

## Objectives

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[a]

Individuals are screened prior to authorizing access to organizational systems containing CUI.

# PS.L2-3.9.1

## Personnel Security

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### Screen Individuals

*"Screen individuals prior to authorizing access to organizational systems containing CUI."*

## Assessment Methods

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### ● EXAMINE

Personnel security policy; procedures addressing personnel screening; records of screened personnel; system security plan.

### ● INTERVIEW

Personnel with personnel security responsibilities; personnel with information security responsibilities.

### ● TEST

Organizational processes for personnel screening.

### Key Discussion Points

#### Before Access:

Screening must occur BEFORE access is authorized — granting access and running the check simultaneously does not meet the requirement.

#### Role-Based Screening:

The level of screening should reflect the position's access requirements — all CUI-access positions need at minimum a criminal background check.

#### Contractors Too:

Contractors, consultants, and third-party staff with CUI system access must be screened — employment status does not exempt anyone.

#### Document It:

Screening records must be retained as evidence — verbal confirmation from HR is not sufficient for an assessor reviewing compliance.

# Plain English

## What this control is really saying:

You wouldn't hand someone a classified document without first knowing something about them. This control requires that everyone who needs access to CUI undergoes appropriate screening before they are granted that access — background checks, criminal history, reference checks — whatever is appropriate for the position.

## How it is used:

- All new hires requiring CUI access complete a background check including criminal history and employment verification before their access is provisioned.
- The HR department documents screening completion for each individual — no access to CUI systems is granted until screening is confirmed in the personnel file.
- Contractors and consultants requiring CUI access complete the same screening as employees — screening level is based on the position's access requirements.
- The personnel security policy defines the required screening elements for each position type with CUI access.

# PS.L2-3.9.1

PERSONNEL SECURITY — Screen Individuals

## Real World Example

### The Scenario

Acme Defense grants CUI system access on the first day of employment as part of standard IT onboarding. Background checks are initiated at hire but often take two to three weeks to complete. During that window, new employees have full access to CUI systems.

### What the assessor finds

A new hire accessed CUI design files for 11 days before his background check returned a disqualifying felony conviction. His access was not revoked until HR reviewed the completed check. No procedure requires withholding access pending screening completion.

## SPRS Score Impact

3.9.1 carries a point value of 1. Unscreened personnel with CUI access represent an insider threat that is independent of technical controls — background checks are the first line of personnel trustworthiness verification.

## What Good Looks Like

Personnel security policy defines screening requirements by position, all individuals screened before CUI access granted, screening records documented in personnel files, contractors treated the same as employees, access withheld until screening is confirmed.

# Common Gaps

## What assessors actually find in the field:

- ✗ **No screening before access**  
New employees are granted CUI system access on their first day before any background check is completed.
- ✗ **No screening policy**  
There is no defined personnel screening policy — screening is done inconsistently or not at all depending on the hiring manager.
- ✗ **Contractors not screened**  
Employees are screened but contractors with CUI access are not — they receive access without any background verification.
- ✗ **Screening records not retained**  
Background checks are conducted but results are not documented — there is no evidence of screening to show an assessor.
- ✗ **Access granted before completion**  
Screening is initiated but access is granted before results are received — individuals access CUI with pending background checks.