

OD/PH Module 5 - Sample Review Questions For a Cleared Subsidiary under a FOCI Signatory Company

Questions	Answers
1. Is the facility able to provide legal documentation confirming the current chain of ownership above their facility?	
a. Determine who legally owns and controls the facility and any discrepancies.	
b. Determine the line of business/business unit at the branch/division facility.	
2. Has information been flowed to the facility on corporate FOCI policies?	
3. Determine if personnel from this facility interact with the Foreign Parent/Affiliates.	
a. Document the nature of the interaction.	
b. List the personnel and the dates.	
4. If the facility is under an SSA, are they aware they cannot have access to proscribed information unless there is a NID in place from the customer?	
a. Does the facility perform on any contracts that involve access to proscribed information?	
b. Is the facility bidding on any proscribed contracts?	
c. Any visits where access to proscribed is warranted?	
d. Report the existence of the new contracts or issues surrounding access to proscribed information.	
5. Technology Control	
a. Does the facility have a Technology Control Plan (TCP) that is specific to that facility?	
b. Include any specific access requirements that DCSA should be aware of in comments.	
c. Has the site specific TCP been approved by DCSA?	

OD/PH Module 5 - Sample Review Questions For a Cleared Subsidiary under a FOCI Signatory Company

d. Have employees, consultants, and long-term visitors been briefed on the TCP (written acknowledgement)?	
e. Are there classified or export controlled technologies at this facility? How is it protected?	
6. Electronic Communications	
a. Does the facility have an approved Electronic Communications Plan (ECP) that is specific to that facility? or Does the facility have a site specific addendum to the Company ECP?	
b. Include in comments who owns the facility's email server and who monitors email for security	
c. How does the facility monitor interactions with the Foreign Parent/Affiliates via e-mail, phone, and fax?	
d. Who maintains and/or reviews these records?	
e. Determine if there is any IT connectivity to the Foreign Parent/Affiliates.	
f. Have the facility provide an IT network diagram.	
g. What are the facility's procedures for granting visitors access to the IT network?	
h. Do they have VTC capabilities on site – are they treating these as visits or communications? (VTC interactions are treated as visits unless otherwise stated in ECP.)	
i. Ensure that the facility is treating Teleconferences as visits (unless otherwise stated in ECP).	
j. Has the Foreign Parent required the facility to use foreign software?	
7. Shared Administrative Services (Affiliated Operations)	
a. Does this facility have any shared administrative services with the Foreign Parent/Affiliates?	

OD/PH Module 5 - Sample Review Questions For a Cleared Subsidiary under a FOCI Signatory Company

b. If so, please describe these services in comments and get documentation if possible.	
c. Assess the facility’s interaction with the Foreign Parent/Affiliates in regards to these shared administrative services.	
d. Is there an approved Affiliated Operations Plan (AOP) in place for these shared administrative services?	
8. Co-location	
a. Is this facility co-located with the Foreign Parent/Affiliate?	
b. If yes, have the facility show how they are separated. Is there an approved Facility Location Plan (FLP) in place?	
c. Are there any personnel from the Foreign Parent/Affiliate physically working or assigned to this facility?	
9. Foreign Interest Information	
a. Has the facility reported any FOCI-related information to the home office (FOCI Signatory)?	
b. Has the facility reported all of their foreign agreements, affiliations, understandings, relationships to the FOCI Signatory for the consolidated SF 328 being submitted by the FOCI Signatory?	
c. The facility should show how they have reported this information.	
10. Visitation Procedures	
a. Does the facility have visitation procedures with respect to the Foreign Parent/Affiliate personnel?	
b. Has the facility developed site specific Visitor Control Procedures? Where are these procedures documented?	
c. Visits – Have there been any visits between facility personnel and the Foreign Parent/Affiliates?	

OD/PH Module 5 - Sample Review Questions For a Cleared Subsidiary under a FOCI Signatory Company

d. If there have been any visits, how have these visits been requested/approved?	
e. Does the facility have all records associated with these visits on site and available for review?	
f. Is the detail contained in the visit records adequate?	
g. Is the detail in the interaction request sufficient for the reviewing official to make an informed decision as to whether or not to approve the interaction?	
h. Does the facility have a solid understanding of what can be approved?	
i. Have there been any unplanned contact reports? How have these been reported / documented?	
j. Is the facility able to determine the number of visits that have been requested, approved, disapproved in the past review cycle or since the FOCI instrument was implemented?	
k. Have there been any violations of the FOCI agreement?	
l. If so, how have these violations been reported? Unauthorized transfers of technology? Undue influence by the Foreign Parent/Affiliates – requests of information not authorized?	
m. Where did the facility report these incidences? If there were no issues, do they know where to report?	
n. Have there been any suspicious contact reports?	
11. Security Education	
a. Has the facility provided security education on the FOCI mitigating instrument in place to include site specific TCP/ECP/ FOCI visitation procedures?	
b. Interview employees to determine if the security	

OD/PH Module 5 - Sample Review Questions For a Cleared Subsidiary under a FOCI Signatory Company

education being provided is adequate.	
c. What security education has been provided by Corporate Security at the FOCI Signatory?	
d. Does the facility know who the Inside Director(s) is (SCA & SSA)?	
e. Do they have a list of Foreign Parent/Affiliate companies?	
f. Do the FSO and other facility personnel have any FOCI-related concerns?	
g. Have the Outside Directors/Proxy Holders ever visited the facility to ensure compliance with the FOCI agreement?	
12. Interviews	
a. FSO	
b. Technology Control Officer (TCO)	
c. Senior Management Official	
d. IT Network Administrator	