# CHANGED CONDITIONS AND FACILITY PROFILE UPDATES

## FOR NAESOC FACILITIES

DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY

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## **DCSA Facility Clearance Lifecycle**



GOVERNMENT CONTRACTING ACTIVITY OR CLEARED CONTRACTOR SPONSORS OR CONTRACTOR CHANGED CONDITION

### Continuous Monitoring

- Contractor submitted changes or information
  - Review news and reporting
    - Automated data feeds
      - QA performed

### Oversight

- Conduct field/HQ oversight & security reviews
- Provide continuous engagement, support, & outreach

### ADJUDICATE

### Implement Risk Treatment

- Execute interim measures, if necessary
- Negotiate terms with contractor, as required
- Execute governance and operational mitigations
- Ensure entity eligibility requirements are met

Stages Review & Triage Analysis Determine Risk Treatment Implement Risk Treatment Oversight CM

### **Review & Triage**

- Review sponsorship for legitimate need to access classified
  - Review contractor submitted package for completeness
    - Initial identification of risk indicators w/referrals
      - Initiate key management clearances necessary

### Analysis

- Assess risk indicators for business and security-related vulnerabilities
- Assess risk indicators for FIE threats

#### Determine Risk Treatment

- Review relevant assessments
- Develop Risk Management Strategy



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## Any <u>change</u> to the baseline established at the issuance of the entity eligibility determination/facility clearance.

## **Changed Conditions in the NISPOM**



**32 CFR 117.8(c)(7) Changed conditions affecting the contractor's eligibility for access to classified information.** Contractors are required to report certain events that affect the status of the entity eligibility determination (e.g., FCL), affect the status of an employee's PCL, may indicate an employee poses an insider threat, affect the proper safeguarding of classified information, or indicate classified information has been lost or compromised, including:

- (i) Change of ownership or control of the contractor, including stock transfers that affect control of the entity.
- (ii) Change of operating name or address of the entity or any of its locations determined eligible for access to classified information.
- (iii) Any change to the information previously submitted for KMP including, as appropriate, the names of the individuals the contractor is replacing. A new complete KMP listing need be submitted only at the discretion of the contractor or when requested by the CSA. The contractor will provide a statement indicating:
  - (A) Whether the new KMP are cleared for access to classified information, and if cleared, to what level they are cleared and when they were cleared, their dates and places of birth, social security numbers, and citizenship.
  - (B) Whether they have been excluded from access to classified information in accordance with § 117.7(b)(5)(ii).
  - (C) Whether they have been temporarily excluded from access to classified information pending the determination of eligibility for access to classified information in accordance with § 117.9(g).
- (iv) Any action to terminate business or operations for any reason, imminent adjudication or reorganization in bankruptcy, or any change that might affect the validity of the contractor's eligibility for access to classified information.
- (v) Any material change concerning the information previously reported concerning foreign ownership, control, or influence (FOCI). This report will be made by the submission of an updated SF 328, "Certificate Pertaining to Foreign Interests," in accordance with CSA-provided guidance. When submitting this information, it is not necessary to repeat answers that have not changed. When entering into discussion, consultations, or agreements that may reasonably lead to effective ownership or control by a foreign interest, the contractor will report the details to the CSA in writing. If the contractor has received a Schedule 13D from the investor, the contractor will forward a copy with the report.

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## **Changed Conditions NISPOM Breakout**

Ownership	
Control	
Stock Transfers	
Operating Name	
Address	
Key Management Personnel	
Termination	
Bankruptcy	
Foreign Ownership, Control, or Influence (FOCI)	

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## **Foundational Documents**

- Articles of Organization
- Certificate of Formation
- Certificate of Incorporation
- Certificate of Limited Partnership
- Legal Organization Chart
- Stock Ledger
- Ownership or Control Worksheet
- Most Recent SEC Filings/SEC Schedule 13D/13G
- Member Interest List
- Shareholder Agreement
- By-Laws



- Operating Agreement
- Joint Venture Agreement
- Partnership Agreement
- Charter
- Meeting Minutes
- Exclusion Resolutions (Parent, Subsidiary, Officer/Director/Member)
- SF 328 (with supporting information)
- KMP list
- DD Form 441/DD 441-1
- FSO/ITPSO Appointment Letters

## **Changed Conditions in the NAESOC**



NAESOC companies are centrally managed (no ISR assigned) and have access to NAESOC Helpdesk.

Changed Condition Evaluation is based on documents and records available in NISS.

It is normal for packages to be returned for clarification and additional documents.

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## What is a Facility Profile Update?

• Facility Overview

 $_{\odot}$  Basic company information and contact data

• Business Information

 $_{\odot}$  Type of work your company does and active contract

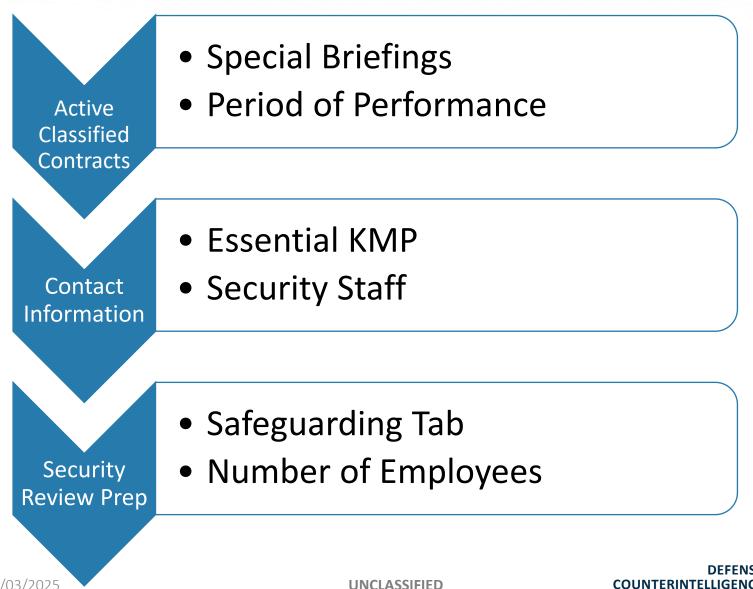
• FOCI & International

• Foreign visits, foreign travel, and exports

• Safeguarding

 $_{\odot}$  Employee counts and classified holdings

## **Facility Profile Updates for NAESOC Facilities**



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## Details

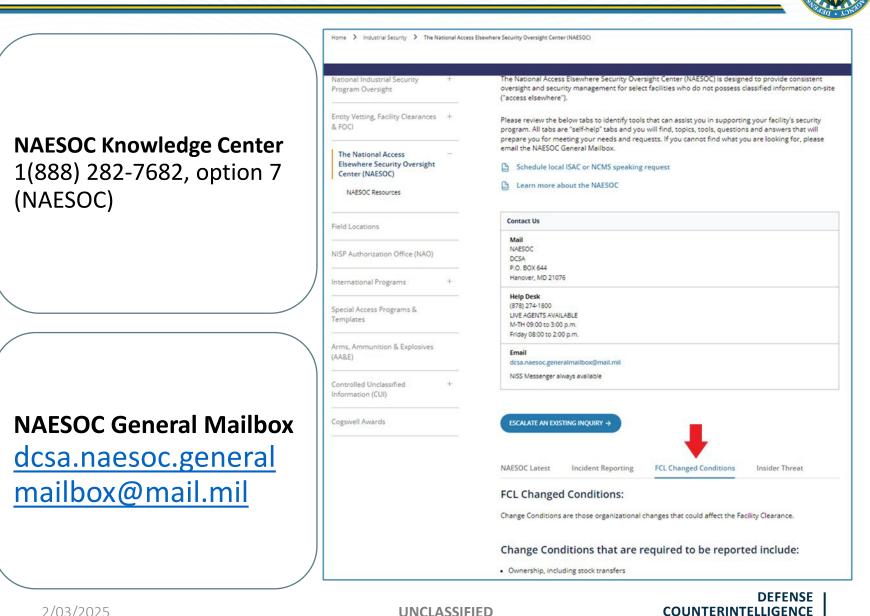


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PSI Survey		July 2024 - VOI Newsletter (△ 1)	
Initial FCL Packa	age	🔟 May 2024 - VOI Newsletter (🛆 3) 🔟 DCSA Industrial Security Field Office Loca	tions (Apr. 24, 2024)
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<ul> <li>Messaging</li> <li>Facility Clearant</li> </ul>	ce Verification	Image: Personnel Security Investigation (PSI) Data Collection Job Aid       Image: March 2024 - VOI Newsletter       (2) 5)         (2024)       (2) 1)       Image: February 2024 - VOI Newsletter       (2) 1)	
	pection Certification	📕 January 2024 - VOI Newsletter ( 🖄 3 ) 🚺 November 2023 - VOI Newsletter ( 🖄 5 )	
Knowledge Base		🔟 October 2023 - VOI Newsletter ( 🙆 2 )	
<ul> <li>System Notices</li> </ul>		🔟 September 11 2023 - VOI Newsletter (SPECIAL BULLETIN) ( 🛆 27 ) 🔟 Contractor and Ownership Control ( 🛆 2	)
• Troubleshooting	g	🔟 August 2023 - VOI Newsletter (🛆 0) 🔟 Annual Industry Checkup Tool (🛆 17)	
Facility Profile U	Jpdate Request	🔟 July 2023 - VOI Newsletter ( 🛆 4 )	
<ul> <li>Requesting NIS</li> </ul>	S Account	🔟 May 2023 - VOI Newsletter ( 👌 4) 🔟 Viewing Mass Notifications ( 👌 6)	
COVID-19 Guida	ince	April 2023 - VOI Newsletter (2) 21) March 2023 - VOI Newsletter (2) 4)	
O Voice of Industr	y Newsletters	📴 Foreign Travel Brief - March 2023 (🛆 80)	
DCSA Cyber Sec	urity		
<ul> <li>Mass Notification</li> </ul>	ons		
Field Office Loca	ations		

## **NAESOC** Website and Contact Information



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