

Personnel Suitability Annex (Tier 1 requirement)

For further information, see “Guidance for Suitability Assessments” on <http://www.selectagents.gov>

1. Suitability Plan Development

Instructions to the entity: Describe who was involved in the development of the plan and what their roles were. This must include:

- a. Responsible Official (RO)

This may also include (if applicable):

- b. Certifying Official (CO)
- c. Human Resources (HR)
- d. Legal
- e. Security
- f. BioSafety
- g. Personnel enrolled in the Suitability Program

2. Program Responsibilities:

Instructions to the entity: Describe individual’s responsibilities when managing or supporting the program (include who to enrolls/disenroll/or terminates access)

- a. RO (or designee) Duties and Authorities
- b. CO Duties and Authorities (if applicable)
- c. Other’s duties and responsibility (if applicable) – HR, Safety, Legal, etc.

3. Elements of Pre-access Suitability

Instructions to the entity: Describe the elements of the pre-access suitability determinations. This can include:

- a. Descriptions of which positions require enrollment in the suitability program. (the select agent rule only requires those with access to Tier 1 agents or toxins)
- b. Descriptions of protocol for assessing an individual’s suitability for access to Tier 1 agents (pre-access suitability) to include what information is reviewed, who reviews and how possibly derogatory information is adjudicated. This may include:

- How the information is collected (contractor, performed by self, internet, form or application verification/validation)
 - How the information is received by the designated official (who collects it and from where)
 - How possibly derogatory information is verified (checked against address history, DOB, SSN)
 - How the applicant is allowed to respond to the information
 - How the information is adjudicated, for example:
 - Team approach (Multidisciplinary): Personnel assessment team (RO or Designee, others as available or required (Safety, Security, HR and Legal))
 - Individual approach- One person makes the call (who and by what standard)
 - Adjudication matrix(if applicable)
 - Process flow (if applicable)
- c. Descriptions of how a person is brought into the program. This **must** include (see section 11(f) of the Select Agent Regulations):
- The training of employees with access to Tier 1 select agents and toxins on entity policies and procedures for reporting, evaluation, and corrective actions concerning the assessment of personnel suitability.
- This may also include:
- Training on Code of Conduct for work with a Tier 1 Agent

4. Elements of ongoing assessment of personnel suitability

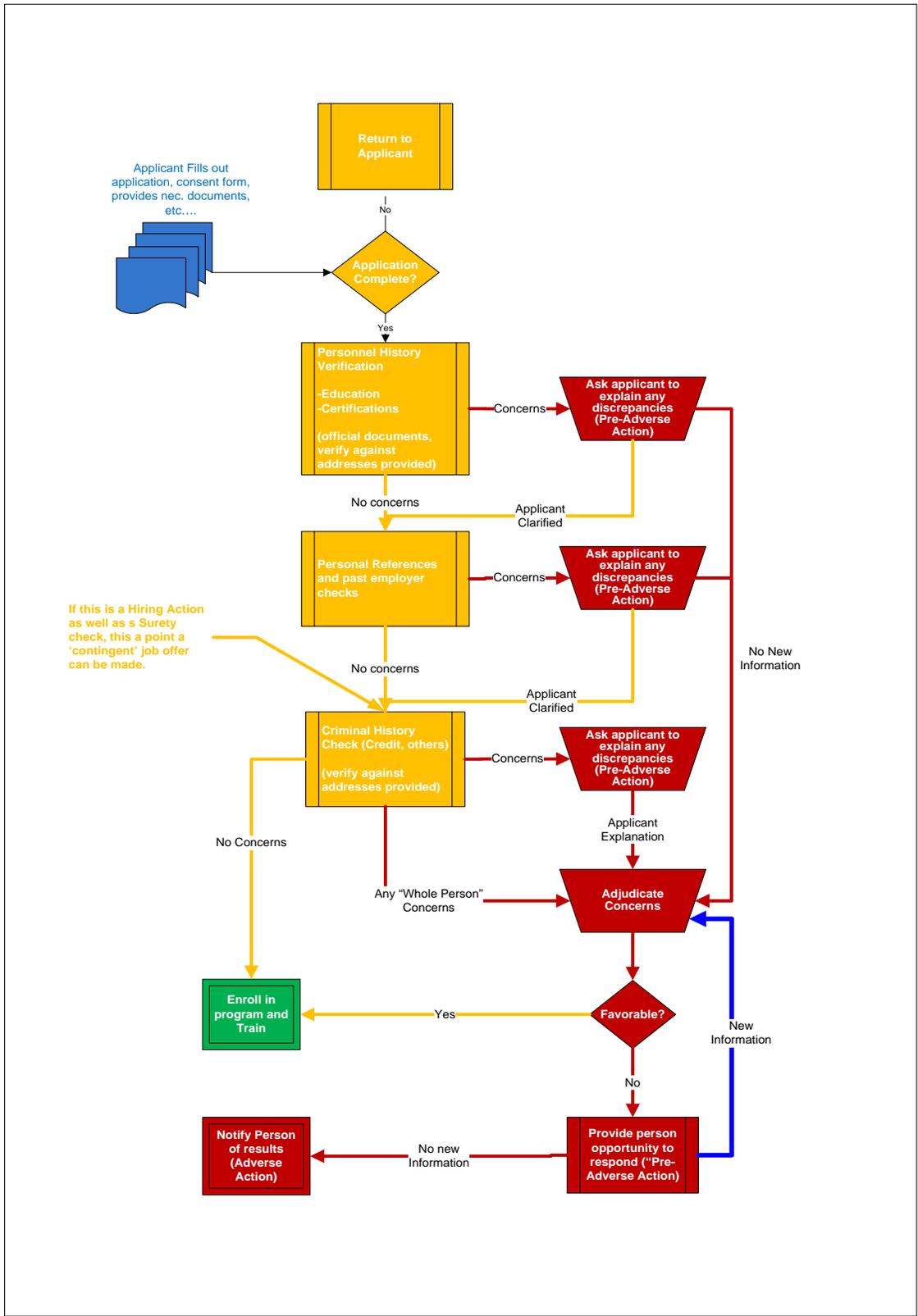
Instructions to the entity: Describe the elements of the ongoing suitability assessments. This may include:

- a. Descriptions of Self- and Peer-Reporting Mechanisms.
- Describe how and to whom a person self-reports.
 - Describe how and to whom a person peer reports to include anonymous reporting. This may include:
 - Who receives the report
 - How the information is verified and who verifies it

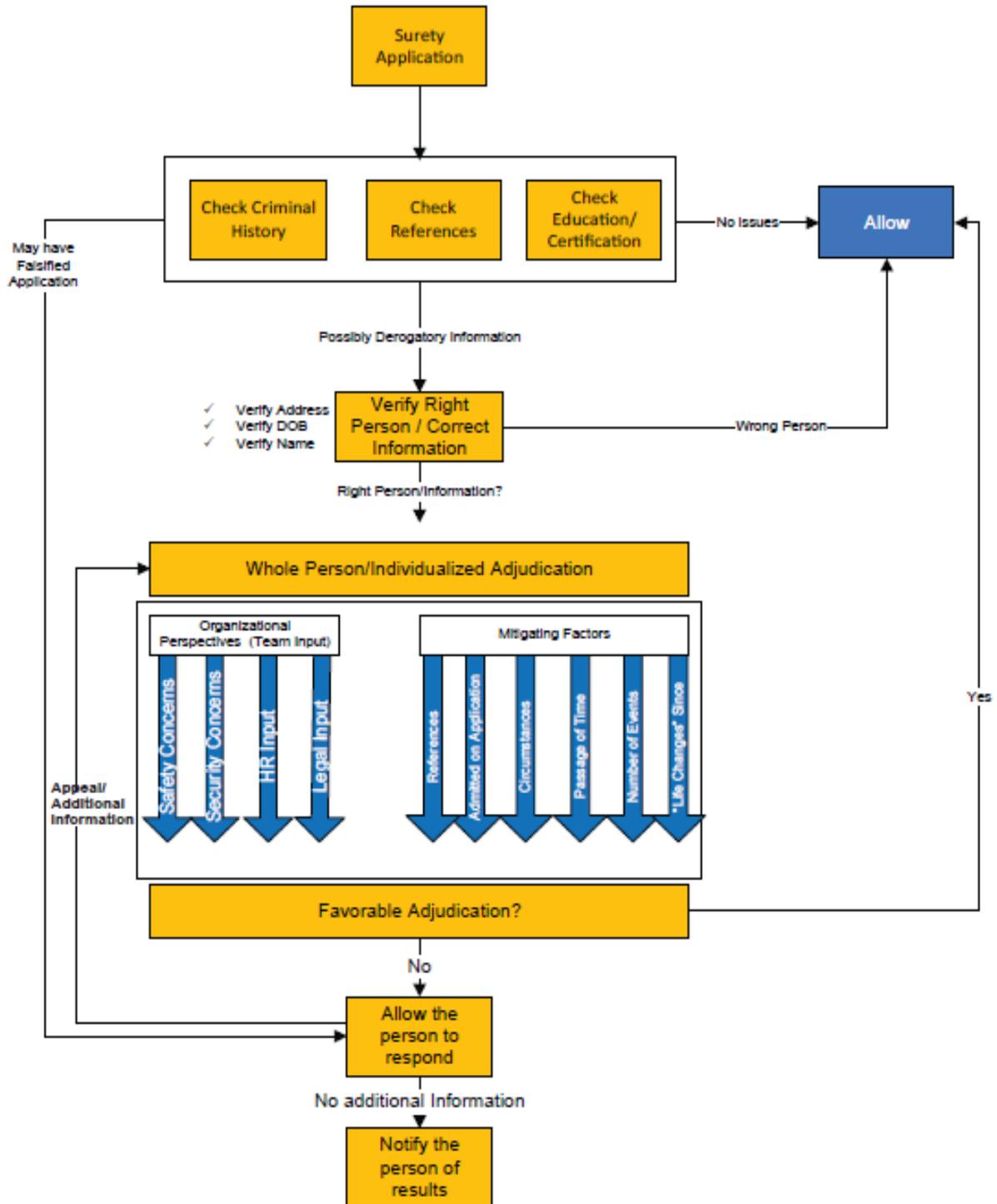
- How the applicant is allowed to respond to the information
- b. Descriptions of the adjudication procedures. This may include:
- Team approach (multidisciplinary): Personnel assessment team (RO or Designee, others as available or required (Safety, Security, HR and Legal))
 - Individual approach: One person makes the final determination.
 - Include Adjudication matrix (if applicable)
 - Process flow (if applicable)
- c. Descriptions of what happens when there are suitability concerns. This may include:
- Actions for when someone opts out
 - Options for when someone self-reports
 - What happens when someone's access is temporarily removed
 - What happens when someone's access is permanently removed because of suitability concerns
 - How you bring someone back into the suitability program if the concerns are mitigated
- d. Descriptions of any suitability feedback or evaluations (or if suitability is wrapped up in another evaluation)
- e. Descriptions of ongoing/annual rechecks of criminal behaviors or other factors used in the pre-access assessment (if any)
- 5. Include any written and finalized policies identified or created. This may include:**
- a. Pre-access suitability policy
 - b. Ongoing assessment policy
 - c. Self and peer reporting policy
 - d. Confidentiality policy
 - e. Any policy concerning corrective actions concerning the assessment of personnel suitability.
- 6. Include blank copies of forms identified or created. This may include:**

- a. Background Screen Disclosure/Informed Consent Form (tells the individual what will be checked and why)
 - b. Authorization to conduct background screen (the individual authorizes the entity to check)
 - c. Pre-adverse action form
 - d. Post-adverse action form
 - e. Code of Conduct
- 7. Describe how records associated with suitability program are maintained (central records, individual locations)**
- 8. Describe what is checked as part of the suitability program (if not covered in elements 3 or 4 above)**
- a. Criminal conviction history (include timeframe)
 - b. Other criminal history (if used)
 - c. Employment verification
 - d. Professional references
 - e. Professional license/Certificate verification
 - f. Education verification
 - g. Any other factors

Example Process Flow Diagram



Example Pre-access Suitability Adjudication Flow Diagram



Example Ongoing Assessment Flow Diagram

