

Mod 5 Job Aid: Sample Inspection Questions For Cleared Subsidiary under 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 entity and any discrepancies.	
b. Determine the line of business/business unit that the branch/division office is part of.	
2. Has information been flowed to the facility on corporate FOCI policies?	
3. Determine if personnel from this facility interact with the foreign parent or affiliates.	
a. Document the nature of the interaction.	
b. List the personnel and the dates.	
4. If the company 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 that is specific to that facility?	
b. Include any specific access requirements that DSS should be aware of in comments.	
c. Has the site specific TCP been approved by DSS?	
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 site? How is it protected?	

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6. Electronic Communications	
a. Does the facility have an approved Electronic Communications Plan that is specific to that facility?	
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 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 must be treated as visits.	
i. Ensure that the facility is treating Teleconferences as visits.	
j. Has the foreign parent company required the facility to use of foreign software?	
7. Shared Administrative Services	
a. Does this facility have any shared administrative services with the foreign parent or its affiliates?	
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. Ensure that these shared services were approved by DSS.	
8. Co-location or Facility Location Plan (FLP)	
a. Is this facility co-located with the foreign parent or any affiliate?	

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b. If yes, please explain and ask the company to show how they are separated if applicable (co-location plan) and has DSS approved this co-location	
c. Are there any personnel from the foreign parent/affiliate companies physically working at or assigned to this location?	
9. Foreign Interest Information	
a. Has the facility reported any FOCI-related information up to Corporate Security at the HOF?	
b. Has the company reported all of their foreign agreements, affiliations, understandings, relationships up the chain for the consolidated SF 328 being submitted by the parent company?	
c. The company 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 company 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?	
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. The detail contained in the interaction request must be 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	

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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 inspection cycle or since the FOCI instrument was implemented?	
k. Have there been any violations of the FOCI agreement?	
l. How have these violations been reported? Unauthorized transfers of technology? Undue influence by the foreign parent/affiliates – requests of information not authorized?	
m. Who have they reported these to? If they did not have any issues do they know who would they report them to?	
n. Have there been any suspicious contact reports?	
11. Security Education	
a. Has the specific site 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 education being provided is adequate.	
c. What security education has Corporate Security provided?	
d. Does the company know who the Inside Directors are?	
e. Do they have a list of 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	