

# Appendix D: How to Conduct a Facility Security Committee

## D.1 Introduction

*Facility Security Committees: An Interagency Security Committee Standard* establishes procedures for a Facility Security Committee (FSC) to use when presented with security issues that affect the entire facility.

The authority for Federal departments and agencies to provide security for the facilities and employees is cited in various sections of the United States Code and the Code of Federal Regulations. Per their respective authority, each department or agency obtains funds to provide security. In single tenant facilities, the Federal department or agency with funding authority is the decision-maker for the facility's security and has the option to use these standards or other internal procedures to make security decisions. For facilities with two or more Federal tenants with funding authority, an FSC will be established to make security decisions for the facility.

At a minimum, the FSCs shall meet semi-annually (every six months) or more frequently, as scheduled by the committee chairperson.

Security countermeasures and upgrades often compete with funding requests at the agency headquarters level. Accordingly, FSC representatives are expected to assist the information flow between their respective headquarters and the FSC.

Each Federal tenant that pays rent on space in the facility will have a seat and a vote on the FSC. Many decisions made by the FSC may have a financial impact. The headquarters element for each FSC representative is responsible for providing timely advice and guidance when needed. The facility security organization identifies security countermeasures to mitigate the risk of a credible threat for the facility. If an FSC makes the decision not to approve or provide funding for a countermeasure, this decision is the acceptance of risk.

In addition to decisions relating to the implementation or removal of countermeasures, FSCs are also responsible for the establishment and implementation of security operations and administration criteria in accordance with *Appendix B: Countermeasures*. Specifically, FSCs must develop and administer countermeasures, policies, and/or procedures related to the oversight of security, life safety, and emergency procedures. This appendix is intended to be used in conjunction with *The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard*.

## D.2 Facility Security Committees

The facility security committee (FSC), consisting of representatives of all Federal tenants in the facility, the security organization (for example: Federal Protective Service for General Services Administration [GSA] owned and operated facilities), and the owning or leasing department or agency determines the FSL for the facility and determine the minimum standards (security countermeasures) for the facility. *Appendix B: Countermeasures* identifies the baseline level of protection (LOP) for a Federal facility. *Appendix A: The Design-Basis Threat Report* establishes a profile of the type, composition, and capabilities of adversaries.

The facility's security organization will conduct a regular Facility Security Assessment (FSA) and, if necessary, provide feedback to the security organization to ensure accuracy of information presented. The findings of the risk assessment are used to determine whether the baseline LOP is adequate, or if a customized LOP is established. Any recommended countermeasures are reviewed by the FSC chairperson and the owning or leasing authority of the facility in advance of a scheduled FSC meeting. At the FSC meeting, the security organization will present and provide documentation of risk assessment findings, recommendations, and cost proposal for the countermeasures presented for consideration. Such documentation shall include all estimated costs obtained by the security organization. Subsequent to the presentation, the FSC will meet to vote on the proposed countermeasure. Each FSC member votes to determine whether:

- The baseline LOP is used,
- Some of the baseline LOP is used and some risk is accepted,
- A lower LOP is used and some risk is accepted, or
- No countermeasures are used and all the risk is accepted.

To allow FSC members additional time to review the risk assessment findings, recommendations, and cost proposal prior to voting, a review period, not to exceed 45 calendar days, may be granted by the FSC chairperson. During the review period, FSC representatives should consult their respective headquarters' security element if the FSC representative needs technical advice. If the FSC representative does not have funding authority, the FSC representative will consult their headquarters' financial element for guidance on votes that have a financial impact. The FSC representative votes to approve or disapprove proposed countermeasures and other security-related issues that come before the FSC.

### **D.2.1 Risk Mitigation or Acceptance**

In general, risk is mitigated by lowering the vulnerability to exploitation of a potential weakness in the facility security posture. A common way to improve security is by adding or increasing the countermeasures to achieve a higher LOP. Some threats or vulnerabilities can be mitigated by a combination of applying a higher level countermeasure and changing existing or adding new physical security policies or procedures. Risk acceptance should be minimized; however, accepting risk may be the logical outcome of a rational decision process.

The security organization for the Federal facility shall identify each threat and the associated vulnerability for the facility. Each FSC shall document the chosen risk management strategy.

In some locations, the Federal tenants of the facility are responsible for funding security improvements through various means, such as a rent increase or by providing lump-sum funds. Frequently, the decision to implement a countermeasure has a financial component. To address this issue, the security organization must evaluate the cost effectiveness of the proposed countermeasure and present the analysis to the FSC. This analysis will follow the performance-measurement methodology outlined in *Appendix E: Use of Physical Security Performance Measures*.

When a countermeasure is recommended, the security organization shall inform the FSC members of the minimum standard for such countermeasures as outlined in *Appendix B*:

*Countermeasures* for buildings with similar FSLs as well as the threat as outlined in the most recent edition of *Appendix A: The Design-Basis Threat Report (DBT)*. They shall also provide documentation indicating if the proposed countermeasure is above or below the standard set in the RMP for similar buildings.

## **D.2.2 Risk Acceptance**

As stated in *The Risk Management Process for Federal Facilities*, the decision to forgo some available mitigation measures is a permissible outcome of applying the risk management methodology. For the purpose of this Standard, “risk acceptance” is when a countermeasure suggested by the facility security organization is not used or a lower level of countermeasure is selected. For example, if funding is not available for a countermeasure, the FSC and security organization shall document the lack of availability of funding and implement the highest-achievable countermeasure. The FSC shall document all aspects of the chosen risk management strategy and include this document in the meeting minutes.

## **D.2.3 Financial Commitment**

An FSC vote to approve a countermeasure is a financial commitment by each Federal tenant that pays rent for space in the facility. Each Federal tenant is responsible for funding their prorated share of the cost of the approved countermeasure, regardless of how they voted. The prorated share of the cost is equal to the percentage of rentable square feet of space in the facility occupied by the Federal tenant. (For General Services Administration [GSA]-controlled facilities please refer to Section D.3.1, paragraph 3.)

## **D.2.4 Financial Authority**

FSC members may or may not have the authority to obligate their respective organizations to a financial commitment. When funding issues are considered, each FSC representative without funding authority is allowed time to obtain guidance from their respective organization. Each FSC chairperson will establish a date for a vote on a decision item, while providing a reasonable period (not to exceed 45 calendar days from the date all requested documents and materials are provided to the FSC members to supply to their respective funding authorities) for FSC representatives to obtain guidance from their headquarters element. If financial guidance is not provided to the FSC representative within this allotted time, the FSC chairperson may use the Decision Process or other means as determined by the FSC to reach a resolution.

## **D.2.5 Selecting a Security Organization**

When a facility does not have an assigned security organization or Federal tenant with a law enforcement or security element housed in the facility, the FSC shall select a Federal department or agency to provide the services of the security organization, as described in this document. When a facility has one Federal tenant with law enforcement or security function housed in the facility, this entity should be selected as the security organization for the facility. When a facility has two or more Federal tenants with a law enforcement or security function, the FSC should select a lead Federal tenant to serve as the security organization.

## D.2.6 Interagency Security Committee Training

Federal employees selected to be members of a Federal FSC will be required to successfully complete a training course that meets the minimum standard of training established by the ISC. The training is available on the Homeland Security Information Network (HSIN) and/or Federal Emergency Management Agency web-sites. FSC members shall retain proof of completion for as long as they serve as a member of an FSC. The training will minimally include:

- IS-890 Introduction to the Interagency Security Committee and Risk Management Process
- IS-891 Introduction to Interagency Security Committee Documents
- IS-892 Interagency Security Committee Risk Management Process: Facility Security Level Determination
- IS-893 Interagency Security Committee Risk Management Process: Levels of Protection and Application of the Design Basis Threat Report
- IS-894 Interagency Security Committee Risk Management Process: Facility Security Committees

## D.3 Facility Security Committee Procedures and Duties

Each FSC will have a chairperson. Each Federal tenant that pays rent on space in a Federal facility will have one representative with one vote on decision items before the FSC. The owning or leasing authority and security organization are members of the FSC with voting privileges, only if they pay rent on and occupy space in the Federal facility. FSCs are encouraged to include the child-care center director (as applicable) as a non-voting member. Each Federal department or agency headquarters shall provide guidance to its FSC representative. Meeting agendas must be published, and each agenda item must be identified either as a discussion or as a decision item. If a single Federal tenant occupies a facility, they have the option to use this Standard or other internal procedure to determine what security countermeasures are implemented, how funding is provided, and what risk is accepted. *The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard* details other functions where the FSC is expected to make decisions and provide guidance relating to:

- 5.1.6 Determine the Highest Achievable LOP
- 5.1.9 Accept Risk
- 5.2.1 Application to New Construction
- 5.2.2 Application to Existing Federal Facilities
- 5.2.3 Modernization and Renovation
- 5.2.4 Application to Lease Solicitations
- 5.2.5 Tenant and Mission Changes in Occupied Buildings
- 5.2.6 Campus Environments
- Appendix B: Countermeasures

### D.3.1 Voting Procedures

A vote is permitted only on agenda items identified as decision items. Each Federal tenant has one vote. The Office of Management and Budget (OMB) Bureau Code listed in Appendix C of OMB Circular No. A-11 used to define each Federal tenant is located on both the OMB web-site and the Interagency Security Committee (ISC) HSIN web-site.

Each vote is weighted to the rentable square footage of assigned space (by percentage of total square footage for the building) for each Federal tenant. (see Table D-1).

Table D-1 illustrates how weighted voting is established based on the square footage of occupancy. It is common for a facility to have some joint use and vacant space. Depending on the amount of joint use and vacant space, the FSC may elect not to use the square footage for these areas to determine the pro rata voting share for each tenant. However, in facilities where the owning agency is paying vacant space charges to the security provider, vacant space will be added to the owning agency’s pro rata voting share calculation as assigned space and that agency shall have a vote on proposed security countermeasures or changes in security procedures in accordance with *The Risk Management Process for Federal Facilities* security requirements. For example, in GSA facilities where GSA is paying vacant space charges to the Federal Protective Service, the GSA vote shall include that vacant space. To disallow the joint use and vacant space, the FSC can subtract the square footage of the joint use and vacant space from the total square footage of the facility and then recalculate the pro rata voting share for each tenant. Voting to eliminate joint use/vacant space should only be done once.

The FSC Chair can make these calculations for an entire facility by using the ISC Pro Rata Voting Share Calculation Tool located on the ISC HSIN web-site.

**Table D-1: Tenant Voting Percentages Example**

Agency Tenant	Agency/Bureau Code	Square Feet	% of total RSF	Pro Rata Voting Share
DOJ – Legal Activities and USMS (includes US Trustees, USMS and US Attorney)	011/05	14,514	28%	28%
DOJ – FBI	011/10	2,248	4%	4%
Courts - (includes Appellate, Bankruptcy, District Courts, Probation/Pretrial Services, Public Defenders)	002/25	25,982	50%	50%
Social Security Administration	016/00	3,522	7%	7%
VA – Benefits Programs	029/25	5,115	10%	10%
DHS – Immigration and Customs Enforcement	024/55	508	1%	1%
<b>TOTAL</b>		<b>52,141</b>	<b>100%</b>	<b>100%</b>

Table D-1 illustrates each tenant's calculated pro rata voting share. See Section D.8 for instructions on how to use the ISC Pro Rata Voting Share Calculation Tool.

A quorum of 50 percent of the FSC members is required for a vote on a decision item. A decision item passes or fails with a majority of the facility's weighted vote. If 50 percent of the FSC membership is not present for two consecutive meetings, the FSC chairperson may invoke an alternate process to proceed with the vote.

### **D.3.1.1 Decision Item Approval**

When an agenda decision item is approved by the FSC, this vote must be recorded in the FSC meeting minutes. If the vote approves the implementation of a security countermeasure, this vote is a financial commitment by each Federal tenant in the facility regardless of how each FSC representative voted. If a decision item is approved, all Federal tenants in the facility shall provide their prorated share of the cost to fund the countermeasure. The FSC must also approve security countermeasures that are procedural in nature and have no funding implications.

- In a GSA-controlled facility, per the GSA Pricing Desk Guide, 4th Edition, a signature is not required to modify a tenant Occupancy Agreement (OA) when the FSC approves a security feature.
- The security organization and/or the owning or leasing authority and/or organization implementing the security countermeasure must be prepared to accept funding from multiple sources and from mixed fiscal years. Funding for a project approved by the FSC is detailed in Section D.4.2 of this document.
- If a facility owner determines that an approved countermeasure may inhibit the effective operations, maintenance, or management of a facility, the FSC may consider alternative proposals received from the owning or leasing authority. If agreement on alternative proposals cannot be reached, this acceptance of risk will be documented in the FSC meeting minutes. The lessee's requirement to accept risk should be a consideration at the time of lease renewal.

### **D.3.1.2 Decision Item Disapproval**

The meeting minutes must document each Federal department or agency vote to approve or disapprove a recommended countermeasure. If a decision item is disapproved the meeting minutes must document the basis for risk acceptance or the alternative risk management strategy that was chosen. The meeting minutes shall be maintained by the FSC chairperson and the security organization as an historical document for the facility. Each member of the FSC and their respective security element at the organization headquarters level shall be provided a copy of the meeting minutes that document the chosen risk management strategy.

## **D.3.2 Facility Security Committee Chairperson**

The FSC chairperson is the senior representative of the primary tenant. The senior person with the primary tenant may designate a senior staff member with decision-making authority to serve as the FSC chairperson; however, the senior representative retains the responsibility for the FSC. Should the senior person with the primary tenant decline to serve as the FSC chairperson, the FSC members shall select a chairperson by majority weighted vote. The FSC chairperson must

represent a rent-paying Federal department/agency. It is preferred to have an FSC chairperson who is an on-site employee or who regularly visits/works from the facility. He/she is responsible for the following:

- Setting FSC meeting agendas;
- Scheduling FSC meetings;
- Distributing FSC meeting minutes;
- Maintaining FSC meeting records;
- Maintaining training records for all FSC members;
- Coordinating with outside organizations;
- Assigning tasks to other FSC members for drafting plans;
- Maintaining a current list of Federal tenant agency occupant status;
- Maintaining a current list of Federal tenants' square footage;
- Serving as the point of contact for the FSC between meetings;
- Calling for votes on issues before the FSC;
- Establishing deadlines (not to exceed 45 days from the date all documents and materials are provided to the FSC members to supply to their respective funding authorities) by which each FSC member organization must provide guidance to their FSC representative;
- Casting votes for their organization;
- Facilitating dispute resolution between Federal tenants and the security organization; and
- Interfacing with the ISC (i.e., Program Director, Standards Subcommittee, etc.) to facilitate a final determination relative to dispute resolution, as deemed appropriate.

### **D.3.3 Facility Security Committee Members**

FSC members shall be senior officials/individuals with decision-making authority for their organization. Agency representatives will be responsible for making or conveying agency decisions on security measures and funding for their agency. If the FSC member does not have authority to make funding decisions, the FSC member is responsible for making the appropriate request(s) to their organizational headquarters for funding authorization as well as for the following tasks:

- Representing organizational interests;
- Attending FSC meetings;
- Obtaining guidance on how to vote for issues with funding implications;
- Obtaining assistance from organizational security element; and
- Casting votes for their organization.

New facility tenants shall be included as FSC members no later than 60 days after occupying the facility.

### **D.3.4 Owning or Leasing Authority**

The owning or leasing authority is a voting member of the FSC only if they pay rent for space in the facility. The responsibilities of the owning or leasing authority include the following:

- Representing organizational interests;
- Attending meetings;
- Providing technical information;
- Assisting with vendor access to the facility when requested by the security organization; and
- Casting votes for their organization.

### **D.3.5 Security Organization**

The security organization performs the FSL assessment and consults with the FSC and the owning or leasing authority to establish the FSL. Based on the FSL accepted by the FSC, the security organization evaluates the facility using the RMP to determine the baseline LOP and, if necessary, develops a customized LOP to be presented to the FSC for consideration. The security organization is a voting member of the FSC only if the security organization occupies and pays rent for space in the facility and is responsible for the following:

- Advising the FSC;
- Performing the FSL assessment;
- Presenting the FSL assessment to the FSC;
- Preparing, presenting and distributing a facility security assessment (FSA) in accordance with the time intervals established by the ISC based on the FSL;
- Evaluating the facility to determine whether the baseline LOP is adequate, or whether a customized LOP is necessary;
- Presenting a written plan for proposed countermeasures that identifies how it will mitigate the risks identified with specific credible threats;
- Presenting written operating procedures for countermeasures;
- Presenting written cost impact for proposed countermeasures;
- Providing technical assistance and guidance to the FSC as appropriate; and
- Casting votes for their organization.

### **D.3.6 Federal Department and Agency Headquarters**

Federal department and agency headquarters shall provide funding guidance to FSC representatives as needed. When requested, the physical security element at the headquarters level shall advise and assist the FSC representative. If the FSC representative at a facility is unable to resolve a technical or financial dispute, then the respective security or financial headquarters element for each FSC representative shall assist in reaching a solution.

## **D.4 Facility Security Committee Operations**

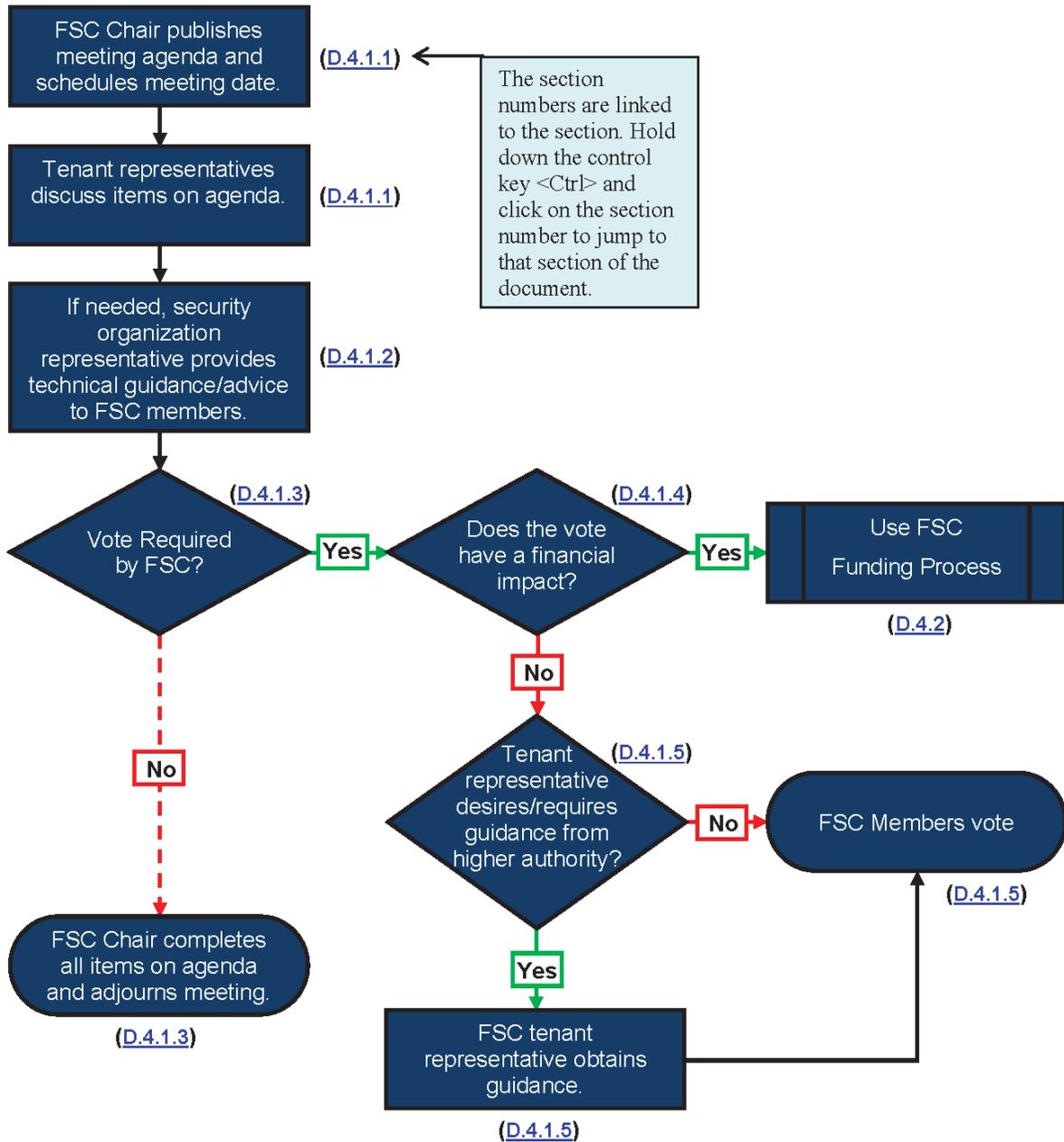
The FSC may be asked to consider many issues regarding the physical security of their facility. Process charts are provided to aid each FSC when making decisions that will determine the security posture of the facility.

If the FSC representatives are unable to resolve an issue, the decision process (see Section D.4.3) flow chart provides an outline for reaching resolution. The objective is for the facility occupants to make decisions for their respective facilities with regard to what countermeasures are implemented. When this is not possible, executive management at the highest level may become involved in the decision process.

### **D.4.1 Facility Security Committee Business Process**

Figure D-1: FSC Business Process outlines the basic steps taken to address decision and discussion items on the meeting agenda. Discussion agenda items allow the FSC to explore and document facility-related issues. If a decision item carries a funding impact, the funding decision process is used (see Figure D-2). If the decision does not carry a funding impact, each FSC representative has the option to request guidance on decision items.

**Figure D-1: FSC Business Process**



### D.4.1.1 Meeting Agenda and Discussions

The FSC chairperson sets and publishes the agenda and schedules the meeting. The FSC representatives review the agenda and agenda items are discussed.

### D.4.1.2 Security Organization Guidance

FSC members are representatives for their organizations who may or may not have a physical security background. When the security organization proposes a change to the security posture of the facility, the details and rationale of this change may require a technical brief to the FSC and

the tenant's respective funding authority, so that each member fully understands the operational and funding impact to their respective operations. The security organization will provide technical assistance and any requested documents and guidance when requested by the FSC members or their respective funding authorities.

#### **D.4.1.3 Decision Point: Is a vote required by the Facility Security Committee?**

A vote can be held on meeting agenda items marked as decision items. Discussion agenda items relay information to the FSC members and document issues in the meeting minutes. A vote is permitted only on agenda items identified as decision items. Once all items on the agenda are addressed, the meeting is adjourned. The FSC voting procedures are detailed in Section D.3.1 of this document. Section D.4.2 of this document addresses processes for decision items that also have a funding impact.

#### **D.4.1.4 Decision Point: Does the vote have a funding impact?**

A funding impact may be associated with a decision item. Section D.4.2 of this document provides guidance on how to address decision items with a funding impact. Section D.4.1 of this document provides details concerning decision items that do not carry a funding impact.

#### **D.4.1.5 Decision Point: Do Facility Security Committee members desire guidance from organizational authority?**

FSC members may desire guidance from their respective organizational authority. The FSC chairperson will establish a date for a vote on a decision item, while providing a reasonable period for FSC representatives to obtain guidance from their organization (not to exceed 45 calendar days from the date all documents and materials are provided to the FSC members to supply to their respective funding authorities). If an organization does not provide guidance to the FSC representative within this allotted time, the FSC chairperson may use the decision process or other means as determined by the FSC to obtain a resolution. (see Figure D-3). All FSC votes are recorded in the meeting minutes and distributed to each FSC member and security organization.

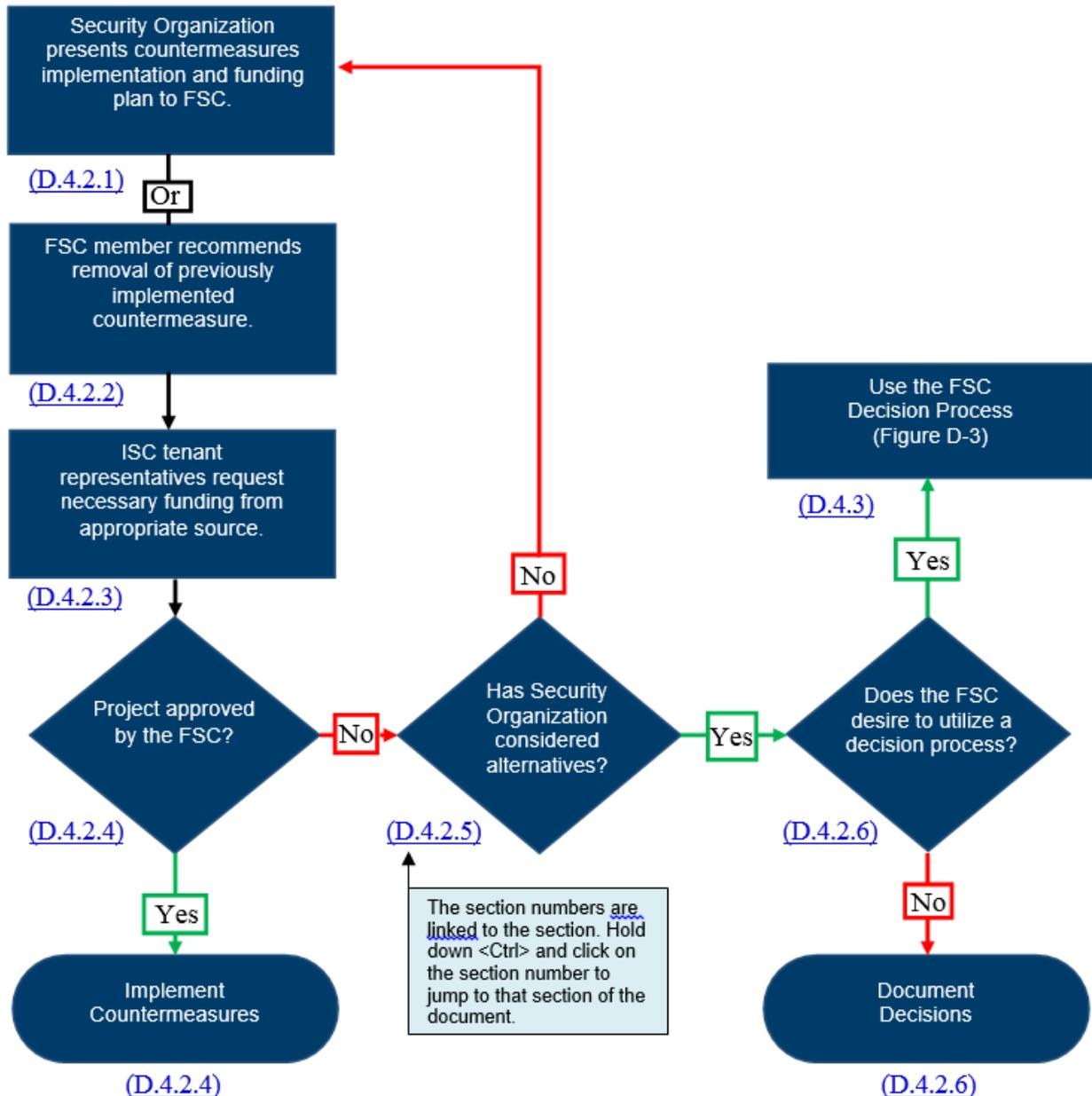
### **D.4.2 Facility Security Committee Funding Process**

The FSC will be asked to consider changes to the security posture of their facility by adding new policies, changing existing policies, or by implementing new or enhancing existing physical security countermeasures. Generally, policy and procedures do not require funding to implement or change. Countermeasures usually require funding to purchase, install, and maintain the countermeasure (e.g., purchasing of equipment or hiring of guards). When the FSC considers items that require funding, each FSC member is responsible for seeking guidance from their respective funding authority. The security organization or implementing agency is responsible for providing assessments, available supporting documentation and cost estimates to funding authorities. Figure D-2 outlines the funding decision process.

The FSC chairperson shall establish a date for a vote on a decision item requiring funding, while providing a reasonable period for FSC representatives to obtain guidance from their respective authority (not to exceed 45 calendar days from the date all documents and materials are provided to the FSC members to supply to their respective funding authorities). If guidance is not provided to the FSC representative within this allotted time, the FSC chairperson may use the decision

process or other means as determined by the FSC to obtain a resolution. The meeting minutes must document each Federal department’s or agency’s vote to approve/disapprove a recommended countermeasure. If a countermeasure is not approved, the FSC accepts the associated risks relating to that decision.

**Figure D-2: FSC Funding Process**



### D.4.2.1 Security Organization Presents Countermeasures Implementation and Funding Plan to the Facility Security Committee

The security organization or implementing organization/agency will develop a proposal for each new or enhanced countermeasure. This plan must include the following elements:

- Estimated cost of a countermeasure;

- How the countermeasure will mitigate the risks identified with specific credible threats to include operational procedures; and
- How the countermeasure meets the necessary LOP as called for in the ISC's Appendix B: Countermeasures to include any cost-saving benefits.

#### **D.4.2.2 Facility Security Committee Member or their Funding Authority Requests Removal of previously Implemented Countermeasure**

There are numerous facilities with security countermeasures in place which may or may not have been approved by a vote of the FSC. As these countermeasures may have financial impact on the tenant organizations, there shall be a mechanism to cancel or remove countermeasures previously implemented.

When a tenant organization is notified by their funding authority or headquarters security element that funding for a countermeasure is no longer available or that the countermeasure is not required by the facility's baseline LOP or assessed risk, the tenant agency or their funding authority/security element will present an agenda item to remove the countermeasure to the chairperson of the FSC.

The decision to remove or discontinue the countermeasure will be based on a majority of the tenant agencies pro rata vote. Tenant organizations are responsible for all costs associated with removal. When removal of a countermeasure is approved the agency responsible for the implementation shall cease or remove the countermeasure by the date specified by the FSC.

#### **D.4.2.3 Facility Security Committee Members Request Guidance from Their Respective Funding Authority**

An FSC member may or may not have the authority to obligate their respective organization to a funding commitment. When the member does not have funding authority, financial guidance from their respective funding authority is necessary.

The security organization/implementing agency shall provide to each tenant agency or their respective security element/funding authority a detailed description of work and cost estimates for the proposed countermeasure.

The FSC chairperson will establish a date for a vote on a decision item, while providing a reasonable period for FSC representatives to obtain guidance from their organization (not to exceed 45 calendar days from the date all documents and materials are provided to the FSC members to supply to their respective funding authority). If an organization does not provide guidance to the FSC representative within this allotted time, the FSC chairperson may use the decision process or other means as determined by the FSC to reach a resolution (see Figure D-3).

An FSC representative shall submit a written funding request to their respective authority and also request that their respective authority respond with a written approval or denial.

#### **D.4.2.4 Decision Point: Did the Facility Security Committee vote to approve the proposed security proposal?**

FSC members vote to approve or disapprove each proposed countermeasure based on the guidance provided by their respective authority. If approved, each countermeasure is implemented. Procedures for handling proposed countermeasures that are not approved are

presented in Section D.5.2.2. When the FSC votes to deny the implementation of a security countermeasure(s), that exceeds the baseline standard for the LOP of a building of its specific FSL, the FSC will have accepted risk as an integral part of the committee's risk management strategy.

#### **D.4.2.5 Decision Point: Has the security organization considered alternatives?**

This decision point is an iterative loop for the purpose of facilitating technical discussions between the security organization and the security elements of the FSC members. The purpose of discussions is to promote creative thinking and evaluate multiple countermeasures to mitigate risk. If certain risks are accepted, the FSC must document the basis for the chosen risk management strategy. See Section D.2.2 for more information on Risk Acceptance.

#### **D.4.2.6 Decision Point: Does the Facility Security Committee desire to utilize a decision process?**

When the security organization has explored alternatives and funding is not available for the countermeasure(s), the decision is either documented or the FSC chairperson can implement a decision process. For more information on the ISC's recommended Decision Process, see Section D.4.3 of this document.

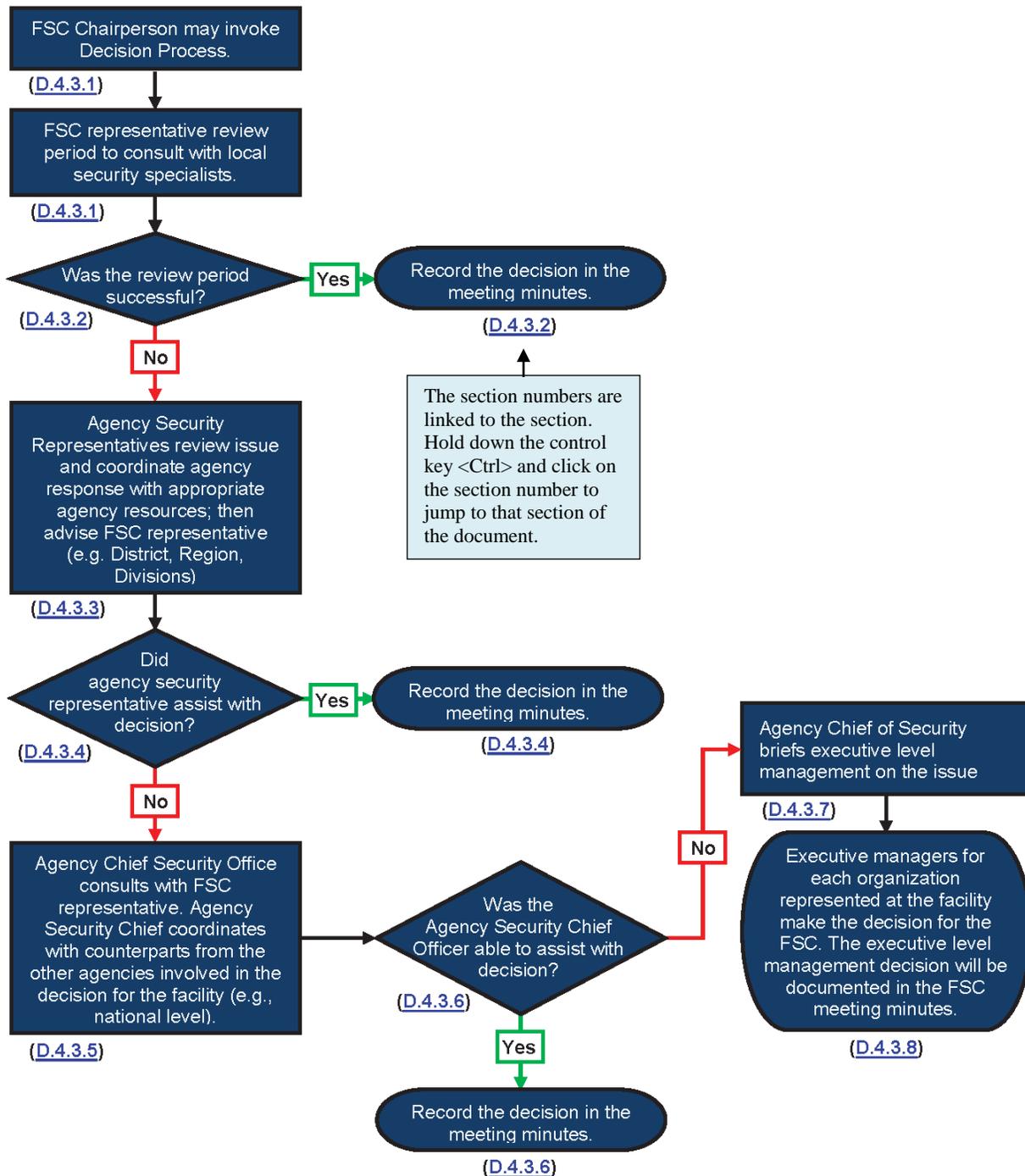
### **D.4.3 Decision Process**

Each FSC will face many decisions regarding the security posture of their Federal facility. The FSC members have the best perspective to determine what the appropriate level of security should be for their facility. There will be times when FSC representatives require guidance from security and financial subject matter experts at their respective headquarters. If the decision process is used on a countermeasure(s) that leaves the facility vulnerable, the risk for this vulnerability or vulnerabilities will be accepted until the final decision is reached.

The decision process example illustrated in Figure D-3 is a general guide. An FSC may adopt an alternate process to facilitate a decision. The organizational structure used by each Federal department and agency may be different. FSC representatives are responsible for determining the appropriate management level to contact within their respective organization for guidance and assistance.

The ISC's Decision Process allows the FSC four opportunities to reach a decision. In the rare event an FSC is unable to reach a decision, the executive level of management for each Federal department and agency at the facility will be presented with the information. Once a decision is made for the facility, the responsibility to implement and manage this decision is returned to the FSC members for action.

**Figure D-3: Example Decision Process**



**D.4.3.1 Facility Security Committee Chairperson Invokes Decision Process**

The FSC chairperson has the option to use the decision process, should the discussions become unproductive. FSC representatives are allowed a review period to consult with their respective organizational security element for guidance when additional information is needed. Each FSC

chairperson will establish a reasonable period (not to exceed 45 calendar days) for FSC representatives to obtain guidance from their organizations.

#### **D.4.3.2 Decision Point: Was the review period successful?**

If the review period was successful, the results are recorded in the meeting minutes. Votes are taken as required. If the review period was unsuccessful, then the FSC proceeds to the next step in the decision process.

#### **D.4.3.3 Organizational Security Element Assistance**

The physical security component from each of the organizations represented in the facility participates in a review of the issue before the FSC and provides guidance to the FSC representative. The physical security specialists for each organization should conduct an onsite review as a team. The objective of the team approach is for the security specialists to evaluate the facility and the proposal presented by the security organization, then look for ways to modify the proposal to an acceptable plan. If a modified proposal cannot be developed, the security representatives and the security organization will work together to develop alternative proposals and an FSC vote will be scheduled.

When the FSC representative contacts their respective organization and requests assistance, this step in the decision process must be completed within 30 calendar days of the initial contact. The FSC may vote to extend the 30-calendar-day timeframe. If a resolution is not reached in the agreed upon timeframe, the issue(s) in question shall be referred to each respective organizational Chief Security Officer for action.

#### **D.4.3.4 Decision Point: Did the organizational security element assistance resolve the issue?**

If the review period was successful, the results are recorded in the meeting minutes. Votes are taken as required. If the review period was unsuccessful, then the FSC proceeds to the next step in the decision process.

#### **D.4.3.5 Organizational Chief Security Officer Review**

The Chief Security Officer for each organization represented at the facility will conduct an analysis of the issue in question, then work collectively, along with representatives from the facility, their counterparts from the other represented organizations, and the organizational representatives from the facility to develop a plan that each organization finds acceptable. This plan is briefed to the organizational FSC representatives at the facility for their consideration and an FSC vote is scheduled.

This step in the decision process must be completed within 30 calendar days of being referred to each respective organizational Chief Security Officer. The FSC may vote to extend the 30-calendar-day timeframe. Should a resolution not be reached in the agreed upon timeframe, the issue(s) in question shall be referred to each respective organization's executive level management for action.

#### **D.4.3.6 Decision Point: Were the Chief Security Officers able to resolve the issue?**

If the review period was successful, the results are recorded in the meeting minutes. Votes are taken as required. If the review period was unsuccessful, the FSC proceeds to the next step in the decision process.

#### **D.4.3.7 Organizational Chief Security Officer Briefs Executive Level Management**

The Chief Security Officer for each organization represented at the facility briefs their organizational executive level management on the issue in question. The executive level management for each organization represented at the facility will work collectively, along with representatives from the facility, with their counterparts from the other represented organizations, and the organizational representatives from the facility to make a decision on behalf of the facility.

This step in the decision process must be completed within 30 calendar days of being referred to each respective organizational executive level management. The FSC may vote to extend the 30 calendar day time. Should a resolution not be reached in the agreed-upon timeframe, the FSC can request assistance from the ISC Steering Committee, or the risk can be accepted.

#### **D.4.3.8 Executive Level Management for Each Organization Represented at the Facility Agrees on a Decision for the Facility**

Organizations have four opportunities to resolve an issue with facility-level input before the issue reaches the executive level for resolution. Should an issue rise to executive level for resolution, a final decision will be made and the facility will implement this decision. The executive level management decision will be documented in the FSC meeting minutes.

### **D.5 Funding**

Federal departments and agencies will be asked to provide funds for security countermeasures for Federal facilities. The funding and security functions should work together when funding requests are considered. The decision to provide funding or accept risk should be based on the FSL, a risk assessment, and the baseline or customized LOPs.

#### **D.5.1 Funding for a Non-Unanimous Vote**

If the FSC votes to approve a countermeasure, Federal tenants are required to fund their prorated share of the cost, even if their FSC representative voted to disapprove the countermeasure.

#### **D.5.2 Facility Security Committee Member Funding Authority**

A voting FSC member may or may not have funding authority. If an FSC member does not have funding authority and a decision item requires funding, the FSC representative shall seek guidance from their respective security and funding authority. The headquarters' security function and funding authority shall work together to provide guidance to the organizational FSC representative.

### **D.5.2.1 Approval of Funds**

When funds are approved, each Federal department or agency must advise their FSC representative as to which fiscal year the funds will be available. When funds are sought from a future appropriation year, the headquarters' security element must track the funds and keep their FSC representative informed of changes in the appropriation or authorization.

### **D.5.2.2 Disapproval of Funds**

When a Federal department or agency does not approve funds, the decision then results in risk acceptance. The headquarters' security element shall document the denial of funds and the risk acceptance to the facility. A copy of this documentation shall be provided to the organizational FSC representative. The FSC representative shall provide a copy of the denial of funding and risk acceptance documentation to the chairman of the FSC in order for the information to be included in the FSC meeting minutes.

Should a Federal department or agency not approve funds, but the FSC votes to approve a countermeasure, the Federal department or agency is responsible for providing funds for their prorated share of the cost of the approved countermeasure.

## **D.5.3 Funding Documents**

Transferring funds from one organization to another may be accomplished in several ways. It is beyond the scope of this document to detail each method of transferring Federal funds. The agency implementing the countermeasure must determine how the countermeasure will be procured. Each FSC member must contact their respective financial authority for guidance on how to transfer funds and in what fiscal year the funds will be available. The agency implementing the countermeasure is responsible for providing each FSC representative with the necessary information on the specific method(s) to be used for transferring Federal funds.

## **D.5.4 Funding Impact to Occupant**

When the facility security organization presents a plan to the FSC for consideration, a written funding plan must be provided to each FSC member. This funding plan will include the project cost for the facility, and the cost per square foot to each Federal tenant will be calculated.

The decision to implement security countermeasures or risk acceptance at a facility contains a financial component. To address this area, the security organization must provide a cost analysis that indicates the cost effectiveness of the proposed countermeasure and include projected costs for subsequent fiscal years. This analysis will follow the performance-measurement methodology outlined in the *Appendix E: Use of Physical Security Performance Measures*.

## **D.5.5 Occupancy Agreement**

Federal tenants may have the option to work with their owning or leasing authority to fund security countermeasure projects by means of rent increases. Usually this requires a change to the occupancy agreement to adjust the amount of rent paid to the owning or leasing authority.

## **D.6 Record Keeping**

Meeting minutes and other documents or information the FSC deems important shall be retained as building-specific records. All FSC decisions shall be documented in the meeting minutes. Vote tabulation shall be recorded in the meeting minutes. Project funding approval, disapproval, and risk acceptance information shall be documented in the meeting minutes and the Facility Security Assessment. It is recommended the FSC and the security organization maintains copies of records for a minimum of ten years.

### **D.6.1 Purpose**

Building and occupant-specific information shall be retained to provide a historical record on each FSC decision.

### **D.6.2 Format of Records**

Records shall be maintained electronically, whenever possible, subject to the E-Government Electronic Records Management Initiative.

### **D.6.3 Access to Records**

All FSC members, their funding authority and security element, will have access to meeting records. Additional access to FSC records held by other agencies will require the approval of the FSC. Records containing National Security Information (NSI) or sensitive information shall only be released to appropriately cleared personnel with the need-to-know.

## D.7 The ISC Pro Rata Voting Share Calculation Tool

The FSC chairperson may determine each Federal agency tenant’s pro rata voting share by using the ISC Pro Rata Voting Share Calculation Tool, located on the ISC HSIN web-site. The following instructions outline how to complete the necessary calculations in the tool.

1. List the total Rentable Square Footage (RSF) obtained from the owning/leasing authority.
2. List separately each agency tenant who is an occupant of the facility as listed in Appendix C of OMB Circular 11A.
3. Enter the rentable square footage of each separate agency tenant’s assigned space.
4. Finally, to calculate the agency’s share of the vote, click in the Pro Rata Voting Share column for each separate agency tenant. (The tool will automatically make the calculations and populate the Pro Rata Voting Share column. As each separate agency tenant is either added to or deleted from the tool, the tool will automatically recalculate all pro rata voting shares.)

**Table D-2: Example of the Pro Rata Voting Share Calculation Tool**

Agency Tenant	Agency/Bureau Code	Square Feet	% of total RSF	Pro Rata Voting Share
Social Security Administration	016/00	3,522	41%	41%
VA – Benefits Programs	029/25	5,115	59%	59%
TOTAL		8,637	100%	100%