NON-POSSESSOR SELF-ASSESSMENT CHECKLIST

COMPANY

DATE

Controlled by: Sandia National Laboratories, _____

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.

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?	YES ◯	NO ◯
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 <u>classified</u> work?

FACILITY SECURITY OFFICER (FSO)	
2.1.1 Program Management and Administration	7. 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	8. Please provide a brief description of the responsibilities of the FSO:

PROGRAM WIDE SUPPORT			
2.2.1 Self-Assessment Program	9. Do you conduct self-assessment activities outside of this periodic security review?	YES ◯ **If YES, answer the following questions.**	NO ◯ **If NO, continue to question 10.**
	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)	
2.3.1 Foreign Ownership, Control or Influence (FOCI)	10. Why does DOE review and determine the Foreign Ownership, Control or Influence (FOCI) of your company?
2.3.1 Foreign Ownership, Control or Influence (FOCI)	11. What is the date of your favorable FOCI determination?
2.3.1 Foreign Ownership, Control or Influence (FOCI)	12. What are your responsibilities as Facility Security Officer regarding FOCI?
FOCI REPORTING REQUIREMENTS	

		YES	NO
SF-328	13. 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:	◯	◯
		N/A Company does not issue stock ◯	

SF-328	14. 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? If yes, please provide more detailed information here:	YES ○	NO ○
		N/A Company issues stock ○	
SF-328	15. Does your organization directly, or indirectly through your subsidiaries and/or affiliates, own 10 percent or more of any foreign interest? If yes, please provide more detailed information here:	YES ○	NO ○
SF-328	16. 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? If yes, please provide more detailed information here:	YES ○	NO ○
SF-328	17. 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? If yes, please provide more detailed information here:	YES ○	NO ○
SF-328	18. Does your organization have any contracts, agreements, understandings, or arrangements with a foreign person(s)? If yes, please provide more detailed information here:	YES ○	NO ○

SF-328	19. Does your organization, whether as a borrower, surety, guarantor or otherwise have any indebtedness, liabilities or obligations to a foreign person(s)? If yes, please provide more detailed information here:	YES ○	NO ○
SF-328	20. 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? If yes, please provide more detailed information here:	YES ○	NO ○
SF-328	21. During your last fiscal year, is the aggregate 30 percent or more of its revenues or net income from foreign persons? If yes, please provide more detailed information here:	YES ○	NO ○
SF-328	22. 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? If yes, please provide more detailed information here:	YES ○	NO ○
SF-328	23. 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)? If yes, please provide more detailed information here:	YES ○	NO ○

SF-328	24. 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? If yes, please provide more detailed information here:	YES ⃝	NO ⃝
FACILITY APPROVAL AND REGISTRATION OF ACTIVITIES			
2.3.2 Facility Approval and Registration of Activities	25. What are the six components that make up your Facility Security Clearance? 1. 2. 3. 4. 5. 6.		
2.3.2 Facility Approval and Registration of Activities	26. Have you ever used your facility clearance as a way to advertise or promote your business? If yes, please provide more detailed information here:	YES ⃝	NO ⃝
2.3.2.5 DOE Facility Clearance Suspensions	27. Are you aware of the circumstances that may lead to your facility clearance being suspended?	YES ⃝	NO ⃝

KEY MANAGEMENT PERSONNEL (KMP)		
2.3.2.1 Key Management Personnel	28. 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

If applicable, provide details on any upcoming/in-progress KMP changes:

FACILITY DATA AND APPROVAL RECORD			
2.3.2.3 Facility Data and Approval Record	29. 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	30. Our team has provided a copy of your Facility Data Approval Record (FDAR). Does all the information on your FDAR match your records? If no, please provide a description of the discrepancies:	YES ◯	NO ◯

CONTRACT SECURITY CLASSIFICATION SPECIFICATION (CSCS)	
2.3.2.4 Contract Security Classification Specification	31. Please provide a description of your understanding of the purpose of a CSCS form.

	FACILITY CLEARANCE REPORTING REQUIREMENTS		
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 ⭘	NO ⭘
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 ⭘	NO ⭘
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 ⭘	NO ⭘
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 ⭘	NO ⭘
2.3.3.3 Reporting Other Changes	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? If yes, please provide more detailed information here:	YES ⭘	NO ⭘
2.3.3.1 Reporting Significant Changes	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?		

SECURITY MANAGEMENT IN CONTRACTING

		YES	NO
2.3.2.4 Contract Security Classification Specification	38. Do you further subcontract with companies that require personnel clearances to perform work on SNL contracts?	◯ **If YES, answer questions below**	◯ **If NO, continue to question 43**
2.3.2.4 Contract Security Classification Specification	39. Please provide a list of the companies you further subcontract with:		
2.3.2.4 Contract Security Classification Specification	40. How do you ensure security requirements are flowed down in a contractually binding manner?		
2.3.4 Security Management in Contracting	41. If your subcontracting company no longer needs personnel security clearances, what actions would you take?		
2.3.4 Security Management in Contracting	42. If lower-tier subcontracts have expired, have been terminated and/or a Facility Clearance is no longer necessary, what actions would you take?		

SAFEGUARDS & SECURITY PROGRAMS
PERSONNEL SECURITY
PERSONNEL CLEARANCES AND BADGING

		YES	NO
5.3 DOE/SNL-Individual Reporting Requirements	43. Are you aware of the DOE reporting requirements for all applicants and all holders of DOE personnel security clearances?	◯	◯

3.3.5 Subcontractor Personnel Reviews	44. Prior to submitting an employee for a DOE security clearance, do you conduct a background review on the clearance applicant?	YES ○	NO ○
3.3.5 Subcontractor Personnel Reviews	45. When you conduct background reviews, what elements do you include as part of the review (i.e. Credit checks, etc.)?		
3.3.3 Clearance Action FSO Responsibilities	46. Do you maintain a record of the background review on clearance applicants?	YES ○	NO ○
3.3.3 Clearance Action FSO Responsibilities	47. Do you maintain personnel clearance information, including name, clearance type and contracts to which the clearance is tied?	YES ○	NO ○
3.3. DOE Personnel Security Clearances	48. How do you ensure the number of personnel clearances requested are held to a minimum consistent with contractual requirements?		
3.3. DOE Personnel Security Clearances	49. Is the DOE clearance type (i.e., L or Q) appropriate for each individual as required for performance of the contract?	YES ○	NO ○

		YES	NO
3.3.3 Clearance Action FSO Responsibilities	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?	○	○
3.3.6 Clearance Termination	51. Have any of your DOE cleared employees been absent from work for 90-calendar days or more in the past 12 months? If yes, what actions have you taken?	○	○
3.3.6 Clearance Termination	52. 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?	○	○
3.2.1 Badge Types	53. Do employees that work at SNL possess the proper SNL-issued badge needed to perform their job duties?	○	○
3.2.4 Returning Badges	54. Are personnel aware of the requirement to report lost, stolen, or forgotten SNL-issued badges to the SNL Badge Office within required timeframes?	○	○

3.2.4 Returning Badges	55. 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?	YES ○	NO ○
3.2.2 Badge Request Process	56. 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):		
CONTROL OF CLASSIFIED VISITS			
3.4.1 SNL Outgoing Classified Visits	57. Are your personnel familiar with the process to request an SNL Outgoing Classified Visit?	YES ○	NO ○
FOREIGN VISITS AND ASSIGNMENTS			
3.5 Unclassified Visits and Assignments by Foreign Nationals	58. Are your personnel familiar with the process for Unclassified Visits and Assignments for Foreign Nationals?	YES ○	NO ○

OPERATIONS SECURITY (OPSEC)
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. ***** *****KEEP ANSWERS UNCLASSIFIED*****

7.5 Operations Security	59. How do you ensure your company uses the Operations Security (OPSEC) process to protect SNL classified, sensitive unclassified, proprietary, and/or critical information?

7.5 Operations Security	60. Have you conducted a threat assessment to understand what information an adversary may want to collect (i.e. Critical Information)? If yes, please describe what your process for conducting a threat assessment was?	YES ◯	NO ◯
7.5 Operations Security	61. Does your company have a way to identify operational vulnerabilities? If yes, what do you do to identify operational vulnerabilities?	YES ◯	NO ◯
7.5 Operations Security	62. Do you have mitigations in place to reduce the risk of the release of information that adversaries may want to collect?	YES ◯	NO ◯
7.5 Operations Security	63. How do you ensure all personnel receives OPSEC training specific to your facility?		
7.5 Operations Security	64. What OPSEC practices have you implemented to reduce inadvertent release of SNL critical information?		
7.5 Operations Security	65. 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?	YES ◯	NO ◯
7.5 Operations Security	66. Are you aware of any threats to your Critical Information? If yes, what have you done to mitigate those threats?	YES ◯	NO ◯

SECURITY AWARENESS

5.2 Classified Information Nondisclosure Agreement	67. What are your responsibilities regarding the SF-312, Classified Information Nondisclosure Agreement form?

SAFEGUARDS & SECURITY OPERATIONS
PHYSICAL SECURITY

		YES	NO
8.1 Security Areas	68. 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.)	○	○
8.1 Security Areas	69. Are your employees aware of the escorting rules/responsibilities and allowed ratios?	YES ○	NO ○

INFORMATION SECURITY PROGRAMS
SECURITY INCIDENT MANAGEMENT PROGRAM (SIMP)

2.2.3 Incident Reporting and Management	70. What is your understanding of an Incident of Security Concern (IOSC)?		
2.2.3 Incident Reporting and Management	71. 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)?		
2.2.3 Incident Reporting and Management	72. 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 Incident Reporting and Management	73. If one of your employees was involved in an IOSC, are you notified by your personnel? By SNL management?		
5.3 DOE/SNL-Individual Reporting Requirements	74. Are all DOE clearance applicants and holders aware of their DOE and Sandia Reporting Requirements? (Refer to the SNL Security Toolcart)	YES ○	NO ○

CLASSIFIED MATTER PROTECTION AND CONTROL (CMPC)	
7.3 Classified Matter Protection and Contro	75. 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 Classified Matter Protection and Control	76. What is the level of classification for your company's facility clearance? **Level/Category:**
7.3 Classified Matter Protection and Control	77. 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 Classified Matter Protection and Control	78. How do you ensure your personnel comply with Sandia's policies for the protection and control of classified matter?
7.3 Classified Matter Protection and Control	79. 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 Classified Matter Protection and Control	80. 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?