





4. Establish an Insider Threat Program Working Group (ITPWG).
5. Develop insider threat awareness training, either in person or computer-based, to all affected persons granted access by the University to Federally designated Sensitive Information, information systems, or research environments.
6. Ensure all affected persons receive adequate training and awareness of the requirements set forth in this policy.
7. Establish and promote an internal network site accessible to all affected persons to provide insider threat reference material, applicable reporting requirements and procedures, and a secure electronic means of reporting matters to the ITP.
8. At least annually, conduct a self-inspection of the AAMU ITP, inform the AAMU President of the results, and outline projected resolutions to deficiencies, if any.
9. Ensure the ITPWG has timely access, as otherwise permitted, to available U.S. Government intelligence and counterintelligence reporting information and analytic products relative to insider threats, foreign intelligence services, and other adversarial threats.
10. Serve as the AAMU insider threat conduit to local, State, and Federal agencies and organizations.

D. The ITPWG will:

1. Assist the ITPSO to develop minimum standards and guidance to implement ITP policies, standards, and procedures.
2. **Establish procedures to centrally manage an insider threat capability to monitor for and respond to indicators of an insider threat.**
3. Establish procedures to securely request, receive, and retain records and documents necessary to complete assessments, inquiries, and resolutions required by this policy.
4. Develop and implement procedures that ensure all ITP activities are conducted in accordance with applicable laws, whistleblower protections, and privacy policies.
5. Establish reporting guidelines for affected persons to refer relevant insider threat information directly on directly ion 792 reW*nBT/F1 12(t)7()-20nt4ynBT/F1 12 Tf74m3

safeguarding of Federally designated Sensitive Information, information systems, or research environments.

- A. The ITPWG, and other AAMU employees, as determined by the ITPSO, will receive, and document the following initial and refresher training:
 - 1. Security and counterintelligence fundamentals;
 - 2. Indicators of insider threat behavior;
 - 3. Procedures to conduct insider threat inquiry and response actions;
 - 4. Laws and regulations regarding gathering, integration, retention, safeguarding, and use of Insider threat records and data;
 - 5. Applicable privacy laws, regulations, and policies;
- B. Affected persons will receive

- B. 32 CFR Part 117, National Industrial Security Program (February 24, 2021).
- C. 32 CFR Part 2002, Controlled Unclassified Information (September 14,2016).
- D. Federal Information Security Modernization Act of 2014 (FISMA 2014).
- E. Office of Management and Budget Circular A-130, Managing Federal Information as a Strategic Resource.
- F. DoD Instruction 5200.48, Controlled Unclassified Information (2020-03-06).
- G.