



Security Awareness: Anatomy of a Change Management and Communications Campaign

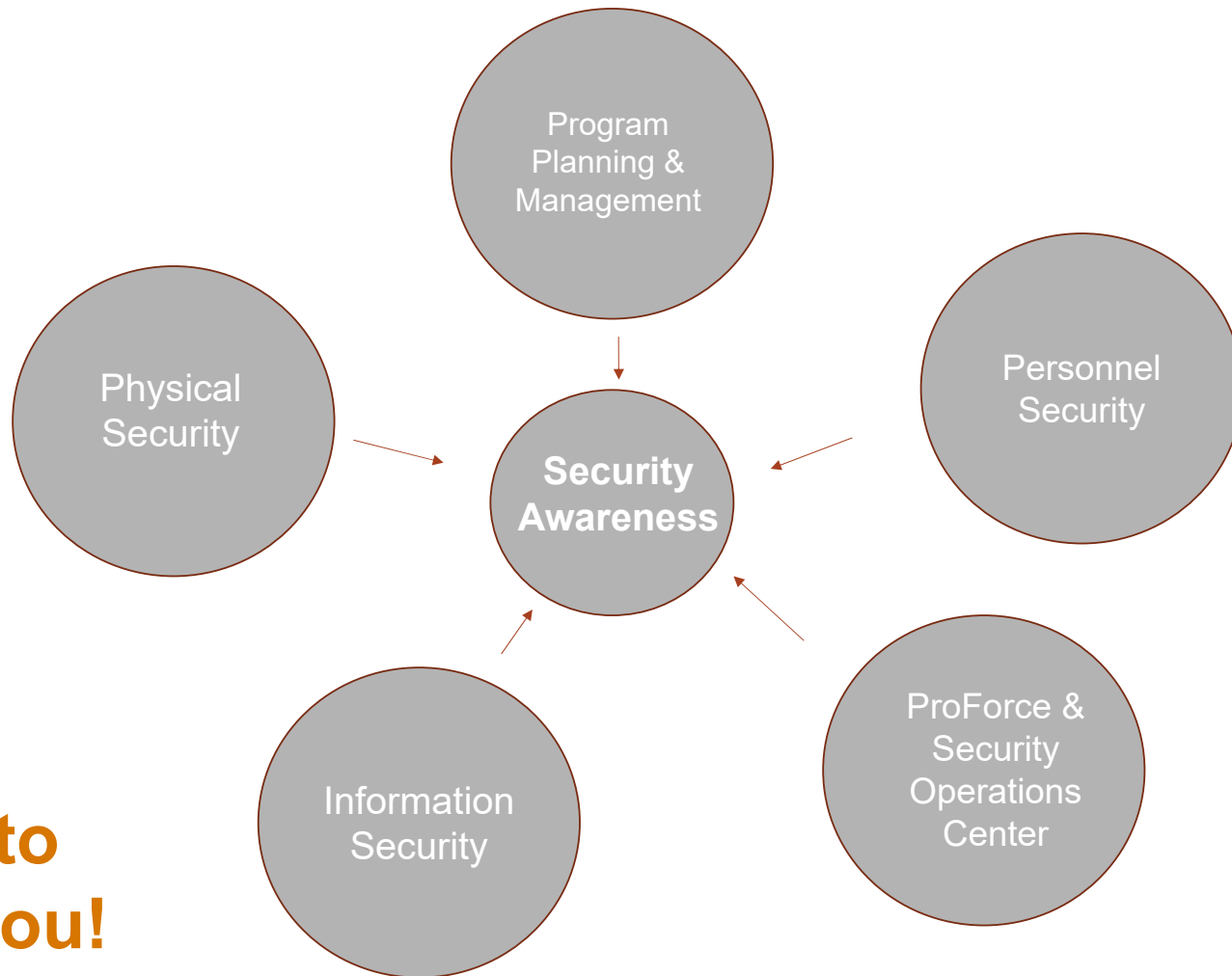


Shannon Cartier
Security Awareness Program



PNNL is operated by Battelle for the U.S. Department of Energy





Nice to meet you!



The not-so-secret sauce of success

SECURITY AWARENESS:
IT'S EVERYONE'S RESPONSIBILITY

A report by Ernst & Young (2020) finds that **"security awareness programs at many organizations are weak, half-hearted, and ineffectual.**

Keeping a security awareness program alive and healthy is an ongoing corporate training and communication effort.

Successful programs are **a lot like marketing campaigns**: Organizations should distribute **little bits of information to employees on an ongoing basis**. The company's internal communications team should be leveraged to ensure that the **messaging is fresh** and consistent with the corporate culture and the current security landscape.

Without **strong management support**, efforts are futile."



Security Awareness: Compliance at its Best

In 2019 at PNNL, Security Awareness meant compliance: staff were trained per requirements and varied announcements were published for staff by a .5 FTE, then this happened...



Safeguards & Security was tasked with an extensive set of changes around the protection of sensitive technologies and export control with the potential to touch all staff (~5,000).



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In addition...

Security Changes Organizational Change Management Activities

Month	Project	Media Type	Media Description	Audience	Owner	Message / Notes	Status
June	All Projects	Briefing - Group	IA Briefing (Details)	Admins	Cartier	Summary of Changes: S2 vs SSP	Complete
June	All Projects	Briefing - Group	DD Forum as appropriate (SAS Focus Group) 6/17/19 and monthly	Line Managers	Wood, Haller	Access control working group. Discussed core badge access (monthly on various topics)	Complete
June	All Projects	Event	VPP Picnic (6/13)	Admins	Cartier/Gordon	Summary of Changes: S2 vs SSP	Complete
June	All Projects	Article	Admin Central (Prior to new course deployment) (scheduled for June 25). Also sent to P Vasquez to cover	All Staff/LTE	Cartier	FVA Course req (prior to course deployment)	Complete
June	Hosting / Escorting	Article	Manager Central (Prior to new course deployment) (scheduled for June 26)	All Staff	Cartier	FVA Course req (prior to course deployment)	Complete
June	Hosting / Escorting	Article	Inside PNNL (Prior to new course deployment) (Scheduled for June 26, July 1)	Hosts	Cartier	FVA Course req (prior to course deployment)	Complete
June	Hosting / Escorting	Article	Targeted Article to FVA Hosts (Scheduled for June 26)	Hosts	C. Harrod (A Haller)	OCOE - what is working, what needs to be changed. Occurring throughout 4 qtr	Complete
June	Hosting / Escorting	Article	Porcelain Press	Ops Managers	Pete Tensmeyer	What is SSP, what changes S2 vs SSP	Complete
June	Hosting / Escorting	Course	Course 2343 New FVA Host Awareness Briefing	COO's	Pete Tensmeyer	Summary of Changes: S2 vs SSP	Complete
June	Hosting / Escorting	Briefing - Group	Ops Mgrs Working Group - OCOE Implications/ Clarifications (Monthly) begins in May/ June 10.	All Staff/LTE	Cartier/Gordon	Summary of Changes: S2 vs SSP	Complete
June	Badging (One Card One Entry)	Briefing - Group	COO Briefing (week of June 17)	Admins	Cartier/Smith	Summary of Changes: S2 vs SSP	Complete
June	All Projects	Event	VPP Mixer (6/27)	All Staff	J Smith	All articles that have been published to date. 6/25 Admin Ctrl article posted.	Not Started
June	All Projects	Article	Post a Message on Admin Central	All Staff	Cartier	Summary of Changes: S2 vs SSP ON HOLD	Not Started
July	Hosting / Escorting	Web	Update SASD Website with articles that have been published	Line Managers	Cartier	Summary of Changes: S2 vs SSP ON HOLD	Not Started
July	All Projects	Article	Manager Central (After COO Briefing/ Working Group discussion)	All Staff	Cartier	Summary of Changes: S2 vs SSP ON HOLD	Not Started
July	All Projects	Article	Newsletter Content for Directorates	Admins	Cartier	Summary of Changes: S2 vs SSP ON HOLD	Not Started
July	All Projects	Article	Admin Central	All Staff	Cartier/Gordon	Summary of Changes: S2 vs SSP Follow up	Complete
July	All Projects	Article	Check It Out	All Staff/LTE	Cartier	Summary of Changes: S2 vs SSP Follow up	Complete
July	All Projects	Article	Porcelain Press	Admins	Cartier	OCOE - what is working, what needs to be changed. Occurring throughout 4 qtr	Not Started
July	All Projects	Event	VPP Mixer (monthly)	Ops Managers	Pete Tensmeyer	Placeholder as necessary	In process
July	All Projects	Briefing - Group	Directorate Admin Meetings (OOE meeting?)	COO's	Pete Tensmeyer	In-flight within Comms; include escort	In process
July	All Projects	Briefing - Group	Ops Mgrs Working Group - OCOE Implications/ Clarifications (Monthly) (begin in May) July 9	Badging Office	Syventek	Access control working group. Discussed core badge access (monthly on various rotating topics)	In process
July	All Projects	Briefing - Group	COO Briefing - Monthly an EHS&S topic	Line Managers	Wood, Haller	FVA changes	In process
July	All Projects	Pamphlet	Visitor Pamphlet	Line Managers	Wood, Haller	FVA changes	In process
July	All Projects	Briefing - Group	Security Brown-Bag (FVA Changes) end of July	All Staff	Haller/Harrod	Includes FVA Escort, Non-Staff Escorts, HSPD 12 badges escorted unclassified visits.	Not Started
July	All Projects	Briefing - Group	HDI Update - FVA, Host/Escort, Open Event	All Staff	B McDowell	HSPD 12 badges escorted unclassified visits. Open information Events, SSP use, changes to FVA hosting; Host a meeting, business event or conference; Open information and Public Events for exhibit; Request Approval for RH interaction; Host/Escort Exhibit.	Not Started
August	Hosting / Escorting	HDI	Security Brown-Bag (FVA Changes) end of July	All Staff	Haller/Harrod	Includes FVA Escort, Non-Staff Escorts, HSPD 12 badges escorted unclassified visits.	Not Started
August	All Projects	Briefing - Group	HDI Update - FVA, Host/Escort, Open Event	All Staff	B McDowell	HSPD 12 badges escorted unclassified visits. Open information Events, SSP use, changes to FVA hosting; Host a meeting, business event or conference; Open information and Public Events for exhibit; Request Approval for RH interaction; Host/Escort Exhibit.	Not Started
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August	All Projects	Briefing - Group	HDI Update - FVA, Host/Escort, Open Event	All Staff	B McDowell	HSPD 12 badges escorted unclassified visits. Open information Events, SSP use, changes to FVA hosting; Host a meeting, business event or conference; Open information and Public Events for exhibit; Request Approval for RH interaction; Host/Escort Exhibit.	Not Started
August	All Projects	Briefing - Group	Directorate Admin Meetings Follow up	Admins	S. Cartier	Topic TBD	Not Started
August	All Projects	Briefing - Group	Ops Mgrs Working Group; OCOE Implications/ Clarifications	Ops Managers	Pete Tensmeyer	OCOE - Policy Clarifications, signage, follow-up etc.	Not Started
August	All Projects	Briefing - Group	DD Forum as appropriate (SAS Focus Group) monthly	Line Managers	Wood, Haller	Access control working group. Discussed core badge access (monthly on various rotating topics)	Not Started
August	All Projects	Briefing - Group	COO's	COO's	Pete Tensmeyer	Placeholder as necessary	Not Started
August	All Projects	Briefing - Group	COO Briefing - Monthly an EHS&S topic	All Staff/LTE	Cartier/Gordon	Topic TBD	Not Started
August	All Projects	Briefing - Group	VPP Mixer (monthly)	All Staff	B McDowell	Changes to Core Building Access	Not Started
August	All Projects	Event	Internal Web Page/Save Updates	All Cleared Staff	Brian McDowell	Revised Proh Article Policy	Not Started
August	All Projects	Web	HDI Update - Core Buildings	All Cleared Staff	Pete Tensmeyer	Revised Proh Article Policy	Not Started
August	GA Access / Open Event	HDI	HDI Update - Prohibited Articles Exhibit	All Cleared Staff	Pete Tensmeyer	Revised Proh Article Policy	Not Started
August	Hosting / Escorting	HDI	HDI Update - Prohibited Articles Exhibit	All Cleared Staff	Pete Tensmeyer	Revised Proh Article Policy	Not Started
August	Prohibited Controlled Articles in LA	Briefing - Group	Focused briefing (LA Staff/Mgmt)	Admins	Pete Tensmeyer	Revised Proh Article Policy	In process
September	Prohibited Controlled Articles in LA	Briefing - Group	Focused briefing (LA Staff/Mgmt)	All Cleared Staff	Pete Tensmeyer	Revised Proh Article Policy	In process
September	Prohibited Controlled Articles in LA	Article	Email from COO/DD	All Staff	Cartier	initiate incorporating revised OCOE policy.	Not Started
September	Prohibited Controlled Articles in LA	Briefing - Group	Security Briefing	All Staff	Cartier	Deploy Nov/Dec	Not Started
September	Prohibited Controlled Articles in LA	Video	Video	Admins	Wood, Haller	Topics as needed	Not Started
September	Prohibited Controlled Articles in LA	Briefing - Group	Directorate Admin Meetings Follow up	Line Managers	Wood, Haller	Access control working group. Discussed core badge access (monthly on various rotating topics)	Not Started
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More required changes and resulting communications

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September	Prohibited Controlled Articles in LA	Video	Video	Admins	Wood, Haller	Topics as needed	Not Started
September	Prohibited Controlled Articles in LA	Briefing - Group	Directorate Admin Meetings Follow up	Line Managers	Wood, Haller	Access control working group. Discussed core badge access (monthly on various rotating topics)	Not Started
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Security Awareness @ PNNL: A New Dawn

Changes in how security awareness was focused were critical.

90% compliance-
based activities
with once-per-year content of
~80 pages, .5 FTE



90% **awareness**
while remaining fully
compliant, 1.5 FTE

Why? Staff respond more positively and have improved retention with varied, creative messaging and mediums, with a healthy dose of visual elements.



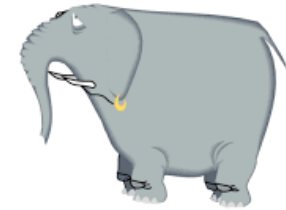
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Where to start? Change management: Identifying the elephant

Export Control Technology Protection OCM Blueprint

Why are we changing?	Measures	What actions or key milestones?
<ol style="list-style-type: none"> Support closure of Notable 4 Improve the identification and protection of technical information To gain the ability to screen for export control information To be able to identify and control high-risk personal property To be able to identify people associated with activities related to export-controlled projects Reduce compliance risks for deemed exports Improve document and data security Increase the ability to capture EC risk in identified systems 	<ol style="list-style-type: none"> Closure of Notable 4 Staff is aware of sensitive technology and export control technology (Survey) <ul style="list-style-type: none"> Staff uses the templates to mark the content of EC (System Check) Captured risk information is used for evaluation/reporting (Audit) Audits of the system (racks to records and records to racks) are successfully passed Incidence of staff with inappropriate access to high-risk personal property is reduced Successfully pass external compliance audits ??? Number of items caught that were not already flagged 	<ul style="list-style-type: none"> Deliver administrative controls to improve technology protection. <ul style="list-style-type: none"> Office-based templates that clearly identify export controlled technical documents. Create policies around updating Data Sensitivity Categorizations for Software Items in the Tech Directory Create policies for managing the Global Admins and highly privileged users that have access to all One Drive documentation. Investigate and identify options for automating information marking, including products other than Office. Deliver Risk Engine integrations for the following systems: <ul style="list-style-type: none"> Information Release Foreign National Visits and Assignments Electronic Prep and Risk Accounts Payable Contracts Deliver a tool that provides identification and control of high-risk personal property contained in spaces and integrates with Lab Assist to identify people associated with activities related to export-controlled projects. (TPIM)
Problem being solved <ul style="list-style-type: none"> Lack of integrated, institute-wide IT controls to identify and safeguard releases of controlled technical information/data A digital, real-time solution is not available to assist Laboratory staff for marking controlled technical data such as documents, email, data classification of papers, reports, drawings, etc. Unlawful export of controlled technical information (a deemed export) can bring significant financial penalties 	Outcomes <p>FY20</p> <ul style="list-style-type: none"> Administrative controls (via document templates) which clearly identify export controlled technical documents Data sources (information release, foreign national visits and assignments, electronic prep and risk, accounts payable, contracts) integrated with the new export control risk engine High-risk personal property is contained in spaces are identified and controlled People associated with activities related to export-controlled projects are identified Compliance risks of deemed exports are reduced 	

How do you eat an elephant?



One bite at a time!

Change management architects are vital to identifying the beast!

Security Awareness: One Bite at a Time

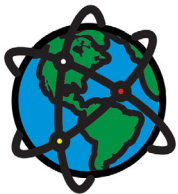
How to approach large-scale changes



- ✓ New program name
 - “Export Control Office” to “Technology Protection & Export Control (TPEC)”
- ✓ New branding
- ✓ New website
- ✓ New staff resources
 - Two new online tools for knowing when TPEC support is warranted, and for requesting TPEC support
 - New all-staff awareness training



Rebranding: Meet TPEC!



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It's not just a program...a consistent, impactful brand that is used in every communication, presentation, poster, email address is vital.



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Rebranding and website

The screenshot shows a website header with the PNNL logo and navigation links: Home, Get Help, Admin Tips and Tricks, and Edit. A search bar is on the right. Below the header is a main content area with a large blue banner on the left featuring a world map and the text "TECHNOLOGY PROTECTION & EXPORT CONTROL @PNNL". To the right of the banner are three smaller sections: "iExport" with a description "Answer screening questions to determine if you need TPEC assistance.", "FAQs" with a colorful question mark graphic, and "GET HELP" with a photo of a smiling woman on a headset. A video thumbnail for Steve Ashby is also visible. At the bottom of the page, a grey bar contains the text: "Welcome to Technology Protection & Export Control (TPEC), formerly known as Export Control. We're here to help!"

Website and resources

Reference Documents

Click the link(s) below to access some of our most-requested documents.

- Article: [Princeton Export Control Violations Highlight Importance of Export Control](#), March 2021
- [TPEC Terminology & Definitions](#)
- [Reference: Identifying Export Controls](#)
- [TPEC Directorate Assignments](#)
- [PowerPoint: Export Control 101 presentation](#), January 2021
- [Avoiding Export Control Violations During Online Meetings](#)
- [Does Your Information Release Request Need an Export Control Review?](#)
- [Export Controls Management & Compliance Plan, July 2019](#)
- [Export Control 101: Brown Bag presentation recording](#), September 2020
- [Export Control Quick Tips for Travel Professionals](#), September 2020
- [Export Control Quick Tips for Shipping Professionals](#), September 2020
- [Export Control Quick Tips for Human Resources Professionals](#), September 2020
- [Export Control Quick Tips for Contracts Professionals](#), September 2020
- [Export Control Quick Tips for Acquisition & Procurement Professionals](#), September 2020
- [Export Control Quick Tips for Administrators](#), November 2020

Vanity URL
tpec.pnl.gov



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Website and resources

iExport

Answer screening questions to determine if you need TPEC assistance.



Technology Protection & Export Control

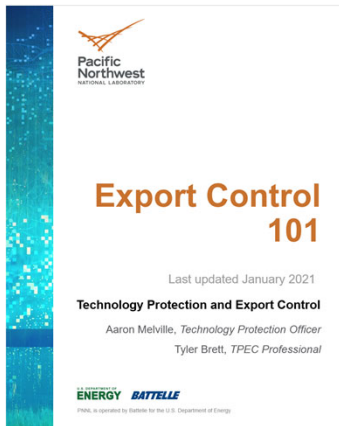
A general awareness briefing.



begin



Communications

Export Control 101

Last updated January 2021

Technology Protection and Export Control

Aaron Melville, Technology Protection Officer
Tyler Brett, TPEC Professional

ENERGY BATTTELLE

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- In-person sessions with branded giveaways, then virtual (recorded)
- Monthly for ~12 months, then quarterly; follow up with email materials
- Targeted presentations for workgroups around the Laboratory
- Invite guest speakers with a nexus: FVA, CI, OPSEC



New Resources for All Staff
Export Control 101
 ☆☆☆☆☆

Join Us for a Lunch and Learn
Tuesday, April 27, 2021
Noon - 1:00 PM
Teams Meeting
 Add to Outlook (.vcs)

Are you up to speed on the changing world of export control regulations? It's a complex topic, and the **Technology Protection & Export Control (TPEC)** group is here to help.


Join TPEC for Export Control 101 and learn about the following topics tailored for all staff:

- What is an export?
- How might I come across potentially export-controlled information or items in my work?
- When might I need to ask TPEC staff for guidance?
- Where is the nexus between export controls, Information Release, and Foreign Visits and Assignments?
- Learn about new resources like iExport and the soon-to-be-launched all-staff export control training.

Bring your questions and curiosity, and see you on Teams Tuesday, April 27 at noon.

[Click here to join the meeting.](#)

Contact: Technology Protection & Export Control

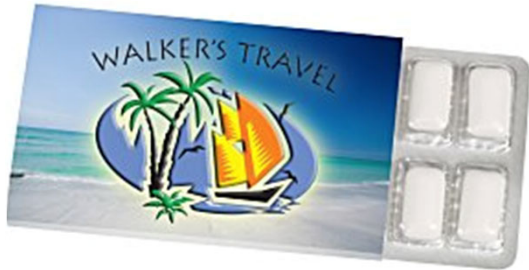


TECHNOLOGY PROTECTION & EXPORT CONTROL
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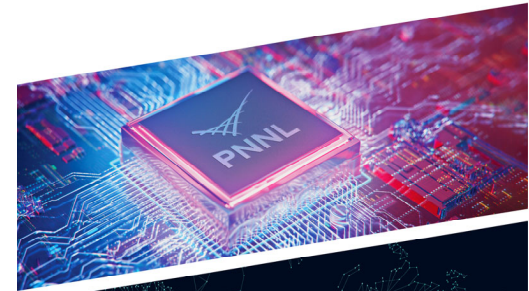


Communications

Display table branding



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Pacific Northwest
NATIONAL LABORATORY | Safeguards
& Security

Communications

Flat panel display



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Learn more about export control requirements and the protection of sensitive technologies.

- **Feb. 6**, 12:30-1:30 p.m., ETB Columbia River
- **Feb. 26**, 12:00-1:00 p.m., CSF Mural
- **March 9**, 12:00-1:00 p.m., ETB Columbia River

Skype available by request, ^PNNL TPEC, tpec.pnl.gov.

Workplace/Yammer Posts



Shannon Cartier is with Tyler Brett and Somer Goulet.

September 14, 2020 · 🌐

...

Join the Technology Protection & Export Control experts **Wednesday at noon** for "Export Control 101".

You'll learn how your work may be affected by export controls requirements (hint: it's not just research-related work that the requirements may touch!)

You'll also have a chance to hear how program requirements interface with Information Release and Foreign Visits & Assignments, and see a demo of the new-ish tool for sending the TPEC staff a request. (Want to check it out for you... [See More](#))



TEAMS.MICROSOFT.COM

Join conversation

Tutorial video



- Every available Lab communications medium with an emphasis on heavy users
- In-person forums with large groups of stakeholders

New group email address
tpec@pnnl.gov

Internal search answer

The Export Control Office is now known as Technology Protection & Export Control (TPEC). Sharing information and sensitive technologies appropriately is important to protecting our information and assets.

LEARN

- [Technology Protection & Export Control website](#)
- [Manage Information Procedure](#)
- [Requesting approval for Foreign National Interaction](#)

ACT



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TPEC is here to help

You can now get support or have general questions answered by the TPEC staff through the Service Catalog. Click on Export Control then Technology Protection and Export Control Service Request.

[Service Catalog](#)

Not sure if you need a TPEC review? Answer a few short questions in iExport to find out.

[Get Started with iExport](#)

CONNECT

Here's the Lead for Technology Protection and Export Control:

 [Technology Protection & Export Control POC](#)
Aaron Melville

For your questions about interaction with a Foreign National, reach out to this person:

 [Christine Harrod](#)
Information Security Prof

Communications

Awareness articles

Inside PNNL Story

Lab News

Princeton Export Control Violations Highlight Importance of Compliance

☆☆☆☆☆

University Fined \$54,000 for Sending Chemical and Biological Materials to 15 Countries
Princeton University **learned the hard way** what happens when an organization and its staff lose sight of export control responsibilities.

The university recently agreed to a \$54,000 settlement with the U.S. Commerce Department over 37 export violations. Between 2013 and 2018, the university sent items controlled for chemical and biological weapons to foreign research facilities in 15 countries without the required export licenses.

Princeton self-reported the violations to the Bureau of Industry and Security, which helped mitigate the penalties of their failures to follow the laws.

It's not only the physical shipment of items that carry export control considerations. Technology and technical data associated with controlled items may be considered exports; having a detailed conversation with international collaborators may be subject to requirements, too. So, how do you know if your work is subject to these requirements?

Significant strides have been made over the past two years to educate staff at PNNL and develop tools and resources to provide quick guidance and support.

For example, the **Technology Protection and Export Control (TPEC)** group, in partnership with Hazardous Material and Waste Management and Worker Safety and Health, have made updates to **Biological Hazard Management (BioMS)** and the **Chemical Management System (CMS)** to flag topics for staff that may have export control considerations.

TPEC professionals are available at no cost to projects via request through the **Service Catalog** to answer any questions or concerns on projects, associated technologies, or potential collaborators, in addition to assisting with potential license or exemption determinations.

A new tool is coming soon to help you determine if you need export control guidance, along with a new all-staff general export control awareness training. Watch for more information over the next few months.

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Inside PNNL Story

Lab News

How Do You Know if Your Information Release Request Needs an Export Control Review?

☆☆☆☆☆

Information Release is a valuable tool used to protect PNNL's information, assets, and staff from export control-related trouble (among other protections related to its reviews), but it's a tool that only works to meet export control requirements when it's used. So, how do you know if you need to request an export control review? And how do you select the option in the **Information Release tool**?

- There are several clues to determining if you need an export control review. They include:
- Information product was produced by a project involving defense, space, intelligence, or homeland security
 - Information product contains technical design information about PNNL or client-owned articles, materials, or software
 - Information product will be sent outside of the United States
 - Information product that will be sent to a foreign national, whether they are located at home or abroad.
- Read **"Does Your Information Release Request Need an Export Control Review?"** for more guidance and instructions on how to select the option for a review.

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Inside PNNL Story

Lab News

PNNL Project Inadvertently Releases Export-Controlled Information to Canadian Company

☆☆☆☆☆

Read the **Lessons Learned** article
Technology protection and export control requirements are complex, occasionally change, and require the engagement of export control staff throughout a project's lifecycle. A good example of how export control requirements can be confusing is the case of a PNNL project that inadvertently shared export-controlled information for two years with a Canadian company.

In this **Lessons Learned** article, you'll read about the intricacies that caused the export control risks to be missed initially and why it matters.
Want to know more about Technology Protection & Export Control at PNNL? Visit the **new website**.
Want to get assistance from TPEC staff? Use the new **Service Request** tool.
Want to hear from us in person? Attend an upcoming brown bag on February 26 or March 9. Watch for more information in **Inside PNNL**.

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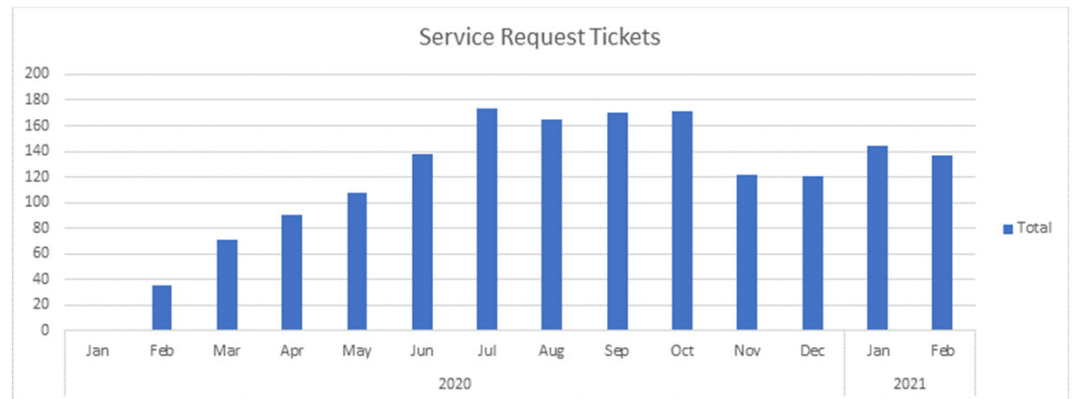
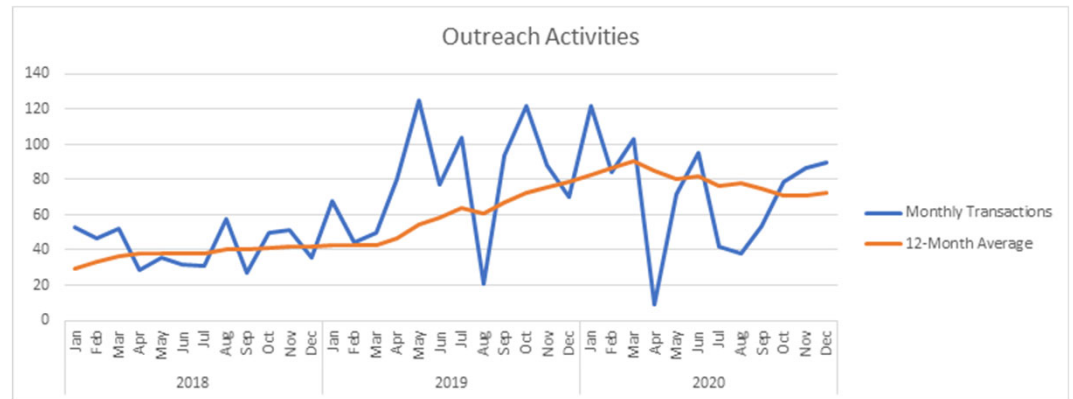


The results

- ✓ TPEC Program: “Many of these efforts are the first of its kind within the DOE complex and are setting the standard for technology protection at DOE.”
- ✓ Benchmark survey – initial completed at beginning of efforts; follow up survey pending rollout of all-staff training



DOE Security Professional of the Year (Contractor)



Benefits of flipping the compliance model

Security Awareness is no longer just about staff taking rote training once a year. It's a continual buffet of security-related messaging for top-of-mind awareness.

Upcoming changes:

- Foreign Visits & Assignments
 - Controlled Unclassified Information
 - Physical Security
 - U-PIV
- Personnel Security



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How to implement large changes at your site

Required:

- Management support
- SME support
- Change management
- Communications
- Graphics
- Benchmark other sites



Staff: WIIFM?



Thank you for engaging with
my presentation!

Shannon Cartier
shannon.cartier@pnnl.gov





Thank you

