



# Personnel Security

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# Why Personnel Security is Necessary at Biomedical/Bioresearch Facilities

- An individual with authorized access (an “insider”) and malevolent intent (posing a “threat”) could, without raising suspicion, divert a microscopic amount of an HCPT from a bioresearch/biomedical facility
- The unique nature of biological materials makes the insider threat of particular concern to the biomedical and microbiological research community





# Achieving Personnel Security

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- **Elements of personnel security program include:**
  - **Personnel Suitability Program**
  - **Badges**
  - **Visitor Control / Escorting**
  - **New Employee Orientation**
  - **Employee Termination Procedures**



# Personnel Suitability Program

- **Personnel Suitability – an individual is likely or not likely to carry out the duties of his/her position with appropriate integrity, efficiency, and effectiveness, and if necessary, in the national interest, based upon character traits and past conduct**
  - Review and verify information
  - If appropriate, conduct a background investigation
  - Make a suitability determination
- **Conduct personnel security training and awareness activities regarding individual obligations and responsibilities**
- **Maintain personnel security file**





# Position Risk

- **Each position within the facility should be assigned a position risk (High, Moderate or Low):**



- **High Risk**

- Those positions with the potential to have an exceptionally serious negative impact on the integrity and efficiency of the organization

- **Moderate Risk**

- Those positions with the potential to have a moderate to serious negative impact on the integrity and efficiency of the organization

- **Low Risk**

- Those positions with the potential to have a limited negative impact on the integrity and efficiency of the organization



# Background Investigations

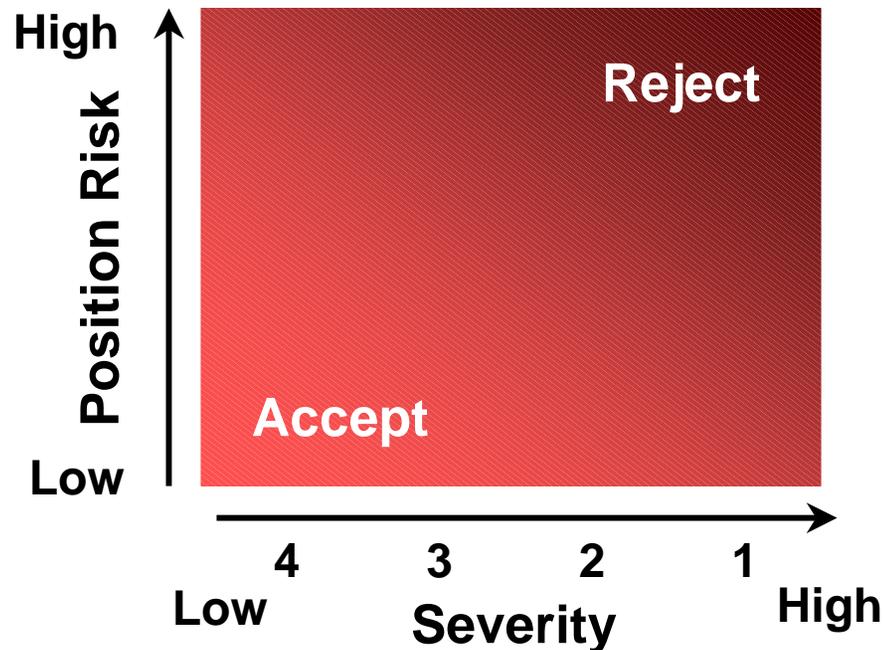
- **The level of background investigation should be commensurate with the position risk**
- **Background investigation elements may include any or all of the following:**
  - **Criminal history checks**
  - **Education verification**
  - **Employment verification**
  - **Credit history**
  - **Medical records (psychological, drug, and alcohol)**
  - **Nationality verification**
  - **Military records**
  - **Driving records and license verification**
  - **International terrorism affiliations**
- **Periodic follow-up investigations may be appropriate**





# Suitability Issues

- The issues that arise during the applicant screening process will have different degrees of significance in how they reflect on an individual's character and associated impact to security





# Adjudication Example

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- **Subject applies for position of security guard**
- **On the background investigation questionnaire, the subject indicates that he has left a job as a police officer under unfavorable circumstances – explains that he resigned because of “family problems due to divorce”**
- **During his background investigation interview the subject states that while working part-time he committed an act of violence against his ex-wife’s boyfriend. The police report submitted by his ex-wife states that he also threatened her boyfriend with a gun. Subject states he decided to resign following this incident and provides a letter of resignation. The police department chief states the subject was fired.**
- **The adjudication was unfavorable based upon:**
  - **Termination from employment for conduct unbecoming an officer (employment related misconduct)**
  - **Domestic violence incident (criminal conduct)**
  - **False statement regarding reason for leaving police department (dishonesty or fraud in background investigation documentation)**



# Security Violations

- **An individual may put his/her favorable adjudication status at risk by violating an organization's security policies.**
- **Security violations should be ranked based on the magnitude of impact to the organization**
  - **The greater the impact, the more influence the violation should have on the individual's ability to maintain a favorable adjudication status.**

Hear ye, hear ye – I am here to tell you that Organization ABC keeps large quantities of HCPTs in Building 1, Room 123, Freezer A.





# Warning Signs

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- **Some common personal problems can turn into security issues if left unaddressed**
- **Supervisors should watch for warning signs in their employees and make efforts to help resolve them**
- **Employee assistance programs may be appropriate**





# Personnel Security Files

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- **Maintain records of:**
  - **Employment application**
  - **All initial and follow-up background investigation information**
  - **Suitability adjudication documentation**
  - **Security violations**
  - **Disciplinary actions**
  - **Any grievance against the individual and subsequent resolution**
  - **Security training records**
- **Personnel security files should be protected**



# Badges

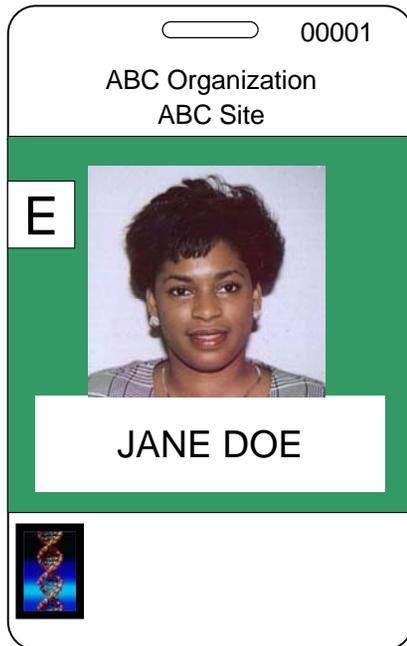
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- **Badges should be issued to those individuals authorized to be on-site and include an indication of the level of authorized access**
- **Employees**
  - **Issue permanent employee badge**
- **Visitors**
  - **Check**
    - **ID**
    - **Visit is expected**
  - **Issue temporary visitor badge**
- **Badge return**
  - **Upon employee termination**
  - **Daily or at the conclusion of a limited term for visitors**
- **Report lost or stolen badges**



# Example Standard Badges

Cleared Employee  
Exclusion Areas



Cleared Contractor  
Limited Areas



Uncleared Employee





# Example Visitor Badges

## Cleared Visitor Exclusion Areas

00004

ABC Organization  
ABC Site

**E**



JANE DOE



IS: 02/01/04  
EX: 02/05/04

VISITOR

## Cleared Visitor Limited Areas

00005

ABC Organization  
ABC Site

**L**



JANE DOE



IS: 02/01/03  
EX: 01/31/04

VISITOR

## Uncleared Visitor

00006

ABC Organization  
ABC Site



JANE DOE



IS: 02/25/04  
EX: 02/28/04

VISITOR

## Uncleared Visitor Building Badge

00007

ABC Organization  
ABC Site

**Building  
Badge**

123



VISITOR



# Visitor Control

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- **Host obtains approval for the visit**
- **Host informs appropriate site personnel of authorized visitor's arrival**
- **Host informs visitor of any prohibited articles such as:**
  - **Firearms**
  - **Illegal drugs (or any other illegal item)**
  - **Electronic recording devices (in particularly sensitive areas)**
- **Host escorts or ensures appropriate escort (accompaniment by an authorized individual) is provided**



# New Employee Orientation

- **Complete all required background investigation forms, safety training, security training and immunizations as applicable for work environment**
- **Requirements complete prior to permanent badge issuance**
  - **Temporary badge, with appropriate access limitations, may be issued until all requirements are met**





# Employee Termination Procedures

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- **Retrieve property**
  - **Badge**
  - **Keys**
  - **Computer**
  - **Cellular phone**
- **Deactivate computer and electronic access accounts**
- **Employee transfer**
  - **Update access authorizations**
- **Unfriendly termination**
  - **Minimize possibility of violence or workplace disruption**



# Summary

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- **Protecting HCPTs by actively screening and monitoring those working with these materials is one of the most effective means of preventing proliferation of dangerous biological materials**
- **Background investigations, proper identification, visitor control, employee assistance programs, and employee security processing activities are all components of an integrated personnel security program**