



**U.S. DEPARTMENT OF COMMERCE
MANUAL OF SECURITY
POLICIES AND PROCEDURES**

Chapter 38 - Security for Special Functions

3801 Safeguarding Critical Functions and Facilities

A. Due to the diversity of missions within the Department and the wide variety of physical facilities and types of spaces throughout the country and overseas, this chapter cannot address all of the possible applications of the security principles and procedures required to protect those facilities. Therefore, it is the responsibility of facility managers and operating unit directors to apply, or adapt where authorized, the standards, methods, and minimum requirements prescribed in this chapter to particular sites or situations required by local conditions.

B. An office head may determine that a certain function is critical to his or her mission, and therefore, requires special safeguards or protection. This might include functions that are required for continuous operation, would be difficult to restore, involve valuable or sensitive equipment or documents, or present safety hazards.

C. Security measures for safeguarding such critical functions might include segregation of the operation from adjacent areas, surveillance by camera or guard, electronic access control systems, construction of a strongroom, implementation of an employee identification system, placement of a receptionist at an entrance, use of visitor control logs, or installation of cipher locks. These measures are discussed in detail elsewhere in this manual.

3802 Printing/Reproduction of Classified Information

Access to pressrooms, darkrooms, copier, composition, binding, and proofreading rooms shall be restricted when classified production is in progress. Only appropriately cleared persons shall be permitted in the area. Cleared escorts may be necessary to assure such segregation from unclassified operations.

3803 Protection of Funds

A. Cash-handling operations or facilities should be located on an upper floor, and as deep as practical within a building. This will preclude easy access from the street and within the building.

B. Reasonable precautions should be taken to safeguard government funds. For example, the handling of funds should be screened from public view to the extent practical. Rather than holding large amounts of cash, personnel should obtain advances through the Departmental credit card



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program or in the form of traveler's checks. Personnel should avoid attracting attention when performing sizable cash transfers by doing so in an inconspicuous and non-routine manner.

C. Contract guard services should be used to escort or move large amounts of funds between the fund activity and the depositories. An even higher degree of safety can be achieved by using electronic fund transfers to the maximum extent practicable. Alternates and local sub-cashiers should be protected by providing separate cash boxes or safe drawers.

D. The intermingling of funds with classified material or items of intrinsic value should be avoided. Personnel should consider having a witness when locking a storage container when the fund will be unattended during the workday and at the close of business.

E. The number of employees allowed access to the storage container and the lock combination should be limited and listed. Procedures to follow in the event of a holdup or other emergency situation should be prepared.

F. For fund operations on a larger scale, the following options should be considered.

1. Install a panic or holdup alarm to annunciate locally or at a guard post or monitoring service.
2. Monitor transactions with closed circuit television cameras.
3. Install bullet resistant partitions and holdup packets of prerecorded bills in high crime areas.

G. An inspection checklist on the security of funds storage areas and equipment can be found at Appendix P, Disbursing Office and Imprest Fund Checklist.

3804 Firearms

See Appendix T, Firearms/Weapons/Use of Force Policy, for procedures on the safeguarding and storing of firearms. See also Chapter 36, Guard Services, regarding the proper equipment for the storage of firearms and ammunition.

3805 Controlled Substances Stored for Medical, Research, or Evidentiary Purposes

A. Controlled substances (opiates, opiate derivatives, stimulants and depressants, and narcotic drugs) must be stored in an approved security container listed in the Federal Supply Schedule. The container must have a built-in, GSA-approved, three-position, dial-type changeable combination



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lock and be of such weight, size, construction or installation as to minimize the possibility of removal or forced or surreptitious entry. Classified material shall not be stored with controlled substances.

B. The container must be kept in a locked room and strict control must be placed on the keys. A room containing large quantities of substances having a high street value should have supplemental security measures such as an alarm system and/or a guard presence or response.

C. Controlled substances shall be inventoried at a frequency to be determined by the facility manager in consultation with the Contracting Officer's Technical Representative (COTR) and the servicing security officer. Discrepancies shall be reported verbally to the security contact or servicing security officer immediately. A written report detailing the discrepancies and subsequent actions shall be submitted by the COTR through the facility manager to the servicing security officer within five days of the discovery with a copy forwarded to the Office of Security. Inventory records for the three most recent inspections will be kept on file and available for review.

3806 Shipping/Receiving and Storage Areas

A. Introduction. Volumes of valuable and critical property pass through shipping and receiving areas daily. Managers often create areas for the storage of new or used equipment waiting for distribution. If not properly protected, these areas become vulnerable to theft and misappropriation of the equipment stored there. Security for such areas and material requires consideration of the basic procedures described below.

B. Physical Premises. Areas where materials are shipped and received must be located near exterior access points, including loading docks and driveways. Such areas should be well lighted, have controls on doors to both exterior areas and interior spaces, and should be equipped with surveillance devices and/or guards or other protective measures. Storage areas should be located away from shipping and receiving areas and facility entry and exit points to make the unauthorized removal of stored items more difficult. See Chapter 37, Storage and Destruction Equipment, for detailed information on planning and design. See also other guidelines for protection of shipping and receiving areas in the Department of Justice's, *Standards for Protection of Federal Facilities* (Appendix K).

C. Access Controls.

1. The guard force should maintain updated access lists to ensure unauthorized personnel are kept out of the shipping, receiving, and storage areas. Persons unknown to the guard should be asked for identification and be required to establish their authority to be in the area.



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2. Employee locker and "break" areas should not be located convenient to storage areas in order to reduce opportunities for pilferage. Controls should be established to screen packages being removed by employees.
3. Vendors and contractor personnel shall be subject to the following screening procedures.
 - a. A pass or identification system may be established for shipping and receiving areas.
 - b. Trash collectors, repair personnel, and others who have trucks, tool kits, carts, and other containers shall be subject to inspection procedures to prevent removal of items hidden in those containers.
4. Storage areas shall be protected by such security measures as high security locks or other access control systems, perimeter and/or interior alarms, and other design measures.
5. Vehicles shall be controlled on entry and exit and be kept under observation, preferably by a guard on a post in the immediate area. At the very least, such areas shall be monitored by means of a CCTV system with a rapid guard response from within the building.
 - a. Delivery vehicles shall be logged in by a guard. The record should reflect the vehicle identification, time of entry and exit, and name of the firm, and the driver. Privately owned vehicles, which should not be permitted in such areas unless absolutely necessary, should be subject to similar controls and shall be required to have permits.
 - b. Notices shall be posted in dock and parking areas stating that all vehicles are subject to search. Vehicles should be watched carefully by guards to prevent unauthorized loading of property into them. Periodic vehicle searches will have the effect of deterring such unauthorized activity.

D. Property Control and Accountability.

1. Procedures shall be established for the control of incoming property, and shipments should be checked for signs of pilferage or damage. A careful inventory of incoming shipments should be conducted to assure that all items on the bills of lading or other manifests are received. Delivery records should be checked against requisitions and purchase orders. Only designated personnel who have a completed background investigation and are determined to be trustworthy shall be authorized to accept or sign for deliveries. Damaged merchandise should be separated and secured until disposition can be made.



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2. Supplies shall be physically protected from unauthorized access and pilferage. Special secure storage provisions shall be made for sensitive or valuable shipments, including secure rooms and containers. Open storage areas will require special protective measures, such as patrols by guards, closed circuit television camera coverage, or alarm devices. Shipping and receiving platforms should be kept free of trash or surplus items. Material stored in the open should be neatly stacked and positioned in a manner that will permit observation by guards or other security personnel.

3. Accountability procedures shall be established for stored items. Periodic comprehensive inventories should be conducted and action taken to trace shortages or correct noted discrepancies. Inventories should be subject to audit by unbiased personnel, and weaknesses should be noted and accompanied by recommendations for improvements.

4. Outgoing material shall be subject to the same strict controls and accountability procedures as deliveries received. Materials shall be kept in secure holding areas pending delivery. Procedures should be established for receipting deliveries to the carrier or messenger; their signatures should be maintained in a card file if practicable. Procedures should also be established to verify the arrival of shipments at their points of destination.

E. Additional guidance on material storage and inventory techniques can be found in Appendix Q, Shipping/Receiving Warehouse Facilities Checklist, of this manual.

3807 Mail Room

A. The U.S. Mail must be protected at all times. Only GSA-approved security containers should be utilized to store registered/certified mail. The Mail Room should be located at the perimeter away from facility entrances, high-personnel density areas, and areas containing critical services, utilities, distribution systems, and other assets. A preferred location for the facility may be near the loading dock.

B. The following design criteria should be incorporated in Mail Room construction.

1. Separate room.
2. Reinforced walls and ceilings.
3. Protection of door-hinges peened to prevent removal if mounted on outside of door.
4. Equipped with one or more secondary locks.



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5. Adjoining rooms locked or blocked.

6. Windows and ventilation openings should be covered with steel bars or No. 9 gauge wire mesh.

3808 Child Care Facilities

A. General. Congress directed that each agency of the Federal Government, each facility operated by the Federal Government, and each facility operated under contract with the Federal Government may allot space in such a building for child care services to children of employees (see Section 490b of Title 40, Public Building, Property, and Works). Through its licensing agreements, the General Services Administration (GSA) provides guidance, assistance, and oversight for the development of child care centers in such facilities to promote the provision of economical and effective child care for Federal workers.

B. Accreditation. For guidance concerning the development and construction of Federal child care centers, the GSA publication, Child Care Center Design Guide, PBS 3425-13, U.S. General Services Administration, June 1998, contains criteria for planning and designing child care centers in GSA-owned or controlled facilities. After one year of operation, a child care center must receive accreditation from the National Academy of Early Childhood Programs. They must also comply with state and local licensing regulations.

C. Safety and Security of Facilities. When establishing child care centers, the heads of each operating units or senior facility managers shall consult with their servicing security officer to ensure that safety and security features are included in the plans for the child care center. Senior facility managers may refer to appropriate sections in the GSA publication noted above when designing safety and security features. In addition, other security conditions noted below shall be followed when developing the child care center.

D. Center Location. The following information provides general guidance for the design of child care centers in Federal office buildings.

1. The child care center should be separated from public areas by buffer zones or barriers, such as fences or screens, particularly in high security risk areas. Buffer zones may be created by using large open turf areas, tree rows, perimeter hedges, berms, or any combination of these. Buffer zones allow the staff to observe individuals as they approach the center and shield the children from unwanted wind, noise, and disruptions.

2. The center may be located in minimum and low risk facilities. Note: Child care centers will not be located in high risk buildings (e.g., courthouses). Entrances shall be at least 100 feet from



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a facility entrance or loading dock, and the center shall be placed 100 feet away from vehicles unless there are compensating blast design measures.

E. Child Care Center Security Measures.

1. Mandatory.

- a. The child care center location must be readily identifiable and accessible to emergency response personnel.
- b. For emergency purposes, at least one parking space must be provided as near to the center entrance as possible.
- c. The location must allow for all exits and entrances to be secured. Normal movement should be restricted to one main entrance and an additional service entry.
- d. The location must be a defensible space with a secure perimeter and controlled access.

2. Recommended.

- a. The location should allow the center to be near the facility guard station.
- b. A separate drop-off and pick-up site shall be provided that is not used for any other building purpose.
- c. Between the child care center and the mail room or other high hazard area, there should be blast resistance for a medium package device.

F. Child Care Center Personnel Security Requirements. Based on the Crime Control Act of 1990, as amended, child care center workers employed in Federally owned or lease facilities must obtain a favorable background investigation before being allowed to work in a child care center. However, child care center workers may be hired provisionally as long as another employee that has a favorable background investigation completed supervises the provisional employee at all times while caring for children (see 42 U.S.C. § 13041 concerning Child Care Worker Employee Background Checks and paragraph 1104 F.).

G. Electronic Security Systems. GSA defines and provides the electronic security systems for each child care center under their control. All Department of Commerce owned and operated centers will comply with the following GSA requirements.



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1. Video cameras are required when the center entrance is not visible by the building security staff, if the entry door has no glazed areas allowing center staff to identify arriving individuals, or if the security risk assessment prescribes video monitoring at the entrance.
2. An annunciator shall be installed at the entry door.
3. Electronic security system, including alarms, cameras, hardware, shall be monitored either by FPS or facility guard service within the building or at the Director's office and FPS law enforcement personnel off-site.
4. An electronic key pad shall be installed at the entry door with large buttons to ensure ease of use accessibility to persons with disabilities (for authorized entrance without staff monitoring).
5. All entry points shall be alarmed and include delayed alarm locks at exit doors. Egress doors not intended for children's use should be equipped with electronic magnetic locks.
6. Duress alarms shall be installed as prescribed by the security risk assessment.
7. Emergency alarm signals should be audible and visible and monitored by the FPS, or the on-site facility guard service.

H. Fence and Enclosure Criteria.

1. Play yards must be enclosed by fences to define the play yard, allow ease of supervision of the children, and protect them from unauthorized individuals or stray animals.
2. The transparent or opaque nature of the fence and fence height will depend upon the location and environmental conditions of the center and the requirements identified by the risk analysis.
3. When the play yard can be viewed, a six-foot high fence must enclose the perimeter.
4. When the play yard is adjacent to hazards, roadways, or is in a high security risk neighborhood, the perimeter of the play yard must be enclosed with an eight-foot high fence that screens view from the play yard.

I. Safety Issues.

1. The perimeter of the building and play yards should be treated as a controlled filter with only one primary means of public access and egress.



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2. All service and emergency egress points should be controlled, with access limited to authorized individuals.
3. The entry approach should be designed to be visible by center staff personnel who are inside.
4. The reception area should be positioned adjacent to the entrance and the Director's office.