

## FISMA SOP Appendix A: Personnel Requirements

April 2016

### I. Overview

The purpose of this Appendix A is to set forth processes and procedures for typical personnel responsibilities under federal research contracts that include FISMA Terms.

### II. Staffing Change Notifications:

Notification to the Contracting Officer's Representative (COR) and Contracting Officer must occur within **five working days** for any staffing changes (including Partners Information Systems staff) for positions that have or will have access to HHS Information systems or data.

- Partners Research IT Core Director, Brent Richter, or designee will notify Investigators when staff changes occur and Investigators must update the roster accordingly. The Core Director will ensure that newly-hired Core staff are trained and have completed the appropriate forms and non-disclosure agreements, as required by each federal research contract.
- Investigators must notify the Core Director when training refresher notices or updates are received from the federal sponsor.

### III. Process for Onboarding New Employees:

The following must be completed and noted on each New Hire Checklist ([page 3](#)):

#### A. Roster of Employees ([Appendix B](#))

- Provide the name, position, title, email address, and phone number of the new employee.
- Provide the name, position, title and suitability level held by the former incumbent.
- If the employee is filling a new position, provide a description of the position and the Government will determine the appropriate security level.

#### B. Training

New employees must complete the courses listed before performing any work.

##### NIH

1. **NIH Information Security Awareness Course:** [Information Security Awareness Course](#)
2. **NIH Privacy Awareness Course:** [Privacy Awareness Course](#)
3. **Role Based Training:**
  - [Information Security for IT Administrators](#) (All employees required)
  - [HHS Information Security for Managers](#) (For IS Managers)
  - [FDCC Systems Administrator Training](#) (For IS Managers)
4. **NIH Information Technology General Rules of Behavior:** [NIH IT Rules of Behavior](#)
5. *NIH Course Certificates:*

NIH Certificates are located at the end of each course and should be retained on file by the PI or his/her designee.

##### HHS

6. **HHS Privacy Awareness Training:** Fiscal Year 2015 [[HHS Privacy](#)]

7. **HHS Information Systems Security Awareness Training** Fiscal Year 2015 [[HHS Security](#) ]
8. *HHS Security and Privacy Awareness Training Certificate* ([Certificate](#))  
HHS Certificates should be distributed to employees for completion and then retained on file by the PI or his/her designee.

**C. Non-Disclosure Agreement for Contractors:** ([Non-Disclosure Agreement](#))

- Form should be signed, dated and retained on file by the PI or his/her designee.
- An updated inventory of all employees who have signed the “Commitment to Protect-Non-Public Information – Contractor Agreement” will be retained on file by the PI or his/her designee.

**D. National Check and Inquiry Investigation (NACI) with fingerprinting (if applicable):**

- The Contracting Officer will be notified in advance when any new personnel, who are subject to a background check/investigation, will work under the contract and if they have previously been the subject of a national agency checks or background investigations (via Roster of Employees).
- Upon receipt of the Government’s notification of applicable Suitability Investigations required, the new employee shall complete and submit any required forms within 30 days of the notification.

**IV. Process for Departing Employees:**

The following must be completed for all departing employees. All documentation shall be made available to the COR and/or Contracting Officer upon request.

**A. Roster of Employees** ([Appendix B](#))

- Provide the name, position title, and security clearance level held by or pending for the individual departing
- Provide the name, position, title and suitability level held by the former incumbent.

**B. Employee Separation Checklist**

- Perform and document the actions identified in the Employee Separation Checklist, when an employee terminates work under this contract. [Separation Checklist](#)
- HR and PI to review checklist and get required sign off, prior to employee termination

**C. Key Personnel:**

- Written consent of Contracting Officer is required to replace Key Personnel.
- A thirty (30) day notification must be sent to Contracting Officer with comprehensive justification for the replacement request (including proposed substitutions for key personnel) noting the impact on performance under the contract.

**NEW HIRE CHECKLIST**

**New Staff Member's Name:** \_\_\_\_\_

**Date of Hire:** \_\_\_\_\_

<i>Requirement</i>	<i>Date Completed</i>	<i>Comments</i>	<i>Confirmed by:</i>
<i>Add information to Roster of Employees</i>			
<i>NIH Information Security Awareness</i>			
<i>NIH Privacy Awareness</i>			
<i>Role Based Training</i>			
<i>General Rules of Behavior</i>			
<i>HHS Privacy Awareness Training</i>			
<i>HHS Information Systems Security Awareness Training</i>			
<i>Non-Disclosure Agreement for contractors</i>			
<i>NACI Required Forms</i>			