



# INCREASED SECURITY CONTROL EVALUATION WORKSHEET

## EXAMPLE

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**Document Control:**

This document is to be controlled in accordance with the requirements for “Sensitive Information” (Reference Comprehensive IC Compliance Plan, Page No. 42). Any questions concerning document control should be directed to Tom Smith, Radiation Safety Officer at (555) 555-5555.

Date	January 02, 2007
Name	Tom Smith, Radiation Safety Officer
Notes:	Preliminary Evaluation

**Increased Security Control Program Element Being Evaluated:**

**IC.1.b.(1)** Is there a requirement that determination of the T&R for individuals employed for three years or less, minimally include verification of employment history, education, and personal references?

Policy Reference	Existing Policy and Procedure:
<p>A. Human Resources Policy 15:78</p> <p>B. Blood Bank Policy 04:16</p> <p>C. Human Resources Policy 15:84</p>	<p><b>Compliance Evaluation:</b></p> <p><u>Policy A:</u> Prior to an offer of full time employment of Technical Professional Staff (TPS), the Human Resources Office performs an A-2 background check. This designation of background check requires:</p> <ul style="list-style-type: none"> <li>• Verification of employment history (5 years minimum when possible)               <ul style="list-style-type: none"> <li>➢ This includes direct communication with past supervisor(s)</li> </ul> </li> <li>• Verification of education and certifications as presented by job applicant               <ul style="list-style-type: none"> <li>➢ This includes direct communication with past instructor(s) and classmate(s)</li> </ul> </li> <li>• Criminal background check</li> </ul> <p><u>Policy B:</u> Prior to an offer of employment, the hiring package (job description, technical requirements and interview summaries) must be provided to the Human Resources Office, which then makes the final determination (with Blood Bank Supervisor consultation) on selection for employment offer.</p> <p><u>Policy C:</u> The Human Resources Office maintains documentation of each employee’s records, including:</p> <ul style="list-style-type: none"> <li>• All information associated with new hire determinations (ref. Policy A &amp; B above).</li> </ul> <p>The documentation is maintained for the duration of employment or a minimum of 5 years after termination</p> <p><b>Recommended Modifications</b>  <b>“Coding”/Terminology Considerations</b>          &lt;&lt;See “Recommendations”&gt;&gt;</p>



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**Point of Contact:**

1. Accessibility
2. Trustworthy & Reliable
3. Trained and Knowledgeable
4. “Coding” / Terminology
5. Access Level
6. Communication Forms/Requirements

Within the Human Resources Offices, the Asst. Supervisor (currently Peggy Snow) has been designated the POC for the Comprehensive IC Compliance Program

1. She is available through her office M-F 8am - 5pm (telephone ext. 606)
2. Her position is required to undergo evaluation to determine T&R evaluation [IC1.b(1)]
3. She has been trained by the RSO (Tom Smith) in the specific requirements and intent of the Comprehensive IC Compliance Program which are relevant to her duties
4. The above training included reference and training of terminology specific to the IC requirements
5. The above training was specific and limited to the Comprehensive IC Compliance Program components which are relevant to her duties
6. The above training included relevant information and guidance on document control associated with the Comprehensive IC Compliance Program. <see recommendations>

**Access:**

1. Notification Requirements
2. Physical Location
3. Form of Documentation
4. Required Revision Notification

1. Access, for appropriate and authorized internal or external review, to Human Resources’ documentation is available through the Asst. Supervisor. For external review purposes (audits), advanced notice is preferred, but not required.
2. The documentation is maintained in accordance with current Human Resource’s Office protocol. <<see recommendations>>
3. Documentation is maintained in hardcopy (paper) form
4. Currently, changes in Human Resource’s policy’s or staff would not be brought to the attention of the RSO position. <<see recommendations>>

**Integration With Other Elements:**

1. Compatibility
2. “Coding” / Terminology



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1. <<see recommendations>>
2. <<see recommendations>>

**Resource Considerations:**

- 1. Current**
- 2. Future**

1. There is a current requirement to rapidly modify and organize the integration of Human Resource practices and the requirements for a Comprehensive IC Compliance Program. Consideration of this task as a Special Project for the Asst. Supervisor is recommended. A joint meeting between the RSO, Asst. Human Resources Supervisor and her supervisor to determine a temporary realignment of priorities to accomplish the task is recommended.
2. Once the modifications and integrations have been completed, the future additional resource requirements for the Human Resources Office are expected to be minimal. The Asst. Supervisor's work plan should be modified to reflect anticipated resource requirements to sustain compliance with the Comprehensive IC Compliance Program

**Recommendations**

1. Consideration to assure the Human Resource requirements for TPS hires is also required of any staff that the RSO has determined require Trustworthy and Reliable (T&R) designation (this could include staff from diverse areas such as housekeeping, security and maintenance). An agreed upon methodology to "flag" positions deemed requiring T&R by the RSO will be integrated into those job descriptions – this designation should categorize the positions as requiring TPS hiring requirements (direct notation to radioactive material or security control need not be made).
2. Consideration to assure that if during the TPS hiring process, direct communication with past supervisors and/or past instructors is not completed – additional other efforts will be made to comply with requirements for verification through "personal references." (Note: The criminal background check is only relevant if personal references are included, documented and auditable.)
3. A documented agreement between Human Resources and the RSO (Blood Bank) is required to assure any consideration to revisions or modifications of relevant Human Resources policies includes prior notification and consultation with the RSO.
4. Consideration and agreement must be determined on the status of TPS / T&R determination documentation within the Human Resources Office. If compliance can be accomplished through policy cross reference, documented only in the Comprehensive IC Compliance Program, then associated documents maintained in the Human Resources Office need not be considered Sensitive Information (in regards to IC compliance).
5. Following consideration and actions taken on the above issues, a follow up evaluation of this compliance element and identified policies will be made to determine if full compliance is achieved