

ISLAND SECURITY POLICY INSTITUTE

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POLICY BRIEF

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Insider Threat in Small Island Government Agencies — The Policy Gap No One Has Addressed

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EXECUTIVE SUMMARY

- **Federal insider threat program requirements assume organizational structures with dedicated security personnel and segregated IT management that small island government agencies cannot achieve.**
- **The multi-function government employee — whose role encompasses financial management, HR, IT, and operational oversight simultaneously — creates a high-risk insider threat profile that no existing framework identifies or addresses.**
- **Political dynamics in small island communities create insider threat conditions with no continental analog.**

In a Pacific Island territory government department of nineteen employees, the finance officer, the HR director, and the IT administrator are the same person — a single government employee whose role has expanded over twelve years to encompass every sensitive function in the department. Federal insider threat program compliance requirements — including those under Executive Order 13587 — were written for government organizations of a scale that small island governments do not approach.¹

The Multi-Function Government Employee

The finance officer who also manages HR records, administers IT systems, and maintains operational oversight simultaneously holds access privileges that would trigger immediate remediation review in a large organization — but that are invisible to risk assessment frameworks calibrated for large organizational environments. This is not a performance gap. It is a structural condition of small island government that existing policy frameworks have never addressed.

Policy Recommendations

1. Develop small island government-specific insider threat policy frameworks prescribing compensating controls — third-party auditing, rotating duty assignments, peer oversight — appropriate for small government scale.
2. Reform federal insider threat program compliance requirements for Pacific Island territory governments to reflect operational capacity constraints.
3. Commission ISPI to develop practitioner-grounded insider threat assessment tools for small island government agencies usable without dedicated security staff.

NOTES AND REFERENCES

ABOUT THE ISLAND SECURITY POLICY INSTITUTE

The Island Security Policy Institute (ISPI) is a nonprofit, nonpartisan research organization based in Honolulu, Hawaii. ISPI produces practitioner-led research, policy analysis, training programs, and commissioned research on public safety, emergency preparedness, insider threat, and security policy for island and coastal communities worldwide. ISPI is registered as a federal contractor on SAM.gov under NAICS 541720. Warren Pulley, Founder & Executive Director.

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