

# National Industrial Security Program Policy Advisory Committee (NISPPAC)

## Meeting Minutes

November 20, 2019

The NISPPAC held its 63rd meeting on Wednesday, November 20, 2019, at the National Archives and Records Administration (NARA), 700 Pennsylvania Avenue, NW, Washington, DC. Mark Bradley, Director, Information Security Oversight Office (ISOO), served as Chair.

### **Welcome:**

The Chair welcomed everyone, and reminded participants that this was a public meeting and was being recorded. The Chair recognized the new Industry spokesperson Heather Sim, and another new Industry representative, Aprille Abbott. The Chair also welcomed the new Defense Counterintelligence Security Agency (DCSA) representative, Keith Minard, as well as his alternate, Karl Hellmann. In addition, the Chair recognized Brad Weatherby as the new NISPPAC representative from the National Security Agency. Furthermore, the Chair observed that we do not have representatives from the National Aeronautics and Space Administration and the Central Intelligence Agency.

The Chair stated that it is his job to solicit and accept nominations from the agency head for members to serve on the NISPPAC. He stressed that there is a recognized procedure and that members cannot nominate themselves. The Chair reminded the audience that the bylaws stated that the nomination should come from the agency head. The bylaws are in the process of being modified which will allow the senior agency official to nominate a member.

In addition, the Chair reminded the attendees that all government NISPPAC members must file an annual disclosure form with the National Archives General Counsel. The Chair stated that a new form is not required and that members can simply copy the forms they have on file with their agency and send it to the General Counsel.

### **II. Administrative Items**

Greg Pannoni, ISOO and Designated Federal Official (DFO) mentioned that all of the committee members should have received the presentations and handouts in electronic format prior to the meeting and that the transcript, along with the minutes and presentations for this meeting, would be posted to the ISOO website. He also mentioned that NISPPAC meeting announcements are posted on the federal register approximately 30 days prior to the meeting.

### **III. Old Business**

#### **Action Items from Previous Meetings**

Mr. Pannoni addressed and provided updates to the NISPPAC action items from the July 18, 2019 meeting;

- Access to the Defense Information for Security System (DISS) by non-DoD agencies.

**STATUS: OPEN.** The Defense Vetting Directorate (DVD) Senior Advisor consulted with the Department of State (State). It was agreed that the best tool to support these needs would reside in the National Background Investigations System (NBIS). Dr. Charles Barber, the DCSA, Director, Enterprise Business Support Office (EBSO) is in the process of establishing a working group to help resolve these issues.

- Industry to provide instances of delayed National Interest Determinations (NIDs)  
**STATUS: OPEN.** Industry did provide instances of delayed NIDs at a NID Working Group Meeting that was held in August. Despite significant progress, another meeting will be scheduled in the near future.
- DCSA is still in process of internal and formal coordination of an Industrial Security Letter (ISL), that will replace ISL 2016-02. The subject of this ISL is the Insider Threat Program.

**STATUS: OPEN.** NISPPAC comments have been received and DCSA is in the process of reviewing them. DCSA, in coordination with OUSDI Staff will work with NISPPAC on comment adjudication and as a follow-on work with industry on updates to insider threat products and tools that affect cleared industry.

- ISOO will convene a NISPPAC NID working group meeting in the near future with industry representatives. DCSA was going to address the challenges in the NID process.  
**STATUS: OPEN.** A working group meeting was held on August 22 to discuss this issue and another meeting is planned. Some of the ongoing challenges include consistency and reciprocal acceptance of Foreign Ownership Control or Influence (FOCI) analysis among the government parties involved in the NID process.
- Chris Forrest, DCSA, stated there will be a meeting in August for industry and government to discuss ongoing issues with the National Industrial Security System (NISS).

**STATUS: CLOSED.** Due to personnel turnover and security mandated upgrades to NISS, the Operational Requirements Committee (ORC) meeting was not held. It was rescheduled and held on Monday, November 18.

- Office of the Director of National Intelligence (ODNI) to host a meeting in the fall to discuss the state of the Trusted Work Force program to address the concerns of industry.  
**STATUS: CLOSED.** Valerie Kerben, ODNI, addressed this issue during the meeting.
- ISOO requested DoD to take the issue of cyber assurance back to confirm what level of confidentiality, integrity, and availability for the national contractor classification system is or is planned to be.

**STATUS: CLOSED.** The Defense Logistics Agency (DLA) manages the systems accreditation for the Procurement Integrated Enterprise Environment (PIEE), on which NISP Contracts Classification System (NCCS) resides as a module.

- DoD will provide an update on critical technology protection.  
**STATUS: CLOSED.** DoD provided an update during the meeting on this topic.
- Patricia Stokes, DCSA, was going to take an action item for the DCSA EBSO to hold a stakeholder's group meeting.

**STATUS: OPEN.** There was going to be a stakeholder's forum on July 29 and July 30. The EBSO recently met with industry to address systems requirements and industry issues that support vetting and NBIS development activities. Additionally, DCSA is planning an NBIS stakeholder symposium in the spring of 2020.

#### **IV. Reports and Updates**

Before the updates, Kim Baugher, State, inquired if they were not going to get DISS access ID if the low side of the NBIS is going to replace Central Verification System (CVS) at some point. Mr Pannoni replied in the affirmative that the low side repository will be replacing CVS and DISS will be enhanced to support the exchange of civilian personnel and vetting information. Charlie Phalen, Director DCSA seconded that his agency is working to gain interim access with capabilities that are developed into NBIS. Ms. Baugher also inquired when CVS will be completed and Mr. Phalen replied the targeted date is late January.

#### **V. DoD update**

The first report was provided from Garry Reid, Director of Defense Intelligence, Counterintelligence, Law Enforcement and Security, Office of the Secretary of Defense. The focus of his discussion was critical technology protection. Mr. Reid began the discussion by noting the different changes in his office, with a new Secretary of Defense, as well as a new Acting DNI and a new OPM director. He also acknowledged Bill Lietzau who is the head of the Personnel Vetting Transformation Office, and acknowledged the help Mr. Lietzau's office has provided. Despite the changes, the strategic priorities have not changed.

Mr. Reid discussed his concern about leaking technology to people that are actively seeking it. He warned of the commercial economic technology space with sophisticated adversaries. It is multi-planned, exploiting vulnerabilities, and our commercial, economic, trade, export controls, and academia research laboratories. This creates an opening for those who want to exploit our research development, in addition to targeting our people and program facilities. He stated that elevating security across the board has been his policy for the last two years. He praised DoD Undersecretary for Intelligence and Security, Joseph Kernan, and his belief in innovation and digital modernization. He warned that the continuous vetting transformation and technology protection are two no-fail missions.

Mr. Reid proceeded to discuss various initiatives, such as a report partnered with MITRE called Deliver Uncompromised (DU). Several major vulnerabilities were mentioned such as supply chain (hardware or software), cyber, weapons systems, and industrial systems. It was after the report was published last November that the DoD critical technology protection task force was created.

Mr. Reid discussed the mandate to protect the Defense Industrial Base (DIB) and span the spectrum of Research Development Activity. They are accomplishing this by creating partnerships with DCSA and Defense Contract Management Agency. He also referred to Katie Arrington, Special Assistant to the Assistant Secretary of Defense for Acquisition and Sustainment who is a supporter of the Cybersecurity Maturity Model Certification (CMMC).

Another focus of the task force is integrating security with acquisition. He also brought up the concept of intelligence support to acquisition which is largely intelligence mission data to support the understanding of adversary capabilities. Other items include studying issues, such as analyzing strategy and understanding the adversary's next move. The collection requirement is being introduced to the Intelligence Community (IC). Another mandate for the task force was

improving security in the research domain. They managed to write an assessment last year and provide it to the personnel in readiness which effected a change in policy over grant funding at universities where there is a Confucious Institute. There are ledge proposals in cycle for next year that will continue to strengthen this area.

Working with the interagency is another line of activity defined for the task force. DoD is working directly with the Commerce and Justice departments to bring tighter connectivity between defensive centrists and those of the export control community commercial center in the Department of Justice. The last domain for the task force is to counter the activities of the adversary from a defensive capability side.

The third initiative is the critical technology program list, which was issued in March. The intent of the list was to focus protection measures in their security resources. They review technology through three lenses, through a foundational lens, biotechnology, and enabling lens. The "guts" of the list are largely For Official Use Only (FOUO).

The fourth initiative was the establishment of DCSA, which took DSS and merged with National Background Investigations Bureau (NBIB) creating a single integrated organization with two distinctive missions. He mentioned that Mr. Lietzau, along with Director Phalen and Christy Wilder, DCSA, are going to develop a transition plan. Mr. Reid observed that it is not just a name change, but also an undertaking for both the vetting mission changes and changes to contemplate going forward in the technology to protect in the NISP space. In describing DCSA, he observed that it is a government wide agency consisting of 105 vetting customers along with 33 NISP partners.

The fifth initiative is the research agenda for their university affiliated research center located at the University of Maryland. It is the applied research lab for intelligence and security. The research focus is social systems, human behavior, conflict security, augmentation, human system integration, information domination and experimental technology.

## **VI. DCSA update**

Mr. Phalen, stated the two issues facing his agency, as they move forward in transition, are 1)who are we and what do we look like? and (2)what is our focus? Issues such as who is coming into the government and how do we vet those individuals to make sure they can be trusted? The other issue is cleared industry, how do you protect critical technology and keep it from our adversaries? He mentioned that as of that Monday (Nov. 18), the inventory number stood at 267,000 with the goal being 200,000.

Mr. Phalen stated that DCSA has two deputy directors. Bill Stephens is the Acting Deputy Director for Critical Technology Protection while Ms. Wilder is the Deputy Director for Personnel Vetting. Mr. Phalen emphasized the need for industry and government to be partners. He provided the example of Dr. Barber to engage with industry NISPPAC members to discuss system requirements. Mr. Phalen commented at the recent National Defense Industrial Association (NDIA) meeting that he received good feedback and noted that one of the questions he received was if legacy organizations would continue. The answer was "Yes." He observed that during Fiscal year 2019, industry submitted 141,000 investigative requests to DCSA.

Mr. Phalen elaborated that there are approximately 1.4 million people in the Continuous Evaluation (CE) program, with a quarter of those being in industry. He noted there are concerns about the ability to communicate when people are enrolled in CE and informed that with the 9.0 release of DISS, it will be easy to see who is enrolled in CE. By the end of the year, DCSA hopes to put all of the information about who is in the deferred periodic reinvestigation program into Scattered Castles and DVS, which will make it available for everybody to have access to them. He observed the process is substantially more efficient.

Mr. Phalen moved on to discussing critical technology. He commented again that he is grateful for the feedback that he has been receiving and they continue to process comments. Among the concerns they face are the details of an intelligence security plan noting that this will be a continuing dialogue. He added that he will continue to work with USDI and with the NISPPAC on the correct suitable process.

## **VII. Industry update**

Ms. Sims began her presentation by discussing Industry membership in the NISPPAC as well as the MOU membership. She also listed the ISOO and DCSA working groups separately. Ms. Sims requested that the NID working group reconvene to discuss some of the timelines and processes that need to be reviewed. Industry formally requests that DCSA engage industry to address current and potential issues as well as formulate independent plans to get to the intent of risk-based process. Also, Industry requested that the insider threat group reengage to discuss the maturity of the insider threat programs as well as the next step in the oversight process.

Ms. Sims believes that due to the enormous amount of new policy effecting the NISP, ISOO could better centralize and engage industry during the review process to convey the potential impacts to industry and develop solutions for implemented policy throughout all cleared industry. She believes that industry input throughout the process will get the government quicker results on this intended outcome. She expressed concern that the focus will be taken away from the NISP and the protection of classified information if not properly coordinated and funded.

Ms. Sims outlined the key 2020 industry efforts. There is concern that little industry engagement with risk-based industrial security oversight since early 2019 has led to much concern throughout industry. Specifically, what is the status of the Security Rating Score? Another item of concern is that the existing guidance is conflicting which leads to inefficiencies for both government and industry. Other concerns raised were who owns the process and how will government communicate to ensure a systematic approach to industry?

Ms. Sims proceeded to discuss Insider Threat. While she praised the initial Insider Threat working group as the benchmark for ISL creation and implementation, the program would benefit to discuss the next steps, Trusted Workforce 2.0 and personal vetting. She observed in the last two weeks, industry has been actively working with government officials in the implementation of Trusted Workforce 2.0. She expressed her appreciation to NBIB for listening to industry concerns and offering transparency into the efforts to reduce the inventory as well as create efficiencies in the investigative adjudication process.

Ms. Sims further mentioned the numerous systems that are going on line. There are still many systematic issues impacting industry's ability to perform on contracts. For example, if the system doesn't provide the same information, there is the risk of the customer removing contractors from work sites. At the end of her presentation, the Chair reminded her that the NID working group will reconvene. The Chair stated that he needed statistics and tasked both government and industry to provide statistics to the working group.

### **VIII. Controlled Unclassified Information (CUI) update**

Devin Casey, ISOO provided the CUI update, and presented a slide for his presentation. The first update was agency implementation. Most agencies will have their high-level policy published within the next 12 to 18 months, which he added is probably the most important milestone in the development of the CUI program throughout the executive branch.

The next topic was the CUI Federal Acquisition Regulation (FAR) clause and Mr. Casey mentioned he could not say with certainty when the FAR will be released but mentioned that he will put it on the CUI blog when it is finally released. He noted that the CUI staff will not be adjudicating comments during the question period. There will be an Ad Hoc meeting specifically designed to address questions about the CUI FAR. He added that while he couldn't explain the reasons for the delay of the FAR clause, it is working through the General Services Administration policy procedure for comment.

The next item concerned the CUI staff discussions with Industry. Mr. Casey referred to the CUI notice that outlines the content of agreements of CUI. He advised that there is a clause in 32 CFR 2002, which requires the reflection of particular controls for the CUI program into contracts and agreements. He also mentioned the notice about creating reciprocity between those oversight entities. The CUI staff is involved with DoD's current efforts as interim for their CUI program as they prepare a policy that will fully implement the CUI program. The CUI staff would like to take the lessons learned from inside DoD and share them with the rest of the community. He also mentioned that there will be a transition period as government and agencies implement CUI.

Furthermore, Mr. Casey stated there will be an upcoming industry day for CUI. In addition, on February 12, there will be an online WebEx to any stakeholder, including industry, academics, or non-federal partners as well as agencies. Furthermore, he reiterated that he is encouraging industry engagement in the development of the CUI programs and stated that there is a built-in engagement that occurs to the FAR through the public comment process. He concluded the presentation by referring to the CUI section on the ISOO website in which all of the CUI notices are located.

### **IX. ODNI update**

Valerie Kerben, ODNI, provided the next update. She mentioned that the Secretary Executive Agent is working on with Security Executive Agent Directive (SEAD) eight, which addresses temporary access eligibility. SEAD eight has been processed informally with the Security

Executive Agent Advisory Committee but sent back to Office of Management and Budget (OMB) for the formal interagency review process. She expressed the hope that they will get approval from OMB and then send it to the Acting DNI for signature. SEAD two, which concerns the polygraph program in support of personnel security vetting for initial and continuous eligibility, went to OMB for comments, which are being collected at the present time.

Ms. Kerben advised that ODNI in partnership with OPM, OMB, DOD, and the PAC is operating TW.2 in two phases, and phase one addressed reducing inventory. Phase two is revamping the fundamental approach to performing federal vetting, clearance verification and clearance processing. As the process is overhauled, they look to improve timeliness, and assist in the mobility of contractors moving from positions in and out of the government. This will be based on a continuous vetting model. She mentioned that ODNI has hosted engagements and briefed the NISPPAC. She also stated that there will be a meeting early next year to discuss these issues.

Ms. Baugher asked about reciprocity in terms of when one person leaves one agency to go to another agency, or if a contractor is coming to the state department, are they obligated to accept the fact they are in Continuous Evaluation? Ms. Kerben replied that is the intent, but it would have to be confined with ODNI's system or DoD's process. Mr. Pannoni suggested that Continuous Evaluation is a continuous investigation. Ms. Baugher observed that the new process is a cultural change. Ms. Kerben agreed that it is a cultural change and needs to be understood as the continuous vetting in the automated record search.

Mr. Reid volunteered that there will be a minimum threshold for certain checks. Mr. Phalen observed the old premise of reciprocity in which if somebody was out of access for a year, the expectation was they would be brought back in at whatever level of access they had and then launch a periodic reinvestigation. He offered the possibility that could still exist and observed the goal is to avoid having to stop everything until a periodic reinvestigation is performed.

## **X. Working Group Reports**

### **NISPPAC Information Systems Authorization (NISA)**

Alegra Woodard, ISOO, provided the update on the Information Systems Authorization Group. She said the first takeaway is the CMMC observing that due to request for clarity on the status of the CMMC process, ISOO hosted a CMMC presentation by Ms. Arrington on October 29.

The second item pertained to media sanitization and disposition guidance in which concern was expressed because of inconsistent guidance, particularly with regional approving authority on the disposition of the sanitization and disposal of solid-state media. It was agreed that although the immediate focus was for regional Authorizing Officials that the topic may need additional time for review and discussion at the CSA level. The next concern is for industry to document those concerns and provide examples for the working group to review

The third item was part of the industry update in response to a memo to ISOO. In response to the memo on September 6<sup>th</sup>, ISOO issued a notice which addressed the oversight of the CUI program. ISOO communicated industry's concerns to DCSA in a memo on September 16, and ISOO responded to the industry memo on September 17.

Mr. Hellmann provided the second part of this working group update. He noted that DCSA is working with the NISA working group on an update to the DCSA assessment and authorization process manual. The last update to this was in April 2019, and it implemented new procedures and processes for the transition to Enterprise Mission Assurance Support Service (eMASS) as a system of record for authorization and assessments. He added that they would spend the month of December adjudicating comments and providing adjudicated comment feedback to the working group. In January, the process manual version 2.1 will be published.

Mr. Hellmann also discussed windows extended service updates, in particular, the end of life for Windows 7 and Windows server 2012 in January, 2020. Earlier this year, a memo was published regarding the extended services update. It was posted on the DCSA website on the availability of purchasing this service.

One of the pieces of feedback from working group members concerned the transition for already authorized systems from windows seven to windows 10. DCSA is working on providing additional guidance to publish so that everyone has an understanding of what the process should look like. He also referred to Ms. Woodard's previous discussion on the solid-state media sanitization and is in discussions with NSA to develop an industry standard for cleaning and sanitization procedures.

#### **Clearance Working Group Update**

Mr. Pannoni provided the update on the clearance working group. He observed the metric data on clearances is moving forward very favorably and he thanked DCSA for their contributions. Among the items this working group has been discussing are tailored security plans, insider threat, and the SEAD on foreign travel. He also provided an update on the NISP intrusion detection standards for qualifying an entity to certify alarm installers. He mentioned that DoD and ISOO met with Intertek and UL to determine if they meet the UL 2050 standards. They are driving to a solution where UL will not be the only entity that is qualified to certify alarm installers. Other items of discussion for this working group include SEAD 9 and personnel vetting data.

Ned Fish, the Deputy Director of the Defense Vetting Directorate, DCSA, continued with an update for this working group. He noted that Marianna Martineau, Heather Green, and Dr. Barber are the key entities within the Defense Vetting Directorate. Mr. Fish proceeded to discuss the first slide which mentioned that one year ago, there were 590,000 cases in the investigative inventory, and the number now stands at 267,0000. In addition, there are 105,000 cases in the Central Adjudication Facility (CAF). Mr. Fish mentioned that if a case is in deferred adjudication, it is still in the inventory, as well as being enrolled in CE. In addition, more gains are being made on the adjudication working off the backlog. For example, Tier 5 initial investigations for NISP industry has gone from 468 days to 295. He also observed the decrease in timeliness for Tier 3 investigations.

The next tier was Continuous Vetting (CV). Currently, they are operating under a continuing resolution (CR). Mr. Fish expected a time frame of 15 days once they get out of the current CR process. He referred to Mr. Phalen's earlier statistic of 1.4 million people being enrolled in CE

and are aiming for a trajectory of 3.1 million people. Approximately 380,000 people from Industry are enrolled in CE, with nearly 55% of the "Hits" being financial. Criminal conduct is the second, while alcohol and drugs are third and fourth respectively. He also discussed deferred PR's, the cases which Ms. Green reviewed and made the risk-based assessment based upon the SF 86 file that the person can have a deferred date.

Mr. Pannoni also discussed the different PR's, the 55,000 in which the PR itself was not done and the decision was made, as opposed to the deferred PR adjudication when the PR was done, but the adjudication has not been completed. Mr. Fish explained these cases were in process and fell to the CAF. It is based on a risk management approach. If a person is in a deferred adjudication, they are also in CE and retain eligibility. Mr. Pannoni then inquired if in the IC, there are a couple of other databases that they look at the seven comprise categories. Mr. Fish replied that there are two programs, the DoD program and the DNI program of which DCSA is collaborating. If someone enrolls today, and with the release of DISS 9.0, it is recorded in DISS that they were deferred. By January, it would be expected to have that the same recommendation would be reflected in Scattered Castles and CVS. DoD will be leveraging Mirador (DoD low side system) and the DNI Continuous Evaluations System to produce a hybrid approach to obtain automated record checks for CE compliance. The 80,000 enrolled in all seven categories (Mirador and DNI CES) are reflected in DISS and Scattered Castles for those personnel enrolled in CE.

Catherine Kaohi, Industry, inquired when the 15-day timeline for the interim security determination begins, and Mr. Fish stated that it starts at the receipt of the case at the Vetting Risk Operations Center (VROC). Ms. Green clarified the distinction between the initiation days and the interim determination days. Ms. Kaohi's second question was about the risk management portion of the slide. Ms. Green explained that when they receive the incident reports, they triage it within one to two days. If it is being triaged at a medium or high level, there might need to be an additional investigation as well as an additional adjudication. Ms. Martineau added that the situation varies and is dependent upon each individual in terms of their personal history as well as the severity of the incident. It also depends on whether they can collect the information from the subject. Ms. Kaohi inquired if there is a cut-off point if it is past 180 days. Ms. Martineau advised that if it goes past 90 to 120 days to reach out to them for a status report.

Lindy Kaiser, Industry, asked what should be credited for the dramatic reduction in processing times. Mr. Fish replied that on the CAF side, a single system DISS was created. Many of the initial problems within DISS were improved. In addition, there is an increase in e-adjudication and additional efficiencies have been identified. Furthermore, they have increased the size of the VROC in order to match the requirements.

Ms. Baugher mentioned that her connection to JPAS had been weak for five of the last seven days. She stated that companies can get into JPAS but are unable to verify a clearance from CVS. It is creating problems because of the switchovers in contracts. Mr. Fish mentioned he will get back with State on this and would ask Dr. Barber to look into it. Ms. Green stated they are aware of the issue in JPAS, and that DCSA is working to resolve the problem. Ms. Martineau added that one can always call the DoD CAF to process the verification.

Richard Weaver, Industry referred to the metrics where the alert rate is 6%. He inquired if there are any metrics, in terms of those alerts that require a field investigation. Mr. Fish replied that the 6% is going to the VROC for processing, where there is the capability to triage them. The minority of that 6% is transferred over to the CAF and identified as being adjudicatively relevant, and make the determination. Ms. Green seconded that the main point in that 6% is some of them are previously known. She mentioned that of the 840,000 cleared population they have, there is an incident report on 2%. When they get the CE alert, they can look back and see the incident if previously known. Mr. Fish added that historically, maybe 3% of the investigations and issues result in Statement of Reasons (SOR), and less than 1% actually get to the first denial or revocation.

## **XI. DOHA update**

Perry Russell-Hunter was the next speaker and he mentioned the workload at DOHA is at a comfortable level. Currently, the number of SORs with them for legal review stands at 224. He also thanked Ms. Martineau for producing a memorandum of agreement that will allow DOHA to directly issue the SOR. There will be no delays with the legal reviews. By moving the issuance to DOHA, it enables the CAF to move those cases directly to them in order to be able to issue the SOR.

Mr. Russell-Hunter reminded the audience that DOHA is not part of DCSA, but rather a part of the DoD Office of General Counsel, because they provide independent review of the investigative and adjudicative work. He stated there are less than 400 cases in the remainder of due process, which means there is no backlog at DOHA. He added that he doesn't know if that will continue, but that he is optimistic because of the positive ways in which the investigative and adjudicative backlogs have been handled so far and as reflected in the DCSA slides.

Mr. Russell-Hunter referred to the DCSA slides depicting the deferred cases, in which he noted that only 1% actually resulted in CE "hits" within the deferred cases. In addition, he noted over 50% of the reported CE hits are in the financial area. He discussed the root cause of this being the ease with which credit card data can appear to show an issue but the reality that most credit card issues end up being mitigated once the fact and circumstances are known. He stressed that it is not the amount of debt that an individual has, but rather how it happened and what the individual is doing to resolve it. He stated that how the over 50% of the reported CE hits which are financial issue hits end up being resolved will depend on the facts that are developed about the debts.

Furthermore, Mr. Russell-Hunter, referred to the new Guideline C Foreign Preference language in SEAD 4; which for the first time, has reconciled the ICPG 704.2 standard and the old Adjudicative Guidelines standard regarding passports. Specifically, he stated that industrial contractor FSOs are no longer collecting foreign passports, because cleared employees are no longer required to surrender them. If a cleared employee has a foreign passport, they merely need to report that they have it. It is no longer true that people can't get a clearance if they have a foreign passport. Dual citizenship, by itself, has never been disqualifying. However, having a foreign relative may or may not be, depending on whether the foreign country poses a heightened risk

## **XII. Open forum and closing remarks**

Following Mr. Russell-Hunter's talk, the DFO opened up the forum for questions and comments. He stated the next NISPPAC meeting will be on Thursday, March 26, 2020.

Marc Brooks, DOE, brought up the issue of FOCI analysis, stating there are no minimum FOCI analysis standards. He suggested that this issue will have to be addressed at national-level policy in order to enable reciprocity for FOCI/NIDS. Mr. Pannoni agreed that the FOCI analysis must be addressed from a policy perspective. In addition, Mr. Brooks referred to Mr. Reid's earlier discussion about DoD's critical technology list, and expressed a desire of getting a FOUO releasable version, to make it shareable.

The last issue Mr. Brooks raised is that as DOE continues to move out on facility clearances or entity eligibility determinations to include FOCI/NID, that it would be beneficial, for reciprocity purposes, if there was a national level system to maintain and store this data, and he believes DCSA is going to have this information repository.

On the FOUO release, Mr. Spinnanger acknowledges that is something in which they can create a critical technology protection list at the FOUO level and distribute it to the NISPPAC members. On the third issue, Keith Minard, DCSA, explained that it is important to look broadly, when talking about sharing. He stressed that we should talk about sharing across the CSA's. This issue is to make it work in a bigger process. Mr. Brooks added that a central repository would be helpful. In conclusion, Mr. Pannoni agreed to discuss these issues at the working group level.

### **SUMMARY OF ACTION ITEMS**

- Industry to provide instances of delayed NIDs processing by CSA/CSO.
- Access to the DISS by non-DoD agencies
- DCSA is still in process of internal and formal coordination of an ISL that will replace the current ISL 2016-02
- ISOO will convene a NISPPAC NID working group meeting in the near future with Industry reps. DCSA to address the challenges in the NID process.
- Bylaws are in the process of being modified which will allow the senior agency official to nominate a member.
- Ms. Sims requested that the NID working group reconvene to discuss timelines and processes.
- Industry formally requests that DCSA re-engage with industry on the relationship between the RISO (Risk-Integration Security Oversight) program, DiT (Defense in Transition), the Tailored Security Plan (TSP), and the Security Rating Score (SRS). There have been misunderstandings throughout industry on the terminology, the process associated with these initiatives, and the relationship between these concepts and assessments.
- Industry requests the insider group re-engage to discuss the maturity of the insider threat program.

- Chair requested government and industry that he be provided Metric statistics for the NID working group.
- Mr. Fish will get back with State about their difficulty of being able to log into JPAS.

# Attachment 1

NISPPAC Attendance List November 20, 2019

In Person					Phone/Web
Abbott, Aprille	Curac, Odeyra	Hogan, Patrick	Matchette, Noel	Reed, Gary	Arriaga, Dennis
Aghdam, Laura	Daley, Shawn	Kaohi, Catherine	Mazanec, Jeffrey	Renzella, Allyson	Brokenik, Patricia
Barber, Charles	Deabler, Angela	Kerben, Valerie	McGarvey, Dan	Richardson, Ben	Clay, Glenn
Baughner, Kim	Dewenter, David	Khajehadi, Collette	McLeod, Donna	Rumandehalke, Shala	Davidson, Bill
Beilard, Gornyl	Dinkel Jane	Kim, YuJin	Miles, Pamela	Sims, Heather	DeJausserand, Richard
Brennan, Benbow	Dodlinger, Sharon	Kindle, Tracy	Minard, Keith	Spinnager, Jeff	Desmond, Lisa
Kathleen, Berry	Doubleday, Justin	Kirby, Jennifer	Mosher, Leandra	Stedman, Michael	England, Michael
Borrero, Rosie	Estelson, John	Klink, Carolina	Moss, Leonard	Steinke, Susan	Faller, Mike
Borgia, Stan	Fish, Ned	Leary, Daniel	Ogryosko, Nicole	Stone, Cheryl	Fulton, Christal
Bradley, Brian	Forrest, Christopher	Libby, Neill	Pannoni, Greg	Sutphin, Michelle	Johnson, Troy
Bradley, Mark	Giguere, Jessica	Lietzau, Bill	Parks, Felicia	Taft, Dianne	Kyzer, Lindy
Brown, Shirley	Glassic, Scott	Lilje, Bob	Pashoian, Norman	Weaver, Richard	Mackey, Brian
Burt, Covington	Green, Heather	Lowy, David	Payton, Steve	Wilkes, Quinton	Matthews, Will
Carpenter, Terry	Guerrero, Marcia	Martineau, Marianna	Pekrul, Mark	Wright, Natasha	Parr, Doris
Casey, Devin	Harney, Bob		Phalen, Charlie		Raynor, Dianne
Conelly, Michael	Heil, Valerie		Reidy, Lisa		Sargent, Patrick
	Hellman, Karl				Steinour, Jason
					Timmons, Katie

NCMS						
Bryan, Christen	Aeleen, Howard	Alexander Resing	Andrew Roswal	Ariene McGregor	Bernadette Mace	B'linda Thompson
Aaron, Wilkey	Alan, Crouch	Alicia Helton	Angela Greaver	Barbara Kitchens	Betty King	Bonnie Parti
Abigail, Martin	Alana, Morales	Alicia Hutchinson	Annette Alvarado Bernal	Barbara Sullivan	Beverlee Kennedy	Bonnie Shanahan
Adam, MacVean	Alana Morales	Amy Gregg	Anthony Finklea	Becky Cullen	Beverly Buswell	Brandi Pendleton

First, Last	First, Last	Firs, Last	First, Last	First, Last	First, Last	First, Last
Brandon Schingh	Carrie Forrest	Christine Godwin	David Grant	Dorie-Ann White	Gregory Adams	Jason Seiler
Brenda Bowman	Carrie Wood	Christopher Bowers	David Johnston	Doris Parr	Gregory Hotaling	Jeffrey Lawhorn
Brenda Filby	Celicia Jones	Christyne King	David Johnston	Dorothy Hight	Gwendolyn McQuillin	Jennifer Cort
Brentt Hall	Celestine Winch	Chrystal Rodriguez	David Lennon	Drew Coppel	Hazel Martinez	Jennifer Graham
Brian Disher	Chamagne Rodriguez	Cindi Hall	Dawn Harvey	Elizabeth Gaither	Heather Ford	Jennifer Larsen
Brian Price	Chandra Rheaultt	Clara Raju	Dawn Santiago	Elizabeth Mayercin	Heather Halfhill	Jennifer Mortensen
Brian Rives	Charles Ososkie	Colleen Conway	Deanna Laperle	Elizabeth Vanderhuff	Heather Little	Jennifer Rothenberger
Brittany Brossman	Charles Hathaway	Conrad Hertzog	Debbie Dech	Emett Price	Hiromi Janice-Sayano	Jennifer Rush
Brittany Schindler	Charles Indelicato	Chrystal Thibault	Debbie Young	Enita Williams	Holli Ashby	Jennifer Sutton
Brooke Stephens	Charles Reeves	Cindi Harrison	Deborah Womer	Eric Sigrist	Holly Leadbeater	Jenny Pinson
Bruce Mitchell	Chauncey Price	Dale Horensky	Deborah Trehern	Esau Pittman	Hope Hodgens	Jerimia Kern
Bruce Tucker	Cherin Schellenschlager	Daniel Grimes	Debra de-Friesse	Eve Jones	Ika Carlton	Jessica Lee
Bryan Campbell	Cheryl Smith	Daniel Ly	Denise Rottier	Felicia Jefferson	Isabelle Levy	Jewel Callier
Camille Roska	Cheryl Ricci	Danielle Karl	Denise Dauer	Frances O'Rourke	Jacqueline Wilson	Jill Gouveia
Carla Peters-Carr	Christie Wilcox	Darci Fisher	Diana Nally	Gail Mason	James Crewse	JoAnn Webber
Carol Garner	Christina Duke	Darrell Flores	Diana Zachery	Gayle Swann	James Ferrall	Johnnie Zimmerman
Carolyn Harrison	Christine Alexander	Darren Quarles	Dianne Lanctot	Geraldine Piccioni	James Gilbane	Jonathan Persinger
Carrie Davis	Christine Crump	David Amiot	Dianne Raynor	Geraldine Rogers	Jamie Sisler	Joni Tucker
Darrell Flores	Denise Rottier	Debra deFriesse	Donzleigh Dowie	Glynn Davis	Jan Hoffman	Joseph Whipp
Conrad Hertzog	Denise Dauer	Gregory Adams	Jennifer Mortensen	Grace Liebl	Jason Herbstman	Joseph Fulco
Crystal Thibault	Diana Nally	Hazel Martinez	Jennifer Rothenberger	Greg Shaffer	Jason Kobus	Joshua Futrell

First, Last	First, Last	First, Last	First, Last	First, Last	First, Last	First, Last
Juanita Fabian	Kim Brown	Linda Steele	Melissa Graham	Pamala Bridges-Criddle	Rebekah Greenebaum	Shawn Finley
Judy Shimamura	Kimberlee Roswal	Lindsay Elsmore	Melissa Poinelli	Pamela Campbell	Renee Donatelli	Shayla Savey
Julie Clapp	Kimberly McKendry	Lisa Deming	Melissa Smittle	Pamela Green	Richard Pepper	Sheila Sandford
Julie Saylor	Kimberly Parker	Lisa Hadwin	Michael Davis	Pamela Hamilton	Robert Escubedo	Sheila Cutler
Justin Mack	Kimberly Ruiz	Lisa Measures	Michael Escobar	Pamela Heaton	Robin Blackmon	Sheri Butler
Kandace Needle	Kimberly S. Edwards	Lori Argumedo	Michael Heller	Pamela Lawson	Robin Collo	Stacey Abrey
Karen DePaulo	Kimberly Simpson	Lori Harrison	Michael Hulet	Patrice Singletary	Robyn Roy	Stephan Atkinson
Karen Myers	Krista Laybourne	Lourdes Scott	Michael Marks	Patricia Reynolds	Roger Wisnosky	Stephan Reuchlein
Karen Sullivan	Kristen Burba	Luis Chaumont	Michael Vrahnos	Patricia Woodruff	Roxanna Perry	Stephanie Lossing
Karl Grindley	Kristie Thibodeaux	Marie Wicker	Michelle Hamilton	Patricia Zamora	Roy Barnes	Stephanie Sandberg
Katherine Mills	Kristin Williams	Mark Eckel	Michelle Maitland	Patrick Dapkas	Ryan Brown	Stephanie Sickmond
Kathryn Taylor	Kristina Dummars	Mark Ries	Mozelle Posey	Patrick Odonell	Sandra Bauer	Stephen Jackson
Kelley Standard	Kristy Bock	Martin Snyder	Nancy Malone	Paul Ainley	Sandy Burns	Susan Dagney
Kelli Gilliland	Kyle Cochrane	Mary Dean	Nancy Trudei	Paul Brown	Sara Torgenson	Susan Damiani
Kelli Shuhard	Lacey Rothe	Mary Ellen Pierce	Nathaniel Taube	Paula Beamon	Sarah Shackelford	Susan Martin
Kelli George	Lauri Carmellini	Mary Hanners	Nicholas Taufer	Penny Tennant	Sarah Stull	Susan Morley
Kenneth Martin	Laurie Christian	Mary L. Knight	Nicole Ragland	Pete DiSante	Scott Bennett	Susan Perryman
Kevin Johnson	Lesley Gunn	Maryann Wilson	Nina Gurman	Pia Pieters	Scott Felhner	Susan Yan
Kevin Lawrence	Linda McCoy	Matthew Cawley	Norma Heller	Rachel Hudacko	Scott Wagner	Susie Vaughn
		Melanie Doherty	Olivia Stine	Rae Yuhas	Shannon Brown	Suzanne Eckerstrom
		Melissa Busch	P Quinnatt Jones	Rafael Berrios	Sharon Morton	Suzanne Nikolaus
				Ramona Gatlin	Sharon Mansolillo	Suzanne Sharpe

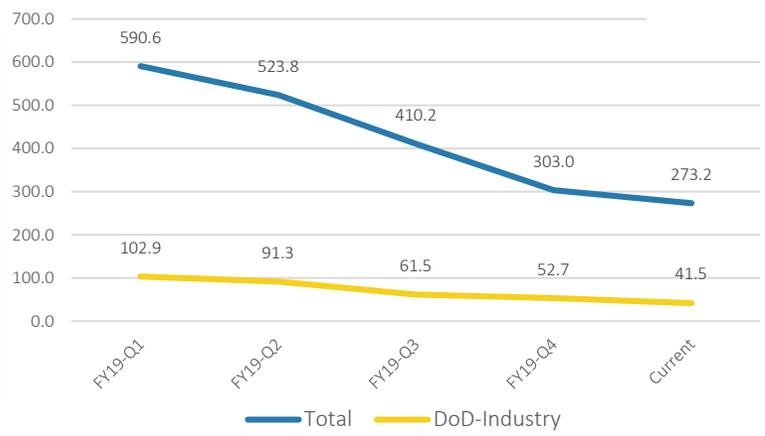
Synda Beron	Tiffany Banks	Tracy Winton	Wynter Bradshaw
Tamara Page	Tiffany Cameron	Trish Brokenik	Yvette Andablo
Tammi Chiappone	Timothy Hynes	Valerie Pylant	Zephaniah Moses
Tammi Leiter	Tina Funkhouser	Vickie Holmes	Zorica Ambrose
Tammy Wilson	Tina Medina-Creel	Virginia Lord	
Tania Orellana	Tod Stephens	Wailohia Woolsey	
Tasha Threat	Tom Vaughn	Winda Fallen	
Teresa Keese	Tonya Gray	William Blaszyk	
Teresa Roach	Tracy Edmonds	William Branch	
Theresa Lee	Tracy Peterson	William Hayward	
Tianna Trudeau	Tracy Root	William Whisel	

# Attachment 2



## INVESTIGATION

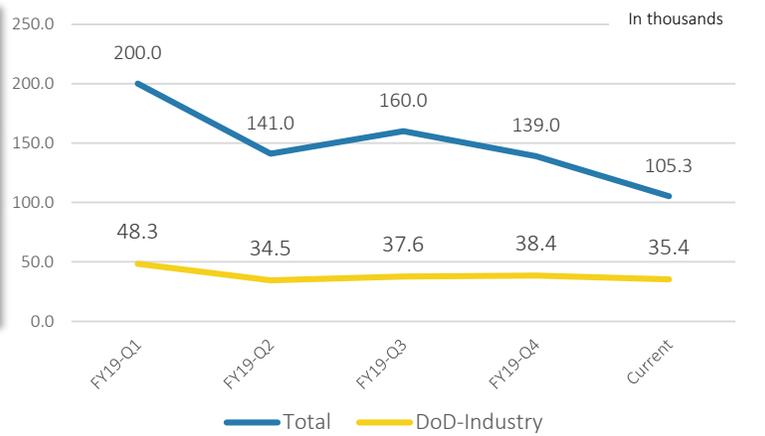
CURRENT INVENTORY	
All DCSA Customers	273.2K
Industry Only	41.5K



## ADJUDICATION

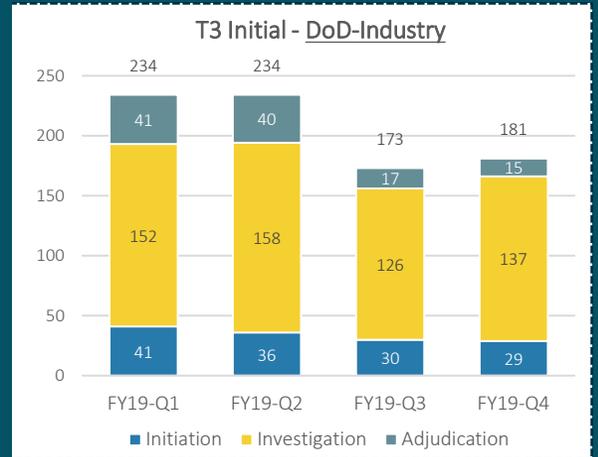
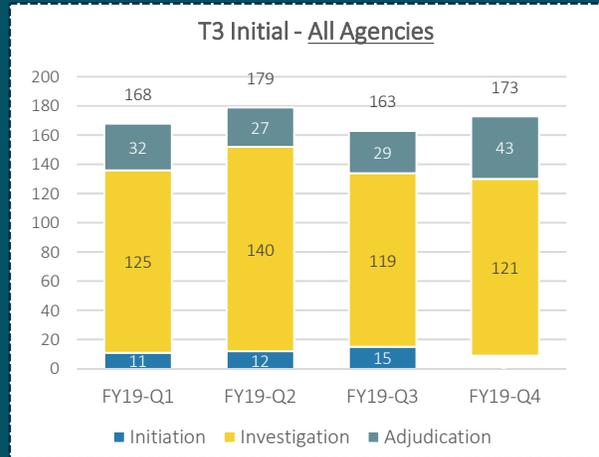
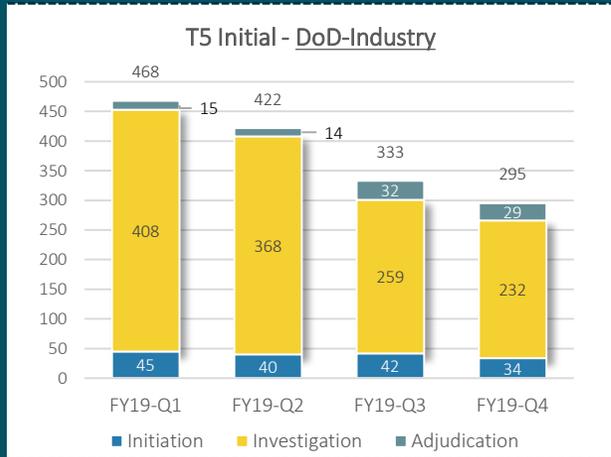
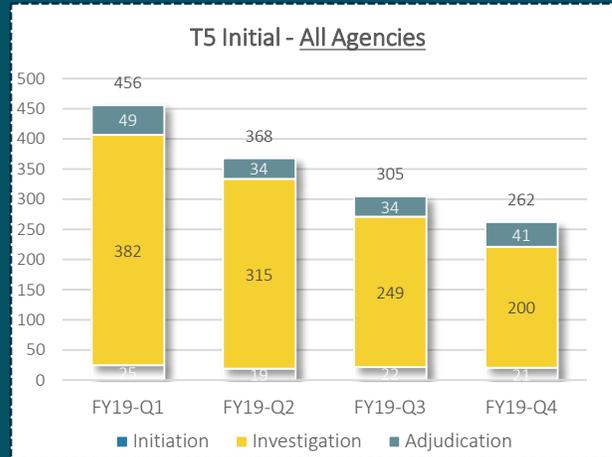
*DoD CAF Only*

CURRENT INVENTORY	
CAF All*	105.3K
Industry Only	35.4K



\* Does not include 73.0K cases in a deferred adjudication status

## END-TO-END TIMELINESS (Fastest 90% of adjudicated investigations in days)



# DCSA PV INDUSTRY FY19 METRICS | CONTINUOUS EVALUATION



## FY19 PSI EXECUTION



**180k**

Requests for Investigations Processed

**15 days**

Interim Security Clearance Determinations Timeliness

**839k**

NISP Contractors With Clearance Eligibility

## CUSTOMER ENGAGEMENT & SUPPORT



**145k**

Calls Handled

**60**

Events Attended

**OVER 6k**

Attendees Briefed

**12k**

RRU/CSR Processed

**7k**

DISS User Accounts Provisioned

## RISK MANAGEMENT



**1-2 days**

Adverse Information Triage

**2%**

Adverse Information Report Rate

## CONTINUOUS EVALUATION



**~1.4mil**

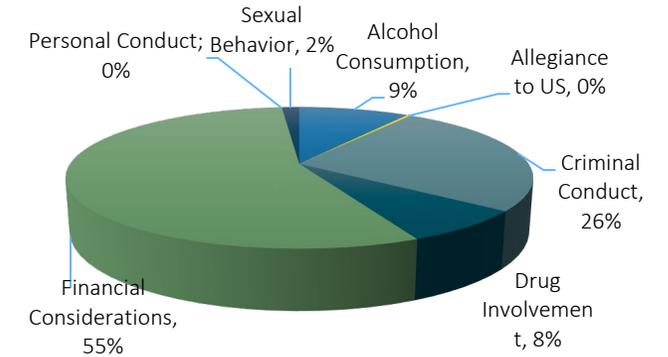
Total Subjects Enrolled in CE

**~380,000**

Industry Subjects Enrolled in CE



### CE Alert Guideline Trends



### Early Detection and Risk Mitigation

**Secret: 6yr 7mo**

**TS: 2yr 5mo**

before next PR due to begin

**54,592**

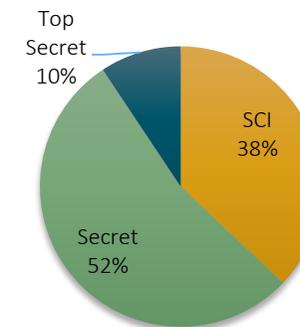
Industry PRs Deferred into CE to Date

### CE Alert Rate

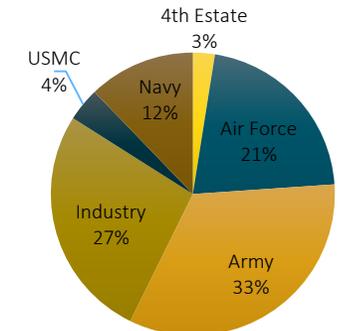
**6%**

Rate of CE Alerts Received

### Population by Eligibility



### Population by Department



# Attachment 3

# Industry NISPPAC Update

*November 2019*

# Agenda

- **Current NISPPAC/MOU Membership**
- **Working Groups**
- **Policy Changes and Impacts**
- **2020 Industry Key Focus Areas**
- **Systems**
- **Supply Chain and Small Business Concerns**

# National Industrial Security Program Policy Advisory Committee

## Industry Members

<b>Members</b>	<b>Company</b>	<b>Term Expires</b>
<b>Robert Harney</b>	<b>Northrop Grumman</b>	<b>2020</b>
<b>Brian Mackey</b>	<b>BAE Systems</b>	<b>2020</b>
<b>Dennis Arriaga</b>	<b>SRI International</b>	<b>2021</b>
<b>Dan McGarvey</b>	<b>Alion Science and Technology</b>	<b>2021</b>
<b>Rosie Borrero</b>	<b>ENSCO</b>	<b>2022</b>
<b>Cheryl Stone</b>	<b>RAND Corp</b>	<b>2022</b>
<b>Heather Sims</b>	<b>General Dynamics*</b>	<b>2023</b>
<b>Aprille Abbott</b>	<b>MITRE*</b>	<b>2023</b>

# National Industrial Security Program Policy Advisory Committee

## Industry Memorandum of Understanding (MOU) Members

	<b>Chairperson</b>
<b>AIA</b>	<b>Kai Hanson</b>
<b>ASIS</b>	<b>Matt Hollandsworth</b>
<b>CSSWG</b>	<b>Joseph Kraus</b>
<b>FFRDC/UARC</b>	<b>Shawn Daley</b>
<b>INSA</b>	<b>Kathy Pherson</b>
<b>ISWG</b>	<b>Marc Ryan</b>
<b>NCMS</b>	<b>Cathe Kaohi*</b>
<b>NDIA</b>	<b>Rick Lawhorn</b>
<b>PSC</b>	<b>Charlie Sowell</b>

# National Industrial Security Program Policy Advisory Committee

## Working Groups

### ISOO Hosted NISPPAC Working Groups

Clearance

National Interest Determination (NID)

NISP Information Systems Authorization (NISA)

Policy (previously NISPOM Rewrite)-*New*

### DCSA Hosted Working Groups

Defense Information System for Security (DISS)  
Improvement-*New*

National Industrial Security System (NISS)

National Industrial Security Program Contracts  
Classification System (NCCS)-*NEW*

Insider Threat-*INACTIVE*

Risk-Based Industrial Security (RISO)-*INACTIVE*  
*Previously DiT*

- ❖ Industry requests convening of NID working group
- ❖ Industry requests convening of the RISO working group
- ❖ Industry request convening of the Insider Threat working group

# Policy Reviews

## Policy Items under Review

- NISPOM Rewrite-*Industry comments pending*
- Conforming Change 3-*Industry is awaiting product for review*
- CUI Note: 2019-XX-Assessing Security Requirements for CUI within Non-Federal Information Systems-*Industry comments provided November 5, 2019*
- Draft Industrial Security Letters (ISLs):
  - Usage of EPL List and Crosscut Shredders-*Industry comments provided June 20, 2019-STATUS?*
  - Investments in Marijuana-*Industry comments provided June 27, 2019-STATUS?*
  - Insider Threat-*Industry comments provided November 5, 2019*
  - SEAD 3 –Adverse Information Reporting-*Industry comments provided November 6, 2019*
  - Tailored Security Plan-*Industry comments pending*
  - Top Secret Accountability-*Industry comments pending*
  - DAAPM version 2.1 – *Industry comments pending*

## Industry Proposed Solutions / Requests

- Implementation is difficult when Industry expertise is not leveraged early in the planning process on changes across the NISP. Early strategic communication and collaboration with Industry may reduce some of the challenges when implementing new or updated security policy.

# 2020 Industry Key Efforts

## **Risk Based Industrial Security Oversight (RISO)**

- Very little engagement has left industry with variances in implementation between DCSA field offices and inconsistencies within DCSA activities (Engagement Terminology)
- Industry adoption of elevated Industrial Security Requirements Tailored Security Plan (TSP's) without policy or contractual obligations
- Possibility of creating new vulnerabilities—Introduction of vulnerabilities into supply chain by little oversight of companies w/out key technologies

***WHAT IS HAPPENING AND WHEN? HOW CAN INDUSTRY HELP?***

## **Insider Threat**

- Model of success for future ISL creation and implementation!
- Will the self-assessment checklist be updated?
- Will the CDSE job aides be updated to reflect ISL incorporated changes?
- How will DCSA be trained to validate company plan effectiveness?

***WHAT ARE THE NEXT STEPS? HOW CAN INDUSTRY HELP?***

## **Controlled Unclassified Information (CUI) & Cybersecurity Maturity Model Certification (CMMC)**

- The existing guidance is conflicting. Thus leading to inefficiencies for both government and industry. Industry is awaiting information from DCSA on the overview of steps taken to ensure a consistent approach to oversight of the NISP.
- Who owns the overall process?

***HOW CAN INDUSTRY BECOME MORE INVOLVED?***

## **Trusted Workforce 2.0 and Personnel Vetting**

- Continuous Evaluation (CE) and lack of understanding concerning terminated employees
- Agencies not recognizing reciprocity
- Deferring adjudications of closed investigations-what does deferred mean?
- Policy timelines
- Transition from Reciprocity to Transfer of Trust
- Transition of Continuous Evaluation to Continuous Vetting

***HOW DOES INDUSTRY STAY INFORMED?***

**Industry and government would both benefit from early and increased engagement.**

# Systems – Industry Questions / Concerns

## **National Industrial Security System (NISS):**

- Still in transition
- Continued Latency issues
- Increase in facility clearance timelines

## **Defense Information System for Security (DISS): *DCSA DISS Working Group Engaged***

- Concern regarding roll-out and lack of available user training
- DISS replacing JPAS as system of record. When?
- How many users with current accounts?

## **NISP Contracts Classification System (NCCS): *DCSA NCCS Working Group Established***

- Concern regarding timely provisioning of the system
- DCSA is engaged with Industry on strategic plan for transition

## **eAPP:**

- Awaiting go live date and transition plan

## **agency:**

- Initial look at the system in April 2019, awaiting go live date and transition plan

## **eMASS:**

- System has been live since May 2019 and industry will continue working with the NISP AO on identifying modifications needed to enhance efficiency
- RMF timelines has increased and causing systems to be shut down. Industry is awaiting feedback on implementing more ATO extensions for existing low-risk systems versus system shut-down due to paperwork and process issues.

# Old Business: Small Business in Crisis

## Industry Questions / Concerns

- What will happen when RISO, CUI, & CMMC is fully implemented?
- How will this affect supply chains?
- Who has ultimate oversight of consultants/small companies in the supply chain to ensure duplicative assessments will not be conducted by multiple government agencies and prime contractors?
- Based on white paper submitted to DCSA by NCMS, DCSA is engaging with DMDC to determine if system access to JPAS, SWFT and DISS can be accomplished without an eligibility.-What is the status?

## Industry Proposed Solutions / Requests

- We need to discuss implications of security policies/practices and procedures implemented on industry in advance. We also need better policies for consultants/security services companies to support these small companies.



# Attachment 4

# CUI Overview

## What is the CUI Program?

The CUI Program is an information security reform that standardizes the way the executive branch handles information that requires protection

## What is CUI?

Controlled Unclassified Information (CUI) is information that requires safeguarding or dissemination controls pursuant to and consistent with applicable laws, regulations, and government-wide policies

## Policy and Guidance

- Executive Order 13556
- 32 CFR Part 2002 (Implementing Directive)
- CUI Marking Handbook
- CUI Notices
- NIST Publications
- OMB Circular No. A-11
- CUI Advisory Council

**CUI Registry**

The CUI Registry is the Government-wide online repository for Federal-level guidance regarding CUI policy and practice. However, agency personnel and contractors should first consult their agency's CUI implementing policies and program management for guidance.

Search the Registry:

<b>Categories, Markings and Controls:</b> <ul style="list-style-type: none"><li>• Category-Subcategory List</li><li>• Category-Subcategory Markings</li><li>• Limited Dissemination Controls</li><li>• Decontrol</li><li>• Registry Change Log</li></ul>	<b>Policy and Guidance</b> <ul style="list-style-type: none"><li>• Executive Order 13556</li><li>• 32 CFR Part 2002 (Implementing Directive)</li><li>• CUI Marking Handbook</li><li>• CUI Notices</li></ul>	<b>CUI Glossary</b>
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 **Training Tools**  
Learn about training tools developed by the Executive Agent for CUI users.

**Contact Us!**  
Contact an Agency!

 **Additional Tools**  
Learn about additional tools for handling CUI.

- CUI Coversheets
- CUI Marking Trifold Brochure
- Audio/Photo/Video Markings Brochure

  **CONTROLLED UNCLASSIFIED INFORMATION**

**CUI Program Blog**

**Quarterly CUI Program Updates!**

**FOLLOW BLOG VIA EMAIL**

Enter your email address to follow this blog and receive notifications of new posts by email.

Email Address

[www.archives.gov/cui](http://www.archives.gov/cui)

<https://isoo.blogs.archives.gov/>

- ISOO 2018 Annual Report to the President

<https://www.archives.gov/files/isoo/images/2018-isoo-annual-report.pdf>

- FY19 reports are coming in.

## 😊 When I know you will 😊

The FAR is still going through the process of review and approval prior to public comment.

- a) When the FAR is released for public comment we will have a blog post about when/how to comment.
- b) We will also announce an ad hoc stakeholders meeting to address questions about the proposed FAR changes (this will be limited to answering questions about the content of the proposed FAR changes and will not accept or adjudicate any changes).

## Oversight of the Controlled Unclassified Information (CUI) Program within Private Sector Entities

The agency CUI Senior Agency Official (SAO) is responsible for oversight of the agency's CUI Program implementation, compliance, and management.

The agency CUI SAO may:

- a) Delegate internal component or sub-agencies with responsibilities related to the oversight of the handling of any CUI entrusted to private sector entities through the use of agreements or arrangements; and
- b) Enter into agreements with other executive branch agencies, authorizing or allowing oversight actions of any CUI-entrusted private sector entities through the use of agreements or arrangements.

## Reciprocity

- a) Agencies are encouraged to enter into interagency agreements and arrangements to avoid duplicative and unnecessarily burdensome oversight actions.
- b) Each agency is responsible for ensuring that security assessments and audit activities are held to the minimum necessary to effectively oversee compliance.
- c) Instances of duplicative or unnecessarily burdensome oversight actions should be reported by private sector entities to the applicable agency CUI program office.
- d) Private sector entities should inform the CUI EA should such instances remain unresolved.

# Helpful Links for DOD partners:

## **Center For Development of Security Excellence (CDSE) CUI Toolkit:**

<https://www.cdse.edu/toolkits/cui/index.php>

## **DOD Procurement Toolbox (Cybersecurity Tab)**

<https://dodprocurementtoolbox.com/site-pages/cybersecurity-dod-acquisition-regulations>

## **DCSA CUI Tab**

<https://www.dcsa.mil/mc/ctp/cui/>

## **Information about CMMC**

<https://www.acq.osd.mil/cmmc/>

# Upcoming Events

## **INDUSTRY DAY**

February 11, 2020

From 10:00 to 2:00 pm

## **CUI Stakeholder Meeting**

February 12, 2020

From 1:00 to 3:00 pm

# Learn more about CUI

## Website

[www.archives.gov/cui](http://www.archives.gov/cui)

## Blog

<https://isoo.blogs.archives.gov/>

## Email

[CUI@NARA.GOV](mailto:CUI@NARA.GOV)