

Mod 5 Job Aid: Initial/Annual Agreement Meeting Checklist

Signatory Company Name: Address: CAGE: Date:	DSS Representative Field Office
FOCI Mitigation Agreement: (SCA, SSA, Proxy, Voting Trust)	
Execution Date:	Expiration Date:
Outside Director (OD)/Proxy Holder (PH)/ Voting Trustee (VT)	Name and indicate Chairman of GSC and designated additional responsibilities (such as Approving Authority for Visits)
Confirm the number of ODs/PHs/VTs	1. 2. 3.
If less than three, is there a letter of justification from the Company and DSS approval letter?	Date of Approval
Inside directors (IDs)	
Confirm the number of IDs	1. 2.
Is the ID(s) formally excluded from access to classified information by resolution of the company's board?	
When applicable, does the number of ODs exceed the number of IDs?	
Government Security Committee (GSC)	
Was the GSC established?	Date established: GSC Chair: GSC Secretary: List the members:
Does the GSC meets quarterly?	
Include the minutes (check the attendees and the agenda)	
Any recommendations for the GSC meeting?	
Compensation Committee (if applicable)	
Has the Board established a compensation committee if applicable?	
List the members (at least one OD and one ID)	1. 2.

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Does the committee meet annually?	
Review the minutes?	
What decision did they make?	
Board Meetings	
Does the board meet annually?	
Review the minutes.	
Any issues?	
National Interest Determination (NID)	SSA only
Request an updated list of classified contracts with access to proscribed information.	
Any concerns?	
Financials	PA only
Has the format of the financial reports provided to their parent been approved by DSS?	
Has the facility deviated from the approved format?	
Has an independent auditor been appointed by the Proxy Holders?	
Visitation policy	
Are there established visitation procedures for visit notifications and approvals between the company/controlled entities, and the foreign parent and Affiliates?	
Are all the non-routine business visits pre-approved by the designated OD?	
How many non-routine business visits were approved in the last inspection cycle?	
How many were denied? Reason?	
Any concerns?	
Are all the routine business visits approved by the FSO?	
How many were denied? Reason?	
Are the approved routine business visits consistent with the definitions of "business visits" as defined by the agreement?	
Any concerns?	

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Do the submitted Visit Request Forms obtain enough detail sufficient to enable the ODS/PHs/FSOs to approve/deny the visit request?	
Have there been any social visits reported?	
Do these social contact reports have enough detail?	
Any concerns?	
Are there any Blanket visits, Long-term visits or other type visit requests that the GSC or DSS needs to approve?	
Does the GSC periodically review visit requests?	
Does the GSC maintain a chronological file of all documentation associated with meetings, visitations, and communication?	
(PA ONLY)	
Are visits between the Board and foreign shareholder being requested and approved in advance by DSS?	
Are VTCs requested and approved as visits?	
Are there any violations of the visitation policies and/or procedures?	
Have employees reported issues that have taken place as a result of visit?	
Electronic Communication Plan (ECP)	ECP Approval date:
Describe the components of the facility's Electronic Communication Plan (ECP). Does the ECP meet DSS template? Review Section 17.	
Emails:	
What are the company's procedures for reviewing emails between the Corporation and affiliates?	
Review emails for indications of influence or unauthorized disclosure of CUI/classified/export controlled information.	
Any concerns?	

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	Phone calls:	
	What are the company's procedures for reviewing phone communication between the Corporation and affiliates	
	Review phone logs for indications of influence or unauthorized disclosure of CUI/classified/export controlled information.	
	Any concern?	
	Faxes and other type devices for communication:	
	What are the company's procedures for reviewing other types of communication between the Corporation and affiliates?	
	Any concerns?	
	What is the company's policy for personal devices?	
	Technology Control Plan (TCP)	TCP Approval Date:
	Has the company appointed a Technology Control Officer (TCO)?	
	Is the TCO also an Empowered Official?	
	Describe his experience level?	
	What are the access control procedures (badges, escort)?	
	Has there been a release of export controlled or classified material to a parent or affiliate company? If yes, identify the license involved and particulars of the transfer?	
	Have there been any export control violations at the company over the past year? Voluntary disclosures? Who did the investigations?	
	Have there been any export control violations at the company over the past year?	
	Voluntary disclosures?	
	Who did the investigations?	
	Has the company had any export	

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licenses or agreements for export of controlled information?	
Have all employees signed TCP acknowledgments?	
Co-location	FLP Approval Date:
Is this facility co-located with a parent company or officers/employees of the parent excluded in the chain or affiliate company?	
Describe this situation and success of the separation.	
Is a Facilities Location Plan (FLP) submission required?	
Was co-location approved by DSS?	
Are visits between the cleared facility and co-located parent/affiliate/employee kept to a minimum?	
FOCI Briefing	
Has the FSO/GSC established initial and annual security education and training for the implementation of the FOCI mitigation agreement, Visitation Policy, TCP, ECP, FLP (if applicable), and AOP (if applicable), at the company and controlled entities?	
Review the certificates of completion for all employees.	
Verify employees' knowledge on FOCI.	
Was additional education provided?	
Is the security education sufficient?	
Affiliate companies:	
Does the facility have a listing of those companies that are above or outside the agreement?	
Are the employees aware of which companies are affiliates?	
Changes to the organization	
Have there been any changes to the corporation?	
Any changes to the Board or KMP?	
Any pending merger of acquisition?	

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Affiliated Operations Plan (AOP)	AOP Approval Date:
Is the company implementing unapproved affiliated operations?	
Assess company compliance with their approved AOP.	
If no AOP in place, check the following:	
Human Resources:	
Insurance:	
Legal:	
Marketing:	
Audit:	
Taxes:	
Financial Reports:	