

DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
Office of Oceanic Research
Geophysical Fluid Dynamics Laboratory
Princeton, New Jersey 08540

January 11, 2005

GFDL DIRECTIVE

SUBJECT: Document security for sensitive but unclassified paper and electronic building information

1. Purpose. This directive sets forth the Geophysical Fluid Dynamics Laboratory's (GFDL's) policy on the dissemination of sensitive but unclassified (SBU) paper and electronic building information of GFDL's leased facility. A major goal of GFDL and the Federal Government is the safety and security of people and facilities under the charge and control of GFDL. This directive outlines the security procedures needed to reduce the risk that the material will be used for dangerous or illegal purposes.

2. Objectives. In order to reduce the exposure to possible attacks or threats to GFDL controlled space, there are two principal objectives of GFDL's policy regarding sensitive but unclassified (SBU) building information. These are to:

a. Diminish the potential that sensitive information about the building in either paper or electronic form will be available for use by a person or persons with an interest in causing harm to persons or property.

b. Respect GFDL's legitimate business and other needs to allow access to this information to those who have a need-to-know, such as the professional design community, Princeton University, contractors, and state and local officials.

3. History.

a. The physical protection of Federal employees, the visiting public, and facilities is a priority for GFDL. Environmental, fire, security, and other safety concerns have influenced how GFDL builds and procures space and has impacted our construction criteria. However, after recent terrorist events, GFDL and other Government organizations have made a concerted review of construction and security criteria to find ways to safeguard against future occurrences where possible.

b. There is rising apprehension that, if building information is not restricted, it could fall into the hands of terrorists or other criminal elements. In addition, there is

particular concern that, with Internet technology, individuals, including terrorists and criminals worldwide, could have easy access to such information and remain anonymous.

c. Counterbalancing legitimate security concerns is the reality that a "government of the people, by the people, and for the people" must be accessible to its citizens and able to perform its mission without excessive restrictions hampering competition. With certain limited exceptions, GFDL is required by the Competition in Contracting Act to obtain full and open competition. Therefore, prospective Offerors must have access to necessary information in competing for Government contracts. This includes interested vendors, contractors, subcontractors, manufacturers, and suppliers of our building materials, as well as providers of professional services such as building plans and security services or equipment. GFDL must balance security with business requirements in a pragmatic way, without undue bureaucratic burdens on our consultants and contractors.

4. Application. This directive applies to all SBU building information regarding GFDL-controlled space. It also imposes requirements on Federal employees to ensure that authorized users, both Government and non-Government, are aware of and adhere to specific obligations with respect to SBU building information.

5. Responsibilities.

a. General. Because no policy can cover every circumstance, disseminators shall make every effort to apply the *principles* outlined in this order in those cases where circumstances require adaptation, by using good judgment, common sense, and reasonableness. The principles are:

- Only give the information to those who have a *need to know*;
- Keep records of who got the information; and
- Safeguard the information during use and destroy it properly after use.

This directive describes the minimum effort required. In some cases, the disseminator should take additional precautions as circumstances dictate. It is the responsibility of those disseminating SBU building information to provide the first line of defense against misuse.

b. Administrative Officer (AO). GFDL's AO, or his/her designated representatives, must ensure SBU building information is protected from unauthorized use. Federal Government employees who handle SBU building information shall have security training outlining the procedures in this directive.

c. DOC Security Officials. DOC Security Officials must inform site personnel

regarding the information contained herein. DOC Security Officials, in coordination with other offices, shall participate in security training.

d. Consultants. Architects, engineers, and contractors shall be aware of the requirements contained in this order, including:

(1) Labeling of information. All SBU building information, either in electronic or paper formats, shall have imprinted on the *cover* page and *each* subsequent page of the information (such as the cover page on the set of construction drawings and on the cover page of the specifications) and on the label of all magnetic media:

**PROPERTY OF THE UNITED STATES GOVERNMENT
FOR OFFICIAL USE ONLY
COPYING, DISSEMINATION, OR DISTRIBUTION OF THESE DRAWINGS, PLANS,
OR SPECIFICATIONS TO UNAUTHORIZED USERS IS PROHIBITED
Do not remove this notice
Properly destroy documents when no longer needed**

(2) The previous statement shall be **prominently** labeled in bold type in a size appropriate for the document.

e. Office of General Counsel. The Office of General Counsel must provide legal advice concerning Freedom of Information Act (FOIA) requests pertaining to SBU building information.

f. Contracting Officers (CO). The CO's must post a synopsis of the work electronically to the Government-wide Point of Entry (GPE), currently FedBizOpps (<http://fedbizopps.gov/>), for all procurements containing SBU building information. For those procurements where SBU building information, such as exhibits, associated plans, specifications, etc., cannot be made available electronically on the GPE, the CO's must provide a notification as required by the DOC Acquisition Manual.

6. Type of Information for Document Security

a. Sensitive But Unclassified (SBU) building information. Includes but is not limited to paper and/or electronic documentation of the physical facility information listed below. Building designs (such as floor plans), construction plans and specifications, renovation/alteration plans, equipment plans and locations, building operating plans, information used for building service contracts and/or contract guard services, or any other information considered a security risk, for GFDL controlled facilities, shall be considered covered under this category. Specifically (but not exclusively), it includes:

(1) Location of secure functions in the facility such as major computer processing

areas or other client sensitive processing areas (such as major computer labs, etc);

(2) Location of all utilities, such as heating, ventilation, air conditioning, information technology (IT) systems, location of air intake vents, water sources, gas lines, plumbing lines, building automation systems, power distribution systems, emergency generation equipment, uninterrupted power sources (UPS), security and fire alarm systems, routes and annunciation panels;

(3) Location and type of structural framing for the building and any information regarding structural analysis or building security and blast mitigation analysis and counter terrorism methods taken to protect the occupants and building; and

(4) Information regarding security systems or strategies of any kind (such as camera locations) or security guards (such as number and location).

b. Non-sensitive unclassified building information. Information regarding the building that may be made available for limited public dissemination under the following conditions:

(1) Building elevation or other drawings of new or existing buildings shall not show or label information defined under the SBU categories in 8.a., above.

(2) Interior photographs that are limited to publicly accessible space or have been cleared for publication by GFDL.

(3) Conceptual space planning drawings with floor layouts may be made available for presentations to professional designers (architect/engineers, etc.), professional schools for educational purposes, community planning groups participating in the design of new Federal space, or professional print publications *if* specific SBU building information (structural columns, utilities, etc.) is not shown and secure circulation routes, secure elevator locations, etc. are shown as generic space with no wall partitions (such as a block of unpartitioned space labeled "Misc. Space"). Generic concept (bubble) diagrams may be shown to convey information for a non-specific building.

Note: It is the responsibility of the disseminator to use good judgment and to apply the principle that *the more open the forum, the more generic/conceptual the information must be.*

(4) Detailed floor layout drawings of any kind for specific buildings shall not be made available over the public internet or in public presentations or print media, such as brochures, magazines, books, etc.

7. Reasonable care for dissemination of sensitive but unclassified (SBU) building

information. Those who are disseminating SBU building information (which includes flow down dissemination by prime/general contractors, subcontractors, suppliers, architects/engineers, private sector planrooms, state and local governments, print shops/reprographic firms, etc.) must obtain a signed copy of the Document Security Notice (attached) by authorized users of SBU building information that they will exercise *reasonable care* when handling SBU building documents. "Reasonable care" is defined as:

a. Limiting dissemination to authorized users. Dissemination of information shall only be made upon determination that the recipient is *authorized* to receive it. The criterion to determine authorization is *need-to-know*. Those with a *need-to-know* are other Federal Government agencies (who shall make requests through their agency management), and non-Government entities that are specifically granted access for the conduct of business on behalf of or with GFDL. This includes those necessary to do work at the request of the Government, such as architects and engineers, consultants, contractors, subcontractors, suppliers, planrooms, and others that the contractor deems necessary in order to submit an offer/bid or to complete the work or contract, as well as maintenance and repair contractors and equipment service contractors.

Note: It is the responsibility of the person or firm disseminating the information to assure that the recipient is an authorized user and to keep the Document Security Notice records of recipients.

Authorized users shall provide identification as set forth below:

(1) Valid identification for Federal Government users. Valid identification of authorized Government users receiving SBU building information shall be verification of Government employment.

(2) Valid identification for non-Government users. Authorized non-Government users shall provide valid identification to receive SBU building information. Valid identification shall be all items I through III, and including item IV, as necessary:

I. A copy of a valid business license or other documentation granted by the state or local jurisdiction to conduct business. The license at a minimum shall provide the name, address, phone number of the company, state of incorporation, and the name of the individual legally authorized to act for the company. The business must be of the type required to do the work. A general contractor's license may be substituted for the business license in states that issue such licenses. In the rare cases where a business license is not available from the jurisdiction, the information shall be provided and testified to by the submitter; **and**

II. Verification of a valid DUNS Number against the company name listed on the business license or certification. Verification may be obtained through <http://www.fpdc.gov/>, or by calling Dun & Bradstreet at 703-807-5078 to set up an account; **and**

III. A Valid IRS Tax ID Number of the company requesting the information; **and, as necessary,**

IV. A Valid picture state driver's license shall be required of person(s) picking up SBU documents. Phone verification must be made to a previously validated authorized user that the individual(s) picking up the documentation is/are authorized to do so by the company obtaining the documents. SBU documents will not be released to any individual or firm who has not, either previously or at the time of pickup, supplied the required documentation as outlined in paragraphs I through III, above.

b. Record keeping. Those who disseminate SBU building information must require a signed Document Security Notice from those who receive the information. Records of the signed Document Security Notices shall be maintained by the disseminator pursuant to the GFDL system of keeping long-term records and plans. At the completion of work, secondary and other disseminators shall be required to turn over their Document Security Notice dissemination records to GFDL to be kept with the permanent files.

c. Retaining and destroying documents. The efforts required above shall continue throughout the entire term of contract and for whatever specific time thereafter as may be necessary. Necessary record copies for legal purposes (such as those retained by the architect, engineer, or contractor) must be safeguarded against unauthorized use for the term of retention. Documents no longer needed shall be destroyed (such as after contract award, after completion of any appeals process, or completion of the work). Destruction shall be done by burning or shredding hardcopy, and/or physically destroying CD's, deleting and removing files from the electronic recycling bins, and removing material from computer hard drives using a permanent erase utility or similar software.

d. Notice of disposal. For all contracts using SBU building information, the contractor shall notify the GFDL contracting officer that he and his subcontractors have properly disposed of the SBU building documents, with the exception of the contractor's record copy, at the time of Release of Claims to obtain final payment.

8. Miscellaneous.

a. State and local governments. In order to comply with local regulations, GFDL must provide localities with documents to issue building permits and to approve code requirements. Public safety entities such as fire departments and utility departments require unlimited access on a need-to-know basis. These authorities must be informed at the time they receive the documents that the information requires restricted access from the general public. When these documents are retired to local archives, they should be stored in restricted access areas. *This order will not preclude the dissemination of information to those public safety entities.*

b. Electronic transfer and dissemination. Transfer and dissemination of SBU information beyond the GFDL intranet (internet or extranet, modem, DSL, wireless, etc.) must use at least 128 bit symmetric key encryption following NIST Special Publication 800-21 *Guideline For Implementing Cryptography in the Federal Government*. All transfers must use standard commercial products (such as PGP and Secret Agent) with encryption algorithms that are at least 128 bit symmetric (3DES, AES, RC4, IDEA, etc.), and follow the instructions outlined in this order. Authorized users that use project extranets for electronic project management during design or after construction contract award to transfer SBU building information are responsible for verifying and certifying to the Government contracting officer that project extranets meet applicable physical and technical GFDL security requirements as determined by the GFDL Senior IT Manager. Access to the sites shall be password protected and access shall be granted only on a need-to-know basis. A record of those individuals who have had electronic access shall be maintained by the contracting officer or other disseminator in accordance with the GFDL system of keeping long-term records.

c. Appropriate levels of security. GFDL intends to meet project security requirements as defined by our client agencies. This order is meant to define the minimum security requirements of GFDL for SBU building information. A client agency may define an individual project requiring additional security over that outlined in this order. Any information classified for national security purposes shall be handled according to the DOD 5220.22-M National Industrial Security Program Operating Manual (NISPOM) and other appropriate national security directives.

d. Freedom of Information Act (FOIA) requests. Because of the sensitive nature of SBU building information from a security standpoint, it shall not be disclosed pursuant to a FOIA request without a thorough analysis of the security implications and any potentially applicable exemptions under the FOIA. Any determination to disclose SBU building information pursuant to a FOIA request must be made by the Secretary of Commerce, after consultation with the DOC General Counsel and the DOC Security Office.

e. Proprietary information owned by Architect/Engineers. All professional services consultants shall sign the Document Security Notice that documents containing SBU building information created under contract to the Federal Government shall be handled according to the procedures under this directive.

f. Private sector plan rooms. Numerous private sector businesses provide planrooms, which provide access to construction plans and specifications for bidding purposes as a service to construction contractors and subcontractors. Before receiving GFDL SBU building information from any source for dissemination, the private sector planroom shall demonstrate to GFDL that they can and will adhere to the procedures outlined in this order, and sign the Document Security Notice.

g. Reporting incidents of concern. Any concern of a significant security risk should be reported immediately to the GFDL Administrative Officer or to the Eastern Regional Security Office at (757) 441-3431 and any other security agencies as deemed appropriate.

STEPHEN F. MAYLE
Administrative Officer
Geophysical Fluid Dynamics Laboratory/OAR/NOAA

Request for Construction Documents Exhibit	PRTN-JAN-05
Attachment	<blank>
Solicitation	DG1330-05-RP-1038

**DOCUMENT SECURITY
NOTICE TO PROSPECTIVE BIDDERS/OFFERORS**

This solicitation includes Sensitive But Unclassified (SBU) building information. SBU documents provided under this solicitation are intended for use by authorized users only. In support of this requirement, GFDL requires bidders/offerors to exercise reasonable care when handling documents relating to SBU building information per the solicitation.

REASONABLE CARE:

1. Limiting dissemination to *authorized users*. Dissemination of information shall only be made upon determination that the recipient is *authorized* to receive it. The criterion to determine authorization is *need-to-know*. Those with a *need-to-know* are those who are specifically granted access for the conduct of business on behalf of or with GFDL. This includes all persons or firms necessary to do work at the request of the Government, such as architects and engineers, consultants, contractors, sub-contractors, suppliers, and others that the contractor deems necessary in order to submit an offer/bid or to complete the work or contract, as well as maintenance and repair contractors and equipment service contractors.

Note: It is the responsibility of the person or firm disseminating the information to assure that the recipient is an authorized user and to keep records of recipients.

Authorized users shall provide identification as set forth below:

Valid identification for non-Government users. Authorized non-Government users shall provide valid identification to receive SBU building information. The identification shall be presented and verified for each dissemination. Valid identification shall be all items (a) through (c), below, and including item (d), as necessary:

(a) **A copy of a valid business license or other documentation granted by the state or local jurisdiction to conduct business.** The license at a minimum shall provide the name, address, phone number of the company, state of incorporation, and the name of the individual legally authorized to act for the company. The business must be of the type required to do the work. A general contractor's license may be substituted for the business license in states that issue such licenses. In the rare cases where a business license is not available from the jurisdiction, the information shall be provided and testified to by the submitter; **and**

(b) **Verification of a valid DUNS Number** against the company name listed on the business license or certification. Verification may be obtained through <http://www.fpdc.gov/>, or by calling Dun & Bradstreet at 703-807-5078 to set up an account; **and**

(c) **A Valid IRS Tax ID Number** of the company requesting the information; **and, as necessary,**

(d) **A Valid picture state driver's license** shall be required of person(s) picking up SBU documents. Phone verification must be made to a previously validated authorized user that the individual(s) picking up the documentation is authorized to do so by the company obtaining the documents. SBU documents will not be released to any individual or firm who has not, either previously or at the time of pickup, supplied the required documentation as outlined in paragraphs (a) through (c), above.

2. Retaining and destroying documents. The efforts required above shall continue throughout the entire procurement activity, term of this, the resulting contract and for whatever specific time thereafter as may be necessary. Necessary record copies for legal purposes (such as those retained by the architect, engineer, or contractor) must be safeguarded against unauthorized use for the term of retention. Documents no longer needed shall be destroyed (such as after contract award, after completion of any appeals process or completion of the work). Destruction shall be done by burning or shredding hardcopy, and/or physically destroying CD's, deleting and removing files from the electronic recycling bins, and removing material from computer hard drives using a permanent erase utility or similar software.

3. Term of Effectiveness. The efforts required above shall continue throughout the entire procurement, the term of the resulting contract and for what specific time thereafter as may be necessary, as determined by the Government. Necessary record copies for legal purposes (such as those retained by the architect, engineer, or contractor) must be safeguarded against unauthorized use for the term of retention.

4. Written agreement of disposal. For all contracts using SBU building information, the contractor shall provide a written statement that he and his subcontractors have properly disposed of the SBU building documents, with the exception of the contractor's record copy, at the time of Release of Claims to obtain final payment. Documents no longer needed shall be destroyed (such as after contract award, after completion of any appeals process or completion of the work). Destruction shall be done by burning or shredding hardcopy, and/or physically destroying CDs, deleting and removing files from the electronic recycling bins, and removing material from computer hard drives using a permanent erase utility or similar software.

The recipient acknowledges the requirement to use **reasonable care**, as outlined above, to safeguard the documents and, if not awarded, the contract (and at the completion of any protest/appeal process) will make every reasonable and prudent effort to destroy or render useless all SBU information received during the solicitation.

I agree that I will abide by this agreement and will only disseminate Sensitive But Unclassified (SBU) building information to other authorized users under the conditions set forth above.

Signature: _____

Title: _____

Date: _____

Copy of business license attached

DUNS Number: _____

Verified: Yes _____ No _____

IRS Tax ID Number _____

Validated: Yes _____ No _____