reporting and Management</i>	77. What is your understanding of an Incident of Security Concern (IOSC)?		
2.2.3 <i>Incident Reporting and Management</i>	78. 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>	79. If one of your employees was involved in an IOSC, are you notified by your personnel? By SNL management?		
5.3 <i>DOE/SNL-Individual Reporting Requirements</i>	80. Are all DOE clearance applicants and holders aware of their responsibility to report potentially relevant information as addressed in the “DOE and Sandia Reporting Requirements” matrix? (Refer to the SNL Security Toolcart) Comments:	YES	NO
2.2.3 <i>Incident Reporting and Management</i>	81. How do you ensure all employees are aware of their responsibility to report incidents of security concern involving SNL/DOE assets or information to the SNL Security Incident Management Program (SIMP)?		

CLASSIFIED MATTER PROTECTION AND CONTROL (CMPC)

7.3 <i>Classified Matter Protection and Control</i>	82. For personnel who work with classified, how do you ensure they receive the required CMPC (SEC301) training?		
7.3 <i>Classified Matter Protection and Control</i>	83. 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?		



<p>7.3 <i>Classified Matter Protection and Control</i></p>	<p>84. What is the highest level of classification your company is approved to process and store?</p> <p>Process:</p> <p>Store:</p>
<p>7.3 <i>Classified Matter Protection and Control</i></p>	<p>85. 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?</p>
<p>7.3 <i>Classified Matter Protection and Control</i></p>	<p>86. When working on classified what resources, points of contact, etc. Does your staff use for assistance?</p>
<p>7.3 <i>Classified Matter Protection and Control</i></p>	<p>87. How do you ensure your personnel comply with Sandia's policies for the protection and control of classified matter?</p>
<p>7.3 <i>Classified Matter Protection and Control</i></p>	<p>88. What local/internal processes do your staff follow if they need to report any issues related to the control or protection of classified matter?</p>
<p>7.3 <i>Classified Matter Protection and Control</i></p>	<p>89. 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?</p>