SECURITY GUIDE TO NATO CONTROL POINTS

This document provides guidance regarding the security requirements of a NATO Control Point under the DCSA NATO Sub-Registry.

THE REGISTRY SYSTEM
A Central Registry has been established by each North Atlantic Treaty Organization (NATO) member nation. In the United States, the Central United States Registry (CUSR) establishes all U.S. Sub-Registries that account for and secure NATO.

DCSA NATO SUB-REGISTRY
The Defense Counterintelligence and Security Agency (DCSA) is the NATO Sub-Registry responsible for establishing cleared contractor facilities as NATO control points to ensure compliance and accountability of NATO classified information. The DCSA Sub-Registry is located at the DCSA Headquarters in Quantico, VA.

WHAT IS A NATO CONTROL POINT?
A NATO Control Point is a controlling office, subordinate to the Sub-Registry, responsible for receiving, recording, handling, and distributing NATO documents to personnel in the facility in which it serves.

If your facility enters into a contract, directly with a NATO Agency, as the prime, and are required to safeguard NATO SECRET and/or above, you will need to be established as a NATO Control Point.

ESTABLISHING A NATO CONTROL POINT
In accordance with NATO policy, and in compliance with NATO contractual requirements, facilities performing on NATO contracts must be established as NATO Control Points in order to receive NATO SECRET information and above. Facilities are required to email the DCSA Sub-Registry at dcsa.stanag@mail.mil and notify their Industrial Security Representative (IS Rep) when they are awarded a NATO contract. The facility must upload the contract in the National Industrial Security System (NISS) https://www.dcsa.mil/is/niss/. The DCSA Sub-Registry will schedule a telephonic interview with your facility to determine if you will need to establish a Control Point.

NATO CONTROL POINT OFFICER
A NATO Control Point Officer, and at least one alternate control officer, shall be appointed to manage the NATO security program for the Control Point. NATO Control Point Officers must coordinate with their facility elements to:

- Determine which classification levels of NATO information may be required to support the NATO-related missions.
- Determine a need-to-know for NATO access. These determinations will govern who will be listed on the facility’s NATO access roster and at which level of classification.

Some key responsibilities of the NATO Control Point Officer:

- Notify the Sub-Registry upon contract extensions, terminations, or awards.
- Maintain a current DAAG Form 29-1 signatory list.
- Maintain records for personnel accessing NATO classified information.
- Maintain log of accountable NATO classified information.
- Periodically spot check NATO classified information.
- Report loss, compromise, or suspected compromise of NATO classified information.
• Prepare document receipt and destruction certificate for each piece of NATO classified information maintained, reproduced, or when accountability is transferred.
• Confirm reproduction of NATO classified information is essential to mission accomplishment.
• Change security container combinations holding NATO classified information.
• Conduct annual self-inspection.
• Maintain emergency destruction plan.
• Ensure NATO classified information is transmitted through registry channels.
• Conduct annual review of NATO holdings.
• Submit annual inventory to Sub-Registry.
• Ensure all required documents are uploaded into NISS.

INSPECTIONS
The Sub-Registry will conduct an onsite review of the NATO Control Point program on a 24 month cycle to ensure compliance with the established NATO classified material control and accountability procedures outlined in the NATO control point inspection checklist.

NATO SECURITY REQUIREMENTS UNDER DCSA SUB-REGISTRY
Security standards and procedures for handling NATO classified information are outlined below:

ACCOUNTABILITY
• Cosmic Top Secret, NATO Secret and ATOMAL: Receipts and logs shall be maintained on the receipt, disposition, destruction, and dispatch.
• All inventory is required to be spot-checked on a routine basis.
• Annual inventories and destruction certificates must be submitted by the end of the calendar year to the Sub-Registry at: dcsa.stanag@mail.mil.
• NATO classified information shall be returned upon completion of the contract unless written permission is obtained.
• NATO Secret destruction certificates are required to be maintained for five years. All Cosmic Top Secret and ATOMAL must be returned to the Central U.S. Registry for destruction at: usarmy.pentagon.hqda-ita.mbx.cusr-central-us-registry@mail.mil.

SAFEGUARDING
• NATO classified information must be safeguarded and stored in General Services Administration (GSA) approved vaults or containers authorized for storage of U.S. classified information of equal security classification.
• NATO classified information may be stored in the same containers as non-NATO material provided they are separated by a file divider. No indication as to the subject matter shall appear on the outside of the container.
• Everyone with authorized access must be briefed to the level and type of NATO information that is stored in the container. Combinations must be changed every 12 months, upon departure of an individual with access to the combination, or if the combination has been or is suspected of having been compromised.

NATO ACCESS REQUIREMENTS
• Security Access Roster with everyone who is briefed must be maintained.
• Access to NATO classified information is granted if:
  o Individual has a final U.S. security clearance at the equivalent level
  o Individual has a need-to-know
Individual has received a NATO Indoctrination briefing and signed (digital or wet) a briefing certificate

- NATO Awareness Briefing required annually; may be incorporated into other security awareness training.
- When access to NATO classified information is no longer required:
  - Employee shall sign a certificate stating that they have been debriefed and acknowledge their responsibility for safeguarding NATO information has ended
  - NATO SECRET certificates maintained for two years
  - Cosmic Top Secret and all ATOMAL certificates maintained for three years

NATO Access Briefing Certificate is located on the CDSE website:
https://www.cdse.edu/Portals/124/Documents/jobaida/industrial/NATO_Brief.pdf

LABELING AND MARKING

All equipment that stores, processes, or displays NATO classified information must be labeled according to the highest NATO classification involved.

- NATO Classifications:
  - COSMIC TOP SECRET ATOMAL
  - NATO SECRET ATOMAL
  - NATO CONFIDENTIAL ATOMAL
  - COSMIC TOP SECRET
  - NATO SECRET
  - NATO CONFIDENTIAL

When marking NATO classified material, the highest level of NATO information involved must be displayed on the outside. The NATO classification level must be annotated on the top and bottom of all material, and it must contain portion markings. The statement “THIS DOCUMENT CONTAINS NATO CLASSIFIED INFORMATION” will be affixed to the front cover, or first page if there is no cover. NATO classified information is exempt from downgrading or declassifying without the prior consent of NATO.

For additional information on the labeling and marking of NATO classified information, reference the 32 Code of Federal Regulations (CFR) 117.19(g)(10).

DISESTABLISHMENT PROCESS

NATO Control Point Officers must notify the Sub-Registry upon contract termination or when there is no longer a need to safeguard NATO Secret information and above. Destruction certificates and accountability receipts are required to be submitted at the time of notification. The Sub-Registry will formally provide a disestablishment letter upon receipt of all requirements.