

**National Industrial Security Program Policy Advisory Committee (NISPPAC) Meeting**  
**Wednesday, April 14, 2021 - 10:00 a.m. - 1:00 p.m.**  
**National Archives and Records Administration**  
**Meeting held virtually**

**Agenda**

<b>Welcome, Introductions, and Administrative Matters</b>	<b>10 mins</b>
<b>Action Item Follow Up</b>	<b>5 mins</b>
<b>Reports and Updates</b>	
<b>Industry Update</b>	<b>15 mins</b>
<b>Department of Defense (DoD) Update</b>	<b>15 mins</b>
<b>Defense Counterintelligence and Security Agency (DCSA) Update</b>	<b>15 mins</b>
<b>Office of the Director of National Intelligence (ODNI) Update</b> <b>Security Executive Agent</b>	<b>10 mins</b>
<b>Department of Homeland Security (DHS) Update</b>	<b>5 mins</b>
<b>Department of Energy (DOE) Update</b>	<b>5 mins</b>
<b>Nuclear Regulatory Commission (NRC) Update</b>	<b>5 mins</b>
<b>Break</b>	<b>5 mins</b>
<b>Cybersecurity Maturity Model Certification (CMMC) Presentation</b>	<b>30 mins</b>
<b>General Services Administration (GSA) Black Label Presentation</b>	<b>30 mins</b>
<b>Working Group Update</b>	<b>10 mins</b>
<b>Defense Office of Hearings and Appeals (DOHA) Update</b>	<b>5 mins</b>
<b>Controlled Unclassified Information (CUI) Update</b>	<b>5 mins</b>
<b>General Discussion, Remarks and Adjournment</b>	<b>10 mins</b>



**MARK BRADLEY.** The President of the United States approved Mr. Bradley's appointment as Director of the Information Security Oversight Office (ISOO), effective December 2016. ISOO is responsible to the President for policy and oversight of the government-wide security classification system under Executive Order 13526, the National Industrial Security Program under Executive Order 12829, as amended, and the Controlled Unclassified Information Program under Executive Order 13556. As the Director of ISOO, Mr. Bradley serves as the Executive Secretary of the Interagency Security Classification Appeals Panel and the Public Interest Declassification Board, and as the Chairman of the National Industrial Security Program Policy Advisory Committee, the State, Local, Tribal, and Private Sector Policy Advisory Committee, and the Controlled Unclassified Information Advisory Council. Mr. Bradley has been a member of the Federal government's Senior Executive Service since 2003.

Mr. Bradley previously served as the Director of FOIA (Freedom of Information Act), Declassification, and Pre-publication Review, National Security Division, Office of Law and Policy at the Department of Justice (DOJ). While at the Department, he also served as the Deputy Counsel for Intelligence Policy, and the Acting Chief for Intelligence Oversight.

Before joining the Department of Justice in November 2000, Mr. Bradley served as a CIA intelligence officer and Senator Daniel Patrick Moynihan's legislative assistant for foreign affairs and intelligence matters and as his last legislative director. He co-drafted the legislation that established the Public Interest Declassification Board. Mr. Bradley, who remains a member of the District of Columbia Bar, has also worked as a criminal defense lawyer in the District of Columbia defending indigents accused of serious crimes.

The Society for History in the Federal Government awarded A Very Principled Boy, his biography of Soviet spy Duncan Lee, its 2015 George Pendleton Prize for being the best book written by a federal historian in 2014.

Mr. Bradley is a Phi Beta Kappa graduate of Washington & Lee University and holds an M.A. in Modern History from Oxford University, which he attended as a Rhodes Scholar, and a J.D. from the University of Virginia.

## Greg Pannoni



Greg became an employee of the federal government in June of 1980 with the Defense Investigative Service, a component of the Department of Defense, currently known as the Defense Counterintelligence and Security Agency (DCSA). He was initially employed as a personnel security specialist wherein he managed background investigations for the purpose of determining a person's eligibility to access classified national security information. In July of 1983 he transferred to the Defense Industrial Security Program (DISP) and served in a number of positions to include Industrial Security Representative, staff officer and supervisor. Each of these assignments involved responsibilities pertinent to the implementation, monitoring, oversight and policy of the National Industrial Security Program (NISP), the successor to the DISP. He also served as a member of the United States Security Policy Board Staff wherein he worked on information, personnel, physical and industrial security issues, and he was a Deputy Inspector General (IG) within the DSS, Office of the IG for several years.

In December of 2004 Greg joined the staff of the Information Security Oversight Office (ISOO) and currently serves as the Associate Director for Operations & Industrial Security and Controlled Unclassified Information. ISOO is established within the National Archives and acts in consultation with the National Security Advisor in developing policies and overseeing agency actions to ensure compliance with the President's program for classifying, safeguarding and declassifying national security information per Executive Order 13526. He is responsible for monitoring and overseeing the implementation of this program and the complementary programs for Industry, the NISP per Executive Order 12829, and for State, Local, Tribal and Private Sector Entities, the SLTPS program per Executive Order 13549, as well as the Controlled Unclassified Information program per Executive Order 13556. Greg is also ISOO's representative to various governance entities to ensure coordinated interagency development and reliable implementation of policies and minimum standards regarding information security, personnel security, and systems security.

He is a Magna Cum Laude graduate of Towson University in Towson, MD, with a degree in Political Science.

## Valerie B. Kerben



### National Counterintelligence and Security Center Office of the Director of National Intelligence

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**Current Position:** With almost 33 years of federal service, Ms. Kerben holds the position of Senior Security Advisor for the Special Security Directorate at the National Counterintelligence and Security Center (NCSC) since September 2016. In this capacity, she serves as the advisor for all personnel security policy matters for the Director of NCSC and for the DNI in her role as Security Executive Agent (SecEA). She leads the reform efforts in support of the SecEA authorities to develop, implement, and integrate joint security and suitability initiatives with our U.S. Government partners for effective, efficient, and uniform policies and procedures in conducting investigations and adjudications for eligibility for access to classified information or to hold a sensitive position.

Ms. Kerben also serves as the principal liaison for the Performance Accountability Council initiatives and is an active participant in personnel security working groups, prepares briefing materials for internal and external Hill engagements and presents at many public and private sector forums. She has been selected as the DNI primary representative for the National Industrial Security Program and Policy Advisory Council (NISPPAC) and for the State, Local, Tribal and Private Sector Policy Advisory Council (SLTPS).

**Past Experiences:** Previously from May 2005-September 2016, Ms. Kerben was employed at the U.S. Nuclear Regulatory Commission (NRC) and for seven years, Ms. Kerben served as Chief of Personnel Security Branch. She was responsible for the operations and management of the centralized personnel security and Drug-Free Workplace programs including end-to-end security processing and rendering national security clearance and access determinations for federal, contractor and licensee employees.

Prior to joining the NRC, she worked at the U.S. Department of Justice, Immigration and Naturalization Service (INS) as a Personnel Security Specialist, responsible for policy and training and adjudicative functions. While at INS, she was nominated to the position of Chair of the Adjudicator Training Subcommittee at the U.S. Security Policy Board.

In 1988, she began her federal career with the U.S Office of Personnel Management (OPM), Washington Federal Investigative Services as a Federal Investigator. She was assigned to conduct full field background investigations for a myriad of Executive branch agencies and for various positions within the White House and on Capitol Hill. Additionally, she held many career enhancing positions such as Recruiter and Branch Chief of Student Investigator Cooperative Education Program.

Ms. Kerben obtained her B.A. in Criminology from University of Maryland, College Park. She resides in Maryland with her husband and has two college age daughters.

**Tracy L. Kindle**  
U.S. Department of Energy  
Personnel Security Policy Program Manager

Mr. Kindle is originally from Florida and now resides in Maryland. Mr. Kindle spent 20 years in the U.S. Army, retiring in 2005. He has held a number of positions as a civilian security specialist in various Department of Defense (DoD) agencies. After retiring from the Army, Mr. Kindle spent two and a half years as a Security Officer with the U.S. Army from 2005-2008; Information Security Specialist with the Defense Threat Reduction Agency in 2008; Industrial Security Specialist (Policy) with the Defense Counterintelligence and Security Agency formerly Defense Security Service from 2008-2013; Security Education, Training and Awareness and Information Security Supervisory Security Specialist with the Department of the Navy from 2013 to 2018. Mr. Kindle obtained four DoD Security Professional Education Development certifications and holds a Master's of Science Degree in Human Resources Development and Management from National Louis University. As the Department of Energy (DOE) Personnel Security Policy Program Manager, Mr. Kindle has the primary responsibility for assessing, clarifying, and developing DOE-wide Personnel Security Program policy. Mr. Kindle is the DOE alternate voting member on the National Industrial Security Program Policy Advisory Committee and the State, Local, Tribal, and Private Sector Policy Advisory Committee.

Rich DeJausserand serves as the Deputy Director for the Department of Homeland Security (DHS), Office of the Chief Security Officer (OCSO), National Security Services Division (NSSD), Industrial Security Program. In his role as the Deputy Director, Rich is responsible for the Departmental level protection of National Security Information, Technology, Personnel and Facilities.

Prior to assuming the Deputy Director position, he served as the DHS OCSO Compliance/Standards & Training Division Branch Chief (2015-2019), responsible for oversight of the Classified National Security Information Program for State, Local, Tribal and Private Sector entities. He also served as the DHS Science & Technology (S&T) Security Deputy Branch Chief (2011-2015), responsible for Physical Security and the Security Compliance Review program providing security support for the S&T Directorate and five National Research Laboratories.

Rich DeJausserand retired from the United States Navy and served as a Chief Petty Officer (1998-2008). He is a native of the Great State of Michigan and holds both a Masters and Bachelors Degree in Criminal Justice Administration from Columbia Southern University, Orange Beach, Alabama.

## **Dr. Jennifer Ann Obernier**

Dr. Obernier joins the Department of the Navy as the Deputy Director for Security and Intelligence, Office of the Deputy Under Secretary of the Navy. In this role, she serves as the senior technical advisor for security and intelligence.

Prior to this assignment, Dr. Obernier spent 6 years with the Office of the Under Secretary of Defense for Intelligence (OUSD(I)). She joined OUSD(I) as a special operations policy analyst and held various positions, culminating as the Deputy Director of HUMINT and Sensitive Activities, providing oversight and advocacy for the Department's human-enabled sensitive activities and programs. In 2015, she was awarded the Secretary of Defense Medal for Exceptional Civilian Service.



Prior to joining OUSD(I) in 2013, Dr. Obernier was the Senior Intelligence Analyst for WMD-Terrorism at the Defense Intelligence Agency (DIA). During her six-year tenure at DIA, Dr. Obernier also deployed to Afghanistan in support of a Joint Interagency Task Force, conducting target development and supporting detainee and intelligence, surveillance, and reconnaissance (ISR) operations.

In 2006, Dr. Obernier became a program manager for bioterrorism detection R&D at the Department of Homeland Security. These programs procured forensic technologies and assays to support BLOWATCH, a bioterrorism detection system deployed in major US metropolitan areas.

In 2001, Dr. Obernier joined the National Academy of Sciences and became a Senior Project Director, managing committees of leading scientists to provide advice to Congress and the federal government on science and technology policy.

Dr. Obernier holds a Doctorate of Philosophy degree in Pharmacology from the University of North Carolina at Chapel Hill, where she was also a post-doctoral research fellow. She also has a Bachelor of Science degree in Molecular Biology from the Florida Institute of Technology.





# BIOGRAPHY

UNITED STATES AIR FORCE



## JENNIFER M. AQUINAS

Jennifer Aquinas, a member of the Senior Executive Service, is the Deputy Director of Security, Special Program Oversight and Information Protection, Office of the Administrative Assistant, Office of the Secretary of the Air Force, Arlington, Virginia.

Prior to her current position, Ms. Aquinas served as the Division Chief, Security Policy and Oversight responsible for overseeing the development and implementation of Information, Personnel, and Industrial Security policy as well as Special Access Program policy. She has been instrumental in leading Air Force and Department of Defense efforts in personnel vetting and security reform.

Ms. Aquinas has more than 20 years of experience in security, working in a variety of assignments of increasing levels of responsibility. She entered civilian service in 2008 working for the Office of the Under Secretary of Defense for Intelligence. Thereafter, she joined SAF/AA where she led efforts to stand up an Air Force-wide Insider Threat program.

Ms. Aquinas served on active duty and in the Air Force Reserve between 1996–2016 as a Security Forces Officer.



### EDUCATION

1996 Bachelor of Science, Criminal Justice, Pace University, New York  
2001 Squadron Officer School, Air University, Maxwell Air Force Base, Ala.  
2002 Master of Arts, Business and Organizational Security Management, Webster University, St. Louis  
2010 Master of Military Operational Art and Science, Maxwell AFB, Ala.  
2017 Master of Arts, National Security and Resource Strategy, Fort Lesley J. McNair, Washington, D.C.

### CAREER CHRONOLOGY

1. 1996–1998, Flight Leader, 10th Missile Squadron, Great Falls, Mont.
2. 1998–1999, Flight Commander, 341st Missile Squadron, Great Falls, Mont.
3. 1999–2000, Flight Commander, 11th Security Forces Squadron, Bolling Air Force Base, Washington, D.C.
4. 2000–2002, Flight Commander, Detachment 1, 11th Security Forces Squadron, the Pentagon, Arlington, Va.
5. 2002–2016, Commander, U.S. Air Force Reserve (various assignments)
6. 2002–2008, Contractor, Department of Defense, the Pentagon, Arlington, Va.
7. 2008–2013, Security Specialist, Office of the Under Secretary of Defense for Intelligence, the Pentagon, Arlington, Va.
8. 2013–2015, Program Manager, Office of the Administrative Assistant to the Secretary of the Air Force, the Pentagon, Arlington, Va.
9. 2015–2016, Division Chief, Strategy, Readiness and Force Development, Directorate of Security Forces, the Pentagon, Arlington, Va.
10. 2016–2017, Student, Eisenhower School, National Defense University, Washington, D.C.
11. 2017–2020, Division Chief, Security Policy and Oversight, Office of the Administrative Assistant to the Secretary of Air Force, the Pentagon, Arlington, Va.

12. 2020–present, Deputy Director, Security, Special Program Oversight and Information Protection, the Pentagon, Arlington, Va.

**AWARDS AND HONORS**

Air Force Meritorious Civilian Service Award

Meritorious Service Medal

Air Force Commendation Medal

Air Force Achievement Medal

National Defense Service Medal

Global War on Terrorism Service Medal

Nuclear Deterrence Operations Service Medal with “N” device

Armed Forces Reserve Medal

(Current as of July 2020)

**ACTING DEPUTY ASSISTANT SECRETARY FOR  
INTELLIGENCE AND SECURITY**

**Richard L. Townsend**



Richard L. Townsend is the Director for Security at the U.S. Department of Commerce. Headquartered in the Herbert C. Hoover Building in Washington D.C., Mr. Townsend is responsible for a nationwide, multi-disciplined security program, that includes: personnel security, physical security, law enforcement, information security, and continuity and emergency management. Mr. Townsend serves as a primary member of the National Industrial Security Program Policy Advisory Committee (NISPPAC), the primary Departmental Representative to the DHS Interagency Security Committee (ISC), the Federal Law Enforcement Training Centers (FLETC) Training Partner and is the Delegated Original Classification Authority (Secret Level) for the Department. Since January 2021, has been the Acting Deputy Assistant Secretary for Intelligence and Security. In this capacity, in addition to leading the Office of Security, he also oversees the Department's Investigations and Threat Management Service and the Office of Intelligence.

Mr. Townsend previously served as the Director of the Office of Facilities and Environmental Quality overseeing Departmental policy, programs, and operational functions. In this position he served as the Department's Senior Real Property Officer (SRPO) and was a member of the Office of Management and Budget's Federal Real Property Council. Additionally, as a part of his energy and environmental management oversight role, he served as the Deputy Chief Sustainability Officer (Deputy CSO) for the Department and had operational, support, and maintenance responsibility for the Commerce Headquarters building; including overseeing the Herbert C. Hoover Building Renovation and Modernization Project on behalf of the Department.

Prior to joining the Department, Mr. Townsend has held leadership and senior management roles in both the private and public sectors. In the public sector, working for the Department of Defense based at the Pentagon, he supported the programmatic needs for the Office of the Secretary of Defense, the Military Departments, Defense Agencies and Field Activities. In the private sector, Mr. Townsend has held senior positions at General Dynamics, Booz Allen Hamilton, and Parsons Corporation supporting clients such as the U.S. Missile Defense Agency, the U.S. State Department's Overseas Building Office, and the U.S. Intelligence Community.

Mr. Townsend earned his Bachelor of Architecture degree from Carnegie Mellon University in Pittsburgh, PA.

## **HEATHER M. SIMS**

Ms. Heather M. Sims provides Security Strategy, Planning and Collaboration support to the Chief Security Officer at the General Dynamics Corporate Headquarters in Reston, Virginia. Her primary responsibility is to provide subject matter expertise for all security disciplines and insider threat guidance throughout the companies under the General Dynamics (GD) umbrella.

Ms. Sims is also the current Industry Spokesperson to the National Industrial Security Program Policy Advisory Committee (NISPPAC). NISPPAC members advise on all matters concerning the policies of the National Industrial Security Program, including recommending changes. The NISPPAC serves as a forum to discuss policy issues in dispute.

Prior to her arrival at GD in September 2017, Mrs. Heather Sims was the Assistant Deputy Director for Industrial Security Field Operations at the Defense Security Service located in Quantico, Virginia. Mrs. Sims was responsible for the day-to-day field operations throughout the United States and was an instrumental liaison to other government agencies. Prior to assuming the role of Assistant Deputy Director, she was the St. Louis Field Office Chief, responsible for supporting approximately 700 facilities in Missouri, Illinois, Wisconsin, Indiana, Minnesota, and Iowa. Mrs. Sims last role with DSS was a special Department of Defense project on behalf of the Secretary of Defense researching and preparing a Congressional response to The National Defense Authorization Act for Fiscal Year 2017 Section 951, ultimately bringing the personnel security investigation mission back to the department for the federal government.

Prior to her current position with DSS, Mrs. Sims was the Chief, Plans and Programs, 375 Security Forces Squadron, Scott Air Force Base, Illinois. Mrs. Sims provided supervision to over 27 staff personnel that were comprised of civilian, military and contractors. She had program management oversight of the following; Police Service, Installation Security, Physical Security, Electronic Security Systems, Policy and Plans, Installation Constable, Reports and Analysis and Information/Industrial/Personnel Security at an Air Force installation that was home to USTRANSCOM, Headquarters Air Mobility Command, Air Force Communications Agency and three Air Force wings. Additionally, Mrs. Sims was responsible for security oversight of 64 geographically separated units spread throughout the United States.

Mrs. Sims holds a Bachelor's degree in Workforce Education and Development from the University Southern Illinois. She is also a graduate of the Excellence in Government Senior Fellows Program and the Federal Executive Institute as well as a recipient of the Air Force Exemplary Civilian Service award. Mrs. Sims grew up in Pennsylvania and began her Air Force career in August 1989 as a Law Enforcement Specialist. Following Law Enforcement technical training, she was assigned to various overseas and stateside assignments working a variety of law enforcement and security positions. She lives in O'Fallon, Illinois with her husband John Sims and their three children.



DANIEL MCGARVEY is the Senior Principle Business Process Analyst for Alion Science and Technology and is responsible for providing executive consulting in strategic planning for CI/Security programs supporting government and industry. He is the former Senior Consultant for Suitability and Security Clearance Performance Accountability Council, Program Management Office (SSCPAC/PMO). While there, in addition to developing the behavioral model for Personnel Vetting, he provided guidance to the PMO on how activities may be interpreted by stakeholder agencies and industry. Further, he is a senior instructor for the National Security Training Institute (NSTI), providing advanced training in Counterintelligence, Intelligence Collection, and Insider Threat.

He is an active member of the Intelligence and National Security Alliance (INSA) and the National Defense Industrial Association (NDIA), Industrial Security Division.

As an American Society for Industrial Security (ASIS) International member, he was the Chair of the Chief Security Officer (CSO) Leadership Development Committee (LDC), Chair of the Defense & Intelligence Council and team lead for analytical development in the Insider Threat Working Group.

He is a retired member of the Defense Intelligence Senior Executive Service, as the Director, Information Protection, Office of the Administrative Assistant to the Secretary of the Air Force, Headquarters U.S. Air Force, Washington, D.C. He was responsible for the policy development, implementation, training and oversight of the Air Force's information, industrial and personnel security programs. He was chair of the Air Force Security Advisory Group and provided Secretariat support for the Air Force Security Policy Oversight Board. He was also the Functional Manager for the security career field and Chairman of the Air Force Security Advisory Council.

Prior to his Air Staff assignment, Mr. McGarvey was assigned to the National Reconnaissance Office (NRO) with duties that included the development of international space security policy; commercialization of space, a rotational assignment to the National Security Council as adjunct senior staff supporting both the Joint Security Commission II and the U.S. Security Policy Board; Chair of the Training and Professional Development Committee under the Policy Board; and Chief of the Training and Education Division.

As a career military intelligence officer, Mr. McGarvey was cross-trained and assigned in all functional areas. His assignments included a rotational tour as an infantry platoon leader followed by intelligence assignments at both the tactical and strategic levels.

## Dennis Arriaga

Dennis is the Director of Security and Corporate FSO for SRI International, where he leads the diverse team responsible for developing, implementing, and administering security programs across the Institute. Dennis' security experience spans those involved in corporate security management, as well as those disciplines unique to industrial security within Department of Defense (DOD), Special Access Program (SAP), and Sensitive Compartment Information (SCI) arenas.

## Rosael (*Rosie*) Borrero

Ms. Rosie Borrero is currently the Deputy Division Manager of Security for ENSCO, Inc. as well as the Senior Information Security Officer; responsible for managing, training and mentoring all corporate ISSM/ISSOs and providing all levels of security support for DoD and IC secure computing.

Rosie has over 20 years of experience in the cyber security field. She has held various information systems security-related positions within industry as well as on active duty in the United States Air Force; supporting various Government agencies across the Intelligence Community and Department of Defense.

Ms. Borrero was elected as a National Industrial Security Program Policy Advisory Committee (NISPPAC) Representative in 2018 and represents industry on the NISPPAC Information Systems Authorization (NISA) Working Group. She also serves as the Chairperson on the Board of Directors for the Community Association for Information System Security Working Group (CAISSWG).

Rosie has a Bachelor of Science degree in Business Administration and a Masters Degree in Business and Organizational Security Management. She has also earned and maintains a CISSP certification.

Cheryl M. Stone is the Director, Corporate Security & Safety at RAND Corporation. She provides leadership and direction for the global Security and Safety program covering NISPOM, intelligence, International Travel, and Business Continuity and Disaster Recovery program both domestic and international. She was selected to serve as one of eight industry representatives on the National Industrial Security Program Policy Advisory Committee (NISPPAC) and was nominated to the new Board of Directors for the FFRDC/UARC Security Committee, a MOU signatory to the NISPPAC. She is also the Secretary for the ASIS, Defense and Intelligence Council. Previously, she was the Director of Industrial Security at DynCorp International, LLC from February 2008 to August 2013. She was a Senior Executive and federal employee for over 28 years and retired as the Associate Administrator for Defense Nuclear Security at National Nuclear Security Administration within the Department of Energy in 2008. Other government positions Cheryl served was the Deputy Director for Security at Department of Commerce from March to October 2004, and from February 2000 to March 2004 she guided the personnel security program of the U.S. Nuclear Regulatory Commission (NRC) as the Personnel and Physical Security Branch Chief. Cheryl planned, developed, directed and coordinated implementation of all personnel and physical security policies and activities governing the agencies' nationwide program. She also managed the NRC Criminal History and Drug Testing programs. Prior to the NRC, she was employed by the Department of Navy (DoN) for sixteen years as a Senior Security Specialist and Special Access Program Branch Chief. During that time, she served in the security policy section, where she led four discreet centralized security divisions. They included the DoN Special Access Program Central Adjudication Facility, Security Policy Support, the personnel clearance, access and facility database, and the Security Close-Out division.

Mrs. Stone prepared and oversaw implementation of policies and directives for sensitive national security projects, ensuring compliance with Department of Defense physical, personnel and computer security within the Navy Special Access Program Central Office. During this period, she reengineered personnel and facility security procedures significantly reducing cost and eliminating mismanagement of scarce security resources.

Mrs. Stone established the first Navy SAP Central Adjudication Facility responsible for ensuring compliance with national security policy. She managed the adjudication review process for granting, suspending, revoking, or denying access; ensuring individuals nominated for access to National Security Information were afforded due process. She also oversaw the development and deployment of a Security Management System, a large relational database, populated with over four million records that maintained pertinent security information on classified Navy projects. Her responsibilities included managing the Automated Information System Security Branch, providing computer security oversight and support within the organization as well as field activities.

Mrs. Stone actively participated in several U.S. Security Policy Board sponsored committees and working groups.

Mrs. Stone has a Bachelor of Science degree in Criminal Justice and a Masters degree in Security Management. She began her government career as a Special Agent with the Defense Investigative Service.



# **Aprille Abbott, ISP<sup>©</sup>**

## **INDUSTRIAL SECURITY PROFESSIONAL**

Aprille Abbott is currently employed by the MITRE Corporation as an Industrial Security Program Lead and Corporate FSO. She has been a security professional for over 20 years' and has had notable success in a broad range of initiatives that provided support to the security community. The most impactful initiatives have involved her active roles in NCMS "Society of Industrial Security Professionals in the following capacities:

- President of the Society 2 years
  - NCMS MOU representative to the NISPPAC
- Vice President 2 years
- Board of Director 9 years
- National Seminar Chair 3 years
- National Program Chair 2 years
- National Chapter Chair Liaison to the NCMS Board of Directors
- New England Chapter Local leadership positions
- Elected to the NISPPAC October 2019

Each of these roles required her to foster working relationships with government and industry partners, demonstrate leadership qualities, work to implement change and attend Government and Industry meetings as the representative for NCMS and Industry.



**DEREK W. JONES**  
**Assistant Department Head, Government Security**  
**Security Services Department**  
**Massachusetts Institute of Technology**  
**Lincoln Laboratory**

Derek W. Jones serves as the Assistant Department Head for the Security Services Department at MIT Lincoln Laboratory providing direct program support under the Laboratory's Chief Security Officer. Mr. Jones has supported Lincoln Laboratory for almost 17 years serving in a variety of positions to include personnel security, business operations and manager of industrial security.

In his current role, Mr. Jones is directly responsible for security management oversight, guidance and direction for all facets of the Laboratory's industrial security program and special program activities to meet government and contractual security requirements. His responsibility also includes managing the security program for local remote facilities and Laboratory field sites. Mr. Jones serves as a security senior management representative with government sponsors to include the Air Force, DARPA, DCSA, ODNI, etc. Key program oversight aspects include: personnel security, commercial background investigation program, visitor services, education and awareness, vulnerability assessments, closed/secure area administration and construction, policies and procedures, investigations, counterintelligence and insider threat. In addition, he is responsible to manage security fit-up and operational support for remote activities.

Mr. Jones has a long and proven track record providing critical support to a high performing security operation that has been nationally recognized by OUSD. The program at Lincoln Laboratory is dynamic and complex requiring critical skills in leadership, influence and project execution. Mr. Jones was one of the elite selected to participate in MIT's Leadership Program where only two fellows are chosen to attend. He has also received numerous awards for his participation or leadership in a number of efficiency improvements and large scale infrastructure projects. Mr. Jones chairs the FFRDC/UARC Policy Working Group and leads monthly telecons with the other FFRDC/UARC partners to encourage the sharing of information, best practices and experiences. Mr. Jones is a member of the MIT Lincoln Laboratory Information Technology Security Counsel, teaming with the Chief Information Officer and key IT personnel and leaders within the Laboratory to enable a secure environment to mitigate incidents and deter insider threat.

Mr. Jones received his undergraduate degree in Criminal Justice from Westfield State University, and received his graduate degree in Criminal Justice from the University of Massachusetts Lowell. He has served on the University of Massachusetts Alumni Board upon the personal request from the Criminal Justice program department head.

## Tracy Durkin

Mrs. Tracy Durkin is a dedicated security professional with over 30 years of experience in multiple security disciplines across the Intelligence and DoD communities.

Tracy is currently the Executive Director for Enterprise Security at ManTech in Herndon, VA. She manages and oversees their Personnel Security Center (PSC), Physical Security team, Security Education Program, Systems Security and the Information Security team.

Mrs. Durkin was elected as a National Industrial Security Program Advisory Committee (NISPPAC) representative in 2020 and recently became the representative for industry in the NISPPAC Clearance Working Group. She also serves as the Chairperson on the Board of Directors for the Industrial Security Working Group (ISWG). Tracy is also Vice Chair of the ISWG NRO Working Group.

Mrs. Durkin holds a Business Management degree from Strayer University. She is also a Certified Facility Security Officer. Tracy grew up in Maryland and began her security career in 1990 when she became a security officer supporting several Intelligence agencies. She lives in Warrenton, VA with her husband Jared and her two sons. Tracy also has two daughters and five grandchildren.

# **Deputy Assistant Director NISP Authorization Office SELENA P. HUTCHINSON Defense Counterintelligence Security Agency**



Selena P. Hutchinson, GSLC, has been the Deputy Assistant Director, NISP Authorization Office (NAO), Defense Counterintelligence Agency (DCSA) since April 2011. She has over forty years of information technology and cybersecurity management experience in diverse project management, systems acquisition, cyber security and leadership roles. She previously served as the DSS Chief Information Officer. DCSA oversees the protection of national security assets in the hands of industry and provides integrated security services to the Department of Defense. NAO is responsible for the implementation of risk management framework, Information Systems Security Professionals development and is usually the final authority on complex technical, assessment and authorization of systems, and cyber issues that require adjudication.

Ms. Hutchinson received her BS degree in computer information science from Alabama State University and received commission in the U.S Air Force where she had a variety of assignments including a teaching stint at Lowry AFB, CO; several years in the Pentagon engaged in various aspects of information technology, acquisition, and major program management. She ended her military career in 1990 after multiple Pentagon assignments including nuclear munitions support officer.

Ms. Hutchinson began her civil service career with the Federal Bureau of Investigations, where she was involved in the management of several forward leaning technologies in the law enforcement and intelligence communities. Ms. Hutchinson began her graduate studies at Auburn University, completed a Master's of Science Degree in Administration with Central Michigan University and later achieved the Global Information Security Certification. She is also a graduate of the Harvard Kennedy School's Cybersecurity Course. She served twice as Post Commander of the J.E. Hoover Memorial Post 56 of the American Legion and is still an active member. Ms. Hutchinson is an Executive Board Member of Community Lodgings, LLC, a local charity whose mission is to lift families from homelessness and instability to independences and self-reliance. She also participates in a number of other local volunteer programs.



**BIOGRAPHY**  
**DEFENSE INTELLIGENCE AGENCY**  
**DEFENSE INTELLIGENCE SENIOR**  
**LEVEL**

**STACY S. BOSTJANICK**  
Senior Expert for Contracting

Ms. Bostjanick is currently serving as the OUSD A&S, Director of Cybersecurity Maturity Model Certification (CMMC) Policy. In this role, she is responsible for managing the initiation of the CMMC program and is responsible for establishing all Policy and Procedures with regard to the CMMC.



Previously, she served as the DIA, Head of Contracting Activity in which she was responsible for planning, managing, directing and accomplishing the total DIA procurement program. Ms. Bostjanick has also worked as a Senior Contracting Officer for the Missile Defense Agency on the Standard Missile 3 Block IA and IB development and production program. She was responsible for cradle-to-grave execution of over \$5 billion of highly-complex, cutting-edge contracts for our nation's missile defense systems. Ms. Bostjanick has also served as the Deputy Procurement Executive with the Office of the Director of National Intelligence where she had responsibility for establishing Intelligence Community Enterprise-wide Policy and submissions to the Program Management Plan on an annual basis.

Ms. Bostjanick has had numerous awards and accomplishments throughout her career including the Naval Meritorious Civilian Service Award, David Packard Excellence in Acquisition Award, Office of the Secretary of Defense Certificate of Appreciation, the Director of National Intelligence Award for Collaboration Leadership, National Intelligence Meritorious Citation, and the Small Business Award.



**Christopher G. Pollock**

Chief, Policy, Standards and Engineering Branch  
Office of General Supplies and Services  
Federal Acquisition Service  
Supply Chain Management

Chris Pollock has been the Chief of the Policy, Standards and Engineering Branch of Supply Chain Management (SCM) for the General Supplies and Services (GSS) Portfolio of the Federal Acquisition Service since April 2018. In that position, he is responsible for managing the standards and engineering functions of GSA's procurement and distribution of consumable supplies to Federal agencies worldwide, with special emphasis on support for the U.S. military. Overall this program generates annual sales between \$600M - \$1.4B and up to 3 million business transactions a year.

Mr. Pollock also performs as the Program Manager for the GSA Security Equipment Program. This includes performing as the Chairman for the Interagency Committee on Security Equipment (IACSE) and serving as GSA's representative on the Security Equipment and Locking Systems (SEALS) Interagency committee. This committee develops Federal Specifications related to security equipment for the storage of classified information and weapons.

Mr. Pollock received a master's degree in Engineering Management from George Washington University in 1992 and a bachelor's degree in Electrical Engineering from The University of Maryland in 1989.

National Industrial Security Program Policy Advisory Committee (NISPPAC) Meeting Minutes April 14, 2021

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

Greg Pannoni Signature

These minutes will be formally considered by the Council at its next meeting, and any corrections or notations will be incorporated in the minutes of that meeting.

The NISPPAC held its 66<sup>th</sup> meeting on Wednesday, April 14, 2021 virtually. Mark Bradley, Director, Information Security Oversight Office (ISOO), served as Chair.

Jeffrey Spinnanger, Director, Critical Technology Protection (CTP), Office of the Under Secretary of Defense for Intelligence & Security (OUSDI&S) discussed new National Industrial Security Program Operating Manual (NISPOM) rule. Public comments continue to be adjudicated around 60% of which came from Industry partners. The key issue they are going through with the comments are related to Security Executive Agent Directive (SEAD) 3, Reporting Requirements for Personnel with Access to Classified Information or Who Hold a Sensitive Position. Some of the amendments are expected to deal with Trusted Workforce (TW), National Interest Determinations (NIDs)/Section 842 of NDAA 2019.

The SEAD 3 Industrial Security Letter (ISL) went out for NISPPAC comments, of which were extensive. ISLs now go through the Office of Management and Budget (OMB) before being released.

There's been a lot of discussion on Federal Information Systems as it is described and defined in Volume 2 of DoD 5200.22. In the past, Federal Information Systems were previously referred to as "guest systems", which meant a system approved by another government organization. DCSA has authorized federal systems in the hands of cleared industry for many years, however, some government customers are reading the volume two federal information systems paragraph as the only way to adhere to policy for their systems, which DoD thinks is not the case. If Industry or government customers are told to disconnect a previously approved system, please raise the issue with the regional authorizing officials who will engage this directly.

When it comes to Solid State Devices (SSDs), the Defense Counterintelligence and Security Agency (DCSA) follows DoD 5200.22, Volume 2 guidance, which allows flexibility for the government information owner to accept sanitization risk, rather than destruction. If industry has specific sanitization products or questions to address or utilize, submit them directly to NSA for evaluation or the government customer for further guidance.

Section 847 of the Fiscal Year (FY) 2020 National Defense Authorization Act (NDAA) included a requirement for assessment of beneficial ownership pertaining to foreign ownership, control, and influence (FOCI) for DoD prime and subcontracts that are more than \$5 million in value. It requires a DFARS clause that will go through the rule-making process, however, in advance of that process, DoD is drafting a DoD instruction. It is presently in the internal coordination phases within the DOD components under OUSDI&S.

DoD is sponsoring a project with the Applied Research Laboratory for Intelligence and Security (ARLIS) to explore the use of commercial classified cloud in the NISP. ARLIS is going to conduct a pilot, working

with a small number of NISP companies to independently evaluate the connections and approvals process. The project builds on observable improvements to inter-operability, cybersecurity, and core requirements for information security in insider threat, user activity monitoring for highly classified IC and DoD requirements pertaining to compartmented programs that are already in work today, and exploring how those can meet similar application and requirements are presently executed under the NISP.

Heather Sims, Industry Spokesperson, briefed on behalf of Industry. NISPPAC Industry elections are coming up in September. If interested in one of the two open positions, contact a current industry member, or a Memorandum of Understanding (MOU) member.

32 CFR Part 117 is currently a major focus of industry while they move to implement and also adjust to the new changes. It is recommended to go through the new NISPOM for what is there and what is not there.

Another priority for Industry has been working with Performance Accountability Council Program Management Office (PAC PMO), Office of the Director of National Intelligence (ODNI), and Office of Personnel Management (OPM) as TW 2.0 continues to mature.

A third priority for Industry is the continued information sharing struggle. Industry is challenged with sharing of adverse information of cleared employees, potential insider threats identified by the government, target threats against companies, and Industry products and services provided to the government. Industry would like to have continued engagements with their government partners to talk about how information sharing can be increased. Industry is also challenged with being able to share known threats between companies without fear of reprisal and lawsuits. Information sharing with industry holistically is a challenge and improvements would strengthen their ability to provide better security mitigation strategies.

Industry is preparing for the implementation of a new NISPOM, managing and validating and correcting data in DISS, anticipating such a workforce 2.0, preparing for CMMC assessments, and trying to manage the role of controlled unclassified information (CUI).

While CUI is not a part of the NISP, there will be an impact by CUI implementation oversight. Industry is already experiencing a bifurcation of the programs. Each federal agency has been charged with developing a CUI program, but then Industry is dealing with each agency's varied interpretation. Each program is coming up with their own set of rules, leaving Industry in the middle of managing expectations. Industry needs better oversight of government agencies to ensure consistent approaches levied on Industry.

Keith Minard, Senior Policy Advisor, Critical Technology Protection, Defense Counterintelligence and Security Agency, provided the DCSA update.

ISLs are there to help clarify, interpret and provide guidance for industry to better implement portions of the NISPOM requirements. DCSA developed and fielded a NISPOM rule cross-reference tool that enabled readers to select known sections of the current NISPOM and it takes the user to the portion of the rule that it aligns. The tool can be found on the CDSE website. DCSA has been putting out webinars about the NISPOM changes and SEAD 3 reporting requirements.



DCSA has added an external facing webpage, <https://www.dcsa.mil/mc/ctp/NISPOM-Rule/>. It is intended to be a single source to the NISPOM rule information, key changes, events, links to tools and policy, and frequently asked questions for postings related to NISPOM rule to better enable its implementation. They are also using social media to put out updates about the rule. They also released a video called [Get Ready for the Rule](#). It gets to some of the key changes in the NISPOM rule.

DCSA completed a scrub of their existing ISLs and identified some that have to be reissued sometime in the near term. Not all existing ISLs will remain.

DCSA is working to ensure their field personnel have a consistent message on the rule. DCSA field personnel will not begin overseeing the new NISPOM rule until its implementation date.

With the onset of COVID-19 travel restrictions, DCSA shifted from mega operations to remote only activities. Their first priority was the health and safety of our workforce and yours. Secondly, they focused on maintaining support to facilities and continued to conduct oversight responsibilities. COVID limited their ability to physically conduct onsite actions. For example, ATOs were issued without the necessary onsite review. Virtual closed area approvals and administration inquiries were conducted virtually. The first priority, when DCSA can safely begin scheduling onsite contractor visits, will be actions that have been delayed over the past year. This would include final assessments and approvals of storage that have been done without onsite validation, review of information systems that need verifications, and review of corrective actions.

Valerie Kerben, Senior Security Advisor, Special Security Directorate (SSD), National Counterintelligence and Security Center (NCSC), ODNI, provided the ODNI update.

The new Director of National Intelligence, Ms. Avril Haines stated during her confirmation that security clearance reform will be a high priority.

January 15, 2021, OPM and ODNI, as the Executive Agents (EAs), signed a joint Executive Correspondence (EC) on TW. This EC shifted from the prior phase of TW, where the EAs worked to reduce the investigation inventory. The shift to phase two of TW 2.0 focuses on policy development for the implementation of the new government wide approach, with different levels of policy covering the personnel vetting process from beginning to end. One of the main topics in the EC was providing guidance for the executive branch departments and agencies on the differences between TW 1.25 and TW 1.5 transitional state and the enrollment milestones. The EAs are working to ensure agencies are capable and ready to enroll in one of these transitional states. The ultimate goal for transitioning now is that continuous vetting will satisfy the traditional periodic reinvestigation (PR) process. So there will no longer be traditional PRs every five, 10 years. All employees in the national security population and those contractors will be enrolled in a continuous vetting capability where ongoing checks will be done. By September 30, 2021, all departments and agencies must enroll their full national security population in at least the TW 1.25 capability. By September 30, 2022, all departments and agencies must enroll their full national security population in the TW 1.5 capability. There are a few different capabilities regarding which record checks are being done and certain things the agencies are also responsible for doing. EAs are helping agencies enroll and ensuring their concerns are addressed during the implementation phase.

NCSC released a statement regarding COVID-19 and how mental health impacts should not impact national security eligibility. Counseling and undergoing treatment as a result of COVID or the associated

stresses should not in itself be considered a negative or disqualifying factor for rendering eligibility or access to classified information.

OPM issued clarifying guidance on marijuana use and reiterated the federal drug-free workplace that the adherence to the federal laws of using marijuana is illegal.

ODNI continues to operate with limited staff due to COVID-19. Even though they are not back to business as usual, they still have a lot of staff working on team type of schedules. They are operational and ready and able to respond to questions and concerns. Response times may be a little longer. The Scatter Castles program and Continuous Evaluation System help desk personnel are still available and they are fully operational.

Regarding the NISPOM rule implementation, DNI and CIA are working together to implement the NISPOM rule and retract any references to the prior NISPOM manual.

Rob McRae, Director of the National Security Services Division and Rich DeJausserand, Deputy Director for Industrial Security to the Department of Homeland Security (DHS), provided the DHS update. Their workforce largely posture largely remains in a telework remote work environment with the exception of law enforcement, border operations, and port operations.

DHS receives a majority of their industrial security services from DCSA, however, they continue to work with DCSA on the implementation of the new NISPOM final rule, specifically, working with the personnel security team in regards to SEAD 3. They are developing and implementing communication plans, developing policy documents, developing reporting tools, or in the process of developing reporting tools for SEAD 3. They continue to work with DCSA for FOCI assessments regarding accepting NIDs. While they will still conduct their own risk assessments with NIDs, they will make a risk management decision, based on our risk assessments we are still in the process of developing and working hand in hand with DCSA.

Mr. Mark Hojnacke, Director of Security Policy at the Department of Energy (DOE), provided the DOE update. DOE has compared the NISP CFR requirements against DOE's current security requirements and has noted a number of areas that will be addressed, either by page changes to the security directives or through secretarial policy memoranda, including the NIDs language from the recent NDAA update. The DOE Acquisition Regulation (DEAR), and its security clause references DOE security directives, rather than the NISP, to account for other security assets within the department. Because it does not specifically address the NISP, there is no need to update the security clause, although there will be other updates to the DEAR to address NIDs and FCL processing.

DOE's current operating status is that they continue maximum telework throughout DOE in compliance with the OMB goal to operate at 25% of normal building occupancy.

Chris Heilig and Denis Brady provided the NRC update. Their volume of cases and adjudication timeliness is stable. NRC was able to continue processing cases because their process is primarily electronic. As COVID restrictions are easing, we're able to take care of drug tests and fingerprinting at almost a normal pace again. NRC continues to regulate the civilian use of commercial nuclear energy in academic and medical use. The NRC is continuing to implement the requirements of the NISPOM, but had to come up with alternative means for conducting that, but working with our industry stakeholder partners, they have been able to achieve those goals.

Most of NRC is in phase two for maximum telework, but some of their regional offices still are in our phase one for mandatory telework, but are still able to conduct our functions as the regulator for nuclear energy.

Stacy Bostjanick, Director of Cybersecurity Maturity Model Certification (CMMC), briefed updates to the CMMC policy. They are continuing to work through the rule making process, and are adjudicating the comments. Based on those comments, they have gone back and looked at the model and are considering some possible changes in response to those questions and comments, but they are not ready to publicize what those are.

They are moving forward with their pilot and getting the Certified Third-Party Assessor Organizations (C3PAOs) assessed at the CMMC level three, as they consider the information that they are pulling together with those assessments as being sensitive information. Every assessment that they accumulate and review will be housed in the DISA GovCloud, and that information will then be ported over to the Supplier Performance Risk System (SPRS) where contracting officers and program managers will have the opportunity to go in to validate that companies have the appropriate CMMC level for the contracts that they're competing on. They have had a couple of pilots that have canceled. Some of them had award dates in June and the C3PAOs were not going to be ready in time. One of the main tenets of their pilot is they are not going to impact the timing of any of the award cycles for acquisitions right now. They have set up a supply chain working group with members of OUSD, across OUSD and the services, to come up with a lexicon and taxonomy and a standardization to look at supply chain risk and how to assess it and mitigate it and then what are the tolerance levels that can be expected.

Roy Jusino, with the DoD Lock Program, and Chris Pollock with GSA, briefed about recent policy that addresses the removal of older GSA approved containers and vault doors that are currently used for protection of classified information. At the end of service, the removal date is between 2024 and 2028.

Mark Bradley and Greg Pannoni, Associate Director, ISOO, briefed about the NISPPAC working groups (WGs). There was discussion about the Small Business Administration (SBA) joint business venture final rule. ISOO is still working through concerns with it. There will be a forthcoming ISOO notice that clarifies entity eligibility requirements for joint venture entities that enter into classified contacts with the federal government. TW's ongoing transition to 2.0 was discussed, the JPAS to DISS transition, the NISPOM changing over to a rule and the implications of some of the changes, particularly SEAD 3, but also a little bit on TS accountability, limited FCLs, and the intrusion detection recognition that not just UL 2050, but other entities that meet Nationally Recognized Testing Laboratory (NRTL) standards. There was a little bit of discussion about security vulnerability assessments, the ratings, how that's evolving ratings for SBAs. For the NISP Cost WG, this is a broader sub element to an initiative that ISOO under has undertaken, beginning about two or so years ago, to refine and simplify, to support agencies in their efforts to provide overall data with respect to their classified national security information programs, as required by executive order and directive to ISOO on an annual basis. One that get the most attention was reporting on the estimated numbers of derivative and original classification activities, which in and of itself was a highly suspect number. ISOO suspended the collection of data while working on refining collection efforts, consolidating them and taking advantage of technology. ISOO is talking about cost incurred by contractors under Cognizant Security Agency (CSA) cognizance. The government has met several times. Before ISOO brings industry in to see what has been come up with, ISOO wants to hear from each CSA to bring their proposal for how they intend to gather costs that their NISP contractors incur. Each CSA can come up with something that they all agree on and just have one mechanism. We

do not want to have duplication of cost collection. Keeping with the overall intent of the reform effort for data collection, ISOO wants to keep it as simple as possible, so once we have the CSAs' way ahead, and some degree of consensus, we would then bring NISPPAC Industry into take a look at what we have and to get their input.

During the NISP Information Systems Authorization (NISA) WG, we discussed SSDs.

David Scott, DCSA, briefed DCSA NISA WG information, which was provided with slides.

Marianna Martineau, DCSA, briefed DCSA investigation and adjudication information, which was provided with slides. For the background investigation group, as COVID continues, they are maximizing telework as most staff are already working remotely, and we are continuing to use the executive agent approved alternative processes, including telephone interviews. At the beginning of COVID-19, DCSA evaluated their processes and implemented a hold where they were not receiving responses to their requests for additional information or other actions related to COVID-19. They re-evaluated current operating procedures and are reinstating pre-COVID business processes and procedures regarding correspondence requirements for responses. They will no longer be issuing indefinite automatic extensions related to the COVID-19 pandemic. Subjects, through their security managers and facility security officers, will have 30 days from the date request, for an action in the Defense Information System for Security (DISS) to comply with that official request for information. If you have any questions, please send them to DCSA through the portal.

Tracy Kindle, DOE, provided the DOE personnel security update. They are meeting the Intelligence Reform and Terrorism Prevention Act (IRTPA) timeliness goal for all investigative tiers.

Chris Heilig, NRC, provided the NRC personnel security update. They are meeting the IRTPA timeliness goal for all investigative tiers.

Perry Russell-Hunter, Director, Defense Office of Hearings & Appeals (DOHA), provided DOHA's update. DOHA continues to make maximum use of telework except for the personnel who are conducting and supporting the in-person administrative hearings, the DOHA administrative judges, department council and support personnel. Calendar year 2020 was the highest average year for total numbers of Statements of Reasons (SORs) reviewed and issued since 2016. SORs are still going out in typical numbers and are timely. They currently have 330 SOR reviews pending, which is a typical number. At the end of January, they had 390 pending. DOHA reviewed and the CAF issued over 3,100 draft SORs during the period between March of 2020 and March of 2021. The first four months of FY 2021, they reviewed and DoDCAF issued 1,200 SORs. There is going to be a shift later this year where DOHA will begin providing and tracking the SORs directly to Industry employees.

The pandemic impacted the hearing process because DOHA was having challenges with conventional video teleconferencing due to the simple fact that there would often be no operators available at the other end of the line where were DOHA needed to reach, DOHA has now tested and is making good and effective use of something called the Defense Communications System (DCS) to conduct remote online virtual hearings for clearance holders and clearance applicants in locations where travel would still be unsafe or where we could not reach the individual using conventional video teleconference technology.

Evan Coren, Implementation Lead for CUI, ISOO, briefed on ongoing CUI efforts. The National Information Exchange Model (NIEM) has released NIEM 5.0, which for the first time includes a CUI

metadata standard. NIEM is one of the common metadata standards. This will significantly improve the metadata consistency that occurs as metadata is used in association with CUI. The CUI Registry Committee and ISOO will serve as the mechanism to update and review changes to the CUI domain within. National Institute of Standards of Technology (NIST) Special Publication (SP) 800-172 has been published. This was formerly known as the draft NIST SP 800-171B. NIST 800-172 recommended security protections for non-federal information systems that process or transmit CUI. It was finalized February 2, 2021. It mainly evolves changes in narrative and boundaries and does not change the controls that are in place. The controls within NIST 800-172 are used in the CMMC Level 4 and Level 5 determining that contractors have the necessary controls in place.

The CUI Federal Acquisition Regulation (FAR) clause is projected to go out to public comment later this year. Once it is out for comment, ISOO will hold an ad hoc stakeholders meeting that will be scheduled at the beginning of the public comment period to address concerns and discuss the draft version that will be up for comment.

Everyone is encouraged to take a CUI markings training being offered by ISOO, which is announced at <https://isoo.blogs.archives.gov/>. There are also training resources at <https://www.archives.gov/cui/training.html>.

The next NISPPAC is scheduled for October 27, 2021. All NISPPAC meeting announcements are posted in the federal register at <https://www.federalregister.gov/> approximately 30 days before the meeting, along with the ISOO blog at <https://isoo-overview.blogs.archives.gov/>.

## Summary of Action items

- DCSA is still in process of internal and formal coordination of an Industrial Security Letter (ISL) on Insider Threat Program, which will replace ISL 2016-02. STATUS: CLOSED due to all ISLs being reviewed due to the NISPOM rule.
- Schedule insider threat working group meeting. STATUS: CLOSED. The meeting was held on September 2, 2020.
- DCSA needs to find out if they will be responsible for all SCIF accreditations or just those associated with DIA. STATUS: CLOSED. DCSA, will have a responsibility for the accreditation of military departments, 4th Estate, and their contractor SCIFs.

Questions and Answers from the NISPPAC

None

## NISPPAC Attendance

Abbott, Aprille	Bensie, Evelyn	Brown, Alexis
Abeyta, Melissa	Benson, Michael	BrownWard, Joy
Abney, Quantoinette	Bentel, Misty	Bruce, Erin
Abrams, Nikki	Bentley, Nathaniel	Bruder, Bethany
Ackerman, Daniel	Bergeman, Stephen	Bryan, Karen
Adam, Macvean	Berry, Kathleen	Bryant, Penny
Adams, Elizabeth	Beske, Jamon	Budnik, Caroline
Adams, S. Ann	Bethea, Nasu	Bunch, David
Adissu, Mekdes	Bhalla, Ginny	Burger, David
Agnew, Daniel	Biggers, David	Burgos, Sasha
Akers, Lynetta	Black, Christina	Burke, Doris
Albalos, Raven	Blacka, Leslie	Burns, Lynn
Alcala, Anna	Blackmon, Robin	Burrell, Lisa
Alexander, Christine	Blais, Steven	Burton, Stacie
Alexander, Treva	Blake, Theresa	Busch, Melissa
Allen, Nicole	Blakslee, Jen	Byrge, David
Ambrose, Zorica	Bland, Booker	Cabe, John
Andablo, Yvette	Blanton, Yvette	Call, Samantha
Anderson, James	Blauch, Dana	Callier, Jewel
Andrews, John	Blazic, Andrew	Calloway, Victor
Anthony, Christopher	Blazich, Brigid	Campbell, Parry
Aquinas, Jennifer	Bledsoe, David	Cannady, Richard
Arffman, Kathryn	Blount, Richard	Cantie, Lacey
Argumedo, Lori	Boaston, Thomas	Capsalis, Corey
Armstrong, Robert	Boccalino, Michael	Cardella, Thomas
Arriaga, Dennis	Bock, Kristy	Carlin, Michelle
Arvidson, Alex	Bodrick, Detra	Carnaghi, Suanne
Ashby, Holli	Booker, Patrick	Carney, Jacqueline
Ashley, Janet	Boomer, Mindy	Carter, Roxanne
Atkinson, Stephan	Borrero, Rosie	Casey, Sandy
Auldrige, Kelly	Bosket, Jeffrey	Cashin, Joseph
Avila, Donna	Bostjanick, Stacy	Cassidy, Kerry
Babic, Adriana	Boston, Bridgette	Castel, Jason
Backhus, Annie	Boulware, Chelsi	Cavanagh, Nicole
Bailey, Robert	Boyd, Michelle	Cavano, Jeffrey
Baldree-Nichols, Amelia	Bradley, Mark	Chambers, Steven
Barbee, Lisa	Brady, Denis	Chamblee, Tamra
Barr, Julianna	Brandt, Elizabeth	Chapman, James
Barry, Tris	Braxton, Kishla	Chappell, Curtis
Bassey, Dunamis Gospel	BrennanFontes, Jean	Charyton, Dianne
Bauer, Sandra	Britton, Charles	Chaumont, Luis
Baugher, Kimberly	Broadie, Constance	Chituras, Jimmie
Baxter, Jordan	Broglin-Bartlett, Darinda	Choate, Kevin
Bean, Joan	Brokenik, Trish	Christian, Laurie
Belcher, Lara	Brooks, Valerie	Christian, Heather
Belsinger, Deborah	Brooks, Beverly	Church, Brenda
	Broussard, Derrick	Chvotkin, Alan



Cinelli, Giovanna  
Clader, Heather  
Clark, Wade  
Clasen, Melissa  
Claus, Matthew  
Clifford, Debra  
Cline, Nathan  
Clohessy, Meaghan  
Cloud, Brian  
Cobble, Jonall  
Coburn, Catherine  
Cole, Jim  
Cole, R. Keith  
Coleman, Jeff  
Coleman, Johnathan  
Collo, Robin  
Colon, Susan  
Condon, Jessica  
Connelly, Michael  
Connerley, Christopher  
Conquest, Karlyon  
Conway, Scott  
Cook, Krista  
Cooper, Nicole  
Cooper, Teresa  
Coren, Evan  
Coulter, Sarah  
Couts, Dustin  
Crawford, Priscilla  
Crew, Kimberly  
Crickenberger, Joy  
Crouch, Alan  
Cullison, Ashley  
Curcic, Odeyra  
Da Cruz, Emilea  
Dahle, Nissa  
Dangel, Alex  
Daniels, Trudy  
DAnthony, Stacey  
Dartsch, Kelly  
Davis, James  
Davis, Glynn  
Dawson, Michelle  
Dawson, Steven  
Dean, Mary  
Deck, Rob  
Dejausserand, Richard  
DeJesus, Matthew

Delgado, David  
Demers, Michael  
DeMong, Jeremy  
Denegal, Robert  
Deramus, William  
DiazMartinez, Sarah  
Dickman, Jessica  
Diggs, Brenda  
Dinkel, Jane  
Disante, Pete  
Dixon, Beth  
Donnelly, Janet  
Dotson, Virgil  
Drew, Paul  
Duke, Christina  
Dukoff, David  
Durant, Kelly  
Durkin, Tracy  
Dyer, Teresa  
Eckel, Mark  
Eckerstrom, Suzanne  
Eddins, Kristina  
Edge, Kimberly  
Edington, Mary  
Edmonds, Tracy  
Edson, Mark  
Ellison, Lori  
Enabnit, Misty  
Engelbrecht, Laura  
England, Michael  
Epps, Danette  
Equels, James  
Erickson, Heather  
Escobar, Sheri  
Escobar, Michael  
Escobedo, Robert  
Estes, Megan  
Everett, Trina D.  
Ewton, Erin  
Fabozzi, Madeline  
Falk, Suzanne  
Faller, Mike  
Farmer, Anne  
Farmer, Andrea  
Fehlner, Scott  
Feldman, Ben  
Fell, Rob  
Fergus, Jeffrey

Fisher, Darci  
Fisher, Ray  
FitzEnz, Jonathan  
Flaherty, Joann Emma  
Flaminio, Stephanie  
Fleischmann, Derek  
Flewellen, Linda  
Flores, Stephanie  
Flores, Mayra  
Ford, Elizabeth  
Fowler, Don  
Fowler, Pat  
FrayCarlson, Kerry  
Fredrich, Cathy  
Freeman, Lisa  
Fritts, Kaitlyn  
Fulco, Joseph  
Funicello, Kasey  
Funicello, Lorena  
Fuster, Kathleen  
Gabeler, Jennifer  
Gainey, Mitch  
Gannaway, Mary  
Garcia, Vincent  
Gardner, Kelly  
Garner, Bryan  
Garner, Byron  
Garner, Carol  
Geisler, Angela  
George, LaVerne  
George, Kelly  
Gibbs, Diane  
Gibbs, Katrina  
Gibson, Sharon  
Gilbert, Daniel  
Ginder, Linda  
Glassic, Scott  
Gleason, Kimberly  
Goldstein, Donald  
Gonzalez, Benjamin  
Good, Suzanne  
Goodwin, George  
Graham, Jennifer  
Gray, Juaquita  
Gray, Tonya  
Greaver, Angela  
Green, Heather  
Green, Neil

Greene, Gus  
Greenebaum, Rebekah  
Gribble, Gene  
Griffe, Gene  
Griffin, Diane  
Grimes, Daniel  
Grinsell, Caitlin  
Gulack, Jeffrey  
Gunn, Lesley  
Hadwin, Lisa  
Haggerty, Paul  
Hagood, Kenneth  
Haire, Tamara  
Haley, Rene  
Hamilton, Jill  
Hamilton, Pamela  
Hargis, Jeremy  
Harne, Joseph  
Harris, Tamara  
Harris Pagan, Heather  
Harrison, Kimberly  
Hartburg, Craig  
Hayward, William  
Heaton, Pamela  
Heil, Valerie  
Heilig, Chris  
Helton, Alicia  
Henderson, Alexis  
Henderson, Kaila  
Herbert, James  
Herbst, Jonathan  
Hernandez, Josh  
Hertzog, Conrad  
Hewlett, Daisha  
Hill, Brett  
Hill, Jessika  
Hinojosa, Carla  
Hodges, Hope  
Hogan, Susanne  
Hohausser, Michelle  
Hojnacke, Mark  
Holland, Betsey  
Hollandsworth, Matt  
Hollingsworth, Danielle  
Holloman, Noelle  
Holmberg, Brandon  
Howar, Laura  
Howard, Mark

Howell, Mark  
Huber, Donna  
Hughes, Kimberly  
Hughes, Rachel  
Hulet, Michael  
Hunt, Matthew  
Hurtt, Samuel  
Husker, Frank  
Hutcheson, Amy  
Hutchinson, Selena  
Hutchison, Alicia  
Hyater, Sharon  
Illidge, Kaitlin  
Indelicato, Charles  
Isely, Constance  
Izadi, Katayoun  
Jackson, Sonja  
Jackson, Stephen  
Jackson-Marquard, Kirsten  
James, Robert  
Jenkins, LeeAnn  
Jensen, Kathryn  
Jett, Christina  
Jiggetts, Lauren  
Joe, David  
Johnson, Derrick  
Johnson, Craig  
Jones, Derek  
Jones, Kenneth  
Jones, Melinda  
Jones, Cecilia  
Jongema, Linwood  
Jusino, Roy  
Kamilova, Kamilya  
Kaohi, Catherine  
Karkoski, Michael  
Kay, Jasmine  
Kennedy, Beverlee  
Kerben, Valerie  
Kerr, Julie  
Khajehali, Collette  
Kidd, Linda  
Kim, YuJin  
Kimmel, Kim  
Kindle, Tracy  
King, Christyne  
Kirby, Jen  
Kitchens, Barbara

Kitts, Karen  
Klaczky, Joseph  
Klink, Carolina  
Knarr, Matthew  
Koslow-Verdi, Alison  
Kostielney, Craig  
Kozacek, Shelly  
Kraus Jr, Joseph  
Kuethen, Bonnie  
Kuo, Chia-Chi  
Kyzer, Lindy  
Lai, Kuan  
Lamont, Kimberly  
Lamps, Jeremy  
Lancaster, Laura  
Lanzillo, Brittany  
Laperle, Deanna  
Lapre, JeanPierre  
LaRocque, Laurie  
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Lederle, Alan  
Lee, Jessica  
Lee, Amy  
Leggiere, Eric  
Lerma, Patricia  
Lettera, Brenda  
Levy, Isabelle  
Lewis, Natasha  
Lewis, Tiffany  
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Lightner, Carol  
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Lindsey, Andrea  
Liner, Marquiz  
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Lomeli, Michelle  
Lopa, Mary-Jane  
Lord, Ginger  
Lorenz, Lori  
Lotwin, Andrew  
Lowy, David

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Lundquist, Margaret  
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Massaro, James  
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McLeod, Donna  
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Mcnamara, Carrie  
Mcnichol, Lindsey  
McRae, Robert

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Measures, Lisa  
Mechem, Stormie  
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Palme, Jacob  
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Perrault, Judy  
Persinger, Jonathan  
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Phagura, Satminder  
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Phan, Xera  
Pherson, Kathy  
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Porter, Lizet  
Posey, Mozelle  
Potts, William  
Pound, Mary  
Powers, Kyla  
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Price, Colleen K.  
Prichard, Tennille

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Provencher, Marguerite  
Pulliam, Donna  
Pyles, Larry  
Quintana, Sandra  
R, Nora  
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Rendon, Annabelle  
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Shimamura, Judy  
Silveira, Cynthia  
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Sims, Taniesha  
Singh, Kulvinder  
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Sutphin, Michelle  
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Trehern, Deborah  
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Tsukamoto, Krystina  
Tweed, Michael  
Ty, Emmanuel  
Ulery, James  
Unruh, Carolyn  
Uperesa, Dane  
Vaccariello, Jeffrey  
Vachon, Jackie  
Van Horn, Valora  
Vance, Robert  
Vaughan, Tom  
Vaughan, Francesca  
Vaughn, Susie  
Victoria, Elizabeth  
Villa, Christopher  
Villemaire, Doreen  
Villescas Hermosillo, Jessica  
Vilven, Shanna  
Volak, Martha  
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Wahl, Tamara  
Wallace, Charlene  
Wallerson, Diane  
Ward, Amanda  
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Warner, Jean

Warren, Kerry  
Washington, Keshia  
Watkins, LaTasha  
Watters, Michelle  
Weatherby, Bradley  
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WeaverLillard, JoAnda  
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Whelan, Mary  
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Wilkes, Chelsey  
Willbanks, Ann  
Williams, Enita  
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Williams, Maurice  
Williams, Kristin  
Wilson, Denise  
Wilson, John  
Wilson, Michelle  
Wilson, Jennifer  
Winch, Celestine  
Winford, Donneaka  
Winn, Terrance  
Winton, Tracy  
Wisnosky, Roger  
Witherow, Leneda Kay  
Wojciechowski, Kathy  
WojcikBerthelotte, Brooke  
Woldridge, Marya  
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Wood, Lemy  
Woodall, Christopher  
Woodard, Teresa  
Woodfolk, Torri  
Woodruff, Patricia  
Woolsey, Wailohia  
Worsham, Robert  
Wright, Amy

Wright, Paula  
Wuest, Heather  
Wunderich, Daren  
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Yenigun, Katie  
Yeow, Kim  
Yersak, John Patrick  
Young, Erin  
Zeigler, Bobby  
Zeitler, Erin  
Ziemski, Jason  
Zubrick, Sarah  
Zweil, Alison

# Industry Updates-April 2021



## ➤ September Elections for 2 Industry Members

## ➤ Industry NISP Priorities/Watch List

- New NISPOM, 32 CFR, Part 117
- TWF 2.0-Personnel Security Reform
- Information Sharing
- Operating under COVID and Return to Work
- National Industry Security Program Systems
- Controlled Unclassified Information (CUI)

## ➤ Focus Areas

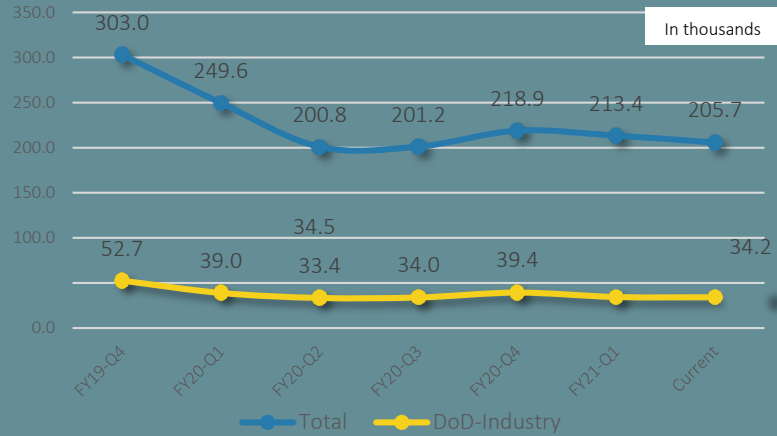
- Partnership/Stakeholders
- Industry Engagements-Unity-Staying Informed
- Focused Strategic Collective Priorities

# DCSA PV INVESTIGATIONS/ADJUDICATIONS | Industry



## INVESTIGATION

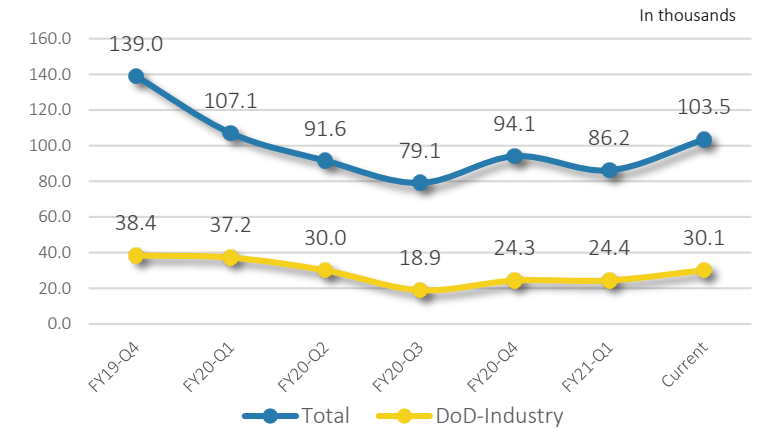
CURRENT INVENTORY	
All DCSA Customers	205.7K
Industry Only	34.2K



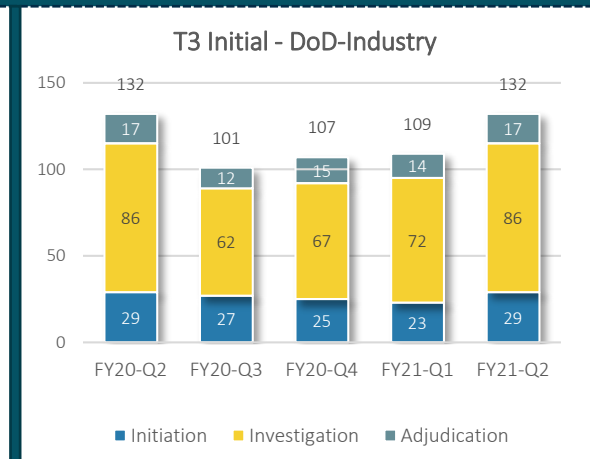
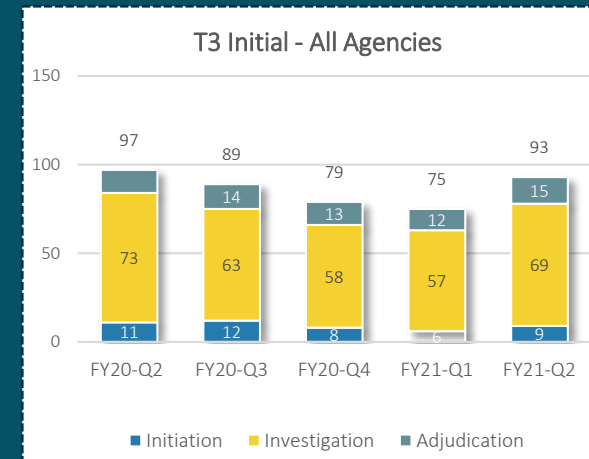
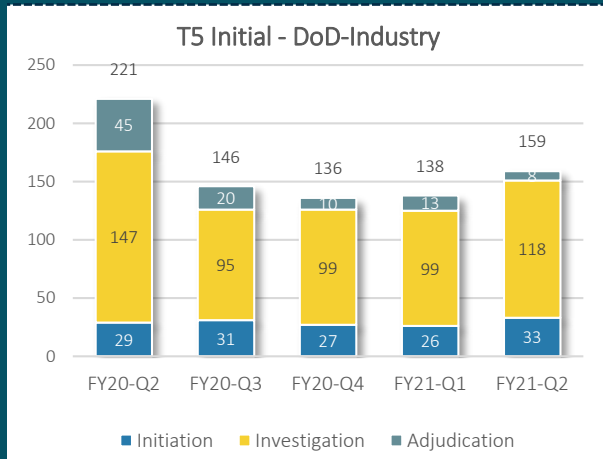
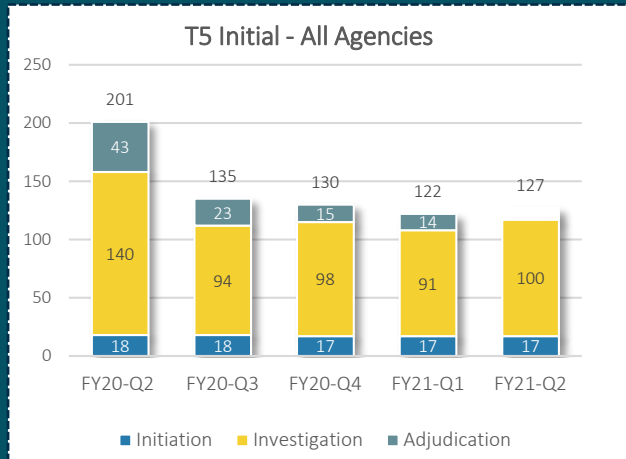
## ADJUDICATION

DoD CAF Only

CURRENT INVENTORY	
CAF All	103.5K
Industry Only	30.1K



## END-TO-END TIMELINESS (Fastest 90% of adjudicated investigations in days)



# DCSA VROC – Industry Updates



## FY21 PSI Execution

**~1M**  
NISP Contractors With Clearance Eligibility

**90k**  
Requests for Investigations Processed

**4,700**  
Incidents Triaged

## Continuous Evaluation

**~675,000**  
Industry Subjects Enrolled in CE\*

**121,000**  
Industry PRs Deferred into CE to Date\*\*

**6%**  
Rate of CE Alerts Received

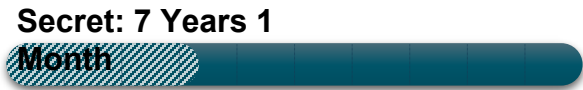
**Note:**

\* DoD CE Program TW 1.25 compliant

\*\* Industry Deferred PRs are enrolled in TW 1.5 data sources to support reciprocity

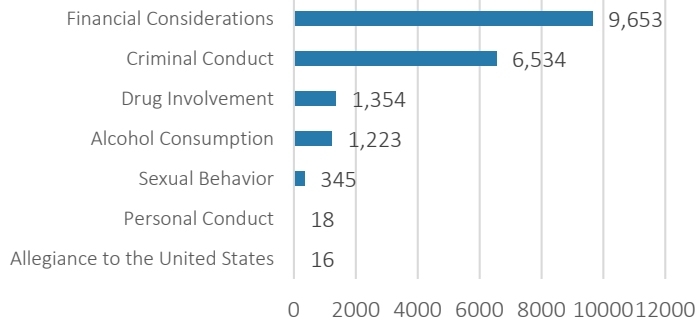
### Early Detection

Early Detection and Risk Mitigation, before next PR due to begin



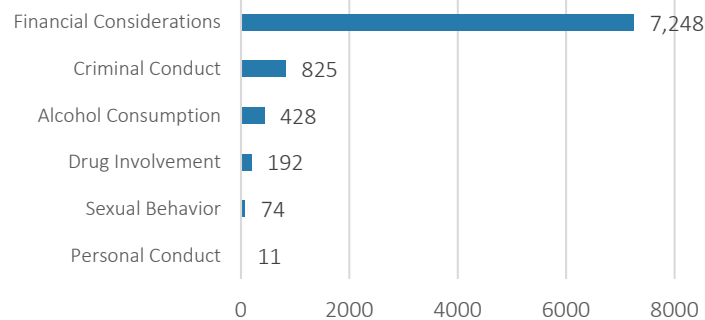
## Industry CE Alert Data

### CE FY21 Valid Alert by Guideline



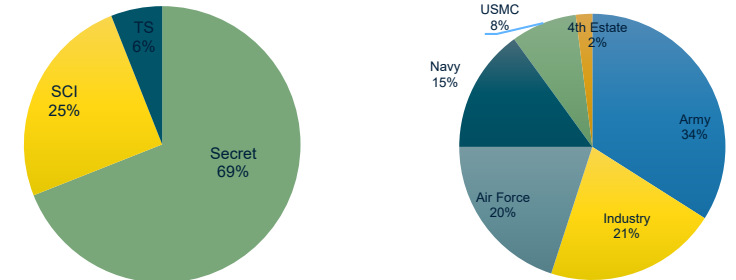
~19K Valid Industry CE Alerts    ~14K Unique Industry Subject

### CE FY21 Actionable Alert by Guideline



~8.7K Actionable Industry CE Alerts    ~8K Unique Industry Subject

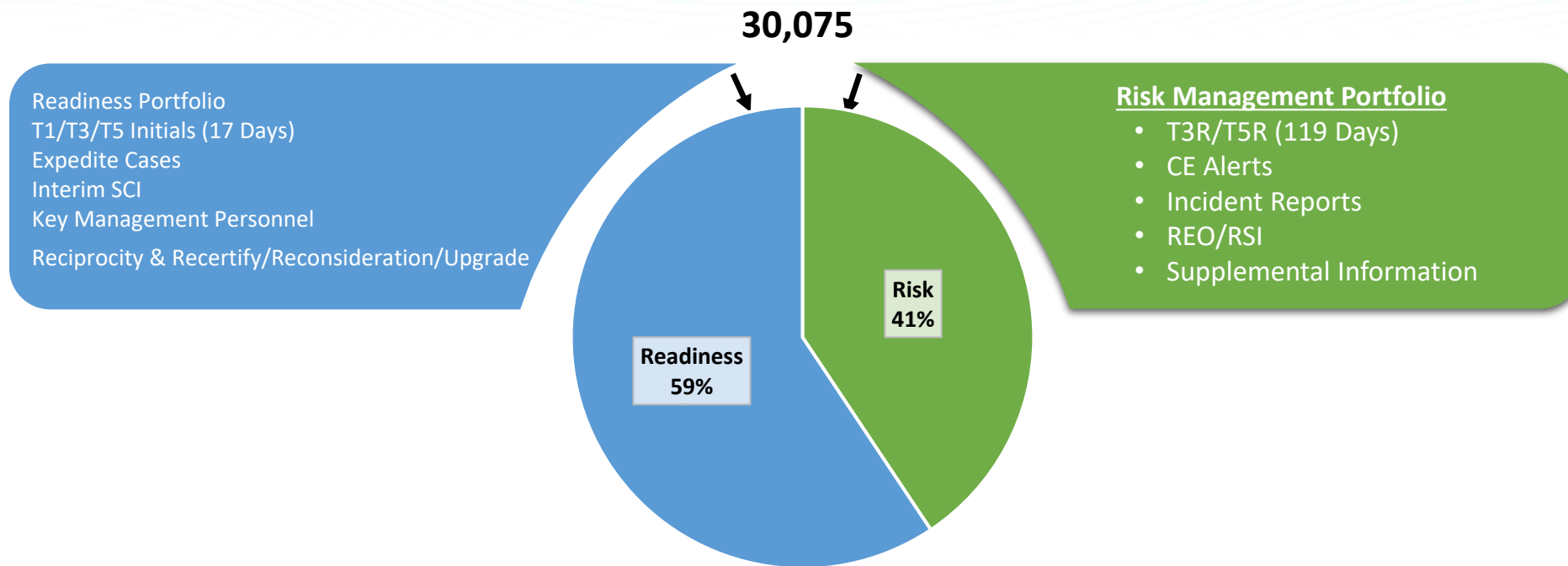
### CE Population



UNCLASSIFIED



# DoD CAF Operational Update - Industry



## FY21 Focus Areas

- DoD CAF continues Meeting Adjudicative Timeliness goals in FY21Q2 and expects to continue throughout FY21
- Maintain Healthy Inventory and execute national security eligibility, civilian suitability and credentialing decisions
- Improve Quality and Consistency of Adjudicative Decisions and business processes through workforce development and training
- Strengthen Relationships with personnel security partners
- Standardized Reciprocity Program within DCSA to improve program performance
- Destigmatize seeking Mental Health Care for cleared persons
- COVID-19. CAF Operating at Full Mission Capacity while maximizing telework

# DCSA NISA WORKING GROUP UPDATE

DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY

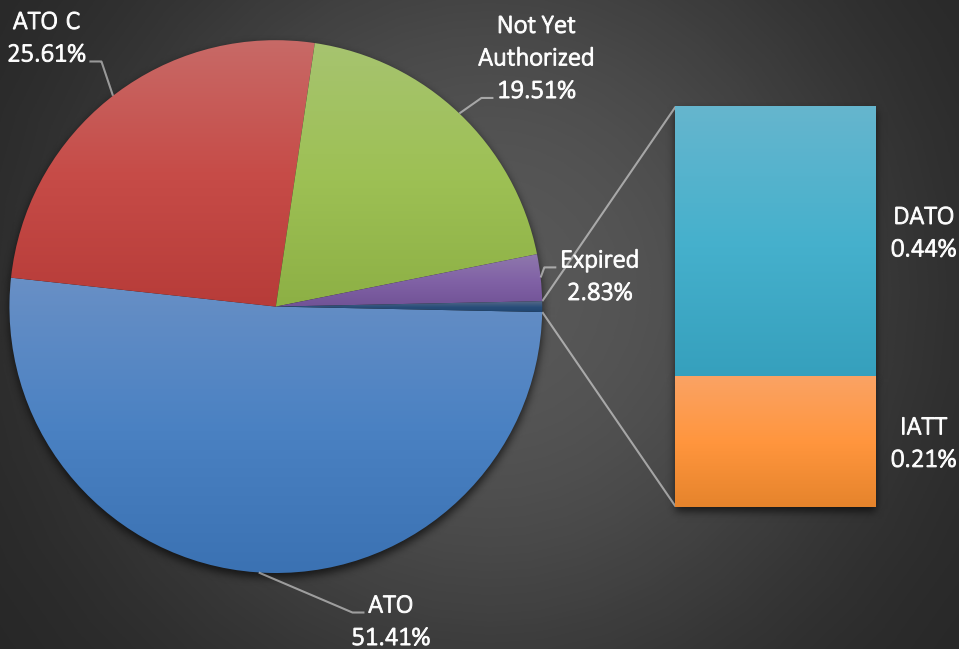


DAVID SCOTT  
NISP AUTHORIZATION OFFICE  
CRITICAL TECHNOLOGY PROTECTION



# National Metrics

## SYSTEM AUTHORIZATION STATUS



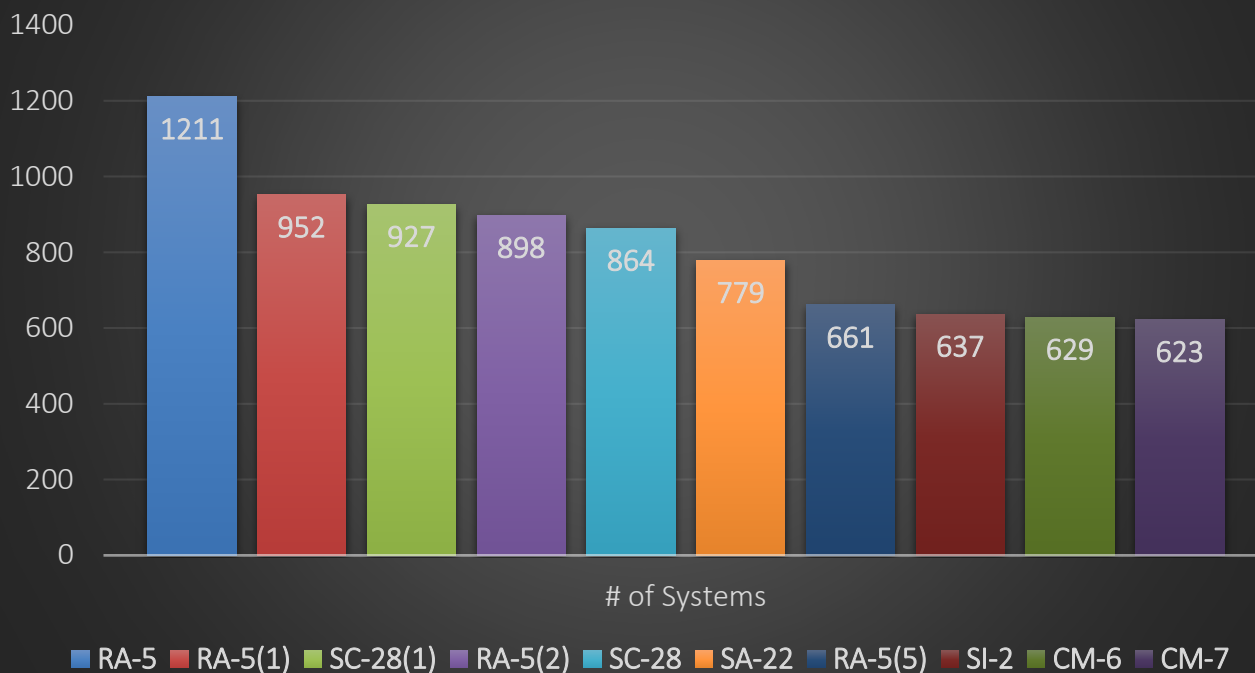
NISP eMASS Metric	Total
# Registered Systems in NISP eMASS	6,292
# of Authorizations Processed in FY21	2,995
# of NISP eMASS Users	3,649

**Overview:** The chart shows the percentage of all the systems within the NISP by authorization status. The following are the statuses: (1) Authorization To Operate (ATO), (2) ATO with Conditions, (3) Not Yet Authorized, (4) Expired, (5) Denial of Authorization to Operate (DATO), and (6) Interim Authorization to Test (IATT).



# National Metrics

## TOP 10 NON-COMPLIANT SECURITY CONTROLS



### Security Control Information

**RA-5:** Vulnerability Scanning

**RA-5(1):** Vulnerability Scanning | Update Tool Capability

**SC-28(1):** Protection of Information at Rest | Cryptographic Protection

**RA-5(2):** Vulnerability Scanning | Update by Frequency / Prior to New Scan / When Identified

**SC-28:** Protection of Information at Rest

**SA-22:** Unsupported System Components

**RA-5(5):** Vulnerability Scanning | Privileged Access

**SI-2:** Flaw Remediation

**CM-6:** Configuration Settings

**CM-7:** Least Functionality

**Overview:** This slide provides the top 10 non-compliant security controls within the NISP. In addition, the number of systems with the identified non-compliant security control is listed. A security control is deemed non-compliant when it is not properly implemented, operating as intended, and/or producing the desired outcome with respect to meeting established security requirements.



# DAAPM Update

- Future DAAPM Revision (TBD - 2022)
  - NIST SP 800-53 Revision 5
    - NAO is tracking the transition from National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 Rev. 4 to Rev. 5.
    - Prior to updating the DAAPM, the updated Committee on National Security Systems Instruction (CNSSI) 1253 must be released.
  - An internal Working Group developing a Connection Process Guide (CPG) in order to assist all stakeholder with the establishment of interconnections. The CPG will provide process flows, templates, and guidance.



# NISP eMASS Common Issues

1. Failing to follow the guidance in the NISP eMASS Industry Operation Guide
2. Incorrect System Name/System Acronym - *DCSA guidance for NISP eMASS system naming must be followed*
3. System details not fully populated
4. Incomplete System Description
5. Improper application of overlays
6. Artifacts needed to support authorization decision are not included in the security plan
7. Risk Assessment Reports (RAR) are not conducted at both the organization and system level. RARs must fully address: (1) relevant threats, (2) vulnerabilities (internal and external), (3) impacts to the organization, and (4) likelihood
8. Unsatisfactory inputs for Implementation Plan, SLCM, and Test Results (*All CCIs must be addressed*)
9. Plan of Action & Milestones (POA&M) is not accurate and/or does not address Non-Compliant security controls
10. Failing to submit security plan 90 days prior to Authorization Termination Date (ATD)



# Questions

- Use available resources (DAAPM, eMASS [HELP], NISP eMASS Internal and Industry Operation Guide, and DISA RMF Functionality Guide).
- Visit the DCSA website: <https://www.dcsa.mil/mc/ctp/>



# Securing the DoD Supply Chain

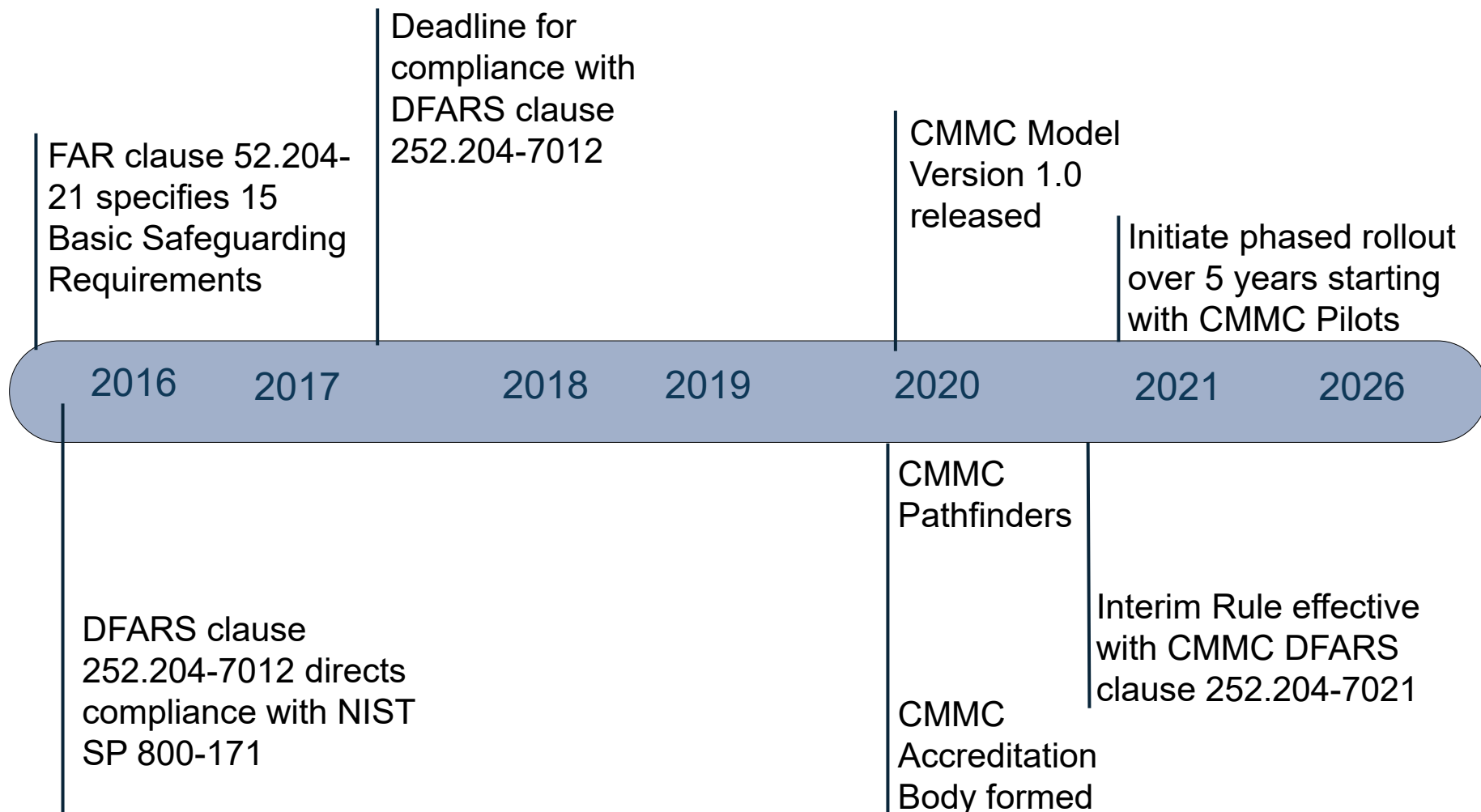
## Cybersecurity Maturity Model Certification

**Ms. Stacy S. Bostjanick**  
**Acting Director of Supply Chain Risk Management**





# CMMC Regulatory and Implementation Timeline



**DFARS Interim Rule for CMMC in effect; DoD initiating CMMC Pilot Kick Off meetings**



# DFARS Clause 252.204-7012: The Foundation for CMMC



## CMMC complements DFARS clause 252.204-7012: Safeguarding Covered Defense Information [Controlled Unclassified Information (CUI)] and Cyber Incident Reporting

DFARS clause 252.204-7012 requires contractors/subcontractors to:

- Safeguard CUI by implementing cybersecurity requirements in NIST SP 800-171
  - Document in a System Security Plans (SSP) how requirements are implemented
  - Maintain a Plan of Action and Milestones (POAM) for unimplemented requirements
  - Obtain approval from Contracting Officers for any variances or “alternate but equally effective controls” implemented to meet the requirements
- Report cyber incidents (to include lost or stolen devices)\*
- Isolate and submit malicious software for analysis\*
- Facilitate damage assessments
- Flow down the clause to subcontractors if CUI is conveyed (not applicable to COTS)

Contractors and subcontractors self-attest to compliance



# DFARS Case 2019-D041

## Assessing Contractor Implementation of Cybersecurity Requirements



The *interim rule* took effect 30 Nov 2020 / DoD implementing a 5-year phased roll-out

### DFARS Provision 252.204-7019 Notice of NIST SP 800-171 DoD Assessment Requirements

#### Solicitation Notice: Basic Assessment Score required in SPRS for contract award

- A [NIST SP 800-171 DoD Assessment](#) (Basic, Medium, High) summary level score must be posted into DoD's Suppliers Risk Performance System (SPRS) for the applicable CAGE code and Systems Security Plan
- The summary level score must remain current (not older than 3 years unless a lesser time is specified) throughout the life of the contract, task or delivery order

### DFARS Clause 252.204-7020 NIST SP 800-171 DoD Assessment Requirements

#### Basic Assessment Score required in SPRS to be considered for contract award

- Applicable to companies subject to DFARS clause 252.204-7012
- Post award, if DoD deems a Medium or High assessment is necessary due to program sensitivity, provide DoD access to facilities, systems and personnel
- Include clause in all subcontracts or other contractual instruments including subcontracts for commercial items
- Confirm subcontractor compliance with SPRS reporting if receiving CUI

### DFARS Clause 252.204-7021 Cybersecurity Maturity Model Certification Requirements

#### Cybersecurity Maturity Model Certification Required by contract award effective 1 Oct 2025

- Until 1 Oct 2025, OUSD(A&S) must approve clause in new acquisitions
  - Contractor certification level must be maintained for contract duration
  - Clause must be flowed down; primes must ensure subs are certified at required CMMC level prior to awarding subcontract
- Interim rule clauses are applicable to contracts, task orders and delivery orders
  - Not applicable to micro-purchases or solicitations exclusively for the purchase of COTS products

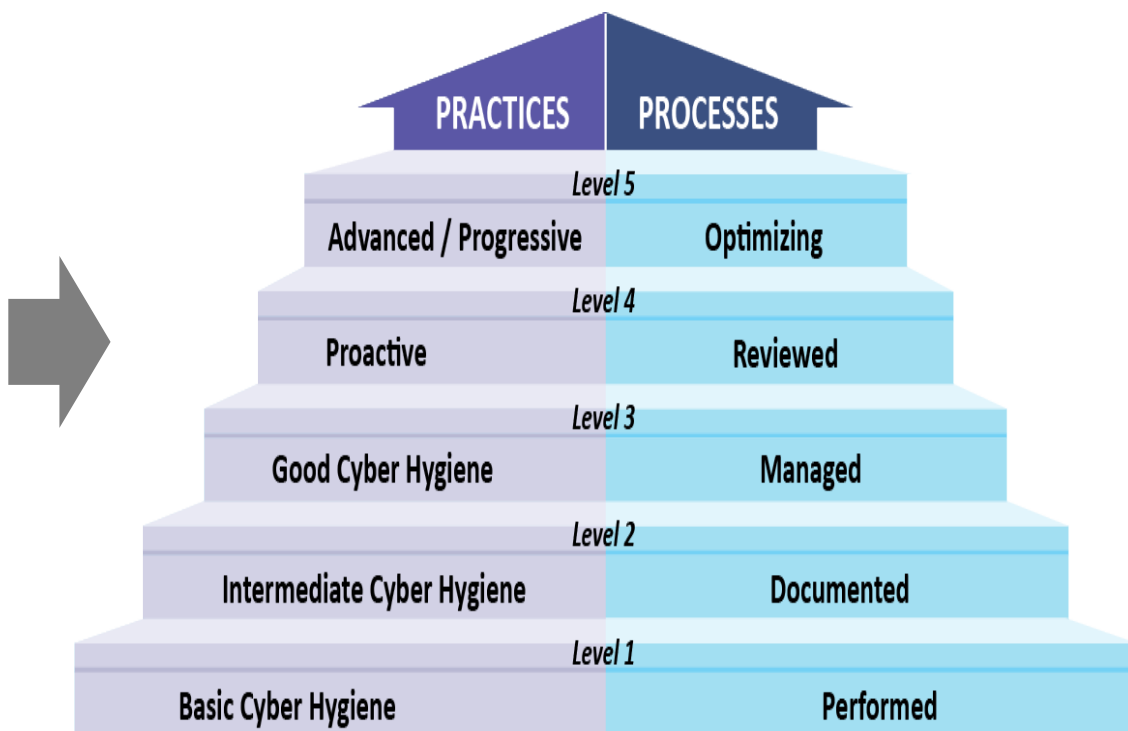
# CMMC Model Structure



## 17 Capability Domains (v1.0)

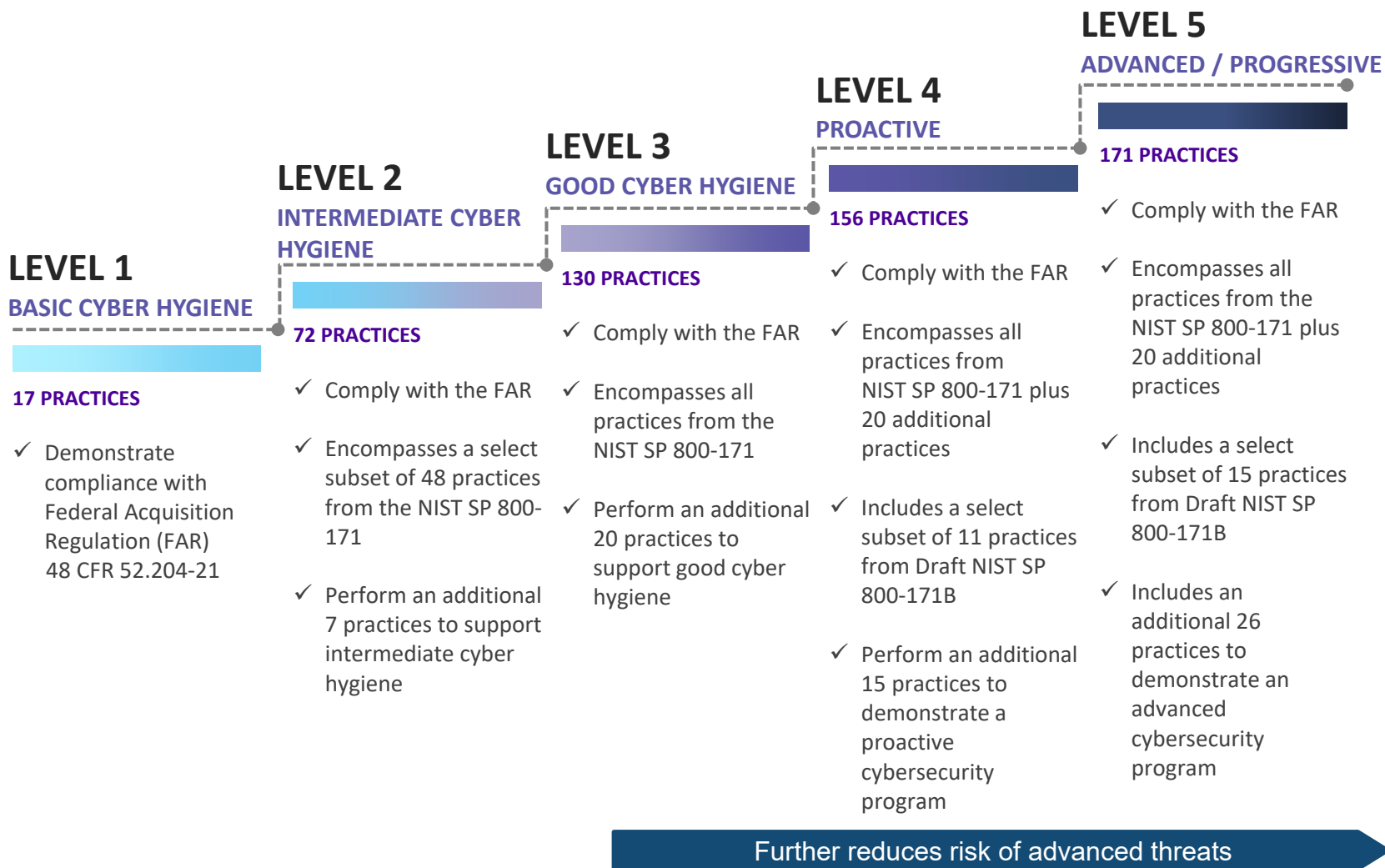
Access Control (AC)	Incident Response (IR)	Risk Management (RM)
Asset Management (AM)	Maintenance (MA)	Security Assessment (SAS)
Awareness and Training (AT)	Media Protection (MP)	Situational Awareness (SA)
Audit and Accountability (AA)	Personnel Security (PS)	System and Communications Protection (SCP)
Configuration Management (CM)	Physical Protection (PP)	System and Information Integrity (SII)
Identification and Authentication (IDA)	Recovery (RE)	

Capabilities are assessed for Practice and Process Maturity





# CMMC Practice Progression





# CMMC Risk Reduction: Pathfinders



- OUSD(A&S) funded risk reduction activities to inform CMMC implementation

## Missile Defense Agency (MDA) Pathfinder (Apr 2020 – present)



### Activity: Mock Assessments

Mock Assessors trained by CMMC-AB  
Conducted mock assessments:

- CMMC Level 3 'delta' of prime contractor
- CMMC Level 3 and Level 1 of two subcontractors



### Objective

Validate drafted CMMC Assessment Guides and gather lessons learned



### Outcome

Identified Lessons Learned to improve draft documentation and assessment processes



### Activity: Acquisition Tabletop

Conducted a sequence of evolving TTXs that focus on the DoD's acquisition processes from RFI to post contract award.



### Objective

Identify and reduce risks associated with implementing CMMC in future acquisitions



### Outcome

Developed exemplar RFI, RFP and flow down language to support contract actions

## Defense Logistics Agency (DLA) Pathfinder (Sep 2020-Present)

### Planned Activity: Mock Assessments



Conduct two mock assessments:

- CMMC Level 3 of two prime contractors
- Assessed by authorized C3PAOs



### Objective

Identify and reduce risks associated with newly authorized C3PAOs

**Mock Assessments are non-attributional, non-punitive and do not result in a certification**



# CMMC Implementation: Pilots (2 of 2)



- The following candidate programs have been identified by Services and Agencies:

Service or Agency	Program
<b>Army</b>	Foreign Military Sales (FMS) Field Service Representative Support
	Woman, Infant, & Children (WIC) Overseas Program for DHA-J10-TRICARE
	Main Operating Base-Installation Service Nodes (MOB-ISN)
<b>Navy</b>	Integrated Common Processor
	F/A-18E/F Full Mod of SBAR & Shut off Valve
	DDG-51 Lead Yard Services / Follow Yard Services
<b>Air Force</b>	Mobility Air Force Tactical Data Links
	Consolidated Broadband Global Network Area Network Follow-On
	Azure Cloud Solution
<b>Missile Defense Agency</b>	Technical Advisory and Assistance Contract

- DoD plans to implement CMMC using a phased rollout over five years commencing with a target of up to 15 new acquisitions in FY21:
  - The rollout ramps up over 5 years with CMMC in up to 475 new prime contracts by FY25
  - Until 1 Oct 2025, OUSD(A&S)/OCISO(A&S) CMMC Office must approve the use of the clause for new acquisitions



# DIB Contractor / C3PAO Business Relationship Basic CMMC Process



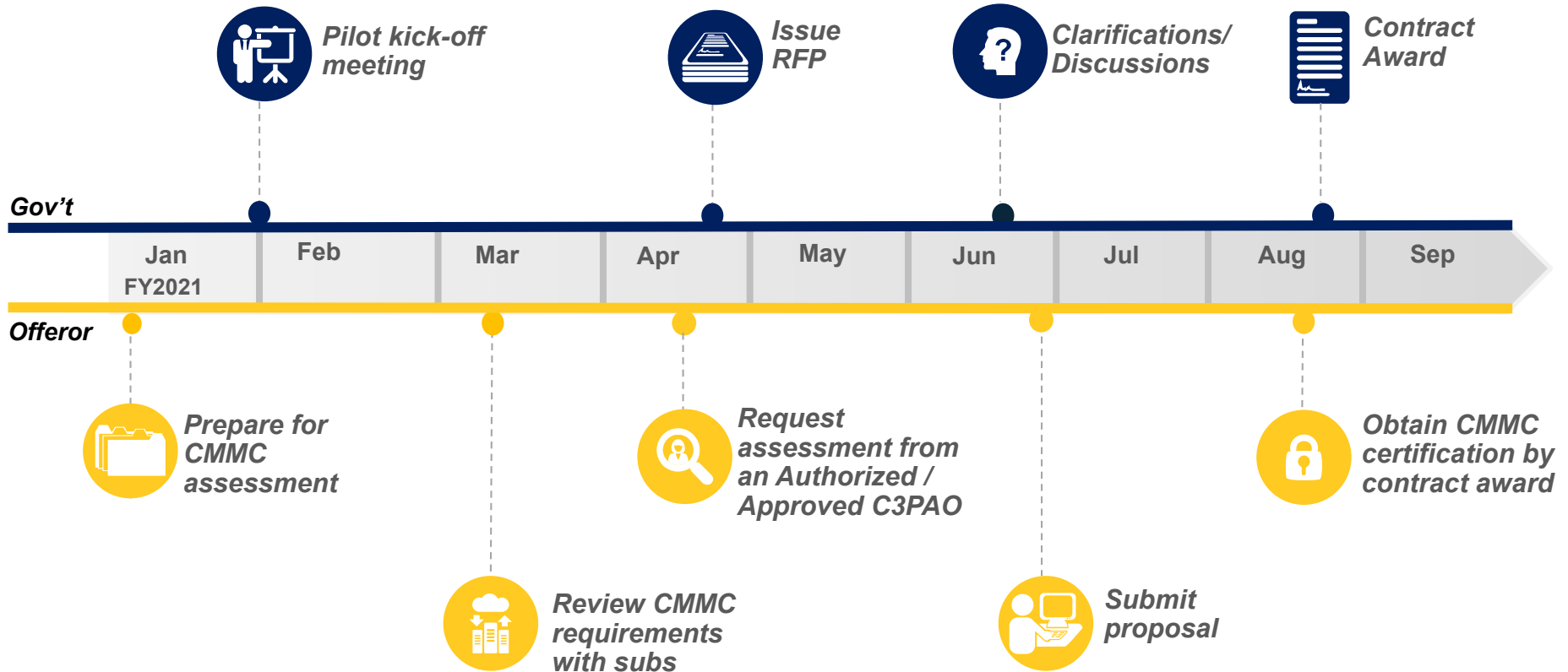




# Notional CMMC Pilot Timeline

## KEY PILOT MILESTONES

Below is a notional CMMC Pilot timeline outlining key milestones for the government and offerors:



e obtaining CMMC Certification by contract award



# Pilot Key Takeaways

**Until 1 Oct 2025, CMMC requirements will only be included in new acquisitions with the approval of OUSD(A&S) / OCISO(A&S)**

## **CMMC Pilot programs will include applicable CMMC requirements in RFPs**

- OUSD(A&S) is not funding CMMC Pilots
- CMMC certification must be met by contract award
- CMMC certification is required of the enterprise network or particular segment where FCI or CUI is processed, stored, or transmitted in performance of the particular contract
- CMMC certification must be maintained for the duration of the contract; recertification may be necessary depending on expiration date of the CMMC certification versus the contract end date

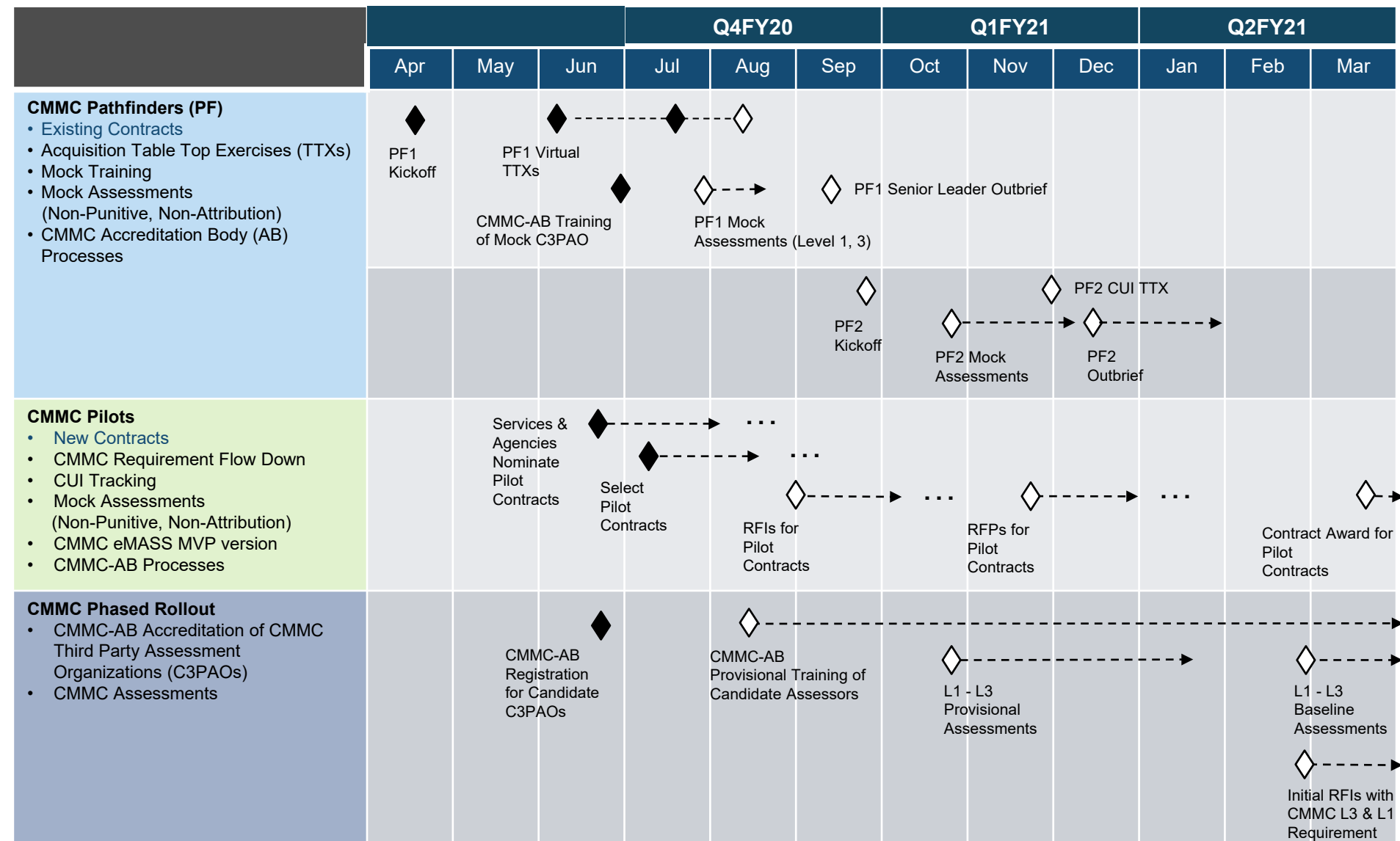
## **CMMC Pilot contractors will be required to achieve CMMC Certification**

- DIB Contractor enters into Business Relationship with an authorized / approved C3PAO
- CMMC certification is achieved by passing a CMMC assessment conducted by C3PAO
- All CMMC practices and processes must be implemented at the required CMMC Level
- CMMC does not allow POAMs
- If there are assessment findings, the contractor will need to remediate to achieve CMMC certification
- CMMC Certification is good for three years

**OUSD(A&S) will provide guidance and support during Pilot roll-outs**



# Draft CMMC Schedule



# Projected CMMC Roll-Out



- **OUSD(A&S) will work with Services and Agencies to identify candidate programs that will have the CMMC requirement during FY21-FY25 phased roll-out**

Total Number of Contracts with CMMC Requirement				
FY21	FY22	FY23	FY24	FY25
15	75	250	479	479

Total Number of Prime Contractors and Sub-Contractors with CMMC Requirement					
	FY21	FY22	FY23	FY24	FY25
Level 1	895	4,490	14,981	28,714	28,709
Level 2	149	748	2,497	4,786	4,785
Level 3	448	2,245	7,490	14,357	14,355
Level 4	4	8	16	24	28
Level 5	4	8	16	24	28
<b>Total</b>	<b>1,500</b>	<b>7,500</b>	<b>25,000</b>	<b>47,905</b>	<b>47,905</b>

- **All new DoD contracts will contain the CMMC requirement starting in FY26**



<https://www.acq.osd.mil/cmmc/index.html>



# General Services Administration

- Removal of GSA Approved Black Label
- Containers & Vault Doors
- NISPAC meeting 4/14/2021



General Services Administration  
Interagency Committee on Security Equipment and Locking Systems  
27 January 2021

To: All GSA-Approved Manufacturers & Training Organizations

Subject: Phase-out Plan for Black Label Security Containers & Vault Doors

All,

The General Services Administration, Interagency Committee on Security Equipment (GSA/IACSE) in coordination with the Information Security Oversight Office (ISOO) is developing a phase-out plan for all GSA-approved security containers and vault doors manufactured prior to 1989 (Black GSA Label). The plan will rescind the approval for all GSA-approved security cabinets and vault doors manufactured from 1954 through 1989 (Black GSA-Approval labels) to store classified information and materials over a period of 4 years starting on as of October 1, 2024

The phase-out plan will start with the oldest cabinets (class 2) and proceed to the last of the Black Label security equipment (class 5 & 6) over a period of at least 4 years as outlined below.

All GSA-approved Class 1, 2, 3 & 4 cabinets manufactured under Federal Specifications AA-F-357 and AA-F-358 600 (Revision Indicators A - F) will be considered obsolete for the storage of classified information and materials as outlined in the below chart.

All GSA-approved Class 5 & 6 cabinets and vault doors manufactured under Federal Specification AA-F-358 (Revision Indicators A - F) and AA-D-600 (Revision Indicators A - C) before 1989 will be considered obsolete for the storage of classified information and materials as of 1 October 2028.

**Black Label Phased-Out Plan Chart**

GSA CLASS	FED SPEC	REVISION	YEARS PRODUCED	YEARS OF SERVICE	END OF SERVICE
1	AA-F-357	A - F	1968 - 1982	46 - 60	1 October 2028
2	AA-F-357	A - F	1954 - 1970	50 - 70	1 October 2024
3	AA-F-358	A - F	1956 - 1968	52 - 69	1 October 2025
4	AA-F-358	A - F	1956 - 1968	52 - 69	1 October 2025
5	AA-F-358	A - F	1968 - 1989	31 - 60	1 October 2028
5	AA-F-363	A - B	1963 - 1989	57 - 65	1 October 2028
5	AA-D-600	A - B	1963 - 1989	57 - 65	1 October 2028
6	AA-D-600	A - C	1963 - 1989	57 - 65	1 October 2028
6	AA-F-358	A - F	1968 - 1989	52 - 60	1 October 2028

Please contact the Chairman of the GSA/IACSE, Mr. Christopher Pollok, if you have and questions at [Christopher.pollock@gsa.gov](mailto:Christopher.pollock@gsa.gov).

Sincerely,

DocuSigned by:

*Christopher Pollock*

46435F98A6014E3...  
Christopher Pollock

Chairman

Interagency Committee for Security Equipment  
(IACSE)

General Services Administration

1800 F Street, NW

Washington, DC 20405

Sincerely,

**JUSINO.ROY.1009**

**641080**

Roy Jusino

Chairman

Security Equipment and Locking Systems  
(SEALS) Sub-committee

NAVFAC EXWC

1100 23<sup>RD</sup> Avenue

Port Hueneme, CA 93043-4370

Digitally signed by

JUSINO.ROY.1009641080

Date: 2021.01.27 16:09:01 -08'00'



# Examples



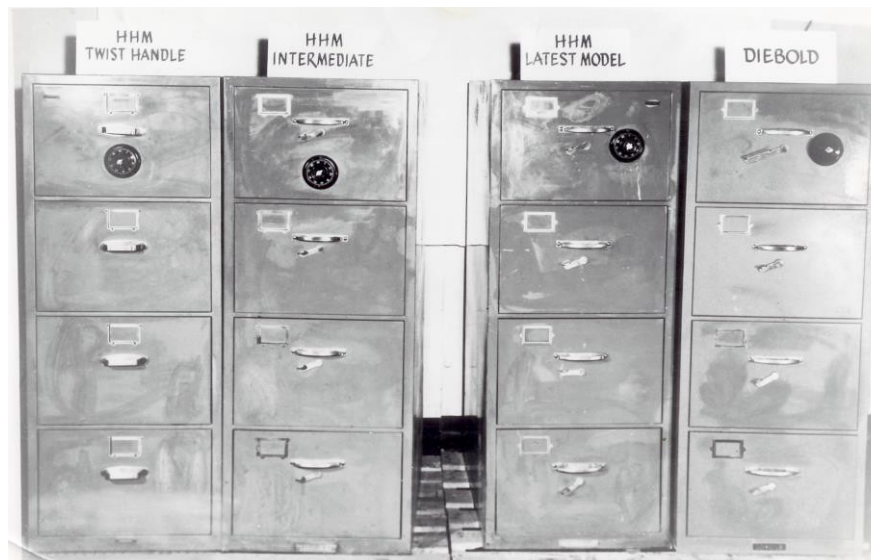
RED Label Class 6  
GSA-approved  
Container



BLACK Label Class 3  
GSA-approved  
Container

# Why?

- Black Label GSA containers can be 30 - 65 years old which leads to:
  - Safety Issues
    - Drawer slides worn out
    - Drawer stops breaking off
    - Rusty interiors
  - Security Issues
    - Old steel plate designs (no lock box)
    - Old hard plate designs (cast lock box)
    - Old combination locks (mechanical)
  - Repair Issues
    - No parts available
    - Manufacturers are no longer in business



# Industry Requirements

- Survey your facilities for GSA-approved containers
  - Determine how many old Black Label containers and vault doors are still in use
  - Determine if they are still required
    - Facility accreditation review
    - Possible classified Holding's reduction
- Work with your Accrediting Authority and/or Contracting Officer to formulate a Company plan for replacement of the identified Black Label containers & vault doors that are still required over the allotted time period.

Questions?

Thank You!

# Information Security Oversight Office

Protect • Inform • Assess



# NISPPAC Working Groups

- NISP Information Systems Authorization (NISA)
  - Discussed Solid State Sanitization
  - Last mtg 3/31/2021
- Clearance
  - NISPOM rule effective 2/24/2021
    - Contractors have to comply no later than 8/24/2021
    - Format is different
  - Last mtg 3/3/2021

# NISPPAC Working Groups

- FOCI (formerly called NID)
  - Discussed NDAA for FY 2019 Section 842, Removal of National Interest Determination (NID) Requirements for Certain Entities which stated a covered National Technology and Industrial Base (NTIB) entity operating under a special security agreement pursuant to the NISP shall not be required to obtain a NID as a condition for access to proscribed information beginning October 1, 2020
  - Last mtg 12/9/2020
- Cost
  - Gov't only at this time
  - Discussed how to collect costs of NISP for Industry
  - Last mtg 12/2/2020

- **NISP Systems**

- Discussed the systems associated with the NISP program at the various CSAs
- Last mtg 9/10/2020

- **Insider Threat**

- Discussed training and certification of security professionals, insider threat plans, Section 9403 of the NDAA for FY 2021 (federal policy on the sharing of information pertaining to contractor employees in the trusted workforce)
- Last mtg 9/2/2020

- **Policy**

- Discussed 32 CFR 148 and 2004 Integration, reciprocity