

Appendix D: How to Conduct a Facility Security Committee (FSC)

D.1 Introduction

Facilities housing two or more federal tenants require an FSC to make security decisions for the facility. The owning or leasing authority is in the best position to determine this requirement and **shall** specify the need for an FSC and communicate this requirement in writing to the prospective tenants during the lease acquisition process. This includes determination and notification of the primary tenant.

Although optional, the ISC advocates that single-tenant facilities create a Facility Security Committee (FSC) or an equivalent entity to systematically address unique security concerns pertaining to the facility. At a minimum, single-tenant facilities must document internal procedures for making security decisions.

In addition to decisions relating to implementing or removing countermeasures, FSCs are also responsible for establishing and implementing security operations and administration criteria per *Appendix B: Countermeasures (FOUO)*. (Such as development of an OEP, FSP, etc.) Specifically, FSCs must develop and administer countermeasures, policies, and procedures related to security oversight and life, safety, and emergency procedures.

D.2 Facility Security Committees

The Facility Security Committee (FSC) comprises five major categories of members which include the chairperson, tenant representatives, security organization, owning or leasing authority and other supporting personnel. All FSC members must:

- Complete the required ISC training (section 6.0) within 90-days of assignment.
- Prepare for, attend, and actively participate in meetings.
- Interface with their respective headquarters.
- Vote on behalf of their agency if they represent a rent-paying federal tenant.
- Maintain required records.

Each FSC will have a chairperson preferably an on-site employee or one who regularly visits or works from the facility. Should the primary tenant¹⁴ decline to provide an FSC chairperson, the FSC members may select a chairperson by majority weighted vote. The FSC chairperson must represent a rent-paying agency. In the event no other members accept the role of FSC chair, the primary tenant retains responsibility. The primary tenant will notify their organizational security element, who will then work towards a resolution. ISC regional advisors are available to assist upon request.

Each federal tenant that pays rent on space in a federal facility will have one representative with one weighted vote on decision items before the FSC. The owning or leasing authority and security organization are members of the FSC; however, they have voting privileges only if they pay rent on

¹⁴ The federal tenant identified by Bureau Code in Office of Management and Budget Circular No. A-11, Appendix C, occupies the largest amount of rentable space in a federal facility.

and occupy space in the federal facility. FSCs should include the child-care center director (as applicable) as a non-voting member. Within 60 days of occupying a facility, FSC members shall include new tenants.

D.2.1 Facility Security Committee Roles and Responsibilities

D.2.1.1 FSC Chairperson

The FSC chairperson shall be the senior representative of the primary tenant and serves as the FSC point of contact. The senior representative may delegate this authority to a senior staff member with decision-making authority to serve as the FSC chairperson; however, the senior representative retains the responsibility for the FSC and must document this delegation. The chair is responsible to:

- Establish the Facility Security Committee
- Schedule FSC meetings, set agendas, call for votes, and distribute meeting minutes.
- Maintain training records for all FSC members.
- Coordinate with outside organizations.
- Assign tasks to other FSC members for drafting plans.
- Maintain current list of federal tenant occupant status to include tenants' square footage.
- Invoke FSC decision-making processes, if required.

D.2.1.2 Facility Security Committee Members

FSC members shall be management level officials with decision-making authority for their organization, able to perform the functions of an FSC member, and able to provide an alternate member to participate if the primary member is unable to attend. FSC members are responsible for making or conveying agency decisions on security measures and funding for their agency. If the FSC member does not have the authority to make funding decisions, the FSC member is responsible for making the appropriate request(s) to their organizational headquarters for funding authorization.

FSC member tasks:

- Represent organizational interests.
- Obtain guidance on how to vote for issues with funding implications.
- Obtain assistance from the organizational security element.

D.2.1.3 Owning/Leasing Authority

In addition to responsibilities outlined in section 5.5, the owning/leasing authority is responsible to advise the FSC on real estate or building related matters, and to assist the FSC with reporting compliance information.

D.2.1.4 Security Organization

In addition to responsibilities outlined in section 5.4, the security organization is responsible for the following:

- Advise the FSC on security or protection related matters.
- Perform and present preliminary FSL assessment to the FSC.
- Conduct, present, and distribute a risk assessment in accordance with the time intervals established by the ISC based on the approved FSL.

- Provide all documents requested by tenant agency representatives, organizational headquarters and/or funding authorities related to the implementation of identified countermeasures.
- Advise the FSC chairperson on their progress in obtaining the funding necessary from each tenant agency for approved countermeasures.
- Provide technical assistance and guidance to the FSC as appropriate.
- Assist FSC with reporting compliance information.

D.2.1.5 Other Supporting Personnel

FSCs can benefit from “non-voting” support personnel that can provide subject matter expertise. Agency headquarters are responsible for providing timely advice and guidance when needed. Additionally, the headquarters element for each FSC representative must budget for countermeasure requests from the facilities it occupies. When requested, the physical security element at the headquarters level must advise and assist the FSC representative. If the FSC representative at a facility cannot resolve a technical or financial dispute, then the respective security or financial headquarters element for each FSC representative shall assist in reaching a solution.

Some other examples include:

- Expert resources: Cost analysts, facility engineers and technicians, and subject matter experts (e.g., Mail Program Managers, ISC Regional Advisors, Organizational Security Elements).
- Non-Federal Entities: Property managers, other non-federal lessors, lessees, local authorities, child-care center directors.

D.3 Facility Security Committee Procedures

D.3.1 Facility Security Committee Charter

The FSC shall develop a charter to formally establish the FSC. At a minimum, the charter will consist of facility location, mission statement, objective statement, list of member agencies (voting and non-voting), and each member FSC function. Refer to Appendix F: Forms and Templates for a sample charter.

D.3.2 Bylaws

FSCs should develop by-laws as an addendum to the charter. The bylaws provide guidance on such areas as meeting frequency, alternate voting procedures, training specifications, local expectations of FSC members. The bylaws should not contradict guidance outlined in this Standard. In the event an FSC charter's bylaws conflict with this Standard, this Standard shall supersede the bylaws and govern to the extent necessary to resolve the confliction.

D.3.3 Facility Security Committee Meetings

At a minimum, FSCs shall hold semiannual meetings. However, the ISC encourages FSCs to hold quarterly meetings. To effectively forecast and submit a budget request to their funding authorities, tenant agencies should dedicate one FSC meeting during the first or second quarter of the fiscal year to budgeting decisions. The FSC chairperson publishes the agenda far enough in advance of the meeting for the FSC members to assess or seek additional guidance on topic items or receiver higher headquarters guidance on voting related issues.

D.3.4 Risk Assessments

The security organization regularly conducts risk assessments of the facility (refer to Section 8.2). The FSC chairperson and the owning or leasing authority review identified countermeasures in advance of a scheduled FSC meeting.

At the FSC meeting, the security organization will provide documentation of risk assessment findings and countermeasure requirements. As part of the risk assessment presentation, the security organization will indicate if the identified countermeasure matches with the necessary LOP or if a vulnerability will remain. The FSC should invite the tenant organizational security elements to FSC meetings when there is the presentation of risk assessment results. This will aid in voting, funding, and development of alternative risk reduction strategies. After the presentation, the FSC will meet to vote on the proposed countermeasure. When voting on countermeasures, each FSC member votes to determine whether to:

- Use the necessary LOP.
- Use some of the necessary LOP and accept some risk.
- Use a lower achievable LOP and accept some risk.
- Accept all identified risks without employing any countermeasures.



Unacceptable level of risk may be occurring while waiting for a decision on whether to fund and implement and identified countermeasure.

FSCs shall provide a written response to the security organization within 90 days of receiving the final risk assessment report as required in section 8.2.5. FSCs develop responses supported by the voting process outlined in section D.3.5. If an FSC does not vote on a required countermeasure, document the associated risk relating to that decision. Meeting minutes and risk acceptance documentation are inspectable items by higher Headquarters and/or the ISC through the compliance and verification process.

During the review period, FSC representatives will consult their 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 organizational security element and financial element for guidance on votes that have a budgetary impact. The FSC representative votes to approve or disapprove proposed countermeasures and other security-related issues that come before the FSC. The FSC will follow guidance outlined in section 8.4.1 to document accepted risk. The meeting minutes document any voting delays and why (e.g., lack of information provided by a stakeholder organization).

D.3.5 Voting Procedures

To ensure adequate time for review and consultation, voting is only permitted on agenda items identified as decision items. The FSC chair should schedule the first vote within 45 days of receiving the final risk assessment report but no later than 90 days (see section 8.2.5). Each federal tenant has one weighted vote. The Office of Management and Budget (OMB) Bureau Code listed in

[Appendix C of OMB Circular No. A-11](#) shall be used to define each federal tenant and is located on the OMB website. The RSF of assigned space (by percentage of total square footage for the building) for each federal tenant weights each vote. (See Table 9).

For a valid vote, a quorum of 50 percent of the FSC tenant organizations, representing at least 51 percent of the RSF must cast a vote on a decision item. A decision item passes when the proposal receives more than 50 percent of the FSC weighted votes. If an FSC member cannot attend a meeting, they may submit a vote on an agenda item in advance. The meeting minutes must reflect the vote provided ahead of time. FSCs should discourage abstention voting, as it will count as a "no" vote due to the potential outcome of risk acceptance if a security measure fails to pass. The minutes must include the reason for any "no" or "abstention" votes.

FSCs must document the result in the meeting minutes if the necessary condition for a valid vote is not present. The FSC Chair may then schedule another time for the vote or immediately **submit the matter to a second level review** (Figure 15).

Table 9 illustrates weighted voting 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, add vacant space 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.¹⁵

The FSC Chair can make these calculations for an entire facility by using the ISC Pro Rata Voting Share Calculation Tool.

Table 9: Example of FSC Weighted Votes

| Agency Tenant | Agency/Bureau Code | Square Feet | % of Total RSF | Pro Rata Voting Share |
|--|--------------------|-------------|----------------|-----------------------|
| DOJ – Legal Activities and USMS (includes U.S. Trustees, USMS and U.S. 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% |

¹⁵ To exclude 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.

| | | | | |
|---|--------|--------|------|------|
| 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% |
| Total | | 52,141 | 100% | 100% |

D.3.5.1 Decision Item Approval

When the FSC approves an agenda item decision, the meeting minutes shall reflect the decision. If the vote approves the implementation of a security countermeasure, this represents a financial commitment by each federal tenant in the facility regardless of how each FSC representative voted. All federal tenants in the facility shall provide their prorated share of the cost to fund the approved countermeasure.

Notification of the decision to the security organization, owning/leasing authority, or implementing agency is through their FSC meeting participation and receipt of the meeting minutes. They shall also be responsible for reporting to the FSC chair their progress in obtaining funding necessary to implement the countermeasure(s).

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, 5th Edition, GSA does not require the FSC to provide a signature for an approved security feature to modify a tenant Occupancy Agreement (OA).
- The security organization, owning/leasing authority, or the organization implementing the security countermeasure should be prepared to accept funding from multiple sources and from mixed fiscal years, if applicable.
- If a facility owner, including GSA, 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 following written notification from the facility owner that the approved countermeasure is not acceptable. If there is not an agreement on alternative proposals, then document this acceptance of risk in the FSC meeting minutes. The lessee's requirement to accept risk should be a consideration at the time of lease renewal.

D.3.5.2 Decision Item Disapproval

The meeting minutes must document each agency's vote to approve or disapprove an identified countermeasure. If the meeting participants reject a decision item, the minutes must document the basis for risk acceptance, or the alternative risk management strategy chosen. The FSC chairperson shall maintain meeting minutes as an historical document for the facility. Provide each member of the FSC and their respective security element at the organization headquarters level with a copy of the meeting minutes documenting the chosen risk management strategy. The security organization will maintain documentation of the decision, as well.

D.3.6 Facility Security Committee Funding Process

This section supplements *Section 7.0, Financial Guidance*. The FSC considers changes to their facility's security posture by adding new policies, changing existing policies, or by implementing or enhancing security countermeasures. Generally, policies 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). Funding requests for security countermeasures and upgrades often compete with other funding requests at the organizational headquarters level. Accordingly, FSC representatives must facilitate the information flow between the FSC and their headquarters (unless the representative has funding authority). Organizations must be prepared for countermeasure funding requests and ensure their annual budget requests consider the number of locations they occupy and the projected requests for security countermeasure funding.

The FSC chairperson shall establish a date for a vote on all decision items requiring funding, while providing a reasonable period for FSC representatives to obtain guidance from their respective organization (up to 90 calendar days after receiving all documents and materials necessary to supply respective funding authorities).

If organizations do not provide guidance to the FSC representative within this allotted time, the FSC chairperson may use the FSC decision process, or other means as determined by the FSC, to obtain a resolution. The meeting minutes must document each agency's vote to approve or disapprove a required countermeasure.

Step 1: Security Organization Presents Countermeasures Implementation and Funding Plan to the Facility Security Committee or Facility Security Committee Member or their Funding Authority Requests Removal of Previously Implemented Countermeasure.

Facilities may have numerous security countermeasures in place, and the FSC may or may not have approved them by vote. As these countermeasures may have budgetary impact on the tenant organizations, there shall be a mechanism to cancel or remove previously implemented countermeasures that are no longer necessary.

When a funding authority or headquarters security element notifies an FSC that funding for a countermeasure is no longer available the tenant agency FSC member 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 pro rata vote of the tenant agencies. Tenant organizations are responsible for all costs associated with removal. When there is approval for the removal of a countermeasure, the agency responsible for the implementation shall cease or remove the countermeasure by the date specified by the FSC.

Step 2: Facility Security Committee Members Request Guidance from Their Respective Funding Authority.

Step 3: Vote - Did the Facility Security Committee vote to approve or disapprove the security proposal?

- Approved: Implement countermeasures
- Disapproved: Consider alternative strategies as noted in section 8.3. This decision point is an iterative loop for the purpose of facilitating technical discussions between the security organization and the organizational security elements of the FSC members. Discussions help promote creative thinking and evaluate multiple countermeasures to mitigate risk.



Figure 13: FSC Funding Process

Step 4: 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.

D.3.6.1 Financial Commitment

An FSC vote to approve a countermeasure is a financial commitment by each federal tenant that pays rent for facility space.

Should an agency vote not to approve a countermeasure, but the FSC votes to approve the countermeasure, the agency is responsible for providing funds for their prorated share of the cost of the approved countermeasure, regardless of their vote. 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 D.3.5.1 Decision Item Approval.) The security organization, owning/leading authority, or implementing authority shall coordinate with each tenant agency funding authority on the transfer of that agency's pro rata share of the funds. Organizations must provide written estimates for when funding will be available.

D.3.7 Risk Acceptance

If an FSC makes the decision not to approve or provide funding for a countermeasure, this constitutes risk acceptance. The FSC representative shall provide a copy of the denial of organizational funding and risk acceptance documentation to the chairperson of the FSC for inclusion in meeting minutes.

D.4 Facility Security Committee Operations

The FSC may consider many issues regarding their facility's security. This standard includes process charts to aid each FSC when making decisions that will determine the facility's security posture.

If the FSC representatives are unable to resolve an issue, the decision process (see section D.4.2 FSC Decision Process) flow chart provides an outline for reaching resolution. The objective is for the FSC to make decisions for their respective facility regarding countermeasures to implement at the lowest level. 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 14 outlines the basic steps taken to address decision and discussion items on the meeting agenda. Discussion items allow the FSC to explore and document facility-related issues. If a decision item carries a funding impact, use the funding process (see Figure 13). If the decision does not carry a funding impact, each FSC representative has the option to request guidance on decision items.

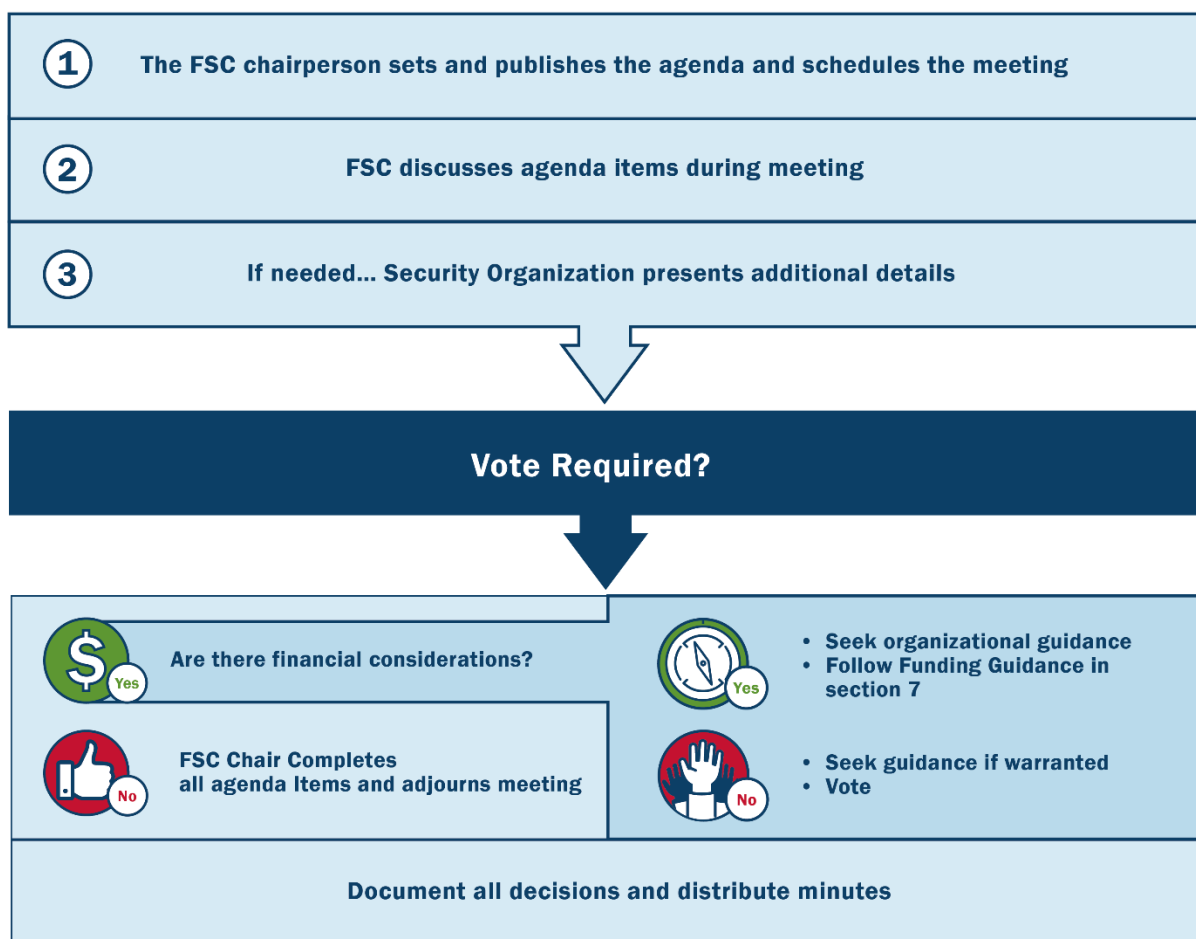


Figure 14: FSC Business Process

D.4.2 FSC Decision Process

Each FSC will face many decisions regarding their federal facility's security posture. 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. When the FSC receives the final risk assessment report, they begin the decision process. When the FSC is at an impasse, the FSC chair must determine whether to submit the issue for a second level review or accept risk. While the FSC moves through the decision process on a countermeasure(s) that leaves the facility vulnerable, they are accepting risk for this vulnerability until the final decision.

FSCs either use the decision process in this standard or adopt a documented alternate process, which includes the same timelines, to facilitate a decision provided it includes levels to elevate decisions within tenant organizations ending with the senior officials. The organizational structure used by each 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 FSC's Decision Process allows three opportunities to reach a decision. Most often, the process concludes at the first review by "FSC Deliberation." If an FSC cannot reach a decision, present the information to the organizational security element for each agency at the facility. The FSC is responsible to implement and manage the process at each level. The FSC will coordinate with the security organization to develop and implement risk mitigation strategies aimed at reducing the accepted risk during this process. Establish mechanisms to monitor and evaluate mitigation strategies and develop/coordinate response efforts in case of an undesirable event.

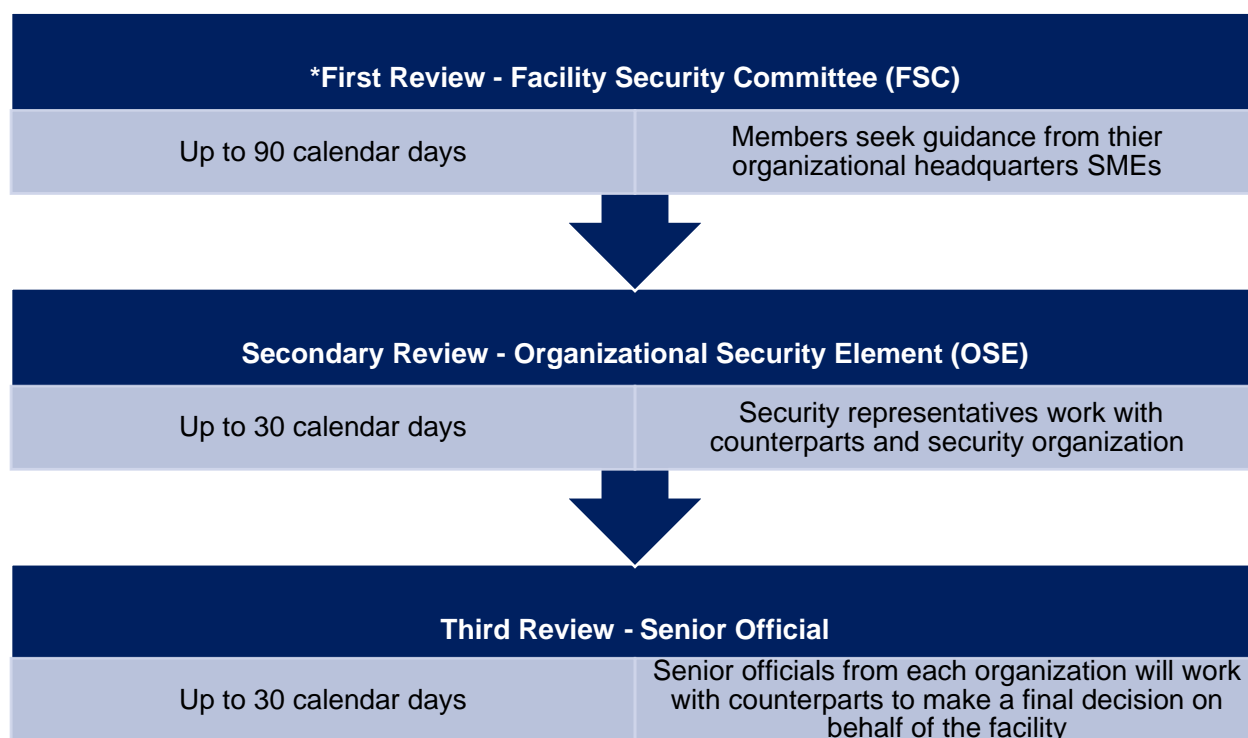


Figure 15: FSC Decision Process

* When using the FSC decision process, if the current level of review is successful, record results in the meeting minutes and appropriate actions taken. It does not need to move to the next level. If the review period was unsuccessful, then the FSC proceeds to the next level in the decision process.

D.4.2.1 First Review – Facility Security Committee

Most FSCs make decisions at during the first review through agenda item discussions and voting. The FSC chairperson has the option to continue to use additional levels of the decision process should the discussions become unproductive. Allow FSC representatives a review period to consult with their respective organizational security element for guidance when they need additional information. The FSC may also coordinate with the ISC regional advisor for additional guidance or recommendations. FSCs must complete the first review no longer than 90-days if responding to a risk assessment (see Section 8.2.5). If the FSC chair decides to submit the subject to a secondary review, the FSC must document the decision and provide the documentation to the security organization.

D.4.2.2 Secondary Review – Organizational Security Element¹⁶

The physical security component from each of the facility's organizations participates in a review of the issue. They evaluate the facility and the security organization's proposal, then work with representatives from the facility, their counterparts from the other represented organizations, and the security organization to develop a plan that each organization finds acceptable. If the security representatives and the security organization cannot develop a modified proposal, they will work together to develop alternative proposals, and the FSC will schedule a vote.

When the FSC representative contacts their respective organization and requests assistance, they must complete this step in the decision process within 30 calendar days of the initial contact. If a resolution is not reachable in the agreed upon timeframe, refer the issue(s) in question to each respective organizational senior official for action.

D.4.2.3 Third Review – Senior Official

The organizational security element for each tenant represented at the facility briefs their senior official on the issue in question. The senior official for each organization represented at the facility will work with representatives from the facility, their counterparts from the other represented organizations, to decide on behalf of the facility. Organizations have multiple opportunities to resolve an issue with facility-level input before the issue reaches the senior officials for resolution. If an issue rises to the senior officials for resolution, they will make a final decision, and the facility will implement this decision. Document the decision in the FSC meeting minutes.

Complete this step in the decision process within 30 calendar days of referring it to each respective organizational senior official. The FSC can request assistance from the ISC Standard Subcommittee or accept risk if unable to reach a resolution in the agreed-upon timeframe.

¹⁶ This level includes the organizational Chief Security Officer or equivalent.



Figure 16: RMP Decision Process Timeline

D.5 Record Keeping

FSCs will retain meeting minutes, and other documents or information the FSC deems important. This includes:

- All FSC decisions.
- Vote tabulations.
- Project funding approval or disapproval.
- Risk acceptance details.

The FSC and the security organization should maintain copies of records for a minimum of two assessment cycles.

The National Archives and Records Administration (NARA) provides guidance on records retention for FSCs in its General Records Schedule 5.6.¹⁷

All FSC members, and organizational headquarters will have access to meeting records. Additional access to FSC records held by other agencies will require the FSC's approval. Only appropriately cleared personnel with the need-to-know shall receive records containing National Security Information (NSI) or sensitive information.

¹⁷ [NARA, General Records Schedule 5.6: Security Management Records, March 2022](#)