INFORMATION SECURITY OVERSIGHT OFFICE
NATIONAL ARCHIVES and RECORDS ADMINISTRATION
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www.archives.gov/isoo

**National Industrial Security Program Policy Advisory Committee (NISPPAC) Meeting Minutes**

**Wednesday, March 18, 2026 (10am-2pm ET)**
**National Archives and Records Administration (NARA)**
**Information Security Oversight Office (ISOO)**
**Meeting held in the McGowan Theater and**
**Virtually through Zoom for Government**

June 16, 2026

*The 75th NISPPAC public meeting was called to order at 10:01am ET.*

## NISPPAC Chairman Remarks

- Michael Thomas, (NISPPAC Chair) opened the meeting.

## Administrative Matters

- Heather Harris Pagán, (NISPPAC Designated Federal Officer (DFO)), briefed on administrative matters. Members from the Nuclear Regulatory Commission (NRC), Department of Homeland Security (DHS), and Central Intelligence Agency (CIA) were not present for the meeting, but the NRC and DHS vetting statistics slides were provided.

- Membership changes: Ms. Breanna Palmer has replaced Mr. Richard Dejausserand as the alternate for DHS. Ms. Allyson Renzella is now the primary at the Defense Counterintelligence and Security Agency (DCSA), with Mr. Matthew Roche being her alternate for a short time, before Mr. Booker Bland replaced him. At the CIA, Nathan and Roger replaced Ms. Jennifer Alworth and Kelly. At the Department of Justice, Mr. Glenn Bensley and Ms. Lori Ellison have replaced Ms. Tonya Fields as the primary and alternate, respectively. At the National Security Agency (NSA), Mr. Eric Sakel is the new primary member. For the Air Force, Mr. John Voorhees has replaced Winston Beauchamp as the primary.

- The previous meeting, held on May 28, 2025, had its minutes certified to be true and correct by the NISPPAC Chair on August 13, 2025. They were posted to https://www.archives.gov/isoo/oversight-groups/sltps-pac/committee.html on August 18, 2025.

## Industry Update

Isaiah Rivers (NISPPAC Industry Spokesperson), delivered the update.

He emphasized that national security protection is a shared mission requiring mutual accountability and trust between the government and cleared industry.

He highlighted a major legislative success for small businesses under Section 874 of the 2025 National Defense Authorization Act (NDAA), which established a pilot program for shared commercial infrastructures (Classified Infrastructure as a Service). This allows small defense contractors and universities to perform secret and top-secret work using a service provider's systems without having to construct their own expensive cleared facilities.

He introduced the concept of "NISP 2.0," an upcoming effort to modernize the program's framework.

LaToya Coleman (NISPPAC Industry member), speaking for the Clearance Working Group, expressed ongoing industry frustration regarding the military departments' inability to expand Industry's Sensitive Compartmented Information (SCI) indoctrination authority and resolve inefficiencies in the SCI nomination process, noting the issue has remained stagnant for over a year.

She highlighted rising personnel security adjudication timelines and requested that DCSA share the root causes and mitigation plans.

She requested an official policy status update from the Office of the Director of National Intelligence (ODNI) regarding the shared covered insider threat information policy and the key management clearance policy, noting both have been stuck in development for over three years.

Charles Sowell (NISPPAC Industry member), speaking for the Policy Working Group, commented on the impact of recent executive orders on industry, specifically citing Executive Order (EO) 14383 (establishing an America-first arms transfer strategy) and EO 14369 (Ensuring American Space Superiority).

He expressed frustration that industry has received no formal government guidance on executive orders dating back to January 2025, specifically regarding the removal of security clearances from former intelligence community seniors sitting on industrial boards.
He announced that the Policy Working Group will launch an artificial intelligence (AI) enabled subject-matter-expert-verified review of the NISP to formulate modernization recommendations. Backed by AI efficiencies, the group expects to deliver these recommendations to the government within 3.5 to 4 months.

Jane Dinkel (NISPPAC Industry member), speaking for the Entity Vetting Working Group, addressed the updated standard form (SF) 328 form concerning Foreign Ownership, Control, or Influence (FOCI) released a year ago. She requested that DCSA issue guidance to narrow the scope of Question 11 (asking about any agreements with foreign persons), as its current broadness requires months of internal corporate coordination for irrelevant commercial arrangements. She requested that DCSA extend the mandatory timeline for reporting significant

FOCI changes beyond the current strict 30-day window, allowing companies more time to compile extensive details while notifying their Industrial Security Representative via email in the interim. She urged DCSA to re-evaluate how it analyzes the organizational structure of academia partners, noting that universities operate differently than commercial entities and should not be forced into a mirrored facility clearance process.

Leonard Moss (NISPPAC Industry member), speaking for the NISP Information Systems Authorization (NISA) Working Group, stated his intent to build a stronger collaboration with non-DCSA Cognizant Security Agencies (CSAs) where communication gaps exist.

He raised a concern regarding the Commercial Solutions for Classified program, also known as Secret Internet Protocol Router Network (SIPRNet) flyaway kits. While popular, embedded contractors are increasingly using these kits to access SIPRNet at home. Citing national security risks, Leonard requested a policy mechanism allowing contractors to operate these kits within unclassified spaces inside accredited industry facilities under corporate oversight, bypassing current DCSA cognizance limits.

He noted that progress on solid-state drive (SSD) spillage mitigations has stalled since the recent government shutdown and requested a status update from DoW.

He reported positive progress on reconciling industry concerns with the newly published DCSA Assessment and Authorization Guide (DAAG), reiterating that the DAAG must be enforced regionally as a guide and not a new requirements document.

He requested further guidance on Enterprise Mission Assurance Support Service (eMASS) software licensing and communications security (COMSEC) firmware updates regarding high-to-low data actions where an internet connection cannot be used for validation.

He noted that industry is receiving conflicting, stove piped direction from individual representatives regarding the destruction of Special Access Program (SAP) information technology (IT) material and requested better consistency.

Jennie Hardy (NISPPAC Industry member), speaking for the NISP Systems Working Group, addressed the complexities of the National Background Investigation Services (NBIS) suite, requesting that the government involve Industry stakeholders before the testing and idea-birth phases of system development.

She urged the government to provide concise, predictable communication channels for the 26,000 industry users and to translate the highly technical NBIS development roadmap into a friendlier, stakeholder-focused version with clear timelines.

She requested early, transparent engagement during the ongoing development of the National Industrial Security System Increment 2 (NI2), specifically regarding the DD254 workflow, the 847 process, and the eventual migration of National Industrial Security System (NISS) functions.

Christopher Stolkey (NISPPAC Industry member), speaking for the Insider Threat Working Group, announced that the they successfully designed a targeted 1-hour insider threat training course that fulfills NISPOM requirements, effectively creating an alternative to DCSA's lengthy 5-hour training course. The training is officially approved by DCSA and hosted on the National Classification Management Society (NCMS) website, classmgmt.com.

Christopher Stolkey (NISPPAC Industry member), speaking for the Physical Security Working Group, announced that contractor open storage self-approval officially went live in January 2026, allowing companies to approve their own open storage areas by following established DCSA procedures.

He briefed that the Intelligence Community Standard (ICS) 705-01 is expected in Q1.

He warned that a new TEMPEST risk assessment tool currently under development by the government is trending toward labeling every scenario as "high risk," which dilutes actual risk management and forces companies to spend excessive funds retrofitting physical facilities.

He noted that facility accreditation timelines continue to lag at 12 to 18 months, directly hindering the administration's mandate for industry to accelerate production.

**Department of War (DoW) Update**

Jeff Spinnanger (DoW NISPPAC member), delivered the update. He commended the growing maturity and accountability of the NISPPAC forum.

He stating that security professionals are in the "how business" to inform risk decisions and that the word "no" does not exist in security policy.

He welcomed Industry's initiative on NISP 2.0 and announced that the Department of War manual for the NISP, DoWM 5220.32, Volumes 1 and 2, will be sent out for a one-month coordination and review pipeline.

He addressed the SCI Indoctrination process, praising an entrepreneurial pilot program within the Department of the Air Force that achieved a 60–80% reduction in processing times, recovering approximately $100 million a year in lost billable productivity. He committed to advocating for expanding this pilot model across other military components.

He addressed the SIPRnET flyaway kit issue raised by Leonard Moss. He hoped to formally resolve the issue to allow these government-approved devices into accredited industry facilities before the next public meeting.

He confirmed that a four-star executive level committee is being reconstituted to oversee Committee on National Security Systems (CNSS) issues, which will address SSD spillage

mitigations. He requested that Industry provide specific data center spillage examples to help frame the scope of the problem.

He suggested that industry bring its SAP IT destruction concerns to the upcoming Cyber Security Special Working Group (CSSWG) spring conference to address inconsistencies with leadership directly.

He shared that the DoW Chief Information Officer (CIO) is actively standing up a Cybersecurity Maturity Model Certification (CMMC) listening session, with the first session to be hosted by the Defense Cybercrime Center.

He detailed next steps for the MITRE Fast-tracking Acquisition Security Transformation (FAST) study, explaining that its 170+ recommendations will be bundled alongside an upcoming Government Accountability Office (GAO) report to streamline remediation efforts, noting that Classified as a Service solutions will resolve up to 70% of those issues.

**DCSA Update**

Allyson Renzella (NISPPAC primary member), delivered the update.

She announced a new IT solution for Classified Infrastructure as a Service sites that uses zero on-site data storage. This framework balances security with agility, enabling industry connection to cloud environments and networks under a single authorization.

She reported that the Facility Clearance (FCL) Handbook is in draft form and undergoing final internal coordination. It incorporates industry feedback and aims to reduce rework and rejections of sponsorship packages for new entrants.

She acknowledged a list of regional inconsistencies provided by industry, stating that DCSA is striving for process consistency while allowing for differing outcomes based on risk-based decisions.

She highlighted the rollout of the Personnel Vetting Questionnaire (PVQ) in late February to 2,500 users for 5-year updates. She also noted that an online real-time status tracker is now live via Electronic Application (eApp) automated emails.

She detailed the phased industry rollout for the Federal Bureau of Investigation's (FBI) Rap Back continuous monitoring service. Phase 1 is the "Rap Back Ready" population with fingerprints on file since May 2018 (no cost to industry). Phase 2 will capture those with prints on file with the FBI since June 2010 (no cost). Phase 3 will encompass everyone else, and DCSA is evaluating avenues to minimize or eliminate direct industry costs for it.

She discussed the recent deployment of the Individual Engagement Portal (IEP) to provide transparency to applicants in NBIS. She also reported that Phase 4 of migrating Central

Verification System (CVS) data into Defense Information System for Security/ (DISS) Joint Verification System (JVS) will finish by the end of March 2026, with federal onboarding starting in Q3.

She revealed that an internal prototype for the NBIS operational roadmap is under review, with the goal to share and demo it with the NISPPAC before the end of March.

**ODNI Update**

Lisa Perez (NISPPAC member), delivered the update.

She detailed the ongoing development of the Transparency of Reciprocity Information System (TORIS), to accelerate personnel mobility and trust transfers across the Intelligence Community (IC). Outlined its six core development pillars, which include the Trusted Workforce Information Exchange (TWIE) and the deployment of the high-side IC PVQ matching DCSA's eApp.

She stated that ODNI has engaged with training points of contact to reduce redundant contractor training times under Intelligence Community Directive (ICD) 613, which establishes core training reciprocity while allowing individual agencies to append short, agency-specific policy supplements.

She reported that the covered insider threat policy for covered employees has reached final language agreement after legal delays regarding document categorization. The policy has been re-submitted and is in the final stages of consideration before the Director for National Intelligence (DNI) for signature.

She also reported that the overhead billet clearance policy governing applications for access for certain personnel, has cleared cross-coordination within ODNI and is also in the final signature stages before the DNI.

**Department of Energy (DOE) Update**

Jaime Gordon, NISPPAC primary member, delivered the update.

She announced that the DOE has established finalized procedures for a variety of technical data contamination scenarios when it comes to solid state drive sanitization. She extended an open invitation to work directly with individual industry partners to ensure compliance based on their unique sanitization requirements.

She addressed the ongoing difficulties of standardizing controlled unclassified information (CUI) due to unique agency parameters. She stated that the DOE must thoroughly review the changes internally before presenting updated implementation guidance to the NISPPAC.

## DOE Vetting Metrics Update

Jaime Gordon (NISPPAC primary member), delivered the update with the slides provided.

She clarified that the longer processing timelines for periodic reinvestigations (PRs) are heavily tied to the agency's continuous vetting framework. The DOE no longer runs routine PRs on a standard calendar cycle; instead, a PR is initiated only if an anomalous alert or questionable information is flagged by the continuous vetting pipeline.

## DCSA NISP Cybersecurity Office (NSCO) Update

William Vaughn (Deputy for the NSCO at DCSA) delivered the update and announced that the NISP currently supports approximately 4,550 active classified information systems. This updated figure represents a major drop achieved by working with the NISA working group to purge duplicate eMASS entries.

He reported that DCSA authorized 548 systems in fiscal year 2026 (with 66 processed just prior to the meeting) and granted 119 operational extensions. The average time to complete the assessment authorization workflow is 64 days, well under the 90-day mandate.

He detailed the deployment of eMASS version 5.14-1 to resolve minor platform bugs, and announced that version 5.15 is slated for the end of April to enhance workflow controls and support the transition to National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 Rev 5. He noted a newly negotiated reciprocity agreement with Defense Information Systems Agency (DISA) so that common software releases do not count against DCSA's strict contractual update limits.

He stated that the FY 2026 Cyber Operational Readiness Assessments (CORA) schedule has been published via the Department of War Cyber Defense Command (DCDC) portal. DCSA is halfway toward its annual business plan goal and is prioritizing mandatory inspections for any SIPRNet circuit that has not achieved a moderate-to-low risk rating within the last two years.

He clarified that data spillage cleanup must be pre-approved inside a contractor's specific incident response plan. Under Committee on National Security Systems Instruction (CNSSI) 1001, the ultimate authority to permit technical mitigation or mandate total hard drive destruction rests entirely with the individual government data owner.

He reported that the curriculum has been formally approved for Phase 2 of the Information Systems Security Professional (ISSP) Training Academy. The program is currently in the vendor design phase to build out the e-learning coursework, which directly addresses the findings of the MITRE FAST study.

He reminded attendees that for specialized systems like Classified Infrastructure as a Service or Expedited SIPRNet circuits, DCSA serves as the assessment and authorization arm, meaning that

prerequisite requirements from DoW Intelligence and Security (DoWI&S), the CIO, the Chief Information Security Officer (CISO), DCDC, and DISA must be fully satisfied before his office can engage.

**DCSA Adjudication and Vetting Services (AVS) Update**

Donna McLeod (Senior Policy Advisor for Personnel Security with DCSA) delivered the update with the slides provided.

She explained that drawing down the investigation inventory caused a massive influx of cases to hit the adjudication phase, resulting in an active backlog of 3,000 Tier 5 cases and 9,000 Tier 3 cases. She stated that the trust decision division is working through a targeted initiative to quickly close new cases that do not require additional issue resolution, anticipating a significant positive impact on adjudication timeliness by next quarter.

She confirmed that a visual preview and a corresponding fact sheet exists for the IEP, and promised that DCSA liaisons would share this information directly with the NISPPAC.

**Defense Office of Hearings and Appeals (DOHA) Update**

Perry Russell-Hunter (Director, DOHA) delivered the update.

He clarified DOHA's role as an independent legal body reporting directly to the DoW's General Counsel, ensuring due process before an industrial clearance can be denied or revoked.

He advised the committee that 98% of all clearance applications and reinvestigations result in a favorable determination, meaning the rate of actual rejections is historically very small.

He noted that under the 2024 NDAA conference report, the department is actively striving to extend the same strict on-the-record legal protections enjoyed by Industry for 65 years to military service members and DoW civilians.

He reported high processing efficiency: 95% of Statement of Reasons (SOR) legal reviews are completed in under 45 days. Over the past calendar year, DOHA reviewed 1,024 SORs and rejected 90 of them for being factually or legally inaccurate, demonstrating robust oversight of the government's investigative pipeline.

He confirmed that all DOHA administrative judges have been formally appointed by the Secretary of War in strict compliance with the Supreme Court's Lucia and Arthrex rulings to ensure legal and political accountability.

**General Discussion, Remarks and Adjournment**

Allyson Renzella (DCSA primary member) announced the upcoming retirement of Donna McLeod (Senior Policy Advisor for Personnel Security with DCSA) in July. Isaiah Rivers presented her with the Industry NISPPAC challenge coin in gratitude for her stellar career partnership.

For new business, Industry requested that DoW implement clear system adoption deadlines for NI2 to reduce fragmentation across components. Jeffrey Spinnanger (DoW NISPPAC member) noted that while component acquisition systems are highly decentralized, they will continue tracking metrics under the NI2 roadmap. Jennie Hardy (NISPPAC Industry member) requested prioritized training for users navigating the transition to the NI2 DD254 workflow.

The next public meeting is tentatively scheduled for September 2, 2026.

The meeting was adjourned at 2:00pm ET.

I hereby certify that, to the best of my knowledge, the foregoing minutes are accurate and complete.

Michael Thomas
Director, Information Security Oversight Office (ISOO)
Chairman, National Industrial Security Program Policy Advisory Committee (NISPPAC)

Enclosure 1: Agenda
Enclosure 2: Meeting Attendees
Enclosure 3: Summary of Action Items
Enclosure 4: Public Q & A
Enclosure 5: Meeting Presentation

Enclosure 1: Agenda

Opening Remarks, Administrative Matters

Updates

- Industry, Q&As
- Department of War (DoW) (NISP Executive Agent), Q&As
- Defense Counterintelligence and Security Agency (DCSA), Q&As
- Office of the Director of National Intelligence (ODNI), Q&As (Security Executive Agent)
- Department of Energy (DOE), Q&As

Break

Updates (continued)

- Working Group (WG)
    - DOE, Q&As
    - DCSA NISP Cybersecurity Office (NCSO), Q&As
    - DCSA Adjudication and Vetting Services (AVS), Q&As
- Defense Office of Hearings and Appeals (DOHA), Q&As

General Discussion, Remarks and Adjournment

Enclosure 2: Meeting Attendees

Abrams, Nikki
Adams, Cherea
Aghdam, Laura
Albany, Cherylyn
Albright, April
Alexander, Treva
Allen (Mullenniex), Kelley
Allen, Larissa
Allen, Lauren
Allen, Nicole
Allison, Anthony
Alspaugh, Gretchen
Anderson, Khaleena
Andrade, Michelle
Anello, Tonya
Antwine, Qaadir
Arnett, Noah
Ashley, Julie
Askery, Bariha
Atkinson, Jamie
Aubert, Leslie
Avila, Donna
Babic, Adriana
Backhus, Andrianna
Baez, Octavio
Baik, Kelli
Bailey, Zaakia
Baldree-Nichols, Amelia
Banks, Grant
Banks, Theodore
Barry, Tris
Battaglia, Rebecca
Bauer, Sandra
Bean, Wyatt
Beauregard, Sarah
Beauregard, Zak
Beck, Michelle
Belew, Susan
Bell, Angela
Belli, Cobie
Bellofatto, Nathalie
Benitez, Lilian
Bhatti, Sabrina
Black, Christina
Blackman, Sean
Bland, Booker
Blersch, Donald
Bock, Kristy
Boling, Daniel
Boomer, Mindy
Boone, Antoine
Boone, Pamela
Borland, Jennifer
Bosch, Lucas
Bourgeois, Carolyn Lauren
Bowman, Jennifer
Bozeman, Emily
Bradford, Eric
Brandt, Elizabeth
Bray, Justin
Breault, Holly
Breeding, Tammy
Brilla, Suzi
Britt, Martin
Broglin-Bartlett, Darinda
Brokenik, Patricia
Broughton, Alisha
Brown, Alexis
Brown, Misty
Brown, Paul
Brown, Robert
Brown, Shannon
Brown, Tracy
Brumfield, Teresa
Bryan, Ashley
Buchanan, Carol
Budd, Quinetta
Buie, Wendy
Buonamia, Andreas
Burgos, Rick
Burns, Lynn
Burris, James
Busch, Melissa
Butz, Lisa
Byrge, David
Cabrera, Maria
Cagle, Fiona
Call, Samantha
Callaway, Nicole
Cameron, Douglas
Campbell, Amy
Carder, Panda
Carpenter, Marcus
Casillas, Fred
Cassidy, Tracy
Castel, Jason
Castro, Damian
Caul, Earskel
Cavano, Jeffrey
Chambers, Steven
Chamblee, Tamra
Chappell, Curtis
Charlston, Jeffrey
Charyton, Dianne
Chavez, Iliana
Chavira, Virginia
Chiocchio, Gina
Chop, Brittney
Christen, A. Bryan
Christian, Laurie
Chupka, Matthew
Chvotkin, Alan
Cippel, Melissa
Clapp, Julie
Clark, J. G.
Clark, Larry
Clements, Haley
Clonts, Charles
Cobbs, Carla
Coble, Jane
Coburn, Catherine
Coffin, Chad
Coleman, LaToya
Collo, Robin
Colón, Kim
Colon, Nancy
Colon, Susan
Condon, Jessica
Contreras, Tracie
Cook, Krista
Cooper, Janette
Cooper, Nicole
Cornet, Kevin
Cotter, Joe
Crabtree, Misty
Cragan, Jennifer
Creech, Ronald
Crews, DeVonte
Cronin, Scott
Croson, Matthew
Crutcher, Latonia
Crytzer, Eric
Cuffman, Daphne
Cummings, Sean
Curry, Randell
Dadosky, Tiffany
Dahle, Nissa
Daniel, Cindy
Daniels, Dennis
Daughenbaugh, Alec
Daugherty, Torrence
Davies, Amanda
Davis, Bethany
Davis, Glynn
Davis, Hasmig

Dayton, David
Dean, Mary
Defenbaugh, Patrick
Deffenbaugh, Mary
Defibaugh, Joshua
Degefa, Girma
DeJesus, Shelley
DeMong, Jeremy
DeTurk, Eric
Devore, Rebecca
Diallo, Ibrahima
Dickerson, Kate
Dickey, Geoffrey
Dietz, Amber
Dinkel, Jane
DiRenzo, Tonya
Dixon, Jennifer
Doman, Lisa
Doodson, James
Doubledee, Tracy
Doucet, John
Dougherty, Patrick
Douglas, Gwendolyn
Dover, Vanessa
Duke, Christina
Dunham, David
Dupre, Cale
Dupuis, Tamara
Durkin, Tracy
Ebright-Herrera, Zach
Eddins, Kristina
Edington, Mary
Edwards, Daniel
Egan, Amanda
Einsmann, Michelle
El Hamdani, Said
Eller, Robyn
Ellison, Lori
Elmore, Christy
Embree, Peter
Enriquez, Marcus
Equels, James
Erickson, Heather
Errington, Gordon
Ervin, Vicki
Escobar, Michael
Etters, Missy
Fahim, Hany
Fallen, Wilda
Faller, Mike
Farrell, Shannon
Fehlner, Scott
Fell, Rob
Fentress, Steven
Ferrell, Bella
Ferrer, Cicero
Fetgatter, Dawn
Fiedler, Tristan
Fields, Tonya D.
Fink, Allison
Finucane, Daniel
Fitzpatrick, John
Flanagan, Matthew
Flewellen, Linda
Flora, Jessica
Flynn, Nicole
Fonseca, Brenda
Fowler, Pat
Francis, Alicia
Franck, Raquel
Freeman, Lisa
French, Heidi
Fridman, Hayley
Fulco, Joseph
Funicello, Kasey
Funicello, Lorena
Futrell, Joshua
Garcia, Gabriel
Garcia, Rogelio
Gardner, Heather
Gardner, Kelly
Garrity, Twila
Gary, Jane
Gaudiosi, Julie
Gemmell, Alexis
George, Thomas
Gibbs, Diane
Gibbs, Katrina
Gibson, Matthew
Ginder, Linda
Glassic, Scott
Gleason, Kimberly
Gnanamurthy, Kumar
Gordon, Jaime
Graham, Jennifer
Granger, Ryan
Gray, Pamela
Greaver, Angie
Green, Heather
Grimes, Daniel
Grinnell, Matthew
Hackney, Tim
Haley, Rene
Halfhill, Heather
Hall, Brent
Hamilton, Pamela
Hampton, Matthew
Hamrah, Maureen
Hannah, Derrick
Hanson, Barbara
Hardy, Jennie
Harris Pagán, Heather
Hawk, Jason
Hawkins, Kay
Hawthorne, Michael
Heaton, Pam
Heavner, Alyssa
Heintzelman, Stacy
Heinze, Michelle
Heller, Michael
Henley, Alesha
Henry, Tracey
Hergert-Romero, Heather
Hernandez, Andy
Hernandez, Elena
Hernandez, Jorge
Hertzog, Conrad
Hicks, Frankie
Hidle, Tamara
High, Howard
Hight, Dorothy
Hill, Brett
Hines, Helencia
Hodges, Micah
Hoffmann, Dawn
Holcomb, Brady
Hollandsworth, Matthew
Holliday, Ellen
Hollomon-Dellis, Tamara
Holmes, Vickie
Houston, Amy
Howar, Laura
Howard, Justin
Huber, Donna
Hubert, Keli
Hulet, Michael
Hunt, Kimberly
Hurley, Brendan
Husker, Frank
Hutcheson, Amy
Hutchison, Alicia
Imhoff, Timothy
Iryna, White
Jackson, Stephen
James, Anthony
James, Crystal

James, Lana
Jenkins, Braedon
Jenkins, LeeAnn
Jenkins, Travis
Jetton, Calvin
Joe, David
Johnson, Desiree
Johnson, Jill
Johnson, Melissa
Johnson, Tiffany
Johnston Jr., David
Johnston, Amanda
Johnston, David
Johs, Brandon
Jones, Cecilia
Jones, Derek
Jones, Jessica
Jones, Mark
Jones, P Quinnatt
Jones, Russell
Jones, Rusty
Jones, Tara
Jongema, Linwood
Joseph, Zachary
Joyce, John
Kamilova, Kamilya
Kampwerth, Bryce
Kastle, Nicole
Kay, Susan
Kearney, Chelsea
Kearney, Jack
Kearns, Julia
Keefer, Scott
Kester, James
Khajehali, Collette
Kimball, Lissa
Kirby, Jen
Kitchens, Barbara
Kitts, Karen
Kitzman, Matthew
Klem, Jeremy
Klingler, Hannah
Klink, Carolina
Knarr, Matthew
Kobus, Jason
Kumpel, Tracey
LaBeach, Stephanie
Lai, Nhon
Lambuth, Michael
LaMont, Kimberly
Lang, Matthew
Larkin, Paulicia
Lauren Bourgeois, Carolyn
Laury, Karen
Lawhorn, Jeffrey
Lawrence, LeVar
Lawrence, Mitch
Lawson, Pamela
Leau, Richard
LeBlanc, Randal
Lee, Jessica
Leisinger, Carmen
Lepak, Tammy
Levasseur, Nick
Lewis, Donnie
Lewis, Natasha
Lewis, Tiffany
Lichliter, Jennifer
Limon, Katherine
Lin, Zhen
Lipford, Denika
Little, Heather
Littlefield, Amy
Lockard, Billie Jo
Loh, Amy
Long, Jamie
Lopez, Isaiah
Lord, Ginger
Lotwin, Andrew
Loven, Shana
Lunar, Shannan
Lund, John
Lupo, Tracy
Ly, Daniel
Maclauchlan, Chris
MacVean, Adam
Magee, Christopher
Malley, Edward
Malloy, Barbara
Malmgren, Michael
Malone, Kimberly
Manning, Lesa
Mansfield, Maria
Mantzell, Kimberly
Markham, Julie
Marks, Monica
Marlowe, Charles
Marshall, Heather
Martens, Sheri
Martinez, Danielle
Martinez, Kelli
Mason, Faye
Massaro, James
Mate, Edith
Mathias, Ashley
Matthews, Will
Mayberry, Grant
McAllister, Courtney
McCaffrey, Mary Rose
McCarthy, Carrie
McCarthy, Leslie
McClellan, Kelly
McGarvey, Daniel
McGlone, Amanda
McGrath, Alison
McGraw, Brenda
McInnis, Jennifer
McKay, Kyle
McKenna, Danielle
McLeod, Donna
McManus, Daniel
McMillian, Tasha
McMillian, Toni
McNeill, Steven
McNichol, Lindsey
McPherson, Kevin
Mellema Jr., Herman
Mercer, Raymond
Merritt, Mandy
Michlinski, Gary
Middleton, Angela
Miller, Anya
Miller, Appollonia
Miller, David
Miller, Dean
Mills, Maria
Mills, Wendy
Minard, Keith
Minard, Verna
Mirus, Nicholas
Moore, Brian
Moore, Kathleen
Moore, Kathy
Moore, Tempril
Morgan, Clifford
Morris, Sarah
Moshos, Phyllis
Mosier, Jennifer
Moss, Leonard
Mulkey, Darcey
Mullin, Nonnie
Mungin, Lisa
Murphy, Brian

Murphy, Tyler
Nabel, Amy
Nestico, Samantha
Nickel, Robin I.
Nikolaus, Suzanne
Nolette, Tammy
Norland, Tenaya
Norris, Alison
Novakoski, Lisa
Numbers, Alyssa
Nylander, Elsa
Omo, Stacey
O'Rear, Marti
Orr, Mary
Osborne, Shavon
Ososkie, Charles
Ostermann, Kyndall
O'Sullivan, Sean
Oxley, Meagan
Page, Carrie
Palmar, Jose
Pannoni, Greg
Parker, Andrew
Parker, Rebecca
Patterson, Charron
Paxton, Larry
Payne, Brittany
Payne, Diana
Pearson Lloyd, Laurel
Pease, William
Penny, Sean
Perez, Rachel
Peterson, Ryan
Peterson, Tracy
Pettengill, Chantel
Phadke, Uma
Phagura, Satminder
Phalen, Charles
Phan, Hung
Phillips, Kristin
Piccioni, Geraldine
Pickering, Tamiko
Pitek, Emily
Pleasanton, Patricia
Post, Sara
Powell, Cynthia
Powell, Marie
Powers, Teresa
Powlovich, Jacob
Prevost, Jacquelyn
Price, Joyce
Prieto, Heather
Prinston, Jessica
Pritchard, Gregory
Pritchard, James
Proft, Allison
Propst, Linda
Pulliam, Donna
Pyles, Larry
Quarles, Darren
Quenette, Brian
Quigley, Jessica
Ragin, Chakeia
Raia, Nicholas
Raju, Clara
Ramaswamy, Shobha
Ramsay, Chad
Randolph, Shaun
Rasmussen, Kristine
Raub, Meghan
Ray, Michael
Ray, Mike
Ray, Richard
Raymer, Nicholas
Reck, Sydney
Rector, Patricia
Reding, David
Regal, Jessie
Regan, Margaret
Reid, Holly
Reidy, Lisa
Reiman, John
Renzella, Allyson
Rice, Meagan
Richards, Rachel
Riche, Kimala
Rickell, Cathy
Riley, Emily
Rivers, Isaiah
Rixmann, Robert
Rixmann, Tracy
Robinson, Amanda
Roche, Matthew
Rodriguez, Ana
Rodriguez, Armando
Rodriguez, Chamagne
Rodriguez, Jessica
Rogers, Liza
Romandelvalle, Shala
Rosenberg, Brett
Rossiter, Lisa
Ross-Sanders, Jannice
Roswal, Andrew
Roswal, Kimberlee
Royal, Andrea
Ruffini, Julia
Rush, Jennifer
Rusinsky, Heather
Russell-Hunter, Peregrine
Sadler, Gregory
Salizzoni, Amanda
Saloom, Charles
Sampson, Katyna
Sanborn, Brice
Sandlin, Taylor
Saupp, Kevin
Scalisi, Carlos
Scheid, Melissa
Scholtz, Robert
Schools, Patricia
Schuetz, Erin
Scott, Christopher
Scott, David
Scott, Yvette
Scottorn, Lisa
Sears, Erin
Seiler, Jason
Sepp, Winnie
Settles, Christina
Shackelford-Ross, Sarah
Shaner, Jennifer
Sharma, Jane
Shaw, Cale
Shepherd, Tameka
Shirley, Michael
Shiver, Clayton
Shoemaker, Nathaniel
Short, Brandon
Sickmond, Stephanie
Sillery, Chad
Simon, Vaughn Q.
Sims, Georgina
Sims, Heather
Sivaivai, Sherry
Smith, Amy
Smith, Berette
Smith, Christopher
Smith, Crystal
Smith, Justin
Smith, Sandra
Smyth, Brenda
Sobilo, Kelly
Somers, Easton

Son, Monica
Sorensen, Tamara
Soriano, Rojohn
Spalding, Marcie
Spinnanger, Jeffrey
Stake, Bryan
Stambaugh, Christine
Standifer, Karla
Staunton, John
Stephens, Brooke
Stephens, Christina
Stoecker, Collin
Stolkey, Christopher
Strid, Jimmy
Sturch, Kenneth
Suarez, Cheryl
Sumpter, Valerie
Sutphin, Joanna
Sutton, Gloria
Swann, Gayle
Talaro, Arlene
Rowena Tarantino
Setneska, Valerie
Tate, Charles
Taylor, Christina
Taylor, Krystal
Terry, Mark
Terry, Whitney
Thayer, Amber
Theken, Jake
Thibodeaux, Kristie
Thomas, Grant
Thomas, Michael
Thomas, Stephanie
Thompson, BLinda
Thompson, Donna
Thompson, Irene
Thompson, Kathy
Tiffee, Bradley
Tillman, Jacob
Timmons, Katie
Tinsley, Russell
Trehern, Debbe
Trehern, Deborah
Triplett, Gary
Troutman, Danielle
Tucker, Bruce
Tucker, Joni
Turley, Jodie
Turner, Sarah
Van Dyke, Alexis
Vance, Robert
Vanderhuff, Elizabeth
Varela, Aaron
Vargas, Angel
Vasquez, Shannon
Vaughn, Susie
Vaughn, William
Velez, Caesar
Verton, Michael
Vickery, Tandy
Vitoritt, Hanni
Voorhies, Elicia
Waggoner, Jaime
Wagner, Joseph
Wagner, Rebekah
Wallace, Crocker
Wallerson, Diane
Warren, Kerry
Waschko, Jacob
Washer, Barbara
Washington, Reginald
Weakley, Kathy
Webb, Joe
Webber, JoAnn
Wendt, Suzy
West, Jessica
West, Nadja
Weyrauch, Richard
Wheeler, Leelena
Whipp, Joseph
White, Dorie-Ann
White, Jennifer
Whiting, Elena
Whitney, Richard
Wicker, Marie
Wilcox, Lindsay
Wilder, Christy
Wilkes, Quinton
Williams, Alyson
Williams, Angela
Williams, Kerri
Williams, Marcus
Willis, Chad
Wilson, Barbara
Winston, Jason
Wolf, Tara
Wood, Michael
Woodall, Christopher
Woodard, Teresa
Woolf, Michael
Wright, Paula
Wright, Tracy
Wright, Zoey
Young, Carlos
Young, Erin
Young, Ronald
Yuhas, Rae
Zimmerman, Carmen
Zubrick, Sarah
Zweil, Alison
Картушин, Илья

Enclosure 3: Summary of Action Items

- Industry requested to be a part of the policy making process regarding the covered insider threat policy with ODNI. This action item is considered closed.

- The Department of War asked ISOO to assist in engaging with the Small Business Administration regarding military departments' ability to meet small business requirements. This action item is still open.

- Industry requested a meeting to discuss reciprocity of training with CSAs and CSOs. This action item is still open.

- Industry asked OUSWI&S to work with the military departments to expand the SCI Indoctrination authority for Industry, and work with them for a better process moving forward. This action item is considered to still be open.

- Industry requested cooperation from government entities in devising sanitization procedures for solid state drives involved in spills. This item is still considered open.

- Industry requested a meeting with CSAs to discuss communication options so they are not surprised by future announcements. It is expected that this will be addressed today by ODNI. NRC is not represented during the meeting today, but will be considered open only for them, as everyone else responded.

- Industry requested that ISOO coordinate with the CSAs to provide guidance to Industry as soon as possible on all EOs with suspected NISP implications. This item has evolved, and is currently with NISPPAC Industry. This item is considered open at this time, while ISOO continues reform efforts.

- Industry requested that ISOO convene a meeting of the CSAs to discuss CUI. This item is considered closed at this time, but will reengage at a later date.

- Industry requested that Government inform Industry of any budgetary or personnel changes that will impact Authorizations to Operate (ATOs). This action item is considered closed, as DCSA responded.

- Industry asked DCSA to provide a status update on the facility clearance orientation handbook. This action item is considered closed, as DCSA responded.

- Industry requested OUSWI&S establish a vehicle for Industry to provide NBIS requirements and feedback, and would like an initial meeting on this topic within 30 days. This item is considered closed as that took place.

- Industry requested guidance from the services on expected timelines for SCIF and SAPF compliance. This item is considered closed due to not being a requested item anymore.

- Industry asked for a meeting with the CSO of DHS. This item is considered closed due to not being a requested item anymore.

In addition to those action items, we also have questions that were not answered during the May 2025 public meeting, but were addressed during the March 2026 public meeting:

- Russell Justice asked: In regards to the CUI and CMMC discussions in today's NISPPAC meeting, I am seeking clarification on CMMC and in scope cloud service providers. For example, many companies in Industry utilize SaaS solutions for security management. These include solutions like SIMs, Tru-Vetting, Security Control, Sign-In Solutions, etc. These programs allow for upload of DD-254s, which are becoming more and more often CUI. Looking through the myriad of guidance on CMMC, it appears that FEDRAMP Moderate Equivalent is still acceptable and is on the contractor utilizing the service to assess required documents and ultimately take on the risk. Additionally, if they do not deal directly with the government, are they able to receive FEDRAMP Moderate certification? Who would be their sponsor? Most are applications that sit within an approved CSP such as AWS GovCloud. If I am not making sense, it only goes to show that the guidance for CMMC, 800-171, etc. are confusing, often contradictory, and not adequately distributed to Industry Partners. Beyond the security software solutions, you have the ERP solutions like Unanet…how far down the private industry chain does FEDRAMP or FEDRAMP equivalent reach? How can we continue to modernize and manage our contracts? Because this question is related to CMMC, it is recommended that Russell reach out to their government contract representative for clarity.

- Nik A asked a 32 CFR Part 117 Question: E-Verify offers an accepted electronic method to validate citizenship. Can DoD/DCSA speak on any consideration to update the 32 Page 31 CFR part 117.10 (C) NISPOM rule to validate original or certified copies of proof of citizenship to include language that supports a similar (if not the same) electronic method? This is open at this time awaiting a response from OUSDWI&S or DCSA.

- Jennie Hardy asked "Can we address the plan to address Industry's concerns with the hesitance of IC adopting initiatives to modernize systems and eventually adopt the PVQ aligning with the updated investigative standards. In speaking with individual agency PERSEC leads, there seems to be no foreseeable intent to modernize. This will continue to be problematic, despite those agencies being under the same Trusted Workforce mandate." This was addressed by ODNI during the meeting.

- Our next question came from Marlene Tores, who asked if we know how many companies are compliant with CMMC? This is not something that is tracked, as Level 1

is a self attestation by a company. Level 2 and 3 are not yet required. She also asked for an explanation of what FCI is in regards to CMMC? This is considered closed due to a lack of clarity.

Enclosure 4: Questions and Statements Received during the Public Meeting

From: Gretchen Alspaugh

Question: Will there be a community wide directive to use [NI2] for DD254s? Some Services use it and others don't, which makes it difficult for industry.

Answer: There already is.

From: Gretchen Alspaugh

Question: Can we get some clarification on DISS and snipping/screenshots - in particular the VAR screen. We have had an issue where host sites aren't seeing VARs, don't go to page 2, or they were deleted by someone else in the host organization to put in a local database. When this became a prevalent issue, my security office started getting asked for snips as proof the VARs exist. Back in the JPAS days, this was strictly prohibited as it was a much more detailed page and the subject page has, understandably, always been off limits, but now there is much less information in VAR pages (e.g., no more SSN or DoDID listed). Some security offices are saying the same rules apply and others ask for the snips. What is the definitive ruling on this?

Answer: Awaiting a response from DCSA.

From: Christy Elmore

Question: I am writing today to see if there is anything that can be done smooth out the process for contractors that need to replace black label security containers that as you know are being phased out. Our company has a DD254 showing the safeguarding need. We have a letter from the Contracting Officer allowing us to purchase a new security container, but GSA is advising that the customer would need to get us a contractor DoDAAC. The customer on the other hand doesn't understand why they have to do that because other big companies can order them no problem with just a letter. I suspect that the big companies probably already have a contractor DoDAAC established that is allowing then to proceed with just a letter from their customer. We have been working over a year to try and get a contractor DoDAAC to purchase a new security container. We have been told the information on the GSA website for contractors is outdated. With so many contractors that are going to have to replace storage containers is there anything that can be done to make this an easier process for us? Or can GSA update their guidance so that we can educate the customer on the steps they need to take to support us?

Answer: Christy was directed to GSA for assistance.

From: Treva Alexander

Question: What empirical data, financial modeling, or risk assessments has ISOO conducted to determine the cost-benefit impact of eliminating the Confidential classification level — particularly in relation to how this change would affect agency classification practices, security infrastructure, clearance processing, and compliance with EO 13589, which mandates efficient and cost-effective execution of mission-critical functions?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: If the Confidential level is eliminated, will agencies be required to reclassify existing Confidential records? If so, which agency or office bears responsibility for that reclassification process, what is the estimated cost, and over what timeline would it occur?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: Has ISOO considered and formally evaluated alternative approaches — such as redefining classification thresholds, implementing classification risk matrices, or restructuring the existing two-tier system — rather than eliminating an entire classification level? If so, where are those evaluations documented and available for public review?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: What measurable progress has ISOO made since its 2021 Annual Report toward overhauling or eliminating the automatic declassification system, and how is this effort specifically aligned with the fiscal stewardship mandates of EO 13589, which directs agencies to "perform mission-critical functions in the most efficient, cost-effective way" and to "identify opportunities to promote efficient and effective spending"?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: Has ISOO conducted a cost analysis comparing the long-term financial impact of maintaining the current declassification backlog against investment in a modernized or

restructured digital declassification system? If so, what are the findings, and where are they publicly available?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: What specific mechanisms is ISOO implementing to ensure that proposed reforms to the automatic declassification system will reduce duplication, improve public access to historical records, and strengthen government transparency — without compromising national security interests?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

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Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: The ISOO 2023 Annual Report to the President documents that the PIDB met with representatives from the Department of State and the Office of the Secretary of Defense to discuss AI/ML tools for declassification, and held additional discussions with other entities on modernizing declassification more broadly. Given these consultations, and given that Executive Order 14365, "Ensuring a National Policy Framework for Artificial Intelligence" (December 11, 2025), establishes a federal obligation to govern AI deployment within a national policy framework: (a) What is the current status of ISOO's and the PIDB's AI/ML declassification modernization efforts, and what publicly available documentation exists describing the scope, governance structure, and evaluation criteria for any AI/ML tools under consideration or development? (b) How is ISOO ensuring that any federal deployment of AI/ML tools for declassification purposes is governed in alignment with EO 14365's national AI policy framework, including appropriate oversight, accuracy validation, and national security safeguards? (c) Has ISOO or the PIDB conducted or commissioned a risk assessment of AI/ML deployment in the declassification context, and if so, where are those findings publicly available?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: How many qualified national security professionals currently serve within ISOO, and what is the methodology used to determine that qualification?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: Specifically, how many ISOO personnel meet the National Security Professional Development (NSPD) standards outlined in EO 13434, which mandates integrated education, interagency training, and cross-functional professional experience for security professionals across the federal enterprise?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: What mechanisms has ISOO implemented to ensure that its own staff possess not only subject matter expertise in information security, but also the interagency competencies, professional development credentials, and cross-agency collaboration capabilities required under EO 13434's National Strategy for the Development of Security Professionals?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: How many formally designated national security professionals — as defined by EO 13434 — currently serve in full-time roles within the NSC Staff?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: Given the NSC's responsibility for synthesizing complex interagency input and producing presidential-level guidance, what steps are taken to ensure that NSC personnel possess not only subject matter expertise in their respective domains, but also the integrated education, intergovernmental training, and cross-functional professional development mandated by EO 13434's National Strategy for the Development of Security Professionals?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: In light of persistent documented concerns regarding the uneven development of interagency competencies across the national security workforce, how does the NSC ensure that its staffing reflects the standards of interagency professionalism, mission-aligned training, and preparedness necessary to safeguard national security at the highest level of executive branch decision-making?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: In light of the professional standards established in EO 13434, how does ISOO justify a position description for CUI Program Managers that does not require the baseline

qualifications — interagency training, security risk acumen, and mission-aligned professional development — that EO 13434 identifies as essential for professionals whose roles carry national security implications?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: Given that the CUI Program's stated mission is to protect controlled information consistently across the entire federal enterprise, should ISOO revise CUI Notice 2019-02a to require that CUI Program Managers meet the professional standards of national security professionals — with training that encompasses not only regulatory compliance but also threat assessment, risk management, and strategic countermeasure development? If not, what is ISOO's affirmative rationale for the current standard?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: How many formally trained national security professionals — as defined by EO 13434 — currently serve on the NSC-led IPC tasked with reviewing and potentially overhauling the classification and CUI executive order framework?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: What criteria govern IPC membership, and are those criteria publicly documented? Do the current members meet the integrated security education, interagency experience, and professional training standards established in EO 13434?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: Given that the IPC's recommendations will govern how classified and controlled unclassified information is handled across the entire executive branch and by hundreds of thousands of cleared contractors, why is there no publicly stated requirement that IPC members

possess security, risk assessment, and countermeasure development expertise? What is the affirmative policy rationale for this omission?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: What is the current operational status of the IPC's work? What mechanisms exist to engage executive branch agencies, the cleared industrial base, and the public about the IPC's progress, interim findings, and projected recommendations or timeline?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: How is ISOO's participation in the IPC process aligned with its obligations under EO 13589, which mandates the identification and elimination of inefficient and duplicative processes across the executive branch?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: When was the CUI Advisory Council last convened? Where can stakeholders and agency representatives access the minutes or summaries of that meeting, as required by Article IV.5 of the CUI Advisory Council Charter?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Treva Alexander

Question: Given the Council's advisory function on matters affecting the safeguarding of CUI across the entire executive branch, why does the Charter not require — at a minimum — that each member agency be represented by a formally credentialed security professional? What is ISOO's affirmative rationale for the current standard?

Answer: ISOO will provide to the appropriate program manager for consideration and any necessary follow-up.

From: Mary Deffenbaugh

Question: Who will the listening sessions for CUI be open to?

Answer: They are listening sessions for Industry on CMMC, not CUI, and they will be hosted by the CIO. The timeline has not yet been established. The Defense Cybercrime Center will host the first one.

From: Joseph Whipp

Question: Could you please go into greater detail, or readdress the comments about timelines and what candidates can see in eApp, [where individuals fill out the Questionnaire for National Background Investigation Services]? Are they able to see where they are in the process? Can they log back in after the [questionnaire] has been submitted?

Answer: This is open at this time awaiting a response from DCSA.

From: Dawn Hoffmann

Question: Is there a link to the Insider Threat Training that was mentioned, I checked the DCSA website and don't see it there.

Answer: It is located at https://classmgmt.com/nisppac/.

From: Pat Fowler

Question: Can someone expand on what the TORIS system is?

Answer: ODNI is developing a system known as TORIS, to align with the Trusted Workforce 2.0 strategies, and of course, to address increased demand for expanded transparency between agencies related to personnel mobility. So, the system is known as TORIS, as I said, and it stands for Transparency of Reciprocity Information System. TORIS will aid in the timely exchange of personnel vetting data among IC agencies, and that will enable greater visibility into the information that's needed in order to support the transfer of trust determinations for personnel.

From: Heather Hergert-Romero

Question: We have heard rumors of changes in the CUI program in the EO. Do we know what changes are occurring?

Answer: There is no ability to comment on pending EO changes.

From: Wendy Buie

Question: Can you define what initiate means? Is that from the point it is initiated after the eApp is transmitted through NBIS?

Answer: Correct

From: Greg Pannoni

Question: Is DoE routinely conducting PR investigations?

Answer: DOE only conducts PRs if a CV alert or self report can not be resolved.

From: Dean Miller

Question: Could we get those stats in writing or provide a URL to where we can find those stats?

Answer: ISOO will be including it in the presentation section of this report. Additionally, it was emailed to him separately on March 18, 2026.

From: Douglas Cameron

Question: With regards to the Individual engagement Platform (IEP), FSOs spend helping subjects properly report incidents with complete and accurate information and encourage them to include SEAD 4 mitigation that reduce the investigation and response requirements for any reports. How will entities meet requirements to report the same information to SAP & SCI & FSOs since per the IEP guidance, the FSOs are removed from the process?
How entities will meet their 32 CFR 117.8(c)(1)(i) requirements to report adverse information to host USG locations, if the FSO are not provided the information themselves?
How will entities will meet their 32 CFR 117.7(d) requirements to "report relevant and available information indicative of a potential or actual insider threat." In effect DCSA, will get incomplete information from individuals without any additional information from the entity?
This is a great idea, with great potential, but the process should be similar the SF86 submissions with a review by the FSO

Answer: This is open at this time awaiting a response from DCSA.

From: Greg Pannoni

Question: Recently I saw an article indicating that the latest TW 2.0 Quarterly Progress Report (QRP) was released and indicated, inter alia, that reform efforts would tackle updating

meaningful performance metrics. One of those was a metric for rejection metrics. With that in mind, will DCSA begin reporting on PCL applicant rejection rates?

Answer: This is open at this time awaiting a response from DCSA.

From: Keith Minard

Statement: Congratulations Donna. Thanks for your dedication and service to the NISPPAC community.

From: Chakeia Ragin

Statement: Donna we will miss you!

From: Heather Hergert-Romero

Statement: I agree CUI should stay open, thank you! There is confusion across the government with Marking. For example...Some include the CUI categories, and some do not include the category when I ask which category they say its CUI Basic and that is a CUI type not a CUI category.

# NATIONAL INDUSTRIAL SECURITY PROGRAM

## POLICY ADVISORY COMMITTEE

## PUBLIC MEETING

ISOO
INFORMATION SECURITY OVERSIGHT OFFICE

MARCH 18, 2026

# PUBLIC WIFI

# A1 Guest

## Click “Sign in”, and then click “Accept”

# AGENDA

- Opening Remarks
- Administrative Matters
- Updates
  - Industry
  - Department of War (DoW)
  - Defense Counterintelligence and Security Agency (DCSA)
  - Office of the Director of National Intelligence (ODNI)
  - Department of Energy (DOE)
- Break
- Updates (continued)

# AGENDA

- Working Group Updates
  - DOE
  - DCSA NISP Cybersecurity Office (NCSO)
  - DCSA Adjudication and Vetting Services (AVS)
- Topic Briefings
  - Defense Office of Hearings and Appeals (DOHA)
- General Discussion
- Closing Remarks
- Adjournment

# OPENING REMARKS

## ISOO
## Michael Thomas

ISOO
INFORMATION SECURITY OVERSIGHT OFFICE

NISPPAC PUBLIC MEETING

MARCH 18, 2026
NATIONAL ARCHIVES & RECORDS ADMINISTRATION

# ADMINISTRATIVE MATTERS

## ISOO
## Heather Harris Pagán

NISPPAC PUBLIC MEETING

MARCH 18, 2026
NATIONAL ARCHIVES & RECORDS ADMINISTRATION

# UPDATES

ASTRANIS

## Industry
## Ike Rivers

ISOO
INFORMATION SECURITY OVERSIGHT OFFICE

NISPPAC PUBLIC MEETING

MARCH 18, 2026
NATIONAL ARCHIVES & RECORDS ADMINISTRATION

# National Industrial Security Program Policy Advisory Committee (NISPPAC) Public Meeting

## NISPPAC Industry Updates

March 2026

# *Welcome Leonard and Jennie!*

# Clearance Working Group (CWG)


**DoD**

- SCI Nomination Process / Indoctrination Authority for Industry

**DCSA**

- Investigation Timelines

**ODNI**

- Covered Insider Threat Information Sharing Policy Update
- Overhead Billets Policy Update
- TORIS Update

# Policy Working Group

## ISOO

- NISPPAC Industry is beginning an AI-enabled review of the current NISP including EOs and associated policies
- Objectives are:
  1) Identify potential improvements to the current NISP
  2) Examine the potential for a complete NISP rewrite
- Assistance is requested from cleared industry members to participate in the review design, execution and report editing

# Entity Vetting Working Group

**DCSA/DoW**

- Updated SF 328 – significantly expands disclosure obligations both in scope and depth
  - Q5 –
  - To answer as written requires extensive research with multiple stakeholders
  - Ask to issue guidance narrowing scope of the question
- Suspense for submitting material changes to SF 328
  - Current requirement - as soon as possible (30 days)
  - Ask to extend notification requirement
- Academia FCLs – currently their structure is evaluated the same as a commercial company structure
  - Ask their FCL process for Academia be tailored to their unique structure
  - DCSA is “aware” of the challenge

# NISA Working Group

**ALL CSA/CSO**

- NISA WG continuing to seek engagement with other CSA's.
- Commercial Solutions for Classified (CSFC) Program. Lack of oversight and industry seeking guidance.

**DoD**

- Solid State Drive Mitigations

**DCSA**

- DAAG – Released Oct 2025. Progress being made still working to reconcile differences.
- eMASS
  - NIST SP 800.53 Rev 5 Migration/Implementation

# NISA Working Group

## Updates

- Currently discussing a new collaboration with NISA WG and ISOO to addressing Artificial Intelligence (AI)
- Monthly Industry NISPPAC Working Group meetings

## Key Issues/Concerns/Ask

- Destruction of SAP IT material
  - Limited approved options available to industry however, same technologies and destruction capabilities

- COMSEC
  - DoD 8140 - Cyber Workforce Qualification Program – implications to staffing expertise
  - KMI/EKMS – Changes by NSA is complicated, expensive slow to implement
  - Ability to discuss/address this must be in secure spaces compounding the challenges

# NISP Systems Working Group

## DoW/DCSA

### Key Industry Needs

- **Engagement Timing:**
  Initial engagement with DISS & NBIS is improved compared to last year, and initial engagement on the NCCS to NI2 transition was beneficial but earlier involvement would further enhance preparation and avoid **short suspense tasks** that require ad-hoc responses.
- **Communication:**
  A more **structured and predictable approach** to communication would help minimize missed details and strengthen overall collaboration.
- **Roadmaps for Planning:**
  Current system roadmaps could benefit from **simplified, stakeholder-friendly formats** that include clear timelines, planned developments, and impacts.
- **Advance Engagement and Resources:**
  **Early visibility into system development** and advance access to training materials/user documentation to ensure requirements are met and industry is prepared.

# Insider Threat Working Group

## ALL CSA/CSO

- Working group currently focused on generating best practices to share with ndustry:
  - Insider Threat for employees that sit at customer sites
  - Best practices to mitigate threats from fraudulent applicants
  - Will look at other areas of focus later in the year

## DCSA

- NISPPAC Insider Threat Working Group Training
  - Developed so that it could be shared with all of industry
  - Goal was to meet requirements while taking less time to complete
  - DCSA validated the training in December 2025
  - Working to distribute this training throughout industry

- Other items not related to Insider Threat
  - NISPPAC is working with DCSA to work through inconsistencies identified by Industry
  - Contractor Open Storage Area Self-Approval Authorization live as of 2026
    - Great resource to move faster

# Physical Security WG

## ALL CSA/CSO

### Engagements

- Multiple ODNI (Office of the Director of National Intelligence) / NCSC (National Counterintelligence and Security Center) collaboration meetings
  - Intelligence Community Industrial Security Representatives Meeting (ICISRM)
  - PTSWG
- Monthly industry NISPPAC Physical Security Working Group meetings
- February SSCI (Senate Select Committee on Intelligence) engagement to communicate concerns; provided requested recommended solution

### Updates

- Significant changes in government leadership are affecting timelines and priorities
- DNI-level guidance is contingent on the release of ICS705-01, expected in Q1
- POA&M due dates are likely to be adjusted following that release
- Risk assessment tool is currently under development
- Ongoing threat education

# Physical Security WG

**Industry Issues and Concerns**

- Absence of a policy- and risk-based approach to threat management.
- Remediation requirements that do not adequately consider the broader risk landscape for the Defense Industrial Base (DIB).
- Insufficient responses to submitted POA&Ms (Plans of Action and Milestones).
- Inconsistent reciprocity of accreditations; lack of a uniform interpretation of risk and remediation expectations.
- Need to evaluate and promote innovative alternatives to achieve TEMPEST protection.
- Significant backlog at a single accrediting organization, resulting in accreditation timelines of 12–18 months.
- Remediation expectations that are not aligned with organizational direction on required speed and urgency.

Without a centralized Tempest policy, IC and DoD components apply differing, subjective interpretations of risk and compliance, which prevents industry from developing strategic, timely, and cost-effective solutions to support the national security mission.

# COMMUNICATION & COLLABORATION


THANK YOU

# UPDATES

## DoW
## Jeff Spinnanger

ISOO
INFORMATION SECURITY OVERSIGHT OFFICE

NISPPAC PUBLIC MEETING

MARCH 18, 2026
NATIONAL ARCHIVES & RECORDS ADMINISTRATION

# UPDATES

## DCSA
## Allyson Renzella

ISOO
INFORMATION SECURITY OVERSIGHT OFFICE

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# UPDATES

## ODNI
## Lisa Perez

ISOO
INFORMATION SECURITY OVERSIGHT OFFICE

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# UPDATES

## DOE
## Jaime Gordon

ISOO
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# BREAK

## Return in 30 minutes

# WORKING GROUPS

## DOE
## Monica Marks

ISOO
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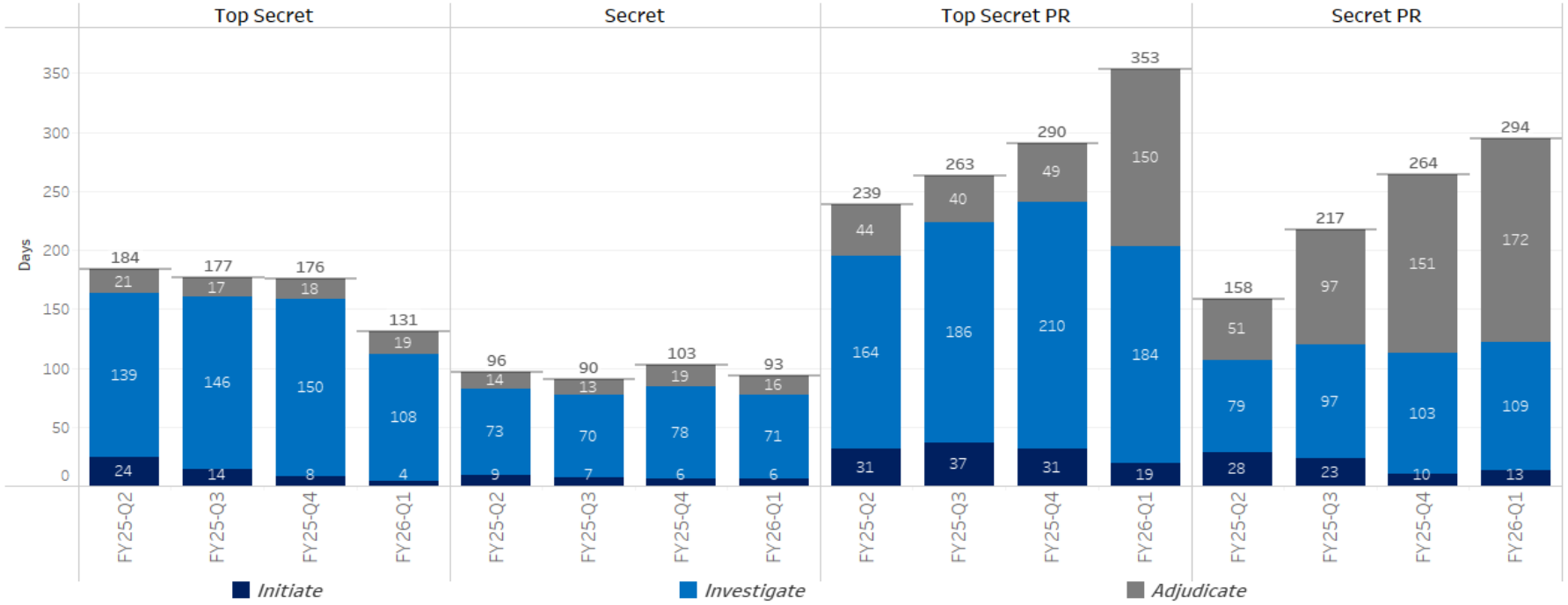
# Workload & Timeliness Performance Metrics

## Department of Energy

*Metrics provided by Defense Counterintelligence and Security Agency

# Quarterly DOE Timeliness Performance Metrics

## Average Days for Fastest 90% of Reported Clearance Decisions Made



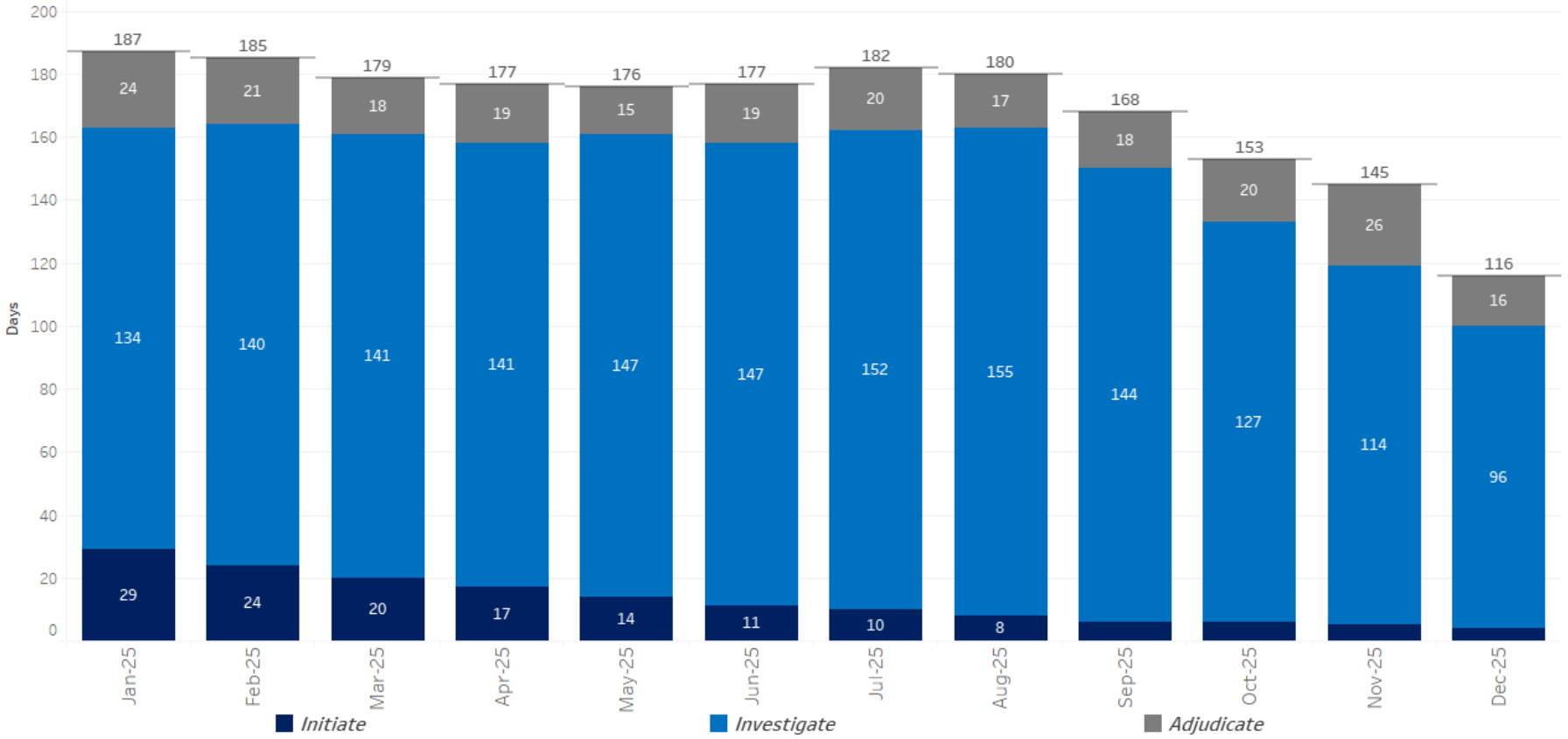

Total Adjudications Reported

| | Top Secret | Secret | Top Secret PR | Secret PR |
|---|---|---|---|---|
| FY25-Q2 | 1,860 | 587 | 307 | 102 |
| FY25-Q3 | 2,262 | 614 | 296 | 60 |
| FY25-Q4 | 2,402 | 482 | 156 | 19 |
| FY26-Q1 | 2,741 | 410 | 44 | 6 |

Data representative of DOE Contractor investigations

UNCLASSIFIED

# Monthly Timeliness for Fastest 90% of Initial Top Secret (T5) Security Clearance Decisions

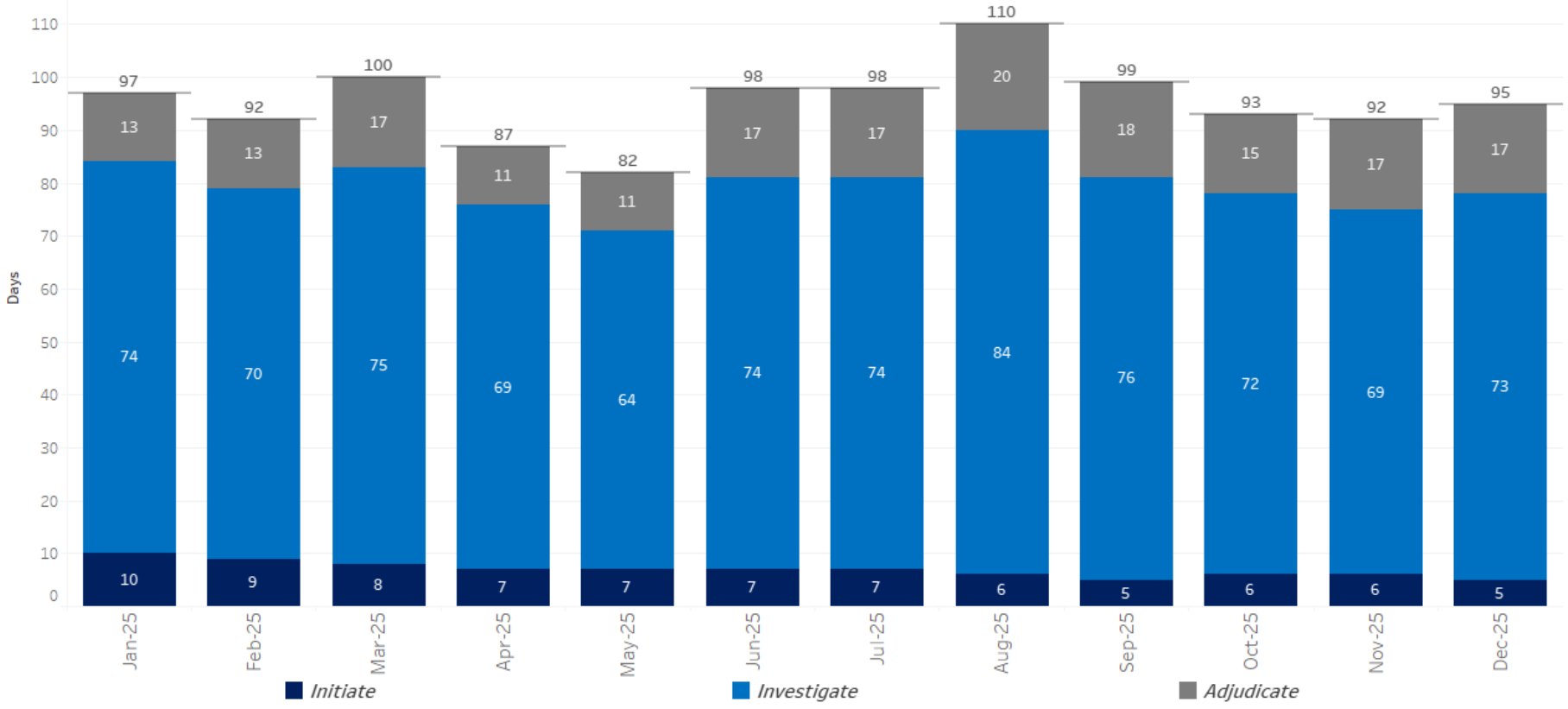



Number of Adjudications Reported

| Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 553 | 581 | 726 | 732 | 799 | 731 | 771 | 769 | 862 | 739 | 679 | 1,323 |

Data representative of DOE Contractor investigations

# Monthly Timeliness for Fastest 90% of Initial Secret (T3) Security Clearance Decisions

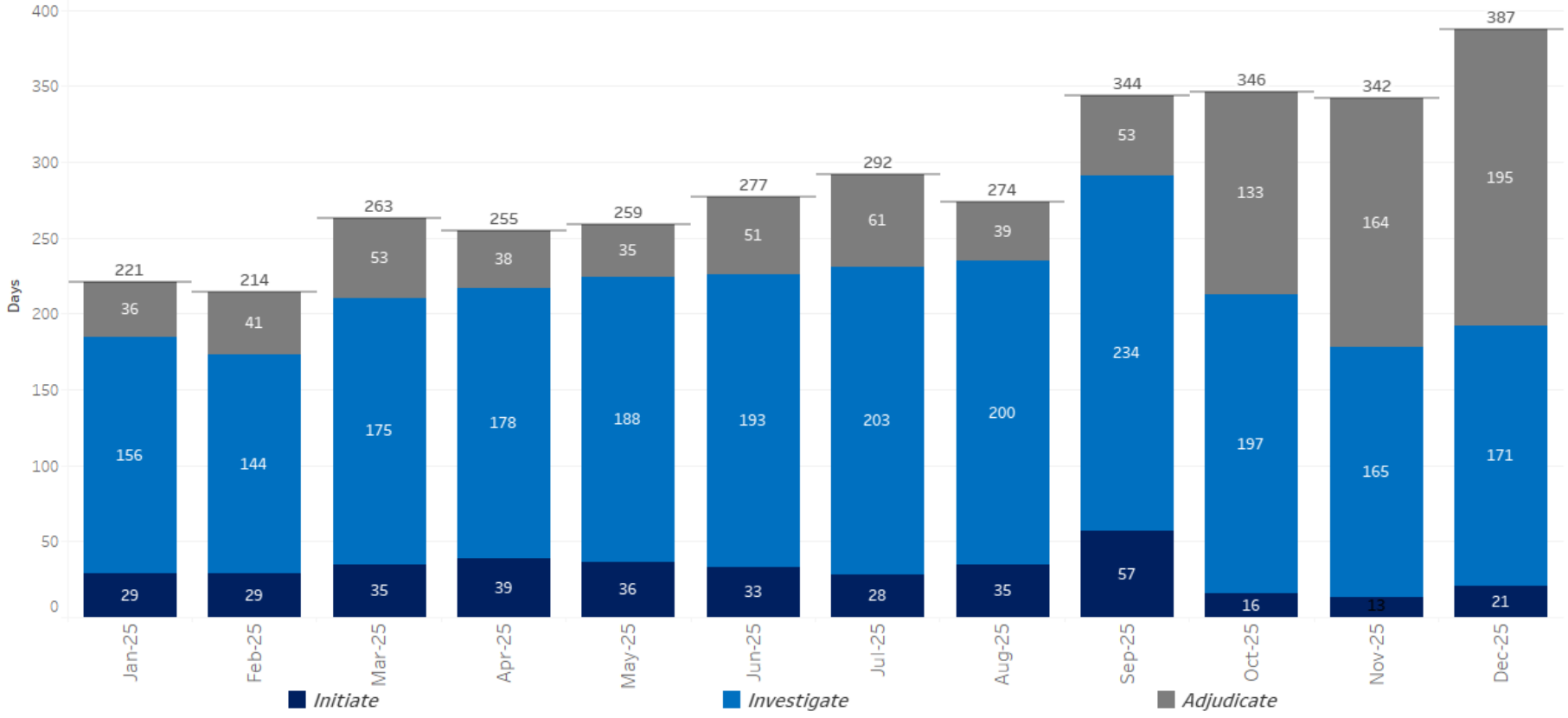



Number of Adjudications Reported

| Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 200 | 217 | 170 | 195 | 233 | 186 | 150 | 153 | 179 | 142 | 121 | 147 |

Data representative of DOE Contractor investigations

# Monthly Timeliness for Fastest 90% of Top Secret Reinvestigation (T5R) Security Clearance Decisions



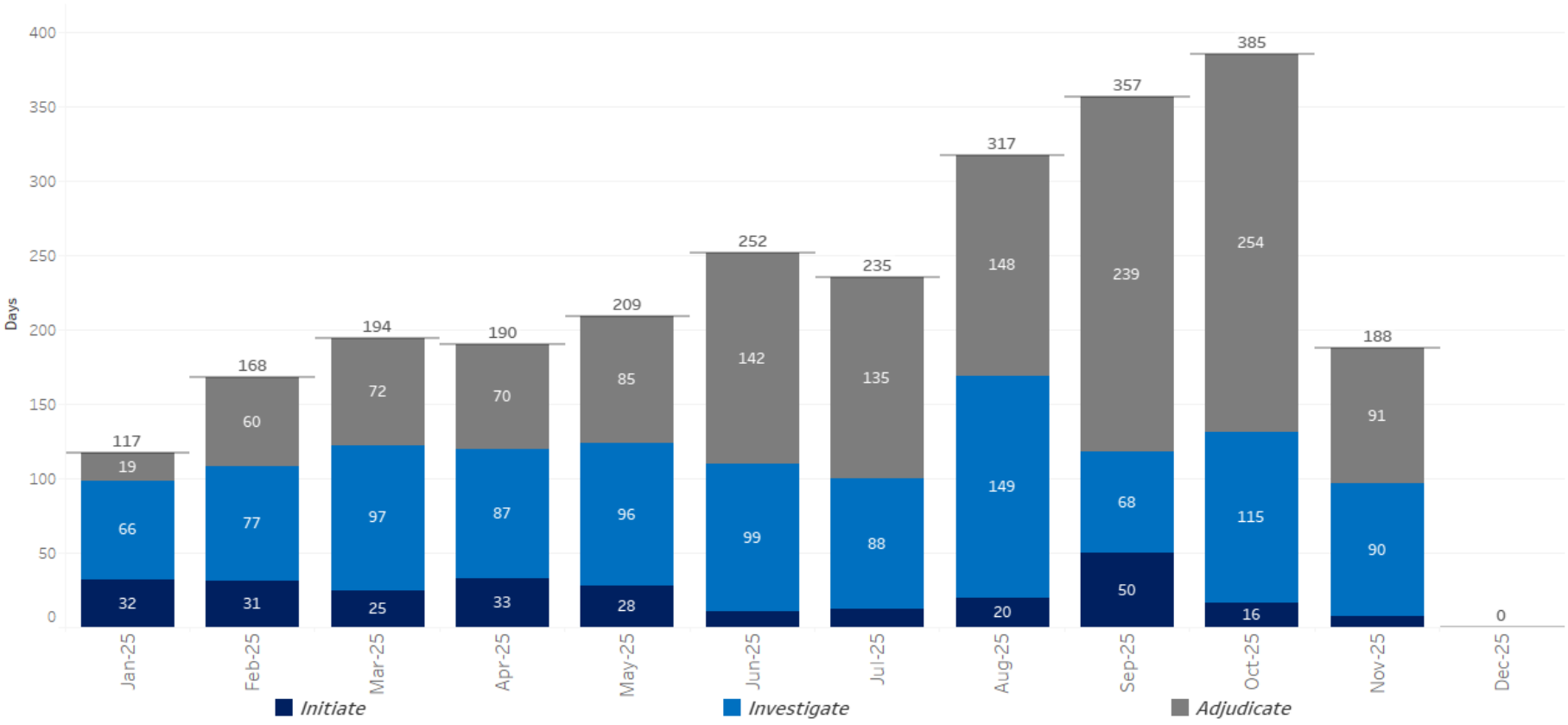

Number of Adjudications Reported

| Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 80 | 101 | 126 | 103 | 107 | 86 | 71 | 50 | 35 | 21 | 9 | 14 |

Data representative of DOE Contractor investigations

UNCLASSIFIED

# Monthly Timeliness for Fastest 90% of Secret Reinvestigation (T3R) Security Clearance Decisions




Number of Adjudications Reported

| Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 35 | 28 | 39 | 17 | 20 | 23 | 11 | 6 | 2 | 4 | 2 | 0 |

Data representative of DOE Contractor investigations

# WORKING GROUPS

## DCSA NSCO
## William Vaughn

ISOO
INFORMATION SECURITY OVERSIGHT OFFICE

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# WORKING GROUPS

## DCSA AVS
## Donna McLeod

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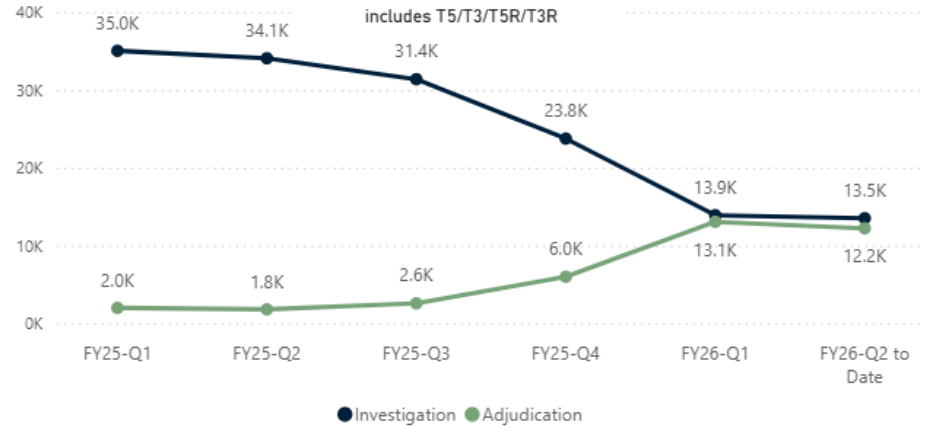
# DCSA INVENTORY & TIMELINESS | *Industry*

## DoW-Industry Pending (as of 21 February)




## DoW-Industry Pending by Case Type *(as of 21 February)*

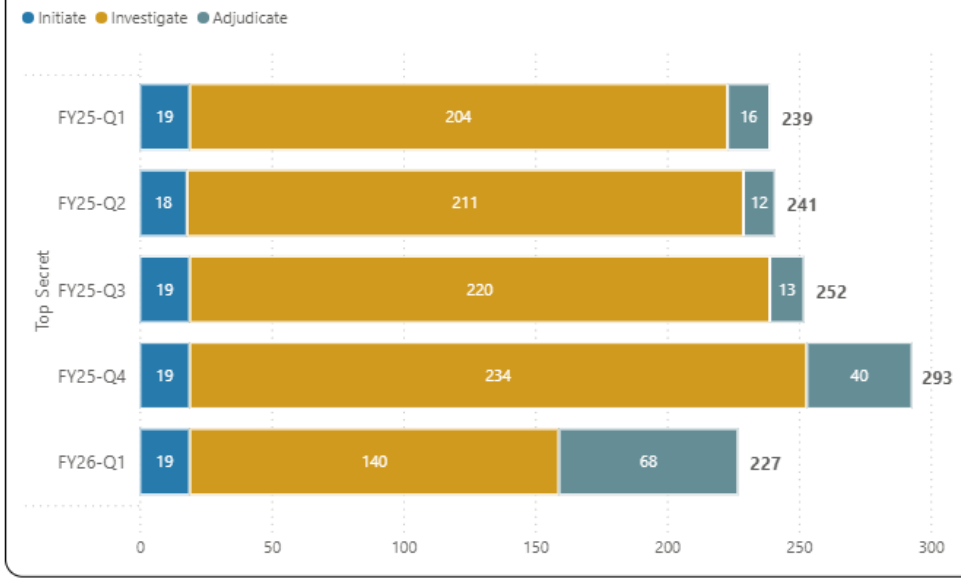
Investigation Inventory

| T5 | | T3 | |
|---|---|---|---|
| FY25 End | Current | FY25 End | Current |
| 12.3K | 4.9K | 11.5K | 8.6K |

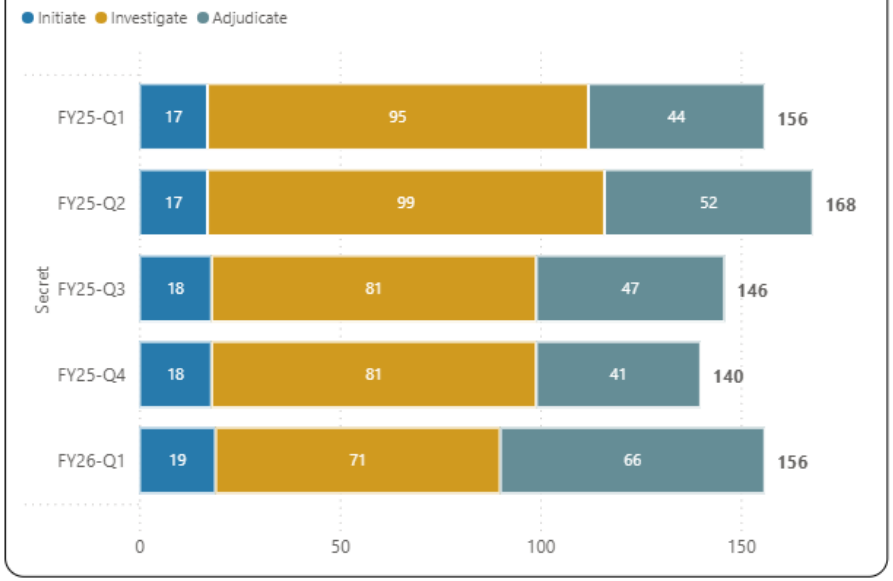
Adjudication Inventory

| T5 | | T3 | |
|---|---|---|---|
| FY25 End | Current | FY25 End | Current |
| 1.6K | 3.0K | 4.2K | 9.1K |

## Fastest 90% Timeliness - Initial Top Secret




## Fastest 90% Timeliness - Initial Secret




**Data as of: 21 February 2026**

# TOPIC BRIEFINGS

## DOHA
## Perry Russell-Hunter

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INFORMATION SECURITY OVERSIGHT OFFICE

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# CLOSING REMARKS

## ISOO
## Michael Thomas

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INFORMATION SECURITY OVERSIGHT OFFICE

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# BACK UP SLIDES

## Working Groups

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# WORKING GROUPS

- Clearance
  - Various items
  - Last mtg 1/21/2026
- NISP Information Systems Authorization (NISA)
  - Various items
  - Last mtg 1/14/2026
- Policy
  - Status of various Industrial Security policies
  - Last mtg 9/3/2025

# WORKING GROUPS

- Physical Security (PHYSEC)
  - Various items
  - Last mtg 1/22/2025

- FOCI (formerly called NID)
  - Discussed NDAA for FY 2019 Section 842, Removal of National Interest Determination (NID) Requirements for Certain Entities which stated a covered National Technology and Industrial Base (NTIB) entity operating under a special security agreement pursuant to the NISP shall not be required to obtain a NID as a condition for access to proscribed information beginning October 1, 2020
  - Last mtg 12/9/2020

# WORKING GROUPS

- NISP Systems
  - Discussed the systems associated with the NISP program at the various CSAs
  - Last mtg 9/10/2020

- Insider Threat
  - Discussed training and certification of security professionals, insider threat plans, Section 9403 of the NDAA for FY 2021 (federal policy on the sharing of information pertaining to contractor employees in the trusted workforce)
  - Last mtg 9/2/2020

# UPDATES

## DHS
## Rob McRae

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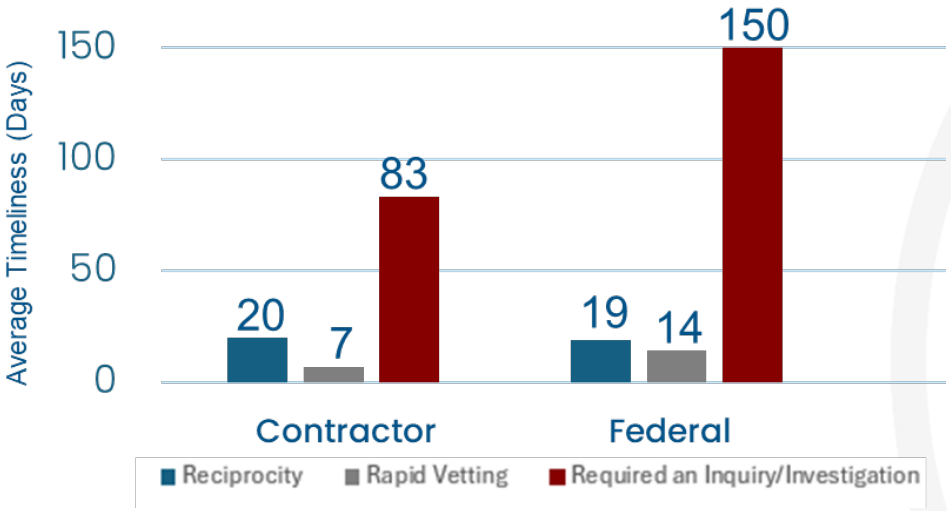
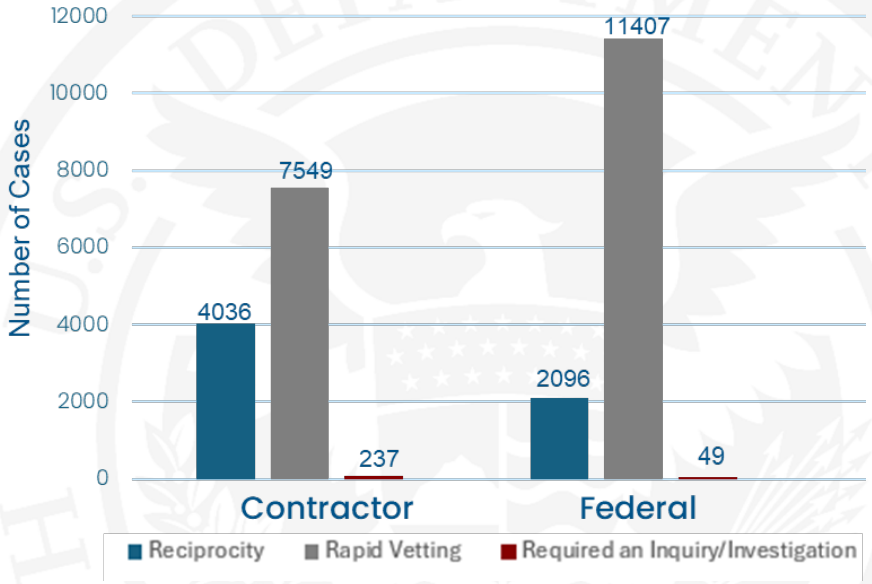
# DHS Timeliness

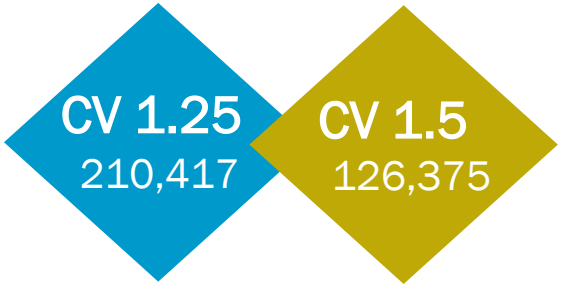
## DHS Timeliness for Entry on Duty Determinations



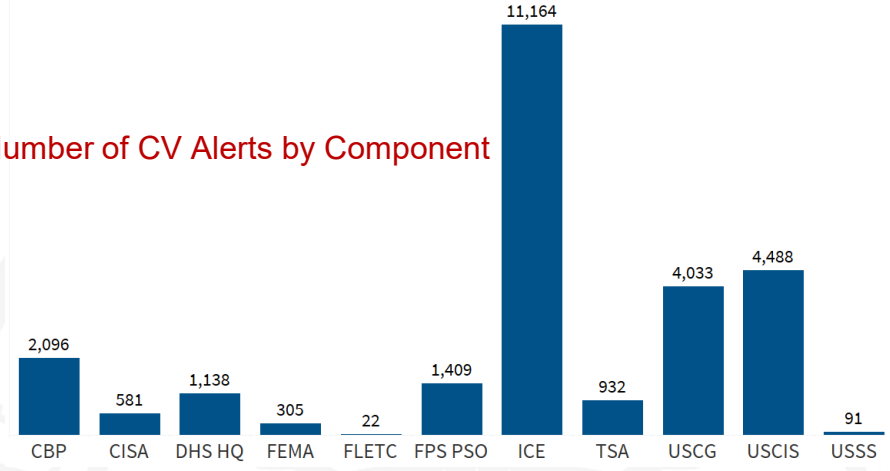



# DHS Continuous Vetting

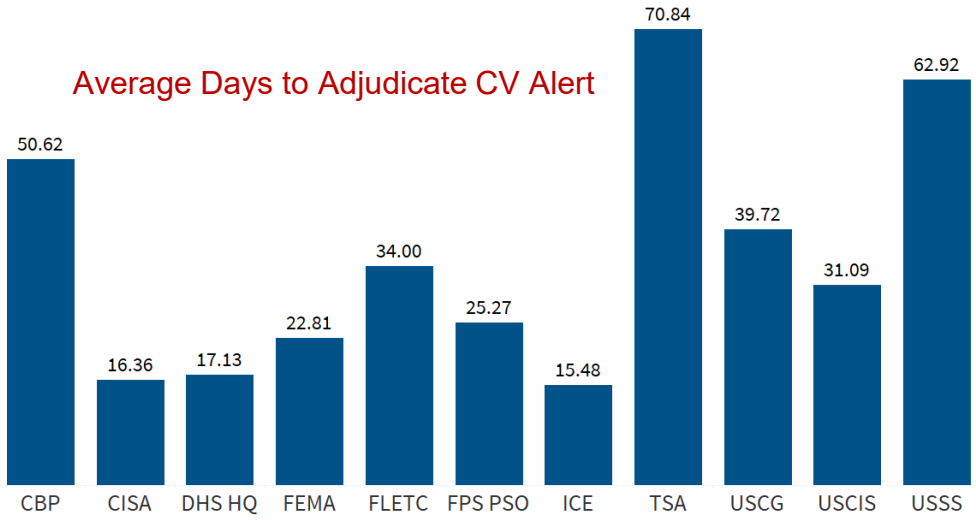
## CV Enrollment



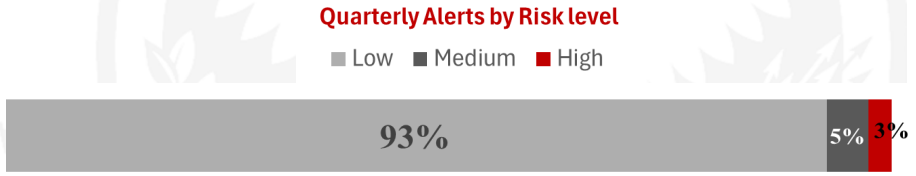

Number of CV Alerts by Component




Average Days to Adjudicate CV Alert




Quarterly Alerts by Risk level

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# WORKING GROUPS

## NRC
## Chris Heilig

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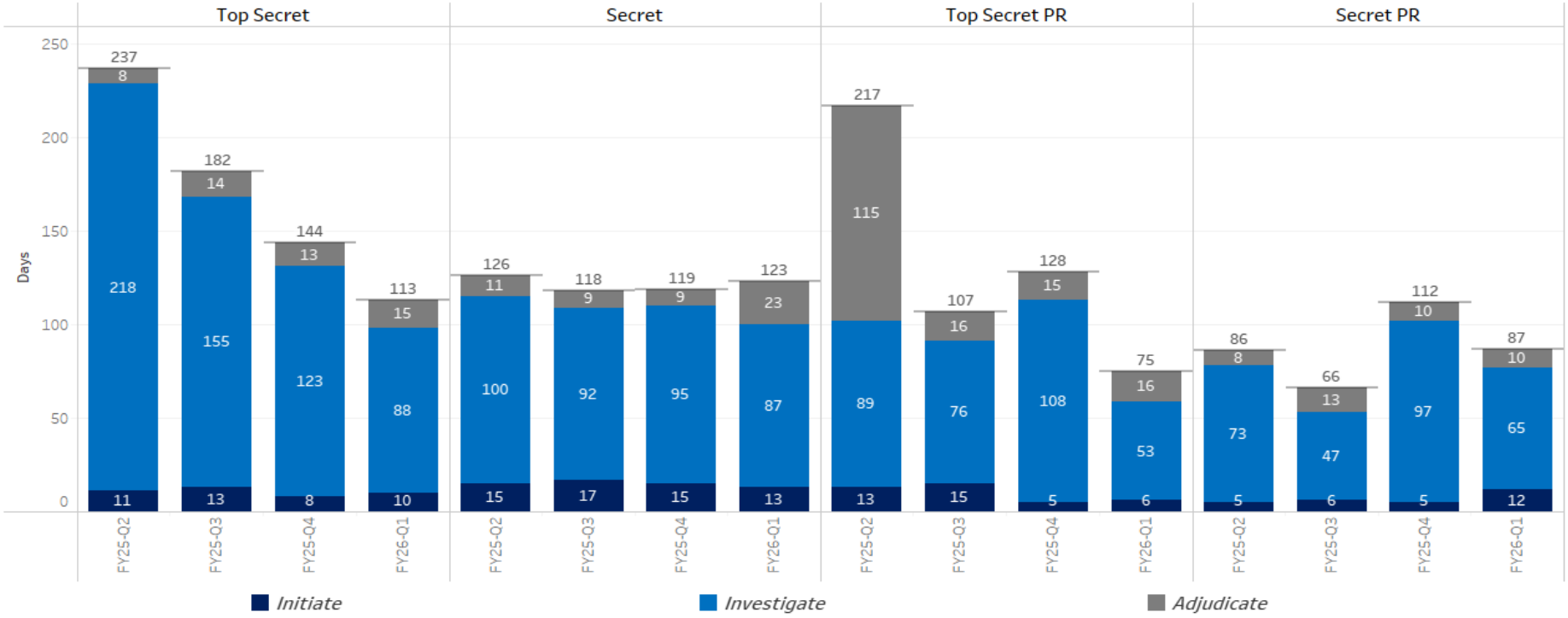
# Workload & Timeliness Performance Metrics

## Nuclear Regulatory Commission

DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY

# Quarterly NRC Timeliness Performance Metrics

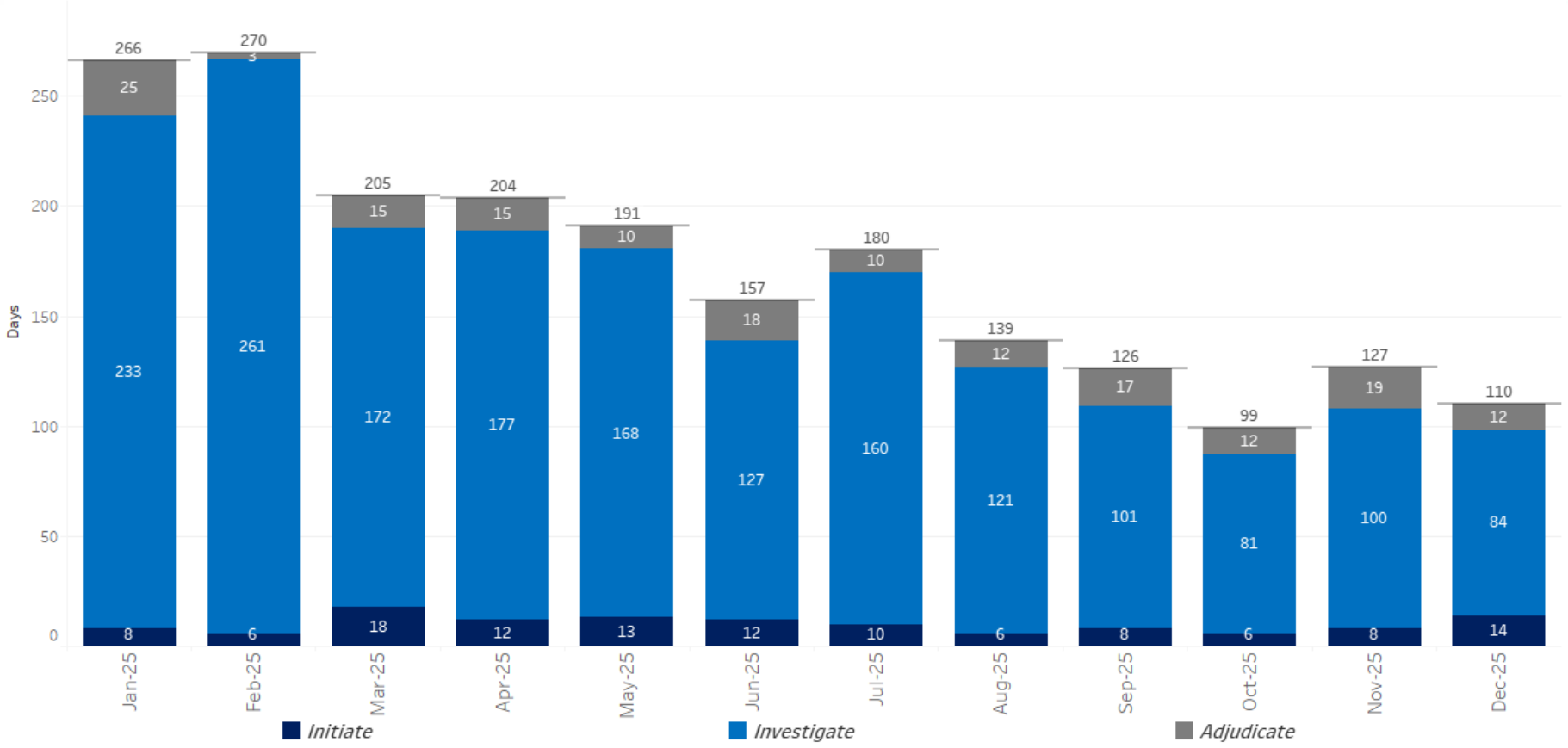
## Average Days for Fastest 90% of Reported Clearance Decisions Made




Total Adjudications Reported

| | Top Secret | Secret | Top Secret PR | Secret PR |
|---|---|---|---|---|
| FY25-Q2 | 32 | 93 | 3 | 2 |
| FY25-Q3 | 30 | 97 | 7 | 12 |
| FY25-Q4 | 58 | 82 | 17 | 7 |
| FY26-Q1 | 64 | 64 | 8 | 5 |

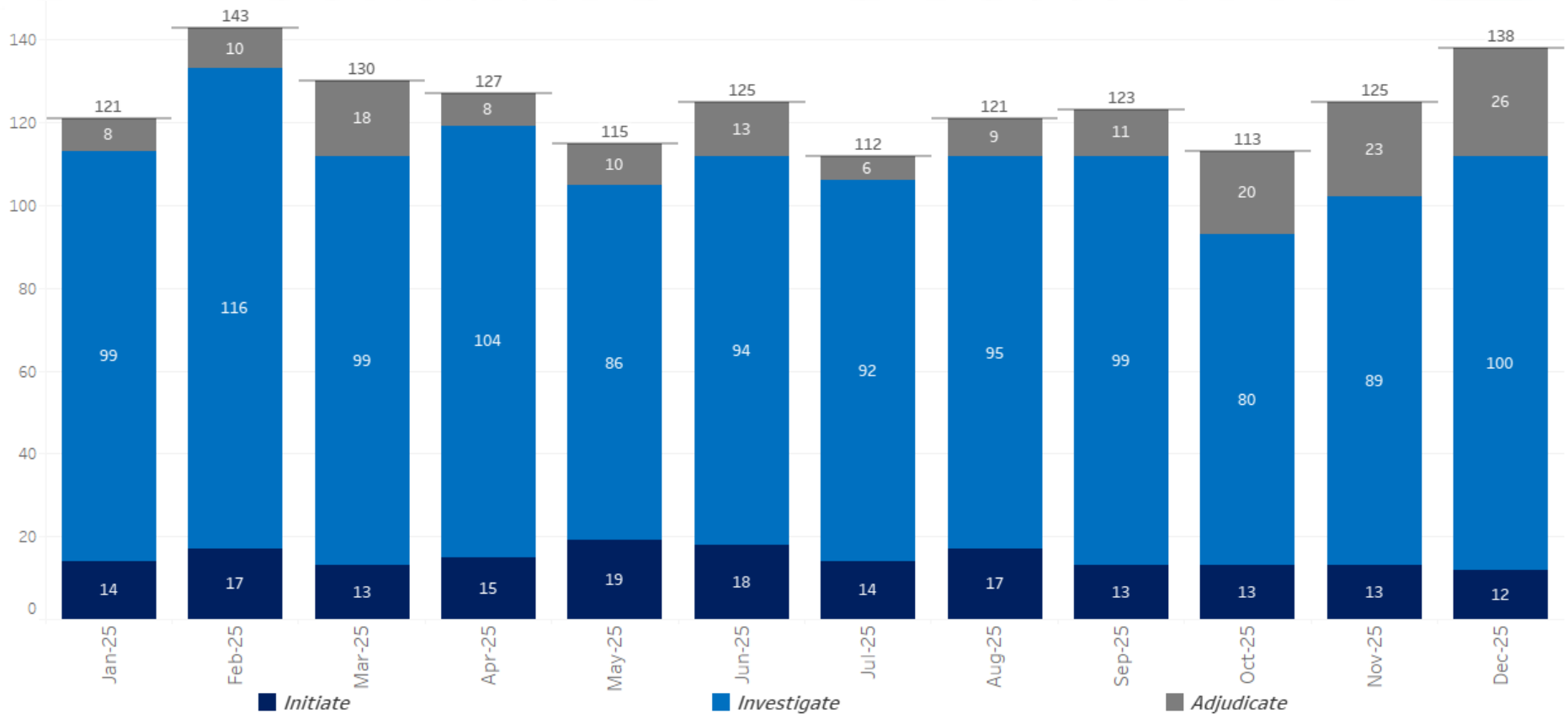
# Monthly Timeliness for Fastest 90% of Initial Top Secret (T5) Security Clearance Decisions




Number of Adjudications Reported

| Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 14 | 6 | 11 | 8 | 11 | 11 | 16 | 21 | 22 | 16 | 23 | 25 |

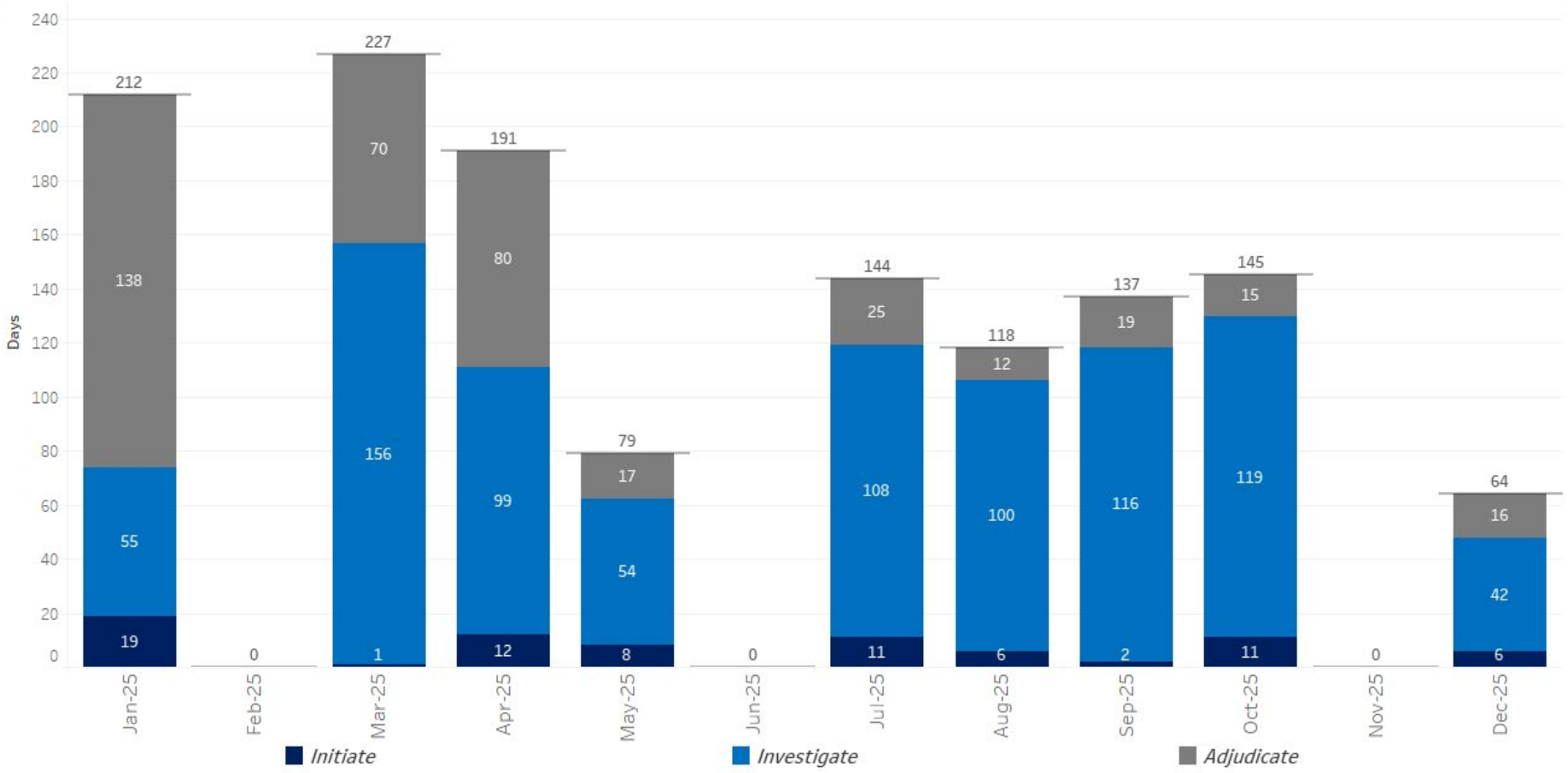
# Monthly Timeliness for Fastest 90% of Initial Secret (T3) Security Clearance Decisions




Number of Adjudications Reported

| Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 42 | 32 | 22 | 34 | 41 | 27 | 29 | 27 | 27 | 15 | 31 | 19 |

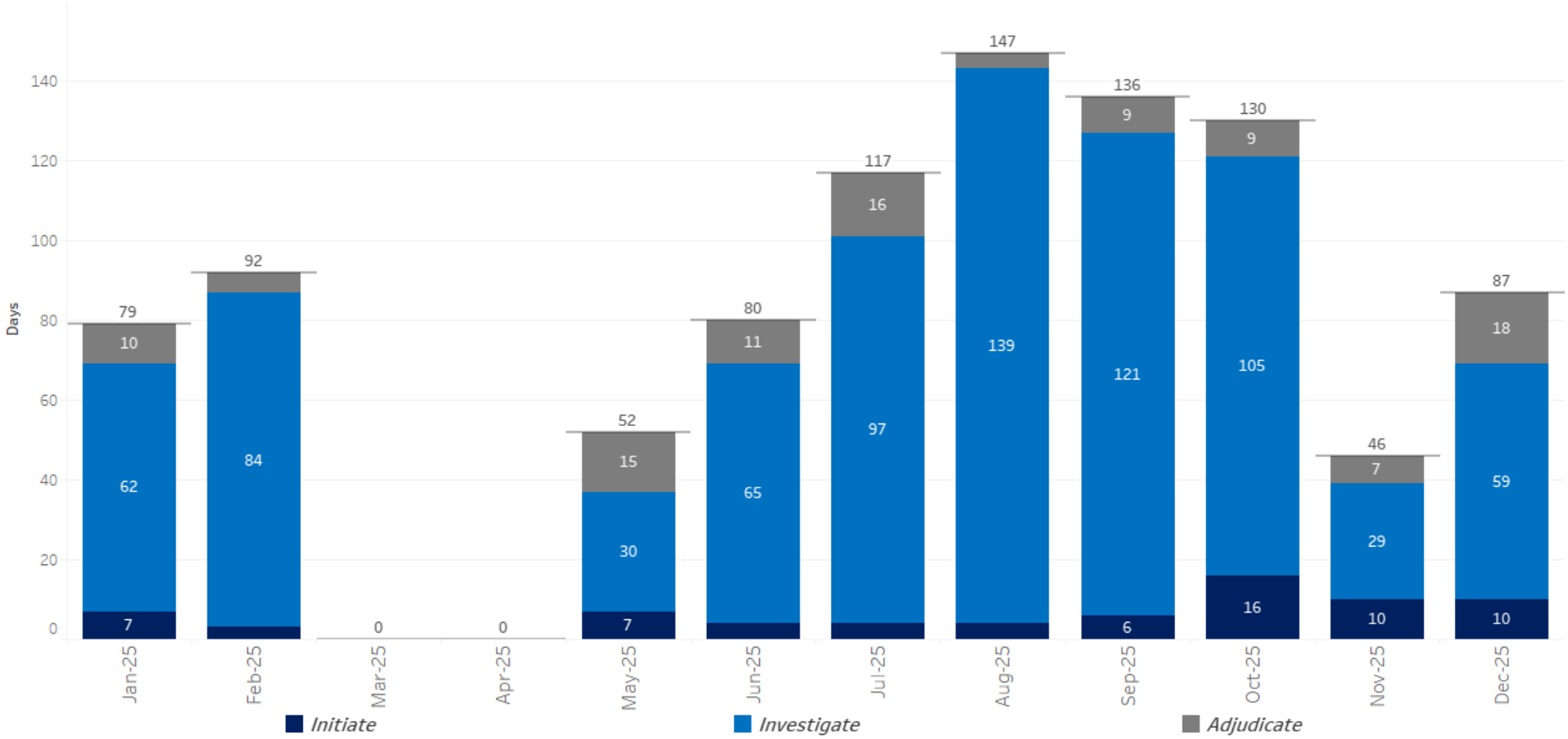
# Monthly Timeliness for Fastest 90% of Top Secret Reinvestigation (T5R) Security Clearance Decisions




Number of Adjudications Reported

| Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 2 | 0 | 1 | 2 | 4 | 0 | 6 | 7 | 4 | 1 | 0 | 7 |

# Monthly Timeliness for Fastest 90% of Secret Reinvestigation (T3R) Security Clearance Decisions




Number of Adjudications Reported

| Jan-25 | Feb-25 | Mar-25 | Apr-25 | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 1 | 0 | 0 | 6 | 6 | 2 | 3 | 2 | 2 | 2 | 1 |