

Department of Commerce · National Oceanic & Atmospheric Administration · National Marine Fisheries Service

<i>NATIONAL MARINE FISHERIES SERVICE INSTRUCTION 34-103-02 SEPTEMBER 6, 2013</i>	
<i>Facilities and Equipment Facilities Management 34-103</i>	
<i>PROCEDURES FOR RESPONDING TO ANTI-TERRORISM RISK ASSESSMENT (ATRA) REPORTS AND ACTION TRACKING</i>	
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OPR: F/MB6 (M Bowman)	Certified by: F/MB (G. Reisner)
Type of Issuance: Renewed July 2014	
<i>SUMMARY OF REVISIONS:</i>	
Signed _____ Gary Reisner Date Director, Office of Management and Budget	

Introduction. Physical Security is an integral part of NOAA’s operation. The Department of Commerce’s (DOC) Office of Security (OSY) provides cyclical reviews of NOAA’s facilities to assess to personnel, programmatic, and structure/equipment vulnerabilities. This procedure implements NMFS Anti-Terrorism Risk Assessment (ATRA) reporting requirements. Reports may include recommendations from OSY to reduce or eliminate threats. NMFS will practice appropriate risk management by proactively working with OSY in evaluation, understanding identified vulnerabilities, and making informed decisions on actions to reduce or eliminate threats.

Objective. The objective of Anti-Terrorism Risk Assessment (ATRA) reports are to evaluate facilities for vulnerabilities to personnel, programs, and structure/equipment and recommend actions that can be taken to eliminate or reduce threats.

Roles and Responsibilities. This directive establishes the following roles and responsibilities:

- a) NMFS’ Office of Management & Budget’s (MB) Facilities, Safety, & Logistics Division (FSLD) is responsible for coordinating the NMFS response, evaluating financial management center (FMC) proposed actions, and tracking and reporting actions from all ATRA reports.
- b) The ATRA Coordinator within Management & Budget’s (MB) Facilities, Safety, & Logistics Division (FSLD), is responsible for the administration, policy, and oversight.

- c) NMFS's financial management center (FMC) directors, generally delegated to the Operations, Management, and Information (OMI) Division or equivalent, are charged with generating responses to reports and completing corrective actions to address.
- d) NMFS Centers/Regions in a facility with shared occupancy, the designated official would be responsible for the ATRA reporting/tracking and any subsequent security countermeasure identified, if applicable, from the assessment of the facility.

Procedures.

I. ATRA Facility Assessment – timeline and sequence of actions

- A. DOC OSY will notify NMFS' ATRA Coordinator of intended assessment, and general timeline (subject to change based on budget, workload, or other requirements); ATRA Coordinator will notify FMCs, and provide the most recent ATRA, NMFS response, and status of recommended actions. Final visit/facility assessment coordination will occur between OSY and the FMC. OSY will provide a copy of the site assessment. Attachment 1 (Appendix A: Risk Acceptance Justification Template) is the assessment list current with issuance of procedure; however, OSY maintains the list, and it is subject to change at OSY's discretion.
- B. Prior to the facility assessment date, the FMC will identify to OSY the facility point of contact for coordinating the assessment. S/he will also coordinate the facility's collection of information/documentation responsive to OSY assessment items.
- C. Depending on the size of the facility, programs, or other issues, the assessment will last approximately one half day. The assessment consists of:
 - 1. Introduction of OSY personnel, brief overview of ATRA and assessment process, and introduction of key facility personnel associated with the assessment. Key personnel are at the discretion of the facility director, but might include the facility director and/or deputy director, facility's manager, FMC and/or facility safety officer, and facility information technology officer.
 - 2. Brief introduction/overview of facility, including programs and personnel.
 - 3. Line-by-line review of OSY assessment list for responses/documentation/discussion.
 - 4. Facility walk-through.
 - 5. Follow up on assessment list for any unanswered/unknown questions.
 - 6. Exit-brief by OSY on preliminary finding/recommendations.
- D. OSY will generally issue the ATRA report within 45 days of the site visit. The report is issued to the ATRA Coordinator. Response from NMFS is due 45 days after receipt of the report.
- E. The ATRA Coordinator will forward the report to the FMC Deputy Director and FMC OMI Division Chief.
- F. The FMC OMI Division Chief will coordinate the facility's response to recommended actions and prepare the electronic draft response for signature by the Deputy Assistant Administrator for Operations. The substance of the response is addressed in section II.

II. ATRA Report Responses (Sample provided in Appendix B)

- A. The FMC must address each recommendation. Proposed responses are:
 - 1. **Completed (date completed/action taken).** The comments section will include documentation to validate.
 - 2. **Approved (date planned for completion).** The comments section may include explanatory notes as needed, such as “funded” or “in progress.”
 - 3. **Risk Accepted.** The comments section should describe why management accepts the risk associated with the vulnerability. Funding should not be the singular deciding factor for accepting risk, other than recommended actions with individual costs of \$20,000 or more; or, aggregate actions costing \$20,000 or more. The FMC is strongly encouraged to address other mitigating circumstances in determining an accepted risk.
 - 4. **None/Not Applicable.** The comments section will include an explanation.
- B. In addition, the FMC must address open recommendations from the most recent ATRA report. The format will include the recommendation, the response provide, an update on circumstances affecting completion, and validation of the response/new completion date or a recommended change in response.
- C. At a minimum, the draft response must be approved by the FMC OMI Division Chief; FMCs may determine additional approvals as needed. The draft will be sent forward in electronic form by the FMC OMI Division Chief to the ATRA Coordinator.
- D. The ATRA Coordinator will review the draft response for completeness and accuracy. The ATRA Coordinator is also responsible for analyzing proposed responses for consistency and evaluating to ensure they are consistent with NMFS senior leadership requirements.
- E. If the draft is not acceptable, the ATRA Coordinator will contact the FMC OMI Division Chief and try to resolve issues. If issues cannot be resolved, the action will be elevated to the Chief, FSLD for resolution.
- F. Once the draft is sufficient, the ATRA Coordinator will ensure signature, transmittal to DOC and NOAA, and begin tracking actions.

III. Tracking Actions

- A. NMFS’ ATRA Coordinator will maintain the repository of reports, responses, actions, and status.
- B. Biannually, the ATRA Coordinator will request updates from FMC OMIs.
 - 1. Actions proposed for completion must include satisfactory evidence.
 - 2. Actions with proposed date changes for completion should include rationale.
 - 3. Actions proposed for alternate response will be coordinated (e.g., recommending proposed action change from *Approved* to *Risk Accepted*), because it will likely require that NMFS submit notification to OSY.
- C. NMFS’ ATRA Coordinator will report action status biannually to the NMFS CFO/CAO and the Deputy Assistant Administrator for Operations.

References.

This policy directive is supported by the references listed in Attachment 1.

Attachment 1

Appendix A: Sample Risk Acceptance Justification Template

Person Completing Form		Date
Organization		Title
E-mail		Phone
Facility Profile		
Facility Name		Identifier/Bldg #
Address		
City	State	Zip
Facility Security Level		
FSL	Date of FSL	Previous FSL
Factor	Score	Rationale
Mission		
Symbolism		
Population		
Size		
Threat		
Preliminary FSL		
Intangibles		
Risk Assessment Information		
Site Visit Start Date	End	Date of Report
Conducted By		Title
Organization		Phone
E-mail		Cell
Software or Methodology		

Appendix B: ATRA Report Response Template

MEMORANDUM FOR: John Wain
 Assistant Director, Anti-Terrorism Division
 Office of Security

FROM: Paul Doremus, Ph.D
 Deputy Assistant Administrator for Operations

SUBJECT: Anti-Terrorism Risk Assessment Report for the Facility ID: VAE0106,
 OFFICE, CITY, STATE, DATE

We have reviewed the subject report and agree with assessment recommendations as detailed below. The Bureau / Line Office estimate of implementation countermeasure (CM) cost is \$45,000 as follows:

<u>Recommended CM</u>	<u>Estimated Cost</u>	<u>Status / Comments</u> (Approved/Pending Funding, Funded/In Progress, Completed, Disapproved, Risk Accepted)
1. Install CCTV cameras to monitor all pedestrian entry and exit points.*	\$5,000	Approved/Pending Funding. The NWS will pursue funding for this CM in FY'11.
2. Install card readers at access control points and upgrade the access control system to HSPD-12 compliance.*	\$20,000	Funded/In Progress. NOAA is pursuing a cost effective solution to upgrade the access control system at NOAA facilities nationwide.
3. Install Fragmentation Prevention Film (FPF) on exterior windows.*	\$20,000	Risk Accepted. The NWS agrees with this recommendation; however, the threat is Low and funding is not currently available.
4. Implement a formal key control program.*	\$00	Approved/In Progress. Facility manager is in the process of developing a written key control policy.