

Mandatory and Required Training for Contractor Personnel

The Mandatory and Required Training Committee (MRTC) is an inter-divisional committee that oversees policies applicable to **mandatory**¹ and **required**² training (MRT). Its authority extends to MRT that must be completed in accordance with Clause 7.5.2-14, Training for Contractor Personnel (October 2025). Additional MRT may be added to the list during the contract period of performance, as determined necessary by the FDIC. See Clause 7.5.1-02 Protecting Sensitive Information for additional requirements related to protecting and controlling sensitive information and Clause 7.5.1-03 Access to FDIC Information Systems for contractor personnel with access to FDIC's network and/or information systems.

Timelines for Compliance

All MRT are identified in the following section, which also lists the timeline for compliance with initial or annual requirements. Training must be completed within these timelines throughout the contract period of performance.

For purposes of MRT, the FDIC defines "annual" as beginning on January 1st of the compliance period and ending on October 31st of the calendar year(s) that training is due. Recurrence for one-time training requirements are identified as "none".

Compliance for Contractors

(a) Contractor Personnel with FDIC Network Access.

Any key personnel or non-key personnel (of the Contractor or subcontractor) who receive access to the FDIC network are required to take the following FDIC training on-line using the FDIC's internal website, as a condition of maintaining access to the FDIC network.

Title	Initial Compliance Period	Recurrence
Cybersecurity and Privacy Awareness Training (CPAT)	Within 5 days of receiving FDIC equipment	Annual
FDIC Workplace Security Training	Within 30 Days of starting work on the contract	Annual

¹ **Mandatory training** is defined as training required due to a statute, regulation, or directive received from a governing entity (i.e., The President via Executive Order, the Office of Management and Budget, etc.) and confirmed as applicable to the FDIC workforce by the Legal Division.

² **Required training** is defined as training established by an authoritative entity within FDIC (the Chairman, Chief Operating Officer, Operating Committee, and the MRTC).

Insider Threat and Counterintelligence Program (ITCIP) Training	Within 30 Days of starting work on the contract	Annual
Legal Hold Training	Within 30 Days of starting work on the contract	Annual
Electronic Signature Training	Within 30 Days of starting work on the contract	None
Professional Conduct at the FDIC Training*	Within 30 Days of starting work on the contract	Annual

*Contractor Personnel are not required to take the Live Virtual Session

(b) Contractor Personnel without FDIC Network Access.

Any key personnel or non-key personnel (of the Contractor or subcontractor) who do not have access to the FDIC network and therefore are unable to take FDIC's on-line training using FDIC's internal website, must access training slides through FDIC's external website (<https://www.fdic.gov/buying/goods/acquisition/index.html>). Training is accomplished by reviewing the training slides, as specified below:

**(1) Contractor Personnel with Unescorted Office/Facility Access
without Access to Sensitive Information.**

Any personnel meeting the conditions of paragraph (b), with unescorted access to FDIC offices or facilities without access to sensitive information, must review the following:

Title	Initial Compliance Period	Recurrence
FDIC Workplace Security Training	Within 30 Days of starting work on the contract*	Annual
Insider Threat and Counterintelligence Program (ITCIP) Training	Within 30 Days of starting work on the contract	Annual
Professional Conduct at the FDIC Training**	Within 30 Days of starting work on the contract*	Annual

*Limited exceptions for short-term/project-based access (e.g. drywall installers, electricians)

**Contractor Personnel are not required to take the Live Virtual Session

(2) Contractor Personnel with Unescorted Office/Facility Access and Access to Sensitive Information.

Any personnel meeting the conditions of paragraph (b), with unescorted access to FDIC offices or facilities and access to sensitive information, must review the following:

Title	Initial Compliance Period	Recurrence
Cybersecurity and Privacy Awareness Training (CPAT)	Prior to the receipt of any sensitive information	Annual
FDIC Workplace Security Training	Within 30 Days of starting work on the contract*	Annual
Insider Threat and Counterintelligence Program (ITCIP) Training	Within 30 Days of starting work on the contract	Annual
Professional Conduct at the FDIC Training	Within 30 Days of starting work on the contract*	Annual

*Limited exceptions for short-term/project-based access (e.g. drywall installers, electricians)

(3) Contractor Personnel with Only Access to Sensitive Information.

Any personnel meeting the conditions of paragraph (b), with only access to sensitive information (Reference Clause 7.5.1-02 Protecting Sensitive Information), must review the following:

Title	Initial Compliance Period	Recurrence
Cybersecurity and Privacy Awareness Training (CPAT)	Prior to the receipt of any sensitive information	Annual

(c) Contractor Personnel Involved in Activities Associated with Continuity of Operations.

Any key personnel or non-key personnel (of the Contractor or subcontractor) performing services in which the contract or the statement of work specifies activities associated with continuity of operations or disaster recovery (regardless of whether the personnel do or do not have FDIC network access), must access training slides through FDIC's external website (<https://www.fdic.gov/buying/goods/acquisition/index.html>). Training is accomplished by reviewing the slides for the following:

Title	Initial Compliance Period	Recurrence
Continuity of Operations (COOP) Training	Within 90 Days of starting work on the contract	Annual

(d) Training Confirmation

The Contractor is responsible for ensuring that mandatory training for Contractor Personnel is completed. The Contractor must provide a written certification **annually by November 15**, stating that all Contractor Personnel covered under paragraphs (b) and (c) have successfully completed the mandatory training requirements described herein, unless they complete the training in FDIC Learning Experience (FLX) through an external FLX account. Training for Contractor Personnel with network access or external FLX accounts, will be validated by reviewing the FLX Report within the FDIC Contract Oversight Dashboard (FCOD).

Enforcement of Compliance

Enforcement of contractor personnel compliance with MRT is delegated to the Oversight Manager. Compliance with mandatory and required training may be enforced through limiting access to the FDIC network until training for the following courses are completed:

- **Cyber and Privacy Awareness Training (or CPAT)**, which directly impacts the FDIC's Information Security Program.
- **Insider Threat and Counterintelligence Program (ITCIP)**, which is required by the FDIC's Insider Threat Detection and Prevention Program.
- **FDIC Workplace Security**, which impacts the FDIC's Physical Security Program.