

# National Industrial Security Program Policy Advisory Committee (NISPPAC) Meeting Report

## Wednesday, November 13, 2024 (10am-1pm EST) National Archives and Records Administration (NARA) Information Security Oversight Office (ISOO) *Meeting held virtually*

# Agenda

### Welcome, Introductions, and Administrative Matters

# **Reports and Updates**

- Industry Update
- Department of Defense (DoD) Update (Executive Agent)
- Defense Counterintelligence and Security Agency (DCSA) Update
- Office of the Director of National Intelligence (ODNI) Update (Security Executive Agent)
- Department of Homeland Security (DHS) Update
- Department of Energy (DOE) Update
- Nuclear Regulatory Commission (NRC) Update
- Central Intelligence Agency (CIA) Update
- Underwriters Laboratories (UL) Briefing
- Working Group (WG) Update
  - o DOE
  - o DCSA NISP Cybersecurity Office (NCSO)
  - o DCSA Adjudication and Vetting Services (AVS)
- Defense Office of Hearings and Appeals (DOHA) Update

### General Discussion, Remarks and Adjournment

### Minutes for the 73rd Meeting of the National Industrial Security Program Policy Advisory Committee (NISPPAC) - November 13, 2024.

The meeting was called to order at 10:00 EST

#### **General Remarks/Updates**

• Heather Harris Pagán, NISPPAC Designated Federal Officer (DFO), National Archives and Records Administration (NARA), delivered the update.

Michael Thomas, NARA, was introduced as the new Director of the Information Security Oversight Office (ISOO) and Jennifer May, NARA, was introduced as the new Associate Director of ISOO.

Allyson Renzella left the Department of Defense (DOD) for the Defense Counterintelligence and Security Agency (DCSA).

• Michael England replaced Dennis Brady as the primary member from the Nuclear Regulatory Committee (NRC).

Winston Beauchamp replaced Jennifer Orozco as the primary member from the Department of the Air Force.

Scott Cronin replaced Derek Broussard as the alternate member from DCSA.

Lisa Reedy replaced LaToya Coleman as the NISPPAC industry coordinator.

#### **Industry Update**

- Isaiah "Ike" Rivers, NISPPAC Industry Spokesperson, delivered the update.
- Industry requested the resumption of face-to-face NISPPAC meetings.
- Industry NISPPAC elections occurred in September. LaToya Coleman, ManTech, and Charlie Sowell, SE&M Solutions, are the newest Industry NISPPAC Representatives, replacing Tracy Durkin from ManTech and Derek Jones from the Massachusetts Institute of Technology (MIT).
- Jim Kennedy, Boeing, is the new Memorandum of Understanding (MOU) member representing the National Defense Industrial Association (NDIA) and Mary Edington, Pearson Consultants, is the new MOU representative from the Intelligence and National Security Alliance (INSA). Jim and Mary replace Quinton Wilkes and Kathy Pearson.

#### **Comments on Industry Update**

• Kathy Andrews, Northrup Grumman, Chair of the NISPPAC Industry Physical Security Working Group, highlighted the lack of a government-wide policy for implementation of

Intelligence Community Directive (ICD) 705/TEMPEST. Kathy also noted concern about the government's ability to staff experts to implement the guidance, specifically for Certified TEMPEST Technical Authority (CTTA) positions.

- Kathy Andrews, Northrup Grumman, shared the proposed Defense Industrial Base (DIB) Classified Area Transition Strategy.
- Jane Dinkel, Lockheed Martin, expressed industry concerns regarding updates to Standard Form (SF) 328 and Section 847.
- Ike Rivers asked for updates from DOD on the draft of the Special Access Program (SAP) manual and the implementation of Controlled Unclassified Information (CUI) Cybersecurity Maturity Model Certification (CMMC).
  - DOD stated that the SAP Manual is out for a second round of coordination and is a priority of DOD leadership.
- Ike Rivers asked DCSA for metrics on the new security rating scorecard.
  - DCSA will be analyzing collected data, along with Jane Dinkel and Misty Crabtree, on the Third Monday of every month. Data analysis efforts will focus on inconsistencies, improvements, and lessons learned.
- Jane Dinkel asked DCSA for a regular release of entity vetting metrics. Industry would also like to understand the extent of the backlog, the reason(s) for the backlog, and the top 3-5 reasons for entity vetting package rejections.
  - DCSA stated that the primary reasons for entity vetting package rejections were missing or incorrect information on the DD-254 (73%) and inconsistent information across the documents submitted by the company or on online databases (63%).
- Industry requested a meeting with DCSA to discuss the increase in background investigation timelines.
- Industry requested DCSA release the 36-month National Background Investigation Services (NBIS) modernization roadmap.
  - DCSA stated that the roadmap needs to be reviewed and approved by both the NBIS Requirements Governance Board (NRGB) and by the Performance Accountability Council Program Management Office (PAC PMO) before it is shared with industry. After approval, a version of the roadmap will be shared with industry and will include the delivery timeframes for the minimum viable products (MVPs).

- LaToya Coleman asked the Office of the Director of National Intelligence (ODNI) for an update regarding the information sharing and overhead billet policies and any other known policies that may impact industry.
  - *ODNI reported that the overhead billet policy is in the internal review stage..*
  - ODNI stated that interagency coordination regarding the insider threat information sharing policy is ongoing. ODNI has been in coordination with DOD, industry, Office of Personnel Management (OPM), Office of Management and Budget (OMB), Department of Justice (DOJ), and the Intelligence Community Security Directors.
  - *ODNI* was not aware of other policies that may impact industry at this time from their perspective.
- Industry requested more information on the Transfer of Reciprocity Information System (TORIS).
  - ODNI stated that TORIS is responsive to increased demand for expanded transparency between agencies related to personnel mobility. TORIS will provide greater visibility into information needed by gaining agencies to support transfer of trust determinations.

### **Department of Defense Update**

- Jeff Spinnanger, Director of the Information and Acquisition Protection Directorate for the Office of the Undersecretary of Defense for Intelligence and Security (OUSD I&S), delivered the update.
- DOD supported reviving in-person NISPPAC meetings and reiterated an interest in more frequent on-the-record NISPPAC meetings.
- DOD stressed the importance of consistency in security.
- DOD anticipates issuing a revised instruction on security classification guides that will be applicable to all classified information across DOD in the near future.
- Reissuance of the National Industrial Security Program Operating Manual (NISPOM) is moving forward.
- Since the last public meeting, the DOD completed the Instruction that implements Section 847 and DOD instruction 5205.87, Mitigating Foreign Ownership, Control, or Influence (FOCI). The next step is implementing the Defense Federal Acquisition Regulation (DFAR) clause.
- DOD acknowledged industry concerns regarding 847 implementation.

- In July, DOD issued a joint venture directive-type memorandum in an effort to alleviate some of the burden military departments experienced in meeting small business requirements. DOD asked ISOO to engage with the Small Business Administration (SBA) on a more permanent solution.
- DOD has initiated their data call to support ISOO's yearly reporting requirements. DOD is making a renewed effort to aggregate the costs to secure classified information, both to DOD and to industry partners.

### **Comments on Department of Defense Update**

- Greg Sadler, General Dynamics Information Technology (GDIT), asked for an update on the Executive Branch's study on CUI.
  - ISOO will follow-up.
- Ike Rivers, Industry Spokesperson, asked DOD to clarify their role in the National Background Investigation Service process.
  - Jill Baker is the lead for NBIS from the OUSD I&S perspective. She coordinates between DOD leadership and DCSA.
- DOD offered to invite the project leads for CMMC from the DOD Office of the Chief Information Officer (CIO) to brief at the next public meeting of the NISPPAC.
- DOD offered to invite Jill Baker to speak at the next public meeting of the NISPPAC on NBIS.

#### **Defense Counterintelligence and Security Agency Update**

- Matt Roche, Division Chief of NISP Operations and Industrial Security at DCSA, delivered the update.
- Since October 1, 2024, DCSA has conducted 267 security reviews utilizing the new security rating scorecard.
- The Insider Threat Industrial Security Letter (ISL) now sits with DCSA general counsel for legal review and comments.
- Matt Roche passed to David Drys, Program Manager, Program Executive Office, DCSA, for an update on the National Industrial Security System (NISS) Increment 2 (NI2).
- NI2 is a singular system, not a system of systems, and FOCI/847 will be the first deliverable. The expected delivery date is the beginning of fiscal year (FY) 25.
- NISS and NCCS have moved into a sustainment and minor enhancement phase as a result of NI2 development.

- David Drys passed back to Matt Roche for an update on Entity Vetting.
- DCSA reported 310 outstanding Facility Security Clearance (FCL) packages. The goal for FY25 is to be under 300 outstanding packages.
- For the month of October, 2024, DCSA reported the average timeframe to receive an FCL was 68 calendar days from the date of the package submission.
- Improvements in data collection, clarifying the FCL handbook, training, hiring, NI2, and continued partnership with industry are all being pursued by DCSA to improve the entity vetting process.
- Mike Faller, NBIS team, DCSA, provided an update on NBIS.
- A demo of the personnel vetting questionnaire (PVQ) in NBIS is scheduled for January, 2025. The PVQ is expected to be the first deliverable.
- NBIS migration and modernization press release dated November 8, 2024 is available for public viewing on DCSA website.
- DCSA is working with the appropriate NISPPAC working group to schedule an off-site in January 2025.

# **Comments on Defense Counterintelligence and Security Agency Update**

- Greg Sadler, GDIT, asked about the timeframe for DCSA's gap analysis
  - DCSA anticipates completing gap analysis by the end of calendar year 2024.
- Greg Sadler, GDIT, asked what is the earliest date that an industry applicant would see the new version of the PVQ.
  - DCSA anticipates 3rd Quarter FY25.
- Ike Rivers, Industry Spokesperson, asked if there is a reason that industry NISPPAC and the working group has not been included in the PVQ demo.
  - DCSA stated that the prototype has not yet been completed. DCSA took an action to work with industry to share something with industry prior to the "official" demo in January, 2025.
- Jane Dinkel, Lockheed Martin, asked DCSA to consider extending the timeframe for SF-328 updates from 30 days to 6 months due to the significant changes to the form.
  - DCSA felt the recommendation was reasonable and took an action to put out formal guidance to industry on the expected completion timeframe for SF-328.

- Jane Dinkel, Lockheed Martin, asked DCSA about what training DCSA or CSDE has proposed for industry or for the government with regards to the SF-328.
  - *DCSA stated that there will be an internal and external training rollout, but he would have to report back on the specific timeframe.*

# Office of Director of National Intelligence Update

- Lisa Perez, the Chief of the Policy and Collaboration Group, Special Security Directorate, National Counterintelligence and Security Center, ODNI, delivered the update.
- Since the last public meeting, ODNI issued the Federal Personnel Vetting Management Standards. Issuance of these standards is the last core piece of Trusted Workforce 2.0 policy framework.

# **Comments on Office of Director of National Intelligence Update**

- Greg Sadler, GDIT, asked, in regards to TORIS, if ODNI had considered changing the current scattered castle approach that dictates industry access. Greg noted that a more standardized access approach has been desired by industry for some time.
  - ODNI stated that all ideas are being explored and a specific course of action has not been identified. ODNI took an action to report on this topic in the future,
- Dave Tender, Perspecta, asked what agencies ODNI is partnering with on the information sharing policy.
  - *ODNI responded that they are working with DOD, industry, OPM, OMB, and DOJ, and the Intelligence Community Security Directors.*
- LaToya Coleman asked ODNI if there was a timeframe for the approval and release of the overhead billet policy.
  - ODNI does not have a timeframe.
- Ike Rivers asked ODNI for a good point of contact at ODNI regarding the overhead billet policy.
  - *ODNI stated that the position is currently vacant, but industry can continue to contact Lisa or Mark regarding the overhead billet policy.*

### **Department of Homeland Security Update**

• Rich Dejausserand provided the update for the DHS.

- In regards to 847, the Department of Homeland Security (DHS), stated that their role is to ensure coordination between DCSA and the respective Cognizant Security Agency (CSA).
- All 204 DHS SCIFs are 705 compliant.
- DHS does not have any SCIF escort requirements for their SCIF build-out.
- DHS stated that they do not anticipate any additional policies that may impact industry from their perspective.

# **Comments on Department of Homeland Security Update**:

• No comments.

# **Department of Energy Update**

- Jaime Gordon, Program Planning and Management, Office of Security, Department of Energy (DOE), delivered the update.
- DOE is committed to mitigating and/or negating foreign influence according to 32 CFR 2004-117 and will continue to exercise the Secretary of Energy's authority to protect security assets under the Atomic Energy Act.
- DOE will continue to work with the CSAs and the Cognizant Security Offices (CSOs) regarding reciprocity requirements.
- Responding to the desire within industry to be involved in the policy process, DOE invited and encouraged industry personnel to participate in the DOE's writing teams for policy and technical standards. Industry involvement in the policy-making and standards development process is fully supported by the DOE.

### **Comments on Department of Energy Update**

- A member of the public asked DOE how often they conduct a DOE business assessment.
  - *DOE will provide an answer at a later time.*

### Nuclear Regulatory Commission Update

- Mike England provided the update for the NRC.
- NRC approaches contractor reciprocity on a case-by-case basis when dealing with SCIF work.
- Due to the ADVANCE Act, NRC anticipates a review of their security policies in FY26. Follow-on actions may or may not impact industry.

# **Comments on Nuclear Regulatory Commission Update**

• No comments.

# **Central Intelligence Agency Update**

- Jennifer Alworth, Chief of the Central Intelligence Agency's (CIA) Industrial Security Office, provided the update.
- CIA FOCI review is separate and distinct from other U.S. Government agencies. However, CIA accepts DCSA documents as supplements to support FOCI mitigation determinations.
- CIA does not anticipate any policies that may impact industry.

### **Comments on Central Intelligence Agency Update**

- Greg Pannoni asked if the CIA could share their FOCI vetting process with NISPPAC Industry
  - Don, CIA, agreed to take the question back.

### **Underwriters Laboratories Briefing**

- John McMahon, Lead Auditor Specialist, Underwriters Laboratories (UL), delivered the briefing.
- The 6th edition of the UL 2050 standard is out for review and should be in print in the first few months of the first quarter 2025.
- UL plans to hold training sessions over the next several years.

### **Comments on Underwriters Laboratories Briefing**

• No comments.

### **Department of Energy Vetting Metrics Update**

- Tracy Kindle, Personnel Security Program Manager, DOE, delivered the update.
- DOE met or exceeded goals for FY24.

### **Comments on Department of Energy Vetting Metrics Update**

• No comments.

## DCSA NISP Cybersecurity Office (NCSO)

- David Scott, NISP Authorizing Official, DCSA, delivered the update.
- Enterprise Mission Assurance Support Service (eMass) release 5.11.2 deployed in October, 2024.
- eMass now provides better timeline information for industry.
- Auto-generated authorization letters in eMass remove human-error.
- eMass "system information" field supports facility classification.
- DCSA anticipates better tracking and metrics capabilities in eMass for industry in planned 2025 eMass enhancements.
- DCSA expects the Assessment and Authorization Process Manual (DAAPM) to change to a guide.
- The change in scoring methodology from the Command Cyber Readiness Inspection (CCRI) Program to the Cyber Operational Readiness Assessment (CORA) Program reflects an emphasis on a more risk-based, risk-focused program.

#### Comments on DCSA NISP Cybersecurity Office (NCSO)

- Greg Sadler, GDIT, asked about a timeline for when DOD might shift to NIST SP 800-53 Revision 5 (REV-5) as part of the new baseline.
  - DCSA noted they could not speak on behalf of DOD but stated that DCSA is moving in that direction. eMass has been designed to accommodate REV-5, but there is a need to understand other components' transition plans. DCSA looks forward to NISA working group collaboration on REV-5 transition.

#### **DCSA Adjudication and Vetting Services**

- Michael Ray, Deputy Assistant Director of Operations and Adjudication and Vetting Services (AVS) with DCSA delivered the update.
- AVS is in the process of establishing a dedicated industry division that will be responsible for interim determinations, management of PSII investigation requests, CV management, and final adjudications for the NISP population.
- AVS averages 1 calendar day for transfer of trust determination decisions.
- Since implementation in February 2024, AVS has issued 100 conditional eligibility determinations.

- Individuals are required to self-report, even in a continuous vetting world.
- Mark Pekrul, DCSA, provided an update on AVS metrics.
- DCSA acknowledges metrics are not where they would like them to be.
- DCSA has formed a tiger team to identify problems and make recommendations to improve processes.

#### **Comments on DCSA Adjudication and Vetting Services**

• No comments.

#### **Defense Office of Hearings and Appeals Update**

- Perry Russell-Hunter, the Director of the Defense Office of Hearings and Appeals (DOHA), delivered the update.
- He congratulated Michael Thomas on his new appointment as the Director of ISOO. He reported that he had recently met with Jen May and Heather Harris Pagán and that ISOO could not have two more dedicated and experienced professionals. He noted that their knowledge and experience in security is impressive and needed in their roles. He also thanked Kathy Pherson and Quinton Wilkes for their exemplary service to the NISPPAC.
- In FY24, 84% of DOHA's hearing cases were handled virtually.
- Thanks to collaboration between Heather Green at AVS and DOHA, the exchange of documents between DCSA and DOHA is now paperless.
- DOHA provides a fair, consistent, and transparent hearing and appeal process that is independent of DCSA's investigative and adjudicative functions.
- DOHA's independent role in collateral contractor clearance cases begins with a legal review of the Statement of Reasons (SOR). DOHA conducted around 2000 SOR legal reviews in FY24.
- DOHA is, and will continue to be, the hearing and appeals provider for collateral clearance eligibility for industry contractors in the NISP.

#### **Comments on Defense Office of Hearings and Appeals Update**

• No comments.

#### **General Discussion, Remarks and Adjournment**

• No new business items were brought forward.

- Heather Harris Pagán, NISPPAC DFO, NARA, closed out the meeting on behalf of NISPPAC Chair, Michael Thomas, NARA.
- NISPPAC meeting announcements are posted in the Federal Register approximately 30 days in advance. Meeting announcements are also posted on the ISOO blog.
- ISOO intends to host NISPPAC meetings in a hybrid format moving forward.
- The next NISPPAC public meeting is tentatively scheduled to occur in-person and in conjunction with the NDIA/AIA conference in May, 2025.

The meeting was adjourned at 12:40 EST

*I hereby certify that, to the best of my knowledge, the foregoing minutes are accurate and complete.* 

Michael Thomas Director, Information Security Oversight Office (ISOO) Chairman, National Industrial Security Program Policy Advisory Committee (NISPPAC)

MAPTI

Enclosure 1: Meeting Attendees Enclosure 2: Summary of Action Items Enclosure 3: Public Q & A Enclosure 4: Meeting Presentation(s)

#### **Enclosure 1: Meeting Attendees**

Adams, Kendall Adissu. Mekdes Aghdam, Laura Agnew, Daniel Ahrens, Allison Alafe, Christiana Allen, Lauren Alworth, Jennifer Ambrose, Zorica Amory, Catherine Anderson, Khaleena Andreone, Jennifer Andrews, Kathy Archibeque, Norbert Argumedo, Lori Armstrong, Matt Arriaga, Dennis Auman, Jenna Backhus, Andrianna Bailey, Benny Banks, Ted Banks, Theodore Barr, Julianna Barrientos, Selma Barton, Kyle Battaglia, Rebecca Baugher, Kimberly Bausum, Anna Beauchamp, Winston Beauregard, Zak Beck. Michelle Belew, Susan Bemah, Kimberly Bergeman, Stephen Berry, Kathleen Berry, Tracy Best, Candy Bingham, Julie Bland, Booker Boling, Daniel Boomer, Mindv Boone, Pamela Bowman, Jennifer

Boyd, Dolores Brandt, Richard Braxton, Kishla Breitbeil, Robert Britt, Martin Broglin-Bartlett, Darinda Brokenik, Trish Brooks, Marc Broussard, Derrick Brown, Kelly Brown, Robert Bryan Christen Bryda, Laurie Buchanan, Carol Buie, Wendy Burger, David Burke, Harold Burns, Lynn Burris, James Burris, Jim Busch. Melissa Cabe, John Calhoun, Timothy Call, Samantha Callaway, Nicole Carpenter, Marcus Cavano, Jeffrey Cawley, Matt Chapman, Jamie Charyton, Dianne Chase. Lauren Cheney, David Chiocchio. Gina Christian, Laurie Cippel, Melissa Cipriano, Julie Cipriano, Reanna Clapp, Julie Clark, Jennie Clavon, Gwen Clay, Glenn Cobbs, Carla Coleman, Johnathan

Coleman, LaToya Colon. Kim Condon, Jessica Connelly, Michael Cooper, Nicole Coppel, Drew Cornnell, Chelsea Cox, Viki Crabtree, Misty Craig, Cindy Cresing, Ryan Crisalli, Steve Cronin, Scott Crytzer, Eric Curtis, Ali Curtis, Aljith Custard-Lazarchick, Janice Dahl, Stevie Dahle, Nissa Davenport, Michael Davis, Glynn Davis, Rebecca Deason. James Debosik, Lindsey Defibaugh, Josh Dejausserand, Richard Demers, Michael DeTora, Deborah DiazMartinez, Sarah Dinkel, Jane Disher. Carl Doman, Lisa Donahue, Jim Doubleday, Justin Doubledee, Tracy Douglas, Gwendolyn Drys, David Duenas, Sally Dunham, David Durkin, Tracy Eaton. De Ett Egan, Amanda Einsmann, Michelle

Eley, Nadia Ellison, Lori Embree, Peter England, Michael Enriquez, Marcus Erickson, Heather Etters, Missy Evans, Jessica Ewton, James Fadden, Geraldine Faller, Mike Fant. Elizabeth Farrell, Shannon Fell, Rob FentressBussey, Sharon Ferrell. Bella Fink, Allison Finklea, Anthony Fireflies, Lisa Flanagan, Matthew Flora, Jessica Flores. Darrell Fonseca, Brenda Fonville, Michele Francis, Benae Freeman, Lisa French. Heidi Fuemmeler, Brooke Fulco, Joe Funicello, Kasey Funicello, Lorena Futrell, Joshua Gabeler, Jennifer Gallegos, Alice Gardner, Kelly Garrett, James Garvin, Kelly Gary, Jane Gatlin, Ramona Ghannam, Samie Gibbs, Katrina Gilbert, Michelle Gilkerson, Mary

Glassic, Scott Gleason, Kimberly Gnanamurthy, Kumar Goddard, Soli Good, Kristina Gordon, Jaime Gordwin, Karen Gougeon, Jeremiah Graham, Jennifer Gray, Pamela Gray, Tonya Green, Eddie Gregory, A. Griego, Alec Grimes, Daniel Guatemala, Christina Gunn, Lesley Gutierrez, Rene Hagood, Kenneth Hakamaa, Marko Haley, Rene Hall. Brent Hamilton, Pamela Harris Pagán, Heather Hastings, Amy Hawk, Jason Hawthorne Sr, Michael Heaton, Pamela Heinze, Michelle Henderson, William Henry, Nicole Hensley, Michael Hensley, Mike Herbst, Jonathan Hermosillo, Jessica Villescas Hernandez, Aimee Hernandez, Andy Hicks, Frankie Hines, Helencia Hock, Marissa Hogan, Teresa Holden, Adam Hollandsworth, Matthew

Hollingsworth, Danielle HollomonHidle, Tamara Holt, Tiffany Holwick. Sharon Howar, Laura Hubert, Keli Hunt, Kimberly Iacobucci, Erin Immel, Christopher James, Lana Jenkins, LeeAnn Jensen, Kathryn Jiggitts, Kristopher Johnson, Jill Johnson, Joyce Johnson, Melissa Johnston, David Johs, Brandon Jones, Cecilia Jones, Linda Jones, Russell Jongema, Linwood Juan, Don Kamilova, Kamilya Kaohi, Catherine Kennedy, Beverlee Kennedy, James Kerben, Valerie Kidd, Linda Kimball, Lissa Kindle, Tracy King-Ratzel, Betty Kirby, Jen Kitchens, Barbara Kitzman, Matt Klem, Jeremy Klink, Carolina Kobus, Jason Koslow-Verdi, Alison Kozacek, Shelly Kraus Jr, Joseph Kreitz, Matt Kyzer, Lindy

LaBeach, Stephanie LaFreniere, Annette LaMont, Kimberly Lawrence, LeVar Lawrence, Mitch LeBlanc, Randal Lecker, Laurie Lee, Amy Lee, Kayla Lee, Kuan Leisinger, Carmen Lepak, Tammy Lewis, Donald Lewis. Donnie Lewis, June Lewis, Natasha Lewis, Tiffany Lightcap, Amy Litscher, Theresa Lord, Ginger Lord, Ginger Lotwin, Andrew Lucock, Cynthia Lunar, Shannan Ly, Daniel Mackey, Jessica Maclauchlan, Chris Macwan, Christopher Malbone, Nicole Malloy, Barbara Mariano, Alex Mariano, Marie Markham, Julie Martens, Sheri Martin, Jason Martinez, Kelli Martinez, Robert Massaro, James Mate, Edith Mathes, Don Mathes, Donald Maxwell, Heather May, Jennifer

Mayberry, Grant Mcallister, Courtney McArdle, Lauren McGovern, Cindy McKay, Jennifer McKay, Kyle McKemy, Scarlett McKenna, Danielle McLeod, Donna McLeod, Risa McMahon, John McNeill, Steven McNichol, Lindsey McNulty, Nick McRae, Robert McWethy, Samantha Means, David Medina-Creel. Tina Miederhoff, Brant Miller, Anya Miller, Appollonia Miller, Lori Miller, Susie Mills, Maria Minard, Keith Minard, Verna Mongold, Jamie Montoya, Marie Moore, Christopher Moore, Kathleen Moore, Kim Morgan, Clifford Mosher, Leandra Moss Jr., Leonard Muckenhoupt, Sarah Mullin, Nonnie Murphy, Brian Nagle, Brenda Nalls, Janet Nelson, SaBrina Nickel, Robin Nikolaus, Suzanne Noles, Chad

Noll. Glenn Norland, Tenaya Nunnenkamp, Kenneth NwainikoneDavis, Dorothy Otrando, Nadine Pak, Kyong Pannoni, Greg Parker, Andrew Pashoian, Norman Payne, Diana Pekrul, Mark Peoria. Matthew Perez, Heather Perez, Lisa Pettengill, Chantel Pettengill, Chantel Phillips, Earl Philopena, Christopher Piccioni, Geraldine Pickering, Rebeca Pickering, Tamiko Post. Sara Powell, Cindy Powell, Cynthia Powell, Marie Prieto, Heather Propst, Linda Pyles, Cheryl Pyles, Larry **Ouiroz**, Daniel Ramsay, Chad Randall. Sheila Randolph, Shaun Rasmussen, Kristine Ray, Mike Ray, Richard Rector, Patricia Reff, Royal Rehor, Kristi Reidy, Lisa Reiman, John Rice, Meagan Richards, Rachel

Riche, Kimala **Riggins**, Rebecca Rivera Jr, Rene Rivers. Ike Rixmann, Robert Rixmann, Tracy Robinson, Melissa Roche, Mattew Roche, Matthew Rodowsky, Laura Rodrigez, Lucy Rodriguez, Chamagne Rodriguez, Jessica Rosera. Steve Ross, Stephanie Rossiter. Lisa Rosssanders, Jannice Roswal, Andrew Royal, Andy Russell-Hunter, Perry Saber, Jennifer Sadler, Greg Saloom, Shahin Sampson, Katyna Samuels, Al Sanchez, Elizabeth Sandlin, Taylor Sandlin, Taylor Saunders, Francisca Scheid, Melissa Schools, Patricia Schuetz, Erin Schulze, Megan Scott, Alison Scott, Christopher Scott, David Scott, Yvette Setneska, Valerie Tarantino Settles, Christina Shafer, Sydney Shawaryn, Gregory Sheeley, Denny Shimamura, Judy

Sidney-Miles, Sharon Simon, Vaughn Simpson, Brooke Sims, Georgina Sims, Heather Singletary, Patrice Sjodahl, Debbie Skinner, John Sloan, William Smasal, Eileen Smick, Martha Smith, Berette Smith, Crystal Smith, Jessica Smith, Rachel Smyth, Brenda Snowdy, Thomas Soriano, Rojohn Sowell, Charles Spencer, Chuck Spiller, Denise Spinnanger, Jeffrey Stahl, Jessica Stambaugh, Christine Stech, Madison Steinbuch, Michael Steinour, Jason Stern, Steven Stolkey, Christopher Stone, Alissa Stroud, Jody Stull, Sarah Sturch, Kenneth Sumter, Natasha Swick, Melissa Sylver, Ferroza TaftMoore, Dianne Talaro, Arlene Tate, Charles Tender, Dave Thayer, Amber Thibault, Crystal Thibodeaux, Kristie

Thomas, Grant Thomas, Michael Thompson, B'Linda Thompson, Donna Thornton, Diana Tidwell, Mercedes Tiffee, Bradley Timmons, Katie Tolliver, Shannon Torres, Gregory Tucker, Joni Tucker, Michele Ulery, James Ulrich, Teresa Valencia, Juan Van Hook, Donna Vance, Robert Vanderhuff, Elizabeth Varga, Michael Varga, Mike Vaughn, Susie Visintainer, Jon Voorhies, Elicia Wakeman, Richard Waldron, Rebecca Walker, Charles Walker, Robert Wallerson, Diane Washington, Keshia Washington, Reginald Waterman, Ronald Webb, Patrick Webber, JoAnn Wendt, Suzy West, Jessica Whitaker, Brenda White, Dorie-Ann Whitfield, Brad Wilkes, Quinton Williams, Angela Winsor, Richard Witting, Scott Woldridge, Marya

Wolf, Tara Womer - Lumber, Deborah Wood, Michael Woodall, Christopher Woodard, Teresa Woodfolk, Torri Woodworth, Lora Woosley, Greg Workentin, Brandon Worsham, Robert Wright, Paula Yablonski, Marycheryl Yuen, Ed Yuen, Edwin Yuhas, Rae Yurechko, Vicky Zimmerly Armijo, Ann Zweil, Alison

# **Enclosure 2: Summary of Action Items**

- ISOO will follow up with Greg Sadler regarding the status of the Executive Branch's CUI study.
- DOD will invite the project leads for CMMC from the DOD CIO to provide a program update at the next public meeting of the NISPPAC.
- DOD will invite Jill Baker to speak at the next public meeting of the NISPPAC on NBIS.
- DOD asked ISOO to assist in engaging with the SBA regarding military departments' ability to meet small business requirements.
- DOD will provide an update on the status of the NISPOM at the next public meeting.
- ODNI will provide a TORIS update at the next public meeting.
- DCSA will work on guidance for SF-328 update timeframes.
- DCSA will provide an update on SF-328 training roll-out.
- DCSA will work with industry to provide a demo of the PVQ in NBIS to industry NISSPAC prior to the public demo in January 2025.
- CIA will look into providing industry insight into their FOCI vetting process.
- DOE will provide an answer to a question about how often DOE performs a business assessment.

# Enclosure 3: Public Q & A

**Question:** The Navy is applying new Defense Intelligence Agency (DIA) guidance without waiver, i.e. although the new DIA policy allows for exemptions when they make sense for the mission, Special Security Office (SSO) Navy has issued internal guidance that they will not grant them. For example, several local contractors have existing Sensitive Compartmented Information Facilities (SCIFs) with no Information System (IS) processing or systems (i.e. minimal risk), but the radio frequency (RF) requirement is still being strictly enforced at great contractor expense and mission loss during renovations.

Answer: In accordance with SSO Navy standards, Department of the Navy (DON) Special Access Program Central Office (SAPCO) has instituted a mandatory requirement for RF Shielding when constructing a new Special Access Program Facility (SAPF). This is for eventual goal of reciprocity with the IC. For existing SAPFs, Telecommunications Electronics Materials Protected from Emanating Spurious Transmissions (TEMPEST) requirements are based on facility security posture and risk from emanations. For dual SCIF/SAPFs, we apply all SSO Navy requirements.

In Summer 2023, Deputy Chief of Naval Operations (DCNO) N2N6/Navy Head of Intelligence Community Element (HICE) issued guidance that all new or newly renovated SCIFs need RF shielding, understanding that DIA did not always require RF shielding. This was based on an evaluation of the threat and associated vulnerabilities of Navy SCIFs across the world. There is no internal guidance other than the NAVADMIN released by DCNO N2N6/HICE of this new guidance. Although CNO or DCNO N2N6/Navy HICE could waiver this requirement, we feel it is in the best interest of the Navy not to waive the guidance unless under extreme circumstance. RF shielding protects Navy's most sensitive and highly classified information.

**Question:** How often does Department of Energy (DOE) perform the equivalent of Department of Defense (DoD) site visit assessments?

*Answer:* DOE has minimum assessment requirements in policy outlined in the DOE O 470.4B located at <u>https://www.directives.doe.gov/directives-documents/400-series/0470.4BOrder-b-chg3-ltdchg/@@images/file</u>

Because DOE is decentralized, DOE doesn't have a "this is the only way to do it" policy. It is nuanced and could be different for each DOE element/Program Office depending on the the organization's assets. In a lot of cases, the organizations clarify the expectations of the 4B in their supplemental guidance and security plans and each office manages their assessment plans/schedules individually.

**Question:** Industrial Security Representatives (ISRs) are telling Facility Security Officers (FSOs) that once the new Standard Form (SF)-328 is released, it will need updated. It was briefed by a Defense Counterintelligence & Security Agency (DCSA) ISR out in Arizona at a DCSA Industry presentation. Is this true?

Answer: DCSA is currently awaiting Office Management and Budget to approve the new SF-328. They had questions concerning the form, which DCSA addressed, and Washington Headquarters Services (WHS) is working with them to close it out. Once the new SF-328 is approved DCSA will hold beginning to use it until the National Industrial Security System (NISS) is updated, but DCSA is advising companies to reference the new SF-328 instructions, once published, in the meantime. Once the new form is approved and NISS is updated, it is the expectation of DCSA that any facility submitting an SF-328 will do so on the new form; however, no one in industry will need to submit an updated form absent having an update to report (see September 2024 Voice of Industry).

**Question:** When can we expect to see the new Insider Threat Industrial Security Letter (ISL)? *Answer: Answer not provided by responsible point of contact (POC).* 

**Question:** Could the Central Intelligence Agency (CIA) share their Foreign Ownership, Control, or Influence (FOCI) vetting process with NISPPAC Industry? *Answer: Answer not provided by responsible POC.* 

**Question:** Is DCSA routinely issuing interim Top-Secret clearances for Industry or is it dependent upon authorization from a government sponsor via a formal letter or DD 254? *Answer: Answer not provided by responsible POC.* 

**Question:** Could DCSA email the entity vetting timelines? *Answer: Answer not provided by responsible POC.* 

**Question:** What is the timeline for DoD to COE reciprocity? *Answer: Answer not provided by responsible POC.* 

**Question:** For the SCIF/SAPF issue, is this in preparation for the rumored transition to DCSA cognizance? If so, do we have an ETA on that? *Answer: Answer not provided by responsible POC.* 

# **Enclosure 4: Meeting Presentation NISPPAC Meeting (November 13, 2024)**



# Agenda Welcome, Introductions, and Administrative Matters **Reports and Updates** - Industry - Department of Defense (DoD) - Defense Counterintelligence and Security Agency (DCSA) - Office of the Director of National Intelligence (ODNI) - Department of Homeland Security (DHS) - Department of Energy (DOE) - Nuclear Regulatory Commission (NRC) - Central Intelligence Agency (CIA) - Underwriters Laboratories (UL) Working Group Updates – DOE - DCSA NISP Cybersecurity Office (NCSO) - DCSA Adjudication and Vetting Services (AVS) Defense Office of Hearings and Appeals (DOHA) . General Discussion, Remarks, and Adjournment





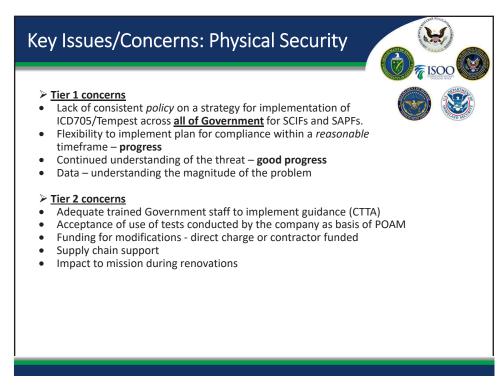


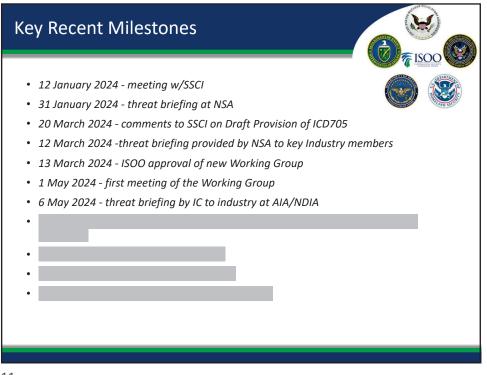






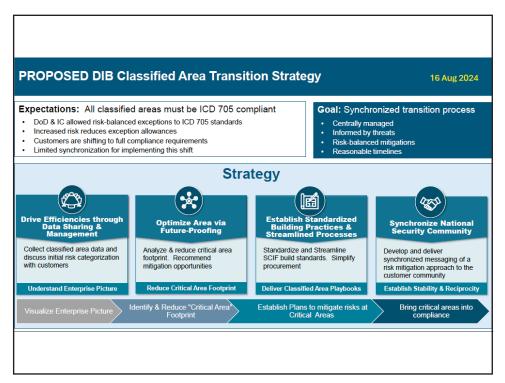
Industry As	sociation Support
	WELCOME Sector WELCOM
	Memorandum of Understanding (MOU) Industry Association Security Representatives
Heather Sims	Aerospace Industries Association (AIA)
Jonathan Fitz-Enz	ASIS Defense and Intelligence Council (ASIS D&IC)
Robert Sanborn	Contractor Special Security Working Group (CSSWG)
Jason Hawk	Federally Funded Research and Development Centers/University Affiliated Research Centers (FFRDC/UARC)
Mary Edington	Intelligence and National Security Alliance (INSA)
Leonard Moss	Industrial Security Working Group (ISWG)
Darcy Fisher	National Classification Management Society (NCMS)
James Kennedy	National Defense Industrial Association (NDIA)
Marc Ryan	Professional Services Council (PSC)
Rosie Borrero-Jones	Community Association for Information Systems Security Working Group (CAISSWG)











# **Industry Topics**

#### All CSA/CSOs

- SF 328 and Section 847
- Inquiry on Upcoming Policy Releases
- Physical Security and Continued Efforts for Consistency for 705/TEMPEST Compliance
- SCIF Escort –Potential Reciprocity for SCIF Escort during SCIF Buildouts

#### Department of Defense (DoD)

- Inquiry on any Feedback on the comments provide from Industry NISPPAC to the DoD Special Access Program (SAP) Manual Draft
- CUI/CMC Implementation across DoD and IC

#### Defense Counterintelligence and Security Agency (DCSA)

- New Security Rating Scorecard
- Entity Vetting (FCL & FOCI) Backlog Update, Request for Metrics
- Investigation Timelines
- NBIS 36 Month Road Map and Industry Dual System Use Requirement (NBIS and DISS)

#### Office of the Director of National Intelligence (ODNI)

- · Information Sharing and Overhead Billet Policies
- TORIS
- Inquiry on Potential Policies Impacting Industry















