The Evolving NISP: Navigating the Road Ahead

- NISPOM revision
- CUI program implementation
“...single, cohesive, integrated program to ensure the protection of classified information in the hands of industry”

- Requirements based on consideration of 3 pillars:
  - Damage to national security
  - Threat to disclosure
  - Cost of requirements

“To the extent that is practicable and reasonable,” those requirements shall be consistent across government and industry.

NISPOM Reissuance

Who:
- DoD as Executive Agent
- NISPPAC NISPOM Rewrite Working Group chaired by ISOO

What:
- Updates 2006 NISPOM version, includes Changes 1-3
- Goal: up-to-date NISP operations
  - Changing threat landscape
  - Cybersecurity environment

Major changes:
- Focuses solely on classified information. Removes references to “unclassified”.
- Removes government agency responsibilities
- Incorporates Risk Management Framework (RMF) for information systems
- Incorporates new national-level reporting requirements
- References other national-level policies as they apply, vice duplicating within the NISPOM

When:
- Estimated CY 2019 as a Federal Rule

- ISOO responsible for issuing the Directive to implement the NISP

- New version issued on **May 7, 2018**
  - Effective date: **June 5, 2018**

- Establishes responsibilities for NISP agencies
  - ISOO
  - Executive Agent
  - CSAs
  - GCAs
New 32 CFR 2004

- Adds insider threat responsibilities and requirements for NISP agencies (E.O. 13587)
- Recognizes ODNI as a CSA (Intelligence Reform & Terrorism Prevention Act)
- Recognizes DHS as a CSA and incorporates White House approved provisions for the DHS Classified Critical Infrastructure Protection Program (E.O. 13691)
- Fills policy gaps for NISP agencies to align with NISPOM provisions for contractors
  - Consistent standards for determinations of contractor eligibility for access to classified information
  - Consistent standards to determine and mitigate FOCI and make NIDs
  - Contract security classification responsibilities
  - Oversight of contractor industrial security programs
  - Terminology and definitions to accommodate all 5 CSAs
- Focus on accountability of the government and better defines its responsibilities
Addresses policy issues and other NISP matters of interest and concern

- ISOO Director chairs
- 16 government and 8 industry members
  - Subject to FACA
  - Meeting notices in the Federal Register
  - Meets 3x/year
- Working groups
  - Clearance
  - NISP Information Systems Authorization
  - Insider threat
  - NID
  - NISPOM rewrite
- Next public meeting: Wed. July 19, 2018, National Archives
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Controlled Unclassified Information Program

- Implementation Projection (3-4 years).
- Implementation Activities (Focus on: Leadership, Policy, Training, and Annual Report to the President).
- Registry and Marking Handbook Revisions.
- CUI Notice 2018-01 (Guidance for drafting agreements).
- CUI Notice 2018-02 (Recommendations for basic training).
- Federal Acquisition Regulation for CUI (FY19).
- Training videos (YouTube).
- **ISOO web page:**

- **ISOO policy documents:**
  - **E.O. 12829:**
  - **Implementing Directive (32 C.F.R. Part 2004):**

- **NISP and NISPPAC pages**
  - Member listings
  - Charter and Bylaws
  - Minutes of NISPPAC meetings

- **CUI web page:**
  - [https://www.archives.gov/cui](https://www.archives.gov/cui)
Baby Stach

SOMETHING TELLS ME
I DON'T BELONG HERE.
QUESTIONS?
COMMENTS?