



U. S. DEPARTMENT OF THE INTERIOR
OFFICE OF SURFACE MINING
RECLAMATION AND ENFORCEMENT
DIRECTIVES SYSTEM

Subject Number:
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Date:
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Subject: Security Management - Internal Control System Model

Approval:

Title: Acting Director

1. Purpose. The Security Management Internal Control System Model, which was adopted from the Departmental Security Office guidelines, will provide a systematic and consistent way for the Office of Surface Mining Reclamation and Enforcement to ensure compliance with the requirements of 340 DM; OMB Circular A-123, Internal Control Systems; and the Federal Managers' Financial Integrity Act.

2. Definitions. None.

3. Policy/Procedures:

a. Responsibilities.

(1) The Director, Office of Surface Mining Reclamation and Enforcement, has the overall responsibility for implementing and administering an Internal Control System for Security Management.

(2) The Assistant Director, Budget and Administration, as the Security Officer, with the assistance of the Personnel Officer, as the Alternate Security Officer, has the overall responsibility for the policy and procedural aspects of the system.

(3) The Chief, Administrative Service Centers (ASCs) and Chief, Branch of Headquarters Personnel Services (BHPS) have the responsibility for developing guidelines for ensuring that the system is consistent with governing policy, rules and regulations.

b. Procedures. The Chief, Administrative Service Centers, and the Chief, Branch of Headquarters Personnel Services, shall plan and carry out their responsibilities within the guidelines contained in the attached document, "Model Internal Control System for Security Management."

(1) Security Clearances.

(a) The Alternate Security Officer will review and process all requests made for security clearances.

(b) The Chiefs, Administrative Service Centers and Headquarters Personnel Services will provide administrative support to the Alternate Security Officer in the processing of clearances and terminations.

(2) Identification Cards.

(a) The Chief, BHPS will coordinate actions relating to I.D. cards through the Personnel Officer.

(b) The Chiefs, ASCs will control the I.D. card process for all field offices and coordinate with BHPS for replenishing I.D. card stocks.

4. Reporting Requirements. None.

5. References. PER-13, Departmental Manual Chapter 340, OMB Circular A-123 on Internal Control Systems, and the Federal Managers' Financial Integrity Act.

6. Effect on Other Documents. None.

7. Effective Date. Upon issuance.

8. Contact. Division of Personnel, (202)/FTS 343-4665.

OFFICE OF SURFACE MINING
RECLAMATION AND ENFORCEMENT

MODEL INTERNAL CONTROL SYSTEM

FOR

SECURITY MANAGEMENT

MODEL CONTROL SYSTEM
FOR
SECURITY MANAGEMENT
PERSONNEL/DOCUMENT SECURITY

I. Introduction

This model is to be used in the Personnel/Document Security internal control process for Security Management. The model provides guidelines to ensure that appropriate controls and procedures are used by bureaus and offices in processing and handling personnel security documents.

II. Background

Personnel clearances play a major role in Security Management. Office of Personnel Management (OPM) is authorized by rules, regulations, and law to establish and carry out a program for investigating the suitability of applicants and appointees for the Federal Service. OPM has established Federal Personnel Manual chapters 731, 732, and 736 to maintain requirements for personnel clearances. Departmental Manual chapter DM 441 is our established guide for personnel clearances. These requirements and guidelines are also stated in PER-13 of the directive system established in the Office of Surface Mining Reclamation and Enforcement (OSMRE).

Clearances are processed based on position sensitivity; therefore, different actions have to be taken depending upon the level of position sensitivity.

III. The Model Control System

- A. Objectives: The objectives of this model are to provide a framework of the procedures and processes that occur when effecting personnel clearances.
- B. Features: The model control system is to be used by OSMRE to ensure that control methods exist in obtaining personnel clearances. Format is presented in a flow chart as a general outline of the process.

There are two types of document controls and two types of process controls described in this model.

Document Controls:

- Completeness Controls assure that the documents contain the desired and necessary information on the forms.
- Reliability Controls assure that the information is pertinent, up-to-date and reliable.

Process Controls:

- Comprehensive Controls assure that the process considers all aspects that are necessary for a decision that results in a proper expenditure of resources and that it is in accordance with the government interests and objectives.
- Objectivity Controls assure that the process is performed without bias. Thoroughly looking through the information and making decisions that will benefit the quality of government are also objectivity controls.

The documents/processes that make up the control system are presented as Attachment A. Control objectives for each document/process are presented in pages A-1 through A-8.

MODEL CONTROL SYSTEM FLOW
FOR
PERSONNEL/DOCUMENT SECURITY

Event Number	Page		<u>RESPONSIBILITY</u>
1	A-1	Requesting Security Clearance	PO/HQ ASCs
2	A-2	Establishing Security File and Reviewing OPF	PO/HQ ASCs
3	A-3	Granting a Clearance	S.O.
4	A-4	Screening Material	PO/HQ ASCs
5	A-5	Handling or Safeguarding Security Files	PO/HQ ASCs
6	A-6	Administratively Updating TOP SECRET Clearance Every 5 Years	PO/HQ ASCs
7	A-7	Downgrading or Terminating Clearance if Transferred	PO/HQ ASCs
8	A-8	Ensuring that Investigative Requirements for all Sensitive Positions are Met	PO/HQ BHPS ASCs

PO/HQ = Personnel Office/Headquarters
 BHPS = Branch of Headquarters Personnel Services
 ASCs = Administrative Service Centers
 S.O. = Security Officer

Event 1

Requesting Security Clearance

Description: The request for security clearance is the DI-1913 form used to send all security clearance requests to the Alternate Security Officer in PO/HQ with a copy of the individual's SF-52 or SF-50.

Completeness Control Objectives:

- ° Is the request signed by the employee's supervisor?
- ° Does the clearance level requested correspond with the position sensitivity on the SF-52/SF-50?
- ° Does the request adequately explain the duties which the employee is required to perform and substantiate the need for the clearance?

Reliability Control Objectives:

- ° Is the request timely to ensure that the clearance may be processed before the employee assumes "sensitive" duties?
- ° If the request was not received prior to an incumbent filling a critical-sensitive position, has a waiver been authorized?

TEST METHODS:

- Document Analysis
- Observation
- Interview
- Other _____

Identified Control Weaknesses:

Event 2

Establishing Security File and Reviewing OPF

Description: Upon receipt of a request for a security clearance, a security file is established and a review made of the employee's Official Personnel File (OPF). The file is reviewed to determine if the employee previously had a clearance or an investigation. If the investigation is current (up to date) a security clearance/suitability may be granted. If the investigation is not current, if the employee has not had the proper investigation completed, or if the employee has had a break in service of over 1 year, forms must be filled out and submitted to the Alternate Security Officer in PO/HQ for the appropriate investigation to be initiated.

Comprehensive Control Objectives:

- ° Has the individual had a NACI (National Agency Check and Inquiries) - the basis for SECRET clearance/noncritical-sensitive positions?
- ° Has the individual had a BI (background investigation) - the basis for TOP SECRET clearance/critical-sensitive positions?
- ° If the employee has had the proper investigation previously for the requested clearance, has he/she been in continuous Government service since the date of the investigation?
- ° If a BI was conducted was it completed within the last 36 months?

Objectivity Control Objectives:

- ° Does the OPF reveal unfavorable information?

TEST METHODS:

___ Document Analysis
 ___ Observation
 ___ Interview
 ___ Other _____

Identified Control Weaknesses:

Event 3

Granting a Clearance

Description: After all conditions are satisfied in event number 2, a clearance may be granted. If a TOP SECRET clearance or above is to be granted, the employee must submit the proper forms. A BI or SBI should be conducted if his/her OPF reveals that a BI has never been conducted, or that an investigation has not been conducted within the last 36 months.

Reliability Control Objectives:

- ° Has the employee completed the proper forms for a SECRET clearance/noncritical-sensitive position?
- ° Has the employee completed the proper forms for a TOP SECRET clearance/critical-sensitive position?
- ° Has a tickler file been established to follow-up on forms sent to an employee for completion?

Completeness Control Objectives:

- ° Employee must complete the following forms for a SECRET clearance/noncritical-sensitive position:
 - Two copies SF-85 (two forwarded, one in security file).
 - Two copies SF-87 (forwarded).
 - Two copies SF-171, with original signature (one forwarded, one in security file).
 - One "Notice to Applicant Form" (retained in security file).
- ° Employee must complete the following forms for a TOP SECRET/special-sensitive position:
 - Three copies SF-86 (two forwarded, one in security file).
 - Two copies OPM-329A (one forwarded, one in security file).
 - Two copies of OFI-36 (forwarded).

TEST METHODS:

Document Analysis
 Observation
 Interview
 Other _____

Identified Control Weaknesses:

Event 4

Screening Material

Description: Upon completion and/or return of an investigation from the investigating agency, the material is screened for completion and adjudication.

Completeness Control Objectives:

- Has a copy of the certification of clearance been forwarded to the appropriate supervisory official (either the Alternate Security Officer in PO/HQ or the employee's immediate supervisor)?
- Has the employee been briefed and returned a signed copy of the SF-189 for inclusion in his/her security file?
- Has notice of clearance been placed in an update/review system?

Comprehensive Control Objectives:

- If the investigation is favorable, has a security clearance been granted?
- If the case contains derogatory information for a TOP SECRET clearance, has the case been referred to the Deputy Director, Administration and Finance and/or Alternate Security Officer in PO/HQ for necessary action?

TEST METHODS:

 Document Analysis
 Observation
 Interview
 Other _____

Identified Control Weaknesses:

Event 5

Handling or Safeguarding Security Files

Description: Security files must be properly handled or safeguarded. When not in use, all security files should be locked in an appropriate safe or file cabinet. These files are protected under the Privacy Act.

Comprehensive Control Objectives:

- ° Are files kept in either locking cabinets, safes, or in off-master rooms?
- ° Are pending security files checked at least weekly to determine case status/necessary follow-up action?
- ° Are copies of all certifications of clearances sent to outside agencies kept in the security file?

Completeness Control Objectives:

- ° Are all inquiries or requests for reviewing files recorded in the security file by the Alternate Security Officer in PO/HQ.

TEST METHODS:

Document Analysis
 Observation
 Interview
 Other _____

Identified Control Weaknesses:

Event 6

Administratively Updating TOP SECRET Clearances
Every 5 Years

Description: TOP SECRET clearances must be administratively updated every 5 years to ensure that clearances are still required and that no derogatory information is contained in the employee's OPF. Therefore, a periodic reinvestigation (PRI) is required.

Completeness Control Objectives:

- ° Has a letter been sent to the employee's supervisor requesting justification for continued clearance along with an SF-86 for update?
- ° Has a memorandum of justification been received from the employee's supervisor along with an updated copy of the SF-86?

Employee must complete the following forms for a Periodic Reinvestigation (PRI):

- ° Three copies of SF-86 (Two forwarded, one in security file).
- ° Two SF-85A's (One forwarded, one in security file).
- ° Two copies of OPM Form 329A.

Objectivity Control Objectives:

- ° Has a favorable review been made of the employee's OPF?
- ° Has a current FBI name check been run on the employee with favorable results?

TEST METHODS:

___ Document Analysis
___ Observation
___ Interview
___ Other _____

Identified Control Weaknesses:

Event 7

Downgrading or Terminating Clearance if Transferred

Description: When an employee is transferring out of OSMRE or the Department, or he/she no longer requires access to classified information commensurate with the level of clearance, action should be taken by the supervisor to notify the Alternate Security Officer in PO/HQ to downgrade or terminate the clearance.

Reliability Control Objectives:

- ° Have security files and update cards been re-marked designating the lower clearance level?
- ° Have the security file and 5-year update card (for TOP SECRET clearances) been removed from active records?
- ° Has a reference card with complete information been placed in the inactive file?

Comprehensive Control Objectives:

- ° If clearance downgrading is necessary, has the security officer or appropriate supervisory official received a copy of the downgrading certification?
- ° Has the employee been debriefed and returned a completed debriefing statement for inclusion in his/her security file?
- ° If clearance is to be terminated, has the security officer or appropriate supervisory official received a copy of the clearance termination certification?

TEST METHODS:

Document Analysis
 Observation
 Interview
 Other _____

Identified Control Weaknesses:

Event 8

Ensuring That Investigative Requirements
for all Sensitive Positions are Met

Description: Not all employees occupying critical-sensitive positions must have a TOP SECRET clearance. Likewise, all employees in noncritical-sensitive positions do not require SECRET clearance. Generally, only those individuals requiring access to classified information are required to have a security clearance. However, investigative requirements for all sensitive positions must be met.

Completeness Control Objectives:

- ° Have BI's been completed on all incumbents of critical-sensitive positions in accordance with the Federal Personnel Manual 296-33 and sent to the Alternate Security Officer in PO/HQ for action?
- ° Have NACI's been conducted on all incumbents in noncritical-sensitive positions in accordance with the Federal Personnel Manual 296-33 and the Alternate Security Officer in PO/HQ listed to receive all investigations for review and dissemination?

Reliability Control Objectives:

- ° Have notifications been sent to appropriate supervisory officials advising that investigative requirements have been met?
- ° Have notifications of completed investigations been sent to the employee's OPF?

TEST METHODS:

___ Document Analysis
___ Observation
___ Interview
___ Other _____

Identified Control Weaknesses:

Model Control System Flow
for
Identification Card Security

Event Number	Page		<u>RESPONSIBILITY</u>
1	B-1	Determining Type of Card Needed	BHPS ASCs
2	B-2	Issuing Secretarial ID Card	BHPS ASCs
3	B-3	Issuing DI-238A, DOI Identification Card	BHPS ASCs
4	B-4	Issuing DI-238, DOI Temporary Identifica- tion Card	BHPS ASCs
5	B-5	Submitting Memorandum to ID Control Office	BHPS ASCs
6	B-6	Processing Employee Exit Clearances	BHPS ASCs
7	B-7	Issuing Retiree ID Cards	BHPS ASCs
8	B-8	Establishing Standards and Controls	ASCs

BHPS = Branch of Headquarters Personnel Services
ASCs = Administrative Service Centers

Model Control System

for

Identification Card Security

I. Introduction

This document identifies the control systems for Identification Card Security.

- Provides background pertaining to the regulatory requirements for Identification Cards.
- Provides the objectives and features of a model control system.
- Defines and describes a model control system for the acquisition and utilization of Identification Card Security.

Background

II. As stated in Departmental Manual Regulation 310 DM, identification cards are required to permit authorized access to space occupied by the Department of the Interior, as well as other Federal agencies. Each employee of the Department is required to have in his/her possession a personal identification card. Employees will present their identification card for examination by building security personnel upon entry into a Department of Interior facility. Deviation from these cards may be made when the head of an activity within the Department determines that another type of identification card would be better suited to a particular operation. However, all deviations require the prior approval of the Chief, Division of Enforcement and Security Management, Office of Administrative Services. All employees will surrender their card upon termination of employment with OSMRE in accordance with INE-18 of the directive system established in the Office of Surface Mining Reclamation and Enforcement and Part 310, Chapter 3 of the Departmental Manual.

III. The Model Control System

- A. Objectives: The objective of this model control system is to aid bureaus and offices in improving and evaluating their internal controls for identification cards. Bureaus and offices should incorporate critical elements of the model into existing systems or use the model as a tool in the development of new systems.
- B. Features: The model control system is a system of documentation, processes, and control objectives that assures the identification card methods are being used in a manner that satisfies program needs, makes best use of staff resources, and complies with applicable laws and regulations.

There are two types of document controls and two types of process controls described in this model:

Document Controls:

- Completeness Controls assure that the document contains the desired/necessary information.
- Reliability Controls assure that the information is reliable, pertinent, and timely.

Process Controls:

- Comprehensive Controls assure that the process considers all aspects that are necessary for a decision that results in a proper expenditure of resources and that is in accordance with the Government's interests and objectives.
- Objectivity Controls assure that the process is performed without bias. This can best be accomplished by a person or group whose interests are broader than the matter under consideration. Another way to obtain objectivity is to provide that duties be so segregated as to prevent the same people from obtaining unauthorized identification cards.

The documents/processes that make up the control system are presented as Attachment B. Control objectives for each document/process are presented in pages B-1 through B-8.

Event 1

Determining Type Of
Card Needed

Description: When applying for an initial or replacement Departmental Identification Card, the supervisor will decide which card the employee is entitled. There are three types of identification cards: Secretarial; DI-238A, Department of the Interior (DOI) Identification Card; and DI-238, DOI Temporary Identification Card. The supervisor will decide upon the type needed based on employee's job title or whether he/she is a permanent employee of the Department.

Reliability Control Objectives:

- ° Does the individual presently hold a position with the Department?
- ° Is the individual a full-time or part-time employee?

Objectivity Control Objectives:

- ° Is the decision based on established issuance criteria, i.e., job title and length of service expected?

TEST METHODS:

___ Document Analysis
___ Observation
___ Interview
___ Other _____

Identified Control Weaknesses:

Event 2

Issuing Secretarial ID Card

Description: This card is carefully controlled and issued only upon a written request to the Chief, Division of Enforcement and Security Management, Office of Administrative Services. A facsimile signature of the Secretary is on the card which bears the Department Seal. The card is also serially numbered and is carefully controlled.

Issuance of these cards is limited to top officials of the Department and Secretarial Cards are issued only to permanent, full-time employees.

Completeness Control Objectives:

- ° Is the card properly numbered and controlled?
- ° Does the card bear the signature of the present Secretary of the Interior?
- ° Was the request memorandum approved by one of the following:
Chief, Division of Enforcement and Security Management or Director, Office of Administrative Services?

Comprehensive Control Objectives:

- ° Is the individual presently a permanent full-time employee with the Department?
- ° Does the individual hold one of the following full-time positions?

Secretary	Heads of Bureaus
Executive Assistant	Deputies
Special & Confidential Assistants	Assistant, Associate and Regional Directors or State or Area Directors
Under Secretary	Heads of Secretarial Offices
Deputies	Deputies
Special & Confidential Assistants	Inspector General
Solicitor	Assistant Inspector General
Deputies	Special and Confidential Assistants
Associate & Regional Solicitors	(Auditors and Investigators who have special need)
Assistant Secretaries	
Deputies	
GS (or GM) 15's & above	

TEST METHODS:

Document Analysis
 Observation
 Interview
 Other _____

Identified Control Weaknesses:

Event 3

Issuing DI-238A,
Department of the Interior Identification Card

Description: This card is issued to permanent, full-time or permanent, part-time employees. The card is white with the individual's picture on the left. The BHPS may obtain the DI-238A in blocks of 100 cards or less for issuance to ASCs. Request for blocks of cards should be submitted to the Chief, Division of Enforcement and Security Management, Office of Administrative Services, the sole source of supply for Department of the Interior activities.

Completeness Control Objectives:

- ° Was the request submitted in writing for a block of cards to the Chief, Division of Enforcement and Security Management by BHPS?
- ° Are the cards properly numbered and controlled?
- ° Does the card bear the signature of the Departmental Security Officer if being issued in the metropolitan area, or by the proper authorized official in the Departmental field offices?

Comprehensive Control Objectives:

- ° Is the employee presently a permanent, full-time or a permanent, part-time employee with the Department?
- ° Has the request form been properly authorized by the individual's supervisor or administrative person who is responsible for requesting identification cards?

TEST METHODS:

____ Document Analysis
____ Observation
____ Interview
____ Other _____

Identified Control Weaknesses:

Event 4

Issuing DI-238,
Temporary Identification Card

Description: This identification card is used for contractors or temporary employees who will be assigned to the Department for a designated period of time. The card is yellow and a picture of the individual is on the left side of the card. The card requires the same information as the DI-238A but an expiration date is also added. All cards must reflect a termination date.

Completeness Control Objectives:

- ° Is the employee's termination date listed on the identification card?
- ° Is the card properly numbered and controlled?
- ° Is the individual's description information complete?

Reliability Control Objectives:

- ° Was the request submitted in writing to the Chief, Division of Enforcement and Security Management for Headquarters and to ASCs for field personnel?
- ° Does the card bear the signature of the Departmental Security Officer in the Washington metropolitan area or by the proper authorized official in the Department field office?
- ° Is the individual a contractor or a temporary employee of the Department?

TEST METHODS:

____ Document Analysis
____ Observation
____ Interview
____ Other _____

Identified Control Weaknesses:

Event 5

Submitting Memorandum to
ID Control Office

Description: When requesting an identification card, a memorandum must be submitted to the identification card control office. The memorandum should include:

Name of Employee
Bureau/Office
Place of Employment
Birthdate
Height
Weight
Hair Color
Eye Color
Social Security No.
Employee's Title

The memorandum should also state whether the individual is a new, permanent employee; temporary or contract employee and the NTE (Not to Exceed) date; or replacement for lost/stolen card. If it is a replacement, the circumstances must be explained.

Completeness Control Objectives:

- ° It the request signed by the individual's supervisor or administrative contact person?
- ° Does the memorandum have all the information needed?

Comprehensive Control Objectives:

- ° Is the individual a permanent, full-time or permanent, part-time employee or is he/she a contractor or a temporary employee?
- ° Is there a termination date included for temporary and contract employees?

TEST METHODS:

___ Document Analysis
___ Observation
___ Interview
___ Other _____

Identified Control Weaknesses:

Event 6

Processing Employee Exit Clearances

Description: Departmental Manual, 370 DM 295.7, dated March 7, 1983, establishes a Departmentwide requirement for an employee exit clearance procedure. When an employee leaves the Department, he/she must first complete an exit clearance form. Included in the form is the requirement for the employee to surrender his/her identification card upon termination. Form OSM-80 is completed when separating from Headquarters. The ASCs have an exit clearance form for separating field personnel. If an individual has possession of a Secretarial Identification Card, he/she must turn in the card to the Chief, Division of Enforcement and Security Management; if holding a DI-238A or a DI-238, the individual must turn in the card to the identification card control office.

If the individual is exiting because of retirement, he/she is eligible for a retiree identification card.

Comprehensive Control Objectives:

- ° Does the individual hold a Secretarial Identification Card, a DI-238A, or a DI-238?
- ° Was the exit clearance for the employee signed after receiving his/her old identification card?

Objectivity Control Objectives:

- ° Is the employee eligible for a retirement identification card?
- ° Does the clearance form follow the requirements of Departmental Manual regulation 370 DM 295.7?

TEST METHODS:

Document Analysis
 Observation
 Interview
 Other _____

Identified Control Weaknesses:

Event 7

Issuing Retiree Identification Cards

Description: When an employee of the Department retires, he/she is eligible to obtain a retiree identification card. Retiree cards are not to be issued to those who have accepted other Federal jobs, are transferring to another Federal agency, or who have been terminated for cause. The BHPS may obtain retiree cards in blocks of 20 or less from the Chief, Division of Enforcement and Security Management, and should be issued by authorized officials in conjunction with the exit clearance process.

Completeness Control Objectives:

- ° Does the card have the agency's name, the employee's name, retirement date, length of service, and the signature of the Departmental Security Officer?
- ° Is the card number from the individual's permanent ID card transferred to the retiree card?
- ° Did the individual have a photo taken for the ID card?

Comprehensive Control Objectives:

- ° Is the card being issued to an individual who is retiring?
- ° Are the cards being issued in conjunction with the employee exit clearance process?

TEST METHODS:

Document Analysis
 Observation
 Interview
 Other _____

Identified Control Weaknesses:

CONTROL EVALUATION REPORT

Bureau/Office _____ Component Security Management

Responsible Official _____ Date _____

NO.	IDENTIFIED CONTROL WEAKNESSES	Type		NO.	PLANNED CORRECTIVE ACTION	DATE SICM, D.
		S	C			
				1/		

Indicate the type of weakness by checking the appropriate column.
 S= A weakness in system design, i.e., necessary controls are lacking.
 C= A weakness in complying with established controls.

Outline of the major risks the evaluation focused on.

Brief summary delineating significant controls tested, type of testing, and amount of testing.