Counter Insider Threat Certification Program Governance Council Charter

I. PURPOSE:

This charter officially establishes the Certified Counter-Insider Threat Professional (CCITP) Governance Council (GC) – here after referred to as "the Council" – as the governance body for the CCITP Certification Program and describes the structure, scope, and responsibilities of the Council.

II. REFERENCES:

- Executive Order 13587, "Structural Reforms to Improve the Security of Classified Networks and the Responsible Sharing and Safeguarding of Classified Information," October 7, 2011
- b. National Insider Threat Policy and Minimum Standards
- c. DoD Directive 5205.16, "The DoD Insider Threat Program," August 28, 2017

III. MISSION:

The CCITP GC is an autonomous body responsible for the oversight and maintenance of the CCITP Certification Program. This includes but is not limited to providing an opportunity for all DoD and non-DoD Component stakeholders within the Counter-Insider Threat (C-InT) Enterprise: to discuss and coordinate on issues of policy, standards, professional development, and certification for the C-InT workforce. The Council executes its mission under the guidance and authority given to it by its two conferral authorities: The Undersecretary of Defense for Intelligence (USD(I)), who serves as the Senior Official and principal civilian advisor to the Secretary of Defense (SECDEF) for the Department of Defense (DoD) Insider Threat Program (reference (c)); and the Director of the National Counterintelligence and Security Center (D-NCSC), who serves as the conferral authority on behalf of the Office of the Director of National Intelligence (ODNI). The Council also has the responsibility of ensuring the Program meets and maintains third-party accreditation requirements.

IV. RESPONSIBILITIES:

- **a.** The Chair & Deputy Co-Chair of the Council are responsible for ensuring the CCITP GC fulfills its mission of oversight and maintenance of the CCITP Certification Program as well as:
 - i. Serve as the designated liaisons between the Council, the USD(I) and the D-NCSC;

¹ The "C-InT Enterprise" is broadly defined as those C-InT professionals working within and/or supporting the United States Government (USG). This includes DoD components, non-DoD USG components, as well those members within industry and academia who support them.

- **ii.** Provide regular status updates on the CCITP Certification Program to the USD(I) and the D-NCSC; and
- **iii.** Receive and report guidance from the USD(I) and the D-NCSC to the Council.
- **b.** Provide an opportunity for each of the component stakeholders within the C-InT Enterprise to discuss and coordinate on issues of policy, standards, professional development and certification for the C-InT workforce:
 - i. The Council will meet at a minimum of two (2) times per year.
 - 1. The first Council meeting will be to approve this program Charter as well as the fundamental program policies. The Council will then conduct thorough reviews and make any necessary amendments to this charter and the program policies at least one (1) time every five (5) years, or sooner if deemed necessary by the Chair.
 - 2. At least one (1) meeting each year shall be an "Open" meeting. All other meetings may be "Open" meetings or "Closed" meetings (See "Meetings" in Section VI below for the description of each).
- **c.** Ensure that the program meets and maintains third-party accreditation requirements.
 - i. The Council will seek accreditation for the CCITP Certification Program through the National Commission of Certifying Agencies (NCCA) and will do everything within its power to ensure that once accreditation is conferred it will be maintained for the duration of C-InT mission within the United States Federal Government. This includes all current CCITP Certifications as well as any future C-InT related certifications, whether higher levels, or specialty areas.
 - **ii.** For purposes of NCCA accreditation, the Council is responsible for making all of the program's essential certification decisions. These include, but are not limited to:
 - 1. Program eligibility standards;
 - 2. Standards for initial certification and maintaining certification;
 - **3.** Program-related disciplinary determinations;
 - 4. Development, administration, and scoring of examinations; and
 - **5.** Selection of Subject Matter Experts (SMEs).

V. COUNCIL ORGANIZATION:

The current C-InT Enterprise within the United States federal government is composed of over 100 stakeholder components and organizations. To adequately and fairly represent these stakeholders the Council has decided to split them into two categories: DoD Components and Non-DoD Components. The USD(I) serves as the Conferral Authority on behalf of the DoD components and the D-NCSC serves as the Conferral Authority on behalf of the Non-DoD Components. The Chair and the Deputy Co-Chair serve as the designated representatives of the Conferral Authorities and are non-voting members of Council.

Each group of stakeholders (DoD & Non-DoD Components) will have five (5) voting component members. Each voting component member will be responsible for designating, in writing, to the Council, their own representative and an alternate to serve on the Council. Designated representatives must be Civilian or Military personnel of appropriate grade, rank, or authority to speak on behalf of their organization as well as be able to balance the needs of their organization with enterprise-wide interests (recommended representatives be the Component's appointed Senior Official or their deputy, but not lower than the Program Manager/Hub Chief).

- **a.** Council Chair: The Chair of the Council will be the DoD C-InT Director, as appointed by the USD(I). It is the Chair's responsibility to preside over Council meetings and oversee the Council's activities and communication. The Chair has no vote on Council decisions, except in the instances when there is a tie among the other voting members, the Chair will then serve as the tie-breaking vote. The Chair appoints a Program Management Office (PMO) in order to implement and support all CCITP Certification Program decisions made by the Council.
- **b.** Council Co-Chair: The Chair will be supported by a Deputy Co-Chair. The Deputy Co-Chair will be one of the Co-Directors of the National Insider Threat Task Force (NITTF) as appointed by the D-NCSC. The Deputy Co-Chair has the responsibility of supporting the Chair in providing oversight of the Council's activities as well as leading Council meetings if the Council Chair is unavailable. The Deputy Co-Chair has no vote on Council decisions except in the instances when there is a tie among the other voting members and the Council Chair is unavailable, then the Deputy Co-Chair will serve as the tie-breaking vote.
- c. Voting Members: The CCITP GC will have twelve (12) voting members: five (5) DoD components members, five (5) Non-DoD component members, a Public Member, and a Certified Member. Each component member will designate, in writing, to the Council, their official component representative, and their alternate, to serve as the voting member on the Council. Each designated component will serve on the council for a period of three (3) years, but may change their designated representative (or their alternate) as needed throughout those three (3) years, so long as it's done in writing and the new appointee is able to represent and speak on behalf of and their component and the larger group of components they are representing. In addition to these two (2) larger voting groups, there are two (2) other voting members: A Public Member and a Certified Member.

- i. DoD Members: All DoD components fall into one (1) of four (4) major organizational categories: Services, Agencies, Combatant Commands (CCMDs), and Field Activities. Because of this unique organizational structure, one (1) component from each organizational category will be selected in order to ensure impartiality and equal representation from across the DoD. Each of these four (4) designated components will serve as a voting member on the Council for a period of three (3) years and then rotate with another organization within their same sub-group. The fifth member of the DoD group will be a representative from the DoD Insider Threat Mitigation and Analysis Center (DITMAC). The DITMAC will be a permanent member of the DoD group and will not rotate because they are the primary organizational body responsible for the management and oversight of all insider threat issues for the Department, not just for an individual organization. Also, by not rotating, they will be able to provide continuity for the other DoD voting members as they do rotate in and out of voting member positions.
- ii. Non-DoD Members: The Non-DoD stakeholder organizations are not structured in the same manner as the DoD. There are several stakeholder organizations nested under various larger agencies or departments, but they do not have the same overarching organizational hierarchy as the DoD. As such, five (5) organizational members from among the Non-DoD group of organizations will be selected to serve as the representative voting members for their group; with the caveat that they must avoid selecting multiple organizations that are subordinate to the same larger agency or department.
- **iii.** *Public Member*: The Public Member must be an individual that is not directly employed by, or subordinate to, any of the other members of the C-InT Enterprise but must be a consumer of or the beneficiary of the services offered by the certified population. The Public Member organization will be appointed by the Chair, and the appointed organization will identify the appropriate representative to serve on the Council and carry out the responsibility of representing and protecting the public's interests.
- iv. Certified Member: The Certified Member must be an individual that is not currently employed by another active voting member of the Council. The Certified Member will come from an organization designated by the Chair once the certified population reaches 10% of the overall certifiable workforce (approximately 200 certificants) or once the CCITP Certification becomes accredited through NCCA (whichever comes first). The designated organization will then appoint a representative to serve a three (3) year rotation on the Council. During that time, the Certified Member has the responsibility of representing and protecting the interests of the certified population.

- **d. Observer/Non-Voting Members:** All other stakeholder components within the C-InT Enterprise that are not currently serving as voting members on the Council are still eligible to attend all "Open" Council meetings as an Observer/Non-Voting Member.
- e. CCITP Program Management Office (PMO): The CCITP PMO's primary function is to conduct the day-to-day administration of the CCITP Certification Program and to implement and support all CCITP Certification Program decisions made by the Council. The CCITP PMO will also be responsible for providing regular updates to the Council on any program administration items of note (e.g., disciplinary issues, waiver requests, appeals, accreditation updates, program statistics, or any challenges/obstacles that are having or may have a negative impact on the program).
- **f. Committees:** The Council may establish committees or working groups, or request the assistance of existing committees or working groups (e.g., NITTF's Insider Threat Training Working Group) consisting of Council representatives and others for the purposes of addressing specific issues and tasks as they arise. Council representatives may identify and appoint SMEs from within the C-InT enterprise to support working groups as needed.2

VI. ADMINISTRATION AND REPORTING:

- **a. Meetings:** The Council will convene at least two (2) times per year, or more frequently as deemed necessary by the Chair. Meetings can be face-to-face or via teleconference. The Chair may opt for electronic coordination, review, and approval of materials in lieu of a regular meeting to expedite program development and mitigate against scheduling issues. Council business will proceed when a quorum is present (For the purposes of this council a quorum will be defined as 50% plus one of the voting members or their alternates present for the meeting). The Council will conduct two (2) types of meetings:
 - i. Open Meetings: Open Meetings are open to all stakeholder components within the C-InT Enterprise, specifically those components stakeholders that are part of a larger group and do not have a direct vote as well as the public (members of the certified population). At least one (1) meeting per year will be an Open Meeting where these components and/or members of the certified body will have the opportunity to raise any issues, concerns, or recommendations before the whole council. NOTE: in the interest of time and in order to keep the meetings orderly, all requests to address the council by non-voting members should be submitted to the Council organizers in advance of the meeting

² SMEs may be selected or appointed by the Council members but the program still has the responsibility to maintain the firewall between training and certification as described within the NCCA Accreditation Standards and will only accept SMEs that allow the program to continuously meet those standards.

- **ii.** Closed Meetings: Closed Meetings are designed for activities or discussions pertaining to assessment content, standard setting, appeals, discipline, certification decisions, or other confidential matters involving applicants or certificants. All findings, recommendations, and decisions made by the Council will be documented as part of the Council record.
- b. Meeting Management: The Chair will designate individuals to provide administrative support for the Council and Committees. The designees will be responsible for coordinating meeting logistics and for the drafting/staffing of all council correspondence, including meeting announcements, read-ahead information, voting materials and meeting minutes. A member of the C-InT PMO will be present at meetings to facilitate or provide information about program administration.
- c. Voting: Each voting member organization is allowed one (1) vote. A quorum of voting members must be present for a vote to proceed. Only the voting member or designated alternate may present the organization's vote. If neither person can attend, the organization forfeits its vote. Voting results are determined by a super majority vote (60%). The Chair may call for a vote between Council meetings. In this case, the voting may occur over email with an attached ballot. In the case of official email voting, a voting deadline (date and time) will be established and strictly enforced. Votes cast after the deadline will not be counted. In the event of a tie vote, the Chair will consult with the deputy co-chair and cast the deciding vote.
 - i. Participation: Voting members are expected to attend meetings in person or via video teleconference in order to maintain the balance of representation needed for council decisions. Voting member participation is critical for the successful execution of the C-InT Certification Program; as such, all Components that do not attend meetings (either in person or remotely) will be counted as abstentions when roll calls are taken. Voting may also take place remotely (via email). All findings, recommendations, and decisions made by the Council will be by consensus. Where consensus is not attainable, decisions supported by at least 60% of the Council voting members will serve as the Council's final decision.
 - ii. Alternates: Each voting member organization is allowed to designate an alternate to their component representative. This alternate must be identified in writing and submitted to the Council in the same manner as the representative. The designated alternate will have the responsibility of attending Council meetings and casting votes on behalf of their component in the absence of the primary representative. Because they have this responsibility, the alternate must also have the authority to speak on behalf of their component in the same manner/capacity as the designated representative.
- d. Appointments, Resignations, and Removals:

- **i.** Appointments: It is understood that within the United States Federal Government employees often rotate in and out of positions as well as in and out of various components and agencies; however, in order to maintain program stability and transparency each component stakeholder designated as a voting member is required to submit, in writing, their nomination for component representative, that representative may change over time, but the appointment will remain with the component organization for the duration of their three (3) year term on the Council.
- **ii.** *Resignations:* A member can resign at any time or an organization may nominate a new representative at any time by giving the Chair written notice.
- **iii.** *Removals:* There are three (3) instances where a voting member may be removed from the council:
 - 1. Dereliction of Duties: If a component representative fails to perform their functions as a voting member of the Council, they can be nominated by the Council for removal. If nominated for removal the representative has the right to address the Council and present his/her case for why they should remain on the Council. After the member has presented their case before the Council, the Council has the option to allow the member to remain in their position, inform the member's organizational leadership of the problem and put the council member on probation for a period of time deemed appropriate by the Chair. If a member is put on probation and continues to neglect their duties as a council member, they can be removed from the Council. If a council member is removed from the Council, the component they represent does not lose their representation at the Council, but are then required to designate a new representative who can fulfill the requirements and responsibilities of the position.
 - 2. Conduct Unbecoming: If a component representative behaves in a manner that discredits him or herself, or in any way calls into question the validity and/or integrity of the CCITP Program, that individual will be subject to removal from the Council. In such cases, evidence will be submitted to the council and a vote of confidence will be taken by the remaining council members. If a vote of "No Confidence" is given, the individual will be removed from the Council. The organization they represented will be notified and will have to provide a new representative to the Council or forfeit their seat to another organization from their group.
 - 3. Conflict of Interest: Members of the Council are all required to report any potential conflicts of interest that may prevent them

from serving as a voting member on the Council. Conflicts of interest include, but are not limited to, being an active C-InT instructor/educator, own or profit from any C-InT Training or certification study products/materials, or being a member of an organization that already has a voting seat on the council. All voting members on the council will be required to sign both a Non-Disclosure Agreement and a Conflict of Interest Statement.

- e. Adding New Members: As the C-InT Enterprise and its stakeholder component programs continue to grow and mature, and as new stakeholder component programs emerge, they may request to be folded into one of the key stakeholder groups, or petition to form a new stakeholder group with its own voting rights. These considerations will be reviewed and considered by the Council when they arise. In the absence of stakeholder petitions, the Council will review its organizational structure, and any necessary changes will be made on the same periodic basis as the Council Charter, at a rate of one (1) time every five (5) years, or as often as deemed appropriate by the Chair.
- **f.** Amendments to the Charter: Amendments to the charter will be made during the periodic review of the charter by the Council, at a rate of one (1) time every five (5) years, or as often as deemed necessary by the Chair. There are three (3) types of amendments that can occur:
 - i. *Administrative:* Administrative amendments to the charter include changes in wording or language within the charter. These changes are made to more clearly articulate an authority, or a process conducted by the Council.
 - **ii.** *Procedural:* Procedural amendments to the charter include changes in the way the Council conducts business (e.g., the way meetings are conducted, votes are collected, or various other actions are taken).
 - **iii.** *Membership:* Membership amendments to the charter include additions of new members or the removal of current members from the Council.

VII. EFFECTIVE DATES:

a. This Charter shall be effective immediately upon ratification by the Council and shall remain in effect until amended by the Council.