

DEPARTMENT OF THE ARMY

US ARMY MEDICAL RESEARCH AND MATERIEL COMMAND 504 SCOTT STREET FORT DETRICK MD 21702-5014

MCMR-AAP-A 22 August 2012

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

1. <u>PURPOSE</u>. The purpose of this memorandum is to establish policy and guidance for the integration of effective AT and OPSEC measures, when required, in the planning and execution of contracts.

2. <u>REFERENCES</u>.

- a. FAR 52.204-2, Security Requirements.
- b. DFARS Subpart 225.74, Defense Contractors Outside the United States.
- c. DFARS PGI 207.105(b)(2)(D), Contents of Written Acquisition Plans CONUS Antiterrorism Considerations.
- d. ALARACT Message 015/2012, Use of an Antiterrorism/Operations Security (AT/OPSEC) In Contracting Cover Sheet for Integrating AT/OPSEC, 15 January 2012.
- e. Integrating Antiterrorism and Operations Security Into the Contract Support Process Desk Reference, 25 January 2012.
 - f. Army Regulation (AR) 525-13, Antiterrorism, 11 September 2008.
- g. Department of Defense Instruction (DoDI) 2000.16, DoD Antiterrorism Standards, 20 October 2006.
 - h. AR 530-1, Operations Security (OPSEC), 19 April 2007.

*This PAN supersedes USAMRMC PAN 12-02, 3 April 2012, Subject: Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

3. BACKGROUND.

- a. Terrorism is the use of violence and threats to intimidate or coerce, especially for political purposes. The risk of terrorists exploiting or targeting Army contracts is real. Terrorist activity has the potential to impact all Army contracts, particularly services, supplies, and construction contracts, at both continental Unites States and outside the continental United States locations.
- b. The Army program to prevent terrorist attacks is called AT. The integration of antiterrorism measures into contract planning and execution addresses potential risks to contractors and the capabilities contractors bring to the force. Antiterrorism and contracting integration measures ensure Army personnel and assets are protected from terrorist threats. When informed about the ways and means to integrate antiterrorism, the Army-community is postured to execute contracts and mitigate the risk of terrorist acts.
- 4. <u>APPLICABILITY</u>. The procedures contained in this memorandum apply to all Army organizations submitting requests to the U.S. Army Medical Research Acquisition Activity (USAMRAA) for supplies with an anticipated contracted value exceeding the simplified acquisition threshold (\$150,000) as well as services and construction, regardless of dollar value. Exceptions are field ordering officer actions and Government Commercial Purchase Card purchases.

5. GENERAL.

- a. The Desk Reference titled "Integrating Antiterrorism and Operations Security Into the Contract Support Process" (Desk Reference) and the Contract Requirements Package Antiterrorism/Operations Security Review Cover Sheet (Cover Sheet) provide a means to integrate effective AT and OPSEC measures into the requirements package.
- b. The Cover Sheet appears as Appendix A to this document and pertinent parts of the Desk Reference appear as Appendices B D. These products are available for downloading from the Office of the Provost Marshal General Army AT Enterprise Portal on AKO at https://www.us.army.mil/suite/page/605757.
- c. The purpose of the Cover Sheet is to document the review of the requirements package performance work statement (PWS), the quality assurance surveillance plan (QASP) when required, and applicable source selection evaluation criteria for AT and

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

OPSEC considerations as well as other related protection matters such as information assurance, physical security, law enforcement, intelligence, and foreign disclosure.

- d. Effective 01 July 2012, Contracting Officers shall not accept a requirements package unless it includes a completed cover sheet signed by a Level II Certified Antiterrorism Officer (ATO) and a Level II Certified OPSEC Officer. Training requirements to become ATO Level II certified are found at AR 525-13, Chapter 5, Paragraph 5-27. Training requirements to become OPSEC Officer Level II certified are found at AR-530-1, Chapter 4, Paragraph 4-2.b.
- e. The purpose of the Desk Reference is to furnish tactics, techniques, and procedures to assist the unit ATO and the OPSEC Officer with incorporating AT and OPSEC measures into requirements packages. Specifically, the decisions made by contemplating the Desk Reference leads to the completion of the Cover Sheet.
- f. Army Regulation 525-13, Antiterrorism, directs that every Army organization of battalion or equivalent size appoint an ATO. If a requiring activity does not have an ATO, the first ATO in the chain of command will review the requirement for AT considerations. The ATO must sign the Cover Sheet.
- g. OPSEC Officer signature of the Cover Sheet is also mandatory. The ATO is the lead integrator responsible to ensure AT and OPSEC related measures are considered in this process. The OPSEC officer and other security related staff officers assist in the process.
- h. Contracting personnel are required, when applicable, to incorporate appropriate contract language that is contained in the Cover Sheet in their respective contract documents.

6. PROCEDURES.

- a. Appendix A, the Cover Sheet, contains three Sections.
- (1) Section I explains the purpose of the Cover Sheet, informs of the Army policy requirement for inclusion of the Cover Sheet in specific requirements packages, and discusses the need for mandatory review and signature of the Cover Sheet.
- (2) Section II, page 1, provides the ATO and OPSEC Officer with a list of twelve AT/OPSEC measures for possible inclusion in the requirements package and subsequent solicitation/contract. Using standard solicitation provisions and contract

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

clauses furnished in Section II, page 2, the ATO and OPSEC Officer must indicate by check mark in Section II, page 1 if the standard provisions and clauses language suffices for each applicable measure. If not, additional language must be included in the PWS.

- (3) Section III affords the ATO and OPSEC Officer to enter specific remarks and contains the requirement for their signatures.
- b. Appendix B is a table from the Desk Reference titled "Office of Primary Responsibility (OPR) Major Tasks. This table provides a sequential step-by-step process for consideration of AT and OPSEC measures. It advises the ATO, the OPSEC Officer, other staff officer leads, the Contracting Officer, and the Contracting Officer's Representative with specific directions concerning requirements package development, solicitation/contract formation, and post award contract administration.
- c. Appendix C is a matrix from the Desk Reference titled "Sample -- Quality Assurance Surveillance Antiterrorism/Operations Security Elements". The matrix provides examples of AT/OPSEC related QASP elements and assists with the incorporation of selected elements in the QASP.
- d. Appendix D from the Desk Reference is titled the "Risk Assessment Process". It is a risk analysis and assessment checklist intended to aid the requiring activity staff analyze the PWS, the QASP, the supply purchase description, and the evaluation criteria for AT/OPSEC matters.

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

APPENDIX A

1. AT Level 1 training (general) 2. AT awareness training for U.Sbased contractor personnel traveling overseas 3. Access and general protection policy and procedures 4. IWATCH training 5. Access to government information systems 6. OPSEC SOP/Plan requirements 7. Requirement for OPSEC training 8. Information assurance/information technology training 9. Information assurance/information technology training training termination technology training termi		orism/Operations Sec	urity	Revie	ew C	over	She	et
contract or clause language found on page 2 of this form is sufficient to meet specific contract requirements, check ryss* in the block below and include this language in the PWS. If standard contractal set (provisions and clauses) or clause language does not apply, check "no." If the standard PWS language applies, but is not in and of itself sufficient, check "yes" and "PWS" and include both the standard language and additional contract-specific language in the PWS. If standard contractal text or clause language is not desired, but there is related contract-specific language in the PWS. check "no." and "PWS." 1. AT Level 1 training (general) 2. AT awareness training for U.Sbased contractor personnel traveling overseas 3. Access and general protection policy and procedures 4. IWATCH training 5. Access to government information systems 6. OPSEC SOP/Plan requirements 6. OPSEC SOP/Plan requirements 7. Requirement for OPSEC training 8. Information assurance/information technology training certification 9. Information assurance/information technology training certification 10. Yes	Purpose of cover sheet: To document the review of the requirements plan, and any applicable source selection evaluation criteria for antiterm AT, operational security (OPSEC), information assurance (IA), physical se Army policy requirement: A signed AT/OPSEC cover sheet is require under the simplified acquisition level threshold, field ordering officer active require this form for supply contracts under the simplified acquisition level Mandatory review and signatures: The organizational antiterrorism to supporting contracting activity to include coordination with other staff	orism (AT) and other related prote- scurity, law enforcement, intelliger at to be included in all requireme ons, and Government purchase of a threshold. a officer (ATO) must review each r review as appropriate per section	ction made, and nts pactard purequirer	atters to d foreig kages e chases. nents pa w. If the	includ n disclo xcept fo Comm ackage requiri	e, but no osure. or supply nand po prior to ng activi	ot limit y contr olicy ma submi ity doe	ed to: acts ay ssion s not
2. AT awareness training for U.Sbased contractor personnel traveling overseas Yes	contract or clause language found on page 2 of this form is sufficient to and include this language in the PWS. If standard contractal text (provisic standard PWS language applies, but is not in and of itself sufficient, check	meet specific contract request recons and clauses) or clause languack "yes" and "PWS" and include to	quirements age does both the	nts, che es not ap e standa	ck "yes oply, ch rd lang	" in the leck "no luage a	block b." If the nd add	below e litional
3. Access and general protection policy and procedures	AT Level 1 training (general)			Yes		No		PWS
4. iWATCH training	2. AT awareness training for U.Sbased contractor personnel traveling	overseas		Yes		No		PWS
5. Access to government information systems	Access and general protection policy and procedures			Yes		No		PWS
6. OPSEC SOP/Plan requirements	4. iWATCH training			Yes		No		PWS
7. Requirement for OPSEC training	Access to government information systems			Yes		No		PWS
8. Information assurance/information technology training 9. Information assurance/information technology training certification 10. Contractor Authorized to Accompany the Force 11. Contract requiring performance or delivery in a foreign country 12. Handling / access to classified information 13. Antiterrorism Review Signature: I am ATO level II certified and have reviewed the requirements package and understand my responsibilities IAW Army Regulation 525-13. Antiterrorism. Reviewer Typed or printed name, rank or civilian grade Signature Operations Security Review Signature: I am OPSEC level II certified and have reviewed the requirements package and it is in compliance with Army Regulation 530-1. Operations Security. Date Typed or printed name, rank or civilian grade Phone number	OPSEC SOP/Plan requirements			Yes		No		PWS
9. Information assurance/information technology training certification	7. Requirement for OPSEC training			Yes		No		PWS
10. Contractor Authorized to Accompany the Force	Information assurance/information technology training			Yes		No		PWS
11. Contract requiring performance or delivery in a foreign counity 12. Handling / access to classified information 13. Ves	9. Information assurance/information technology training certification			Yes		No		PWS
12. Handling / access to classified information	10. Contractor Authorized to Accompany the Force			Yes		No		PWS
Antiterrorism Review Signature: I am ATO level II certified and have reviewed the requirements package and understand my responsibilities IAW Army Regulation 525-13, Antiterrorism. Reviewer Typed or printed name, rank or civilian grade Signature Signature: I am OPSEC level II certified and have reviewed the requirements package and it is in compliance with Army Regulation 530-1, Operations Security. Reviewer Typed or printed name, rank or civilian grade Typed or printed name, rank or civilian grade Phone number Date Phone number	11. Contract requiring performance or delivery in a foreign country			Yes		No		PWS
Antiterrorism Review Signature: I am ATO level II certified and have reviewed the requirements package and understand my responsibilities IAW Army Regulation 525-13, Antiterrorism. Reviewer Typed or printed name, rank or civilian grade Signature Operations Security Review Signature: I am OPSEC level II certified and have reviewed the requirements package and it is in compliance with Army Regulation 530-1, Operations Security. Date Typed or printed name, rank or civilian grade Typed or printed name, rank or civilian grade Phone number	12. Handling / access to classified information			Yes		No		PWS
with Army Regulation 530-1, Operations Security. Reviewer Typed or printed name, rank or civilian grade Phone number	responsibilities IAW Army Regulation 525-13, Antiterrorism. Reviewer	Date	ackage	e and u	ndersta	and my		
Signature	Signature	and and branch has been decided the conservation	rement	s packa	nge and	d it is in	comp	liance
	Operations Security Review Signature: I am OPSEC level II certification with Army Regulation 530-1, Operations Security. Reviewer Typed or printed name, rank or civilian grade	Date						

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

APPENDIX A

Section II. Standard Contract Provision and Clause Text Applicability and/or Additional PWS Language.

- 1. AT Level I Training. This provision/contract text is for contractor employees with an area of performance within an Army-controlled installation, facility, or area. All contractor employees, including subcontractor employees, requiring access to Army installations, facilities, or controlled access areas shall complete AT Level I awareness training within [XX]** calendar days after contract start date or effective date of incorporation of this requirement into the contract, whichever applies. The contractor shall submit certificates of completion for each affected contractor employee and subcontractor employee to the COR (or to the contracting officer, if a COR is not assigned) within [XX]*** calendar days after completion of training by all employees and subcontractor personnel. AT Level I awareness training is available at https://atlevel1.dtic.mil/at.
- 2. AT Awareness Training for Contractor Personnel Traveling Overseas. This standard language requires U.S.-based contractor employees and associated subcontractor employees to make available and to receive government-provided AT awareness training specific to the area of responsibility (AOR) as directed by AR 525-13. Specific AOR training content is directed by the combatant commander, with the unit ATO being the local point of contact.
- 3. Access and General Protection/Security Policy and Procedures. This standard language is for contractor employees with an area of performance within an Army-controlled installation, facility, or area. The contractor and all associated subcontractors' employees shall compty with applicable installation, facility, and area commander installation and facility access and local security policies and procedures (provided by the Government representative). The contractor shall also provide all information required for background checks to meet installation access requirements to be accomplished by the installation Provost Marshal Office, Director of Emergency Services, or Security Office. The contractor workforce must comply with all personal identity verification requirements as directed by DoD, HQDA, and/or local policy. In addition to the changes otherwise authorized by the changes clause of this contract, should the Force Protection Condition (FPCON) at any individual facility or installation change, the Government may require changes in contractor security matters or processes.
- 4. IWATCH Training. This standard language is for contractor employees with an area of performance within an Army-controlled installation, facility, or area. The contractor and all associated subcontractors shall brief all employees on the local IWATCH program (training standards provided by the requiring activity ATCI). This locally developed training will be used to inform employees of the types of behavior to watch for and instruct employees to report suspicious activity to the COR. This training shall be completed within [XX]*** calendar days of contract award and within [YY]*** calendar days of new employees' commencing performance, with the results reported to the COR no later than [XX]*** calendar days after contract award.
- 5. Contractor Employees Who Require Access to Government Information Systems. All contractor employees with access to a government information system must be registered in the ATCTS (Army Training Certification Tracking System) at commencement of services and must successfully complete the DoD Information Assurance Awareness training prior to access to the information system and then annually thereafter
- 6. For Contracts That Require an OPSEC Standing Operating Procedure/Plan. The contractor shall develop an OPSEC Standing Operating Procedure (SOP)/Plan within 90 calendar days of contract award, to be reviewed and approved by the responsible Government OPSEC officer, per AR 530-1, Operations Security. This SOP/Plan will specify the government's critical information, why it needs to be protected, where it is located, who is responsible for it, and how to protect it. In addition, the contractor shall identify an individual who will be an OPSEC Coordinator. The contractor will ensure that this individual becomes OPSEC Level II certified per AR 630-1.
- 7. For Contracts That Require OPSEC Training. Per AR 530-1, Operations Security, new contractor employees must complete Level I OPSEC training within 30 calendar days of reporting for duty. All contractor employees must complete annual OPSEC awareness training.
- 8. For Information Assurance (IA)/Information Technology (IT) Training. All contractor employees and associated subcontractor employees must complete the DoD IA awareness training before issuance of network access and annually thereafter. All contractor employees working IA/IT functions must comply with DoD and Army training requirements in DoDD 8570.01, DoD 8570.01-IM, and AR 25-2 within six months of employment.
- 9. For Information Assurance (IA)/Information Technology (IT) Certification. Per DoD 8570.01-M, DFARS 252.239.7001, and AR 25-2, the contractor employees' supporting IA/IT functions shall be appropriately certified upon contract award. The baseline certification as stipulated in DoD 8570.01-M must be completed upon contract award.
- 10. For Contractors Authorized to Accompany the Force. DFAFS Clause 252.225-7040, Contractor Personnel Authorized to Accompany U.S. Armed Forces Deployed Outside the United States. The clause shall be used in solicitations and contracts that authorize contractor personnel to accompany U.S. Armed Forces deployed outside the United States in contingency operations, humanitarian or peacekeeping operations, or other military operations or exercises, when designated by the combatant commander. The clause discusses the following AT/OPSEC-related topics: required compliance with laws and regulations, pre-deployment requirements, required training (per combatant command guidance), and personnel data required.
- 11. For Contract Requiring Performance or Delivery in a Foreign Country. DFARS Clause 252.225-7043, Antiterrorism/Force Protection for Defense Contractors Outside the United States. The clause shall be used in solicitations and contracts that require performance or delivery in a foreign country. This clause applies to both contingencies and non-contingency support. The key AT requirement is for nonlocal national contractor personnel to comply with theater clearance requirements and allows the combatant commander to exercise oversight to ensure the contractor's compliance with combatant commander and subordinate task force commander policies and directives.
- 12. For Contracts That Require Handling or Access to Classified Information. The contractor shall comply with FAR 52.204-2, Security Requirements. This clause involves access to information classified "Confidential," "Secret," or "Top Secret" and requires contractors to comply with (1) the Security Agreement (DD Form 441), including the National Industrial Security Program Operating Manual (DoD 5220.22-M), and (2) any revisions to DoD 5220.22-M, notice of which has been furnished to the contractor.

[&]quot; [XX] and [YY] are fields to be filled in when finalizing the PWS

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

APPENDIX B

Phase	Step	Office of Primary Responsibility (OPR): Major Tasks
Initial Planning	1. Determine initial requirements	 Requiring activity commander and staff In coordination with appropriate staff subject matter experts, determine support requirements based on the military decision-making process or another planning process Determine specific requirements that cannot be provided by organic or other noncommercial means Conduct an initial risk assessment to determine whether the commercial-sector support is appropriate Determine current and potential future threat assessment levels' effect on contract performance Develop an OPSEC critical information list ATO, OPSEC and personnel who possess the 3C ASI Integrate current AT/OPSEC and operational contract support and related HQDA, and local command policy and procedures (for example, AR 525-13, ATTP 4-10, ALARACT messages 110/2011) into routine staff planning
ent	2. Develop requirements package	 Requiring activity 3C staff officer, noncommissioned officer (NCO), or staff equivalent Comply with applicable command guidance for requirements development Develop requirements package to include draft PWS or purchase description, draft QASP, and other documents as required by local policy or type of support required (for example, service or supply request) Obtain funding and approval for the requirements package Ensure nomination of properly trained and technically qualified contracting officer representatives (CORs) Consider including Contracting Specialist assistance when drafting the PWS—would potentially yield a better package submitted to a Contracting Officer
Requirements Development	3. Perform AT/OPSEC- related risk analysis	 Requiring activity 3C staff officer, NCO, or staff equivalent Obtain proper unit or organization ATO review as required by HQDA and local command policy Work with appropriate staff to develop other support alternatives if risk of contract support is deemed unacceptable for this service ATO Review the draft PWS (for service contracts) and item description or product description in the purchase request (for supply contracts), QASP (for services contracts), and any evaluation factors to determine whether current protection measures, installation or facility access, contractor verification, and physical security procedures are sufficient to mitigate identified AT risks Determine whether contract AT/OPSEC language or clauses are applicable and, if so, whether they are sufficient without additional PWS and QASP elements Coordinate a draft requirements package with other protection function staff members as appropriate for additional risk analysis OPSEC officer Ensure review of the requirements package for OPSEC matters by an OPSEC level II–certified individual

7

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

APPENDIX B

Phase	Step	Office of Primary Responsibility (OPR): Major Tasks
Requirements Development	4. Finalize AT/OPSEC- related measures in the requirements package (or contract modification requests) and adjust installation or facility and contract service performance site security measures (as required)	 Requiring activity 3C staff officer, NCO, or staff equivalent, the ATO, and as necessary other AT/protection staff Include any work site-specific AT-related requirements in the PWS, QASP, and solicitation evaluation criteria as appropriate Stipulate applicability of the standard contract language or clause on the AT/OPSEC cover sheet Include DD Form 254 if the contract is classified or if the contractor will require access to classified information and/or systems Be prepared to appoint a Contractor Verification System trusted agent (CVS TA) to approve contractor requests for Common Access Cards ATO Coordinate with appropriate staff or command to ensure that AT/OPSEC procedures are modified as necessary to mitigate any specific contract support-related AT risks At a minimum, ensure that the following matters are reviewed or considered: (1) personnel identification requirements are in the PWS, (2) reason for access is validated, (3) type of access and privileges are appropriate OPSEC officer Ensure that the final version of the requirements package is reviewed by an OPSEC level II-certified individual Sign the AT/OPSEC cover sheet ATO Review the final version of the requirements package Sign the AT/OPSEC coversheet Requiring activity 3C staff officer, NCO, or staff equivalent Ensure that the signed AT/OPSEC cover sheet is included in the requirements package Submit the requirements package to the appropriate contracting office
Contract Solicitation and Award	5. Contract solicitation and award	 Contracting officer Ensure that the AT cover sheet is part of the requirements package Incorporate, if applicable, AT/OPSEC-related measures into the solicitation or contract via a standard contract or PWS-specific language Incorporate AT/OPSEC-related items in the QASP as appropriate Ensure that the solicitation or contracts provide information on or links to requirements for access to installations or facilities owned or leased by the Army and to other AT-related requirements Ensure that AT/OPSEC-related past performance is included in source selection as identified by the requiring activity Ensure that DD Form 254 is included if required Requiring activity AT/OPSEC officers Assist the contracting officer in determining appropriate source selection evaluation criteria and participate in the Source Selection Evaluation Board as a technical advisor on the AT/OPSEC evaluation factor Conduct background checks through installation provost marshal office that vets contract employees using NCIC and terrorist screening databases (see background check in glossary)

8

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

APPENDIX B

Phase	Step	Office of Primary Responsibility (OPR): Major Tasks
Contract Execution	6. Execute contract and perform contract oversight	 Contracting officer Include major AT/OPSEC responsibilities in the COR appointment letter (as required) Notify the requiring activity of contract award; provide a copy of the contract; provide contract-specific orientation to the COR (as required) Requiring activity CVS TA Process contractor CVS requests per established CVS policy ATO Conduct post-award risk evaluation based on contract award and change to threat levels Notify the contracting officer through the requiring activity 3C staff (or designated individual) if there are any changes to AT-related procedures that may impact the supporting contractor Contractor, requiring activity or supported unit, and continental United States replacement center Validate contractor employee completion of AT/OPSEC pre-deployment and preparation for overseas travel training IAW the terms and conditions of the contract Contracting officer via the COR Ensure that the contractor has met AT/OPSEC training requirements before performance commences Document and report the quality of contractor AT/OPSEC performance Requiring activity 3C officer, NCO, or staff equivalent Notify the ATO(s) of the contract start and end dates ATO/OPSEC officer Advise the COR in assessing AT/OPSEC measures per QASP as determined necessary ATO Review AT measures as the local threat and force protection condition (FPCON) level changes; notify requiring activity 3C staff of same Requiring activity 3C officer, NCO, or staff equivalent Notify the contracting officer (via the COR) of any change to AT-related requirements and, when necessary, develop an appropriate request for contract modification and associated cost estimate Contracting officer Ensure that the contractor is provided with any changes to work sit

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

APPENDIX C

Sample—Quality Assurance Surveillance Antiterrorism/Operations Security Elements

Contractor: Ajax Commercial

Contract Number: TCH345-987

Service or Supply Provided: Facility Maintenance

COR Name: CPT Houser

Date: [XX]*

Standard Language / Specific PWS Requirement	Requirement	Method of Surveillance	Frequency	Performed by Whom?	Acceptable Quality Level	Was the Requirement Met?	Comments/ Remarks
iWATCH Training Standard Language	Has the contractor provided iWATCH training to all personnel within 30 calendar days of contract award?	Training report from the prime contractor	One time	COR	90%	Yes	Report submitted on time, 97% of employees trained
Standard Installation or Facility Access Language	Has the contractor followed installation or facility access procedures? (contingency example)	Incident reporting	Once a month	COR in coordination with the installation or facility security office	No more than one incident per month	No	Three employees found to be carrying cell phones when searched at the gate
OPSEC SOP/ Plan	Has the contractor submitted the required OPSEC SOP/Plan and does it meet minimum quality standards?	Submitted by the contractor	Within 90 calendar days of contract award	Received by the COR, evaluated by the supporting OPSEC officer	No	No	SOP/Plan submitted on time. The OPSEC Officer returned for more detail on counter- measures, incomplete linkage to current threat
Info Assurance Standard Clause	Are IA workforce personnel trained IAW DoD and Army policy?	Submitted by the contractor	Within 30 calendar days of contract award	Received by the COR, evaluated by the supporting OPSEC officer	100%	Yes	All employee certifications complete and training records on file
Access to Classified Information	Is access to classified information and spaces restricted to properly cleared personnel?	Incident reporting	Once a month	COR in coordination with unit info security officer	100%	Yes	No violations reported

^{*[}XX] are fields to be filled in when finalizing the QASP.

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

APPENDIX D

Risk Assessment Process

Threat Assessment Factors

- Is the contract request for a service, construction, or a supply? Note: It could be a combination of supply and service.
 - Assessment of supply contract request:
 - Could the commodity easily be tampered with? If yes, address special AT requirements in the product specification or item description.
 - Assessment of service, construction, or supply contract request with delivery on a governmentcontrolled installation, facility, or area:
 - Will the contractor's area of performance be on a military installation or military-controlled area, or in proximity to military personnel while outside a military-controlled area?
 - Will contractor area of performance be in or on a facility that requires additional security measures such as security clearances, additional screening, or badging?
 - Have current and potential future threat levels' effect on contractor performance been considered?
 - Will contractor employees require to access military information systems?
 - Will contractor employees be handling or need access to classified and/or sensitive data?
 - Will contractor employees have frequent direct contact with government personnel?
 - What are the period of performance, working days, and hours?
- In consideration of the threat assessment of the area of performance, point of manufacture, and/or in-transit location(s):
 - Does the threat assessment specifically consider the likelihood of the potential insider threat risk associated with granting contractor personnel access to the unit area, personnel, and equipment?
 - Does the threat assessment consider the likelihood of terrorist threats directed against contractor personnel providing goods and services?
 - Do local nationals (LNs) or third-country national contractor personnel in overseas locations go through a locally approved personnel verification process?
 - Is there a biometrics process in place to register LN and third-country national employees in overseas locations? (coordinate with legal office covering the HN; some nations have strict laws regarding biometric collection on LNs)

Criticality

A detailed review of potential vulnerability consequences that could result if contractor actions are not mitigated.

- Will the contract be performed at or near mission-critical facility or capability locations? If so, have AT/OPSEC procedures been put in place? Can the contractor gain unauthorized access to critical areas or locations?
- What unit or installation areas have or require controlled access?
- Is the contracted service mission critical? Would delay or loss of the contracted service have a critical impact on the mission?

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

APPENDIX D

- Is the contractor working with personnel, systems, or material that are of critical importance? Consider IT systems and networks, weapons systems, etc.
- · What essential information can contractor personnel gain knowledge of in performance of their duties?
- Does the requirements package contain sensitive information?

Vulnerability

A detailed review of the potential vulnerabilities associated with the contractor's performance of the specific task described in the PWS and evaluated through the QASP. Vulnerabilities are directly affected by the effectiveness of any existing security procedures or AT measures that are in place.

- · Does the contractor require access to sensitive areas to perform duties?
- What potential vulnerabilities to forces, facilities, and supplies may we incur through this particular contract requirement?
- Will contractor personnel have access to hazardous materials (fuel, ammunition, medical waste, etc.)?
- · Can these vulnerabilities be mitigated with specific contract and/or QASP language?
- What AT measures need to be added or modified to mitigate the vulnerabilities discussed above (for example, a supported unit requirement to provide armed escorts of LN contractor employees, more robust contract employee searches upon installation or facility entrance and egress)?

Requirements package risk evaluation

- What is the unmitigated or baseline risk (that is, before additional mitigation procedures are placed in the requirements package and/or AT measures are modified) of this contract request to the unit or mission, based on consideration of the threat, criticality, and vulnerability variables?
- Is there a need to modify or develop specific PWS, QASP, or AT/OPSEC evaluation factors and unit AT/OPSEC procedures?
- What is the residual risk (that is, after additional mitigation requirements are placed in the requirements
 package and/or AT measures and security procedures are modified) of this contract request to the
 unit or mission based on consideration of the threat, criticality, and vulnerability variables?

Continuous risk evaluation

After contract award, ensure that the contracting office is informed (immediately through the appropriate COR) of any major threat level or AT/OPSEC procedure changes that may significantly impact the terms and conditions of the contract.

SUBJECT: Procurement Advisory Notice (PAN) 12-02 Integration of Antiterrorism (AT) and Operations Security (OPSEC) into Contract Support Planning and Execution

7. PROPONENT. The proponent for this notice is the USAMRAA Policy Branch.

forld hite

4 Encls

- 1. Appendix A
- 2. Appendix B
- 3. Appendix C
- 4. Appendix D

DISTRIBUTION:

Α

for Contracting