**Research Administration/Office of Sponsored Programs Procedure**

**Resident Instruction System Security Plans (SSP’s)**

**Effective: June 17, 2019, Last Updated: March 2, 2020**

Per the FAR, government contracting officers must include the 252.204-7012 clause in all DOD contracts, except contracts solely for Commercial Off the Shelf (COTS) items; therefore, successfully negotiating removal of the clause from the contract is highly unlikely. A System Security Plan (SSP) is required for Resident Instruction (RI) research efforts that will be performed on RI computers/networks or at RI locations if the contract includes the 7012 clause. Please note that the OIT Security Team (GRC) that works with the PI to create the SSP does not determine whether or not Controlled Unclassified Information (CUI) will exist on the project. If the contract contains the 7012 clause, an SSP must be completed and approved. Other government or government pass-through contracts may have terms similar to the 7012 clause that also result in an SSP requirement.

**System Security Plans (SSPs) and Reports on Compliance (ROC) for GTRC contracts to be assigned to Resident Instruction (RI) for performance:**

1. If the 7012 or other similar clause is included in the contract, the contract will **not** be accepted and executed prior to the completion and approval of the SSP and a Report on Compliance (ROC) that validates full compliance with the SSP.
2. If **all** of the following are true, the project may qualify for a Fundamental Research Exemption (FRE) SSP:
   1. Contract contains no publication restrictions,
   2. Contract contains no foreign national restrictions,
   3. All technical deliverables are Distribution “A” (for public release), or the results of the research can be freely published.
   4. No documents will be marked CDI (Covered Defense Information) CTI (Controlled Technical Information) or CUI, and
   5. Receipt of written notice from Sponsor that the work is deemed fundamental research and that the government will not provide Georgia Tech with any CDI, CTI, or CUI data.
3. Minimum requirements of the FRE SSP are as follows:
   1. OSP to provide SSP team with documentation for items 2. a. through e. above,
   2. OIT Security to provide CUI training for Principal Investigator (PI) and other key researchers,
   3. OIT Security to complete memo documenting names and dates for completion of CUI training,
   4. PI to sign statement of requirement to notify both OSP and OIT Security if the research progresses beyond FRE,
   5. OIT Security to upload all documentation (items 3 a. through e.) in same system used to track full SSPs, and
   6. FRE SSP to follow same routing as full SSP for approvals.

**System Security Plan (SSP) and Report On Compliance (ROC) for all interdivisional transfers to RI on GTARC/GTRI contracts containing the 7012 or other similar clause:**

1. If the RI work is critical to the GTARC/GTRI statement of work, the contract will not be accepted and executed prior to the completion and approval of an SSP and ROC. Critical is defined as necessary to the overall statement of work with no alternative approach other than participation by the RI faculty member(s) in RI facilities using RI equipment and systems. The GTRI PI must complete and sign the risk mitigation memo found at **Exhibit A**. This memo should be uploaded in eRouting and approved by GTRI lab director and deputy director prior to submission of the proposal.
2. If the RI work is **not** critical to the GTARC/GTRI statement of work, the contract may be accepted and executed; however, no budgeted funds may be transferred from GTRI to RI as an interdivisional transfer until the SSP and ROC are completed and approved. The GTRI PI must complete and sign the risk mitigation memo found at **Exhibit B**. The memo should be uploaded in eRouting as an attachment and approved by GTRI lab director and deputy director prior to submission of the proposal.
3. Please note that if the work is to be performed by an RI faculty member in GTRI facilities using GTRI equipment and systems, the RI faculty member should be placed on a shared appointment to GTRI and GTRI indirect rates must be applied to the effort. No interdivisional transfer is necessary and an RI SSP and ROC are not required.

**Exhibit A:** Risk Mitigation Memo for GTARC/GTRI proposal with inter-divisional transfer to RI on contracts containing language requiring system security plans for controlled unclassified information. Proposal Number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please note that a portion of the work proposed will be performed by RI faculty, in RI facilities, using RI systems and managed by RI faculty. **Also, please note that I consider the RI effort critical to achieving the proposed statement of work (SOW).**

Since RI does not have an overarching System Security Plan (SSP) and the award resulting from this proposal will contain language requiring an SSP, I understand this award will not be accepted or executed by GTARC until the RI faculty-member completes an SSP and receives a report on compliance (ROC) either:

1. Specifically for this proposed effort (project-specific SSP and ROC) or
2. For the lab, systems and personnel who will expend effort on this proposed effort (lab-wide SSP and ROC).

**GTRI Principal Investigator/Project Director**

Name (print):

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Signature and date:

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**GTRI Lab Director:**

Name (print):

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Signature and date:

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**GTRI Deputy Director:**

Name (print):

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Signature and date:

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**Exhibit B:** Risk Mitigation Memo for GTARC/GTRI proposal with inter-divisional transfer to RI on contracts containing language requiring system security plans for controlled unclassified information. Proposal Number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please note that a portion of the work proposed will be performed by RI faculty, in RI facilities, using RI systems and managed by RI faculty. **Also, please note that I do not consider the RI effort critical to achieving the proposed statement of work (SOW).**

Since RI does not have an overarching System Security Plan (SSP) and the award resulting from this proposal will contain language requiring an SSP, I understand that no funds from this award will be transferred from GTRI to RI until the RI faculty-member completes an SSP and receives a report on compliance (ROC) either:

1. Specifically for this proposed effort (project-specific SSP and ROC) or
2. For the lab, systems and personnel who will expend effort on this proposed effort (lab-wide SSP and ROC).

In the event, the RI faculty member never completes the SSP and ROC, GTRI has adequate staff, expertise and facilities to satisfy the SOW.

**GTRI Principal Investigator/Project Director**

Name (print):

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Signature and date:

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**GTRI Lab Director:**

Name (print):

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Signature and date:

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**GTRI Deputy Director:**

Name (print):

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Signature and date:

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