National Industrial Security Program Policy Advisory Committee (NISPPAC)

NISPPAC Industry Updates

November 2021 Update

"Approved for Public Release"

Industry's Role on the NISPPAC

- The NISPPAC was created 8 Jan 93, by Executive Order 12829, "NISP" Functions:
  - ✓ Advise the Chair of the Committee (ISOO, Director) on all NISP policies, including recommending changes
  - ✓ Serves as a forum to discuss policy issues in dispute.
- Comprised of 16 government and 8 industry members
- Two new industry members elected annually
- Nominations by current industry NISPPAC & MOU members
- Meets publicly at least twice a year
- Creates Working Groups covering several NISP topic areas
- Industry members represent ALL NISP companies (Small, Medium, Large, FFRDC/UARC, etc.) and not their own self-interest or company interest
- Industry members are skilled in NISP Functions

Who We Are

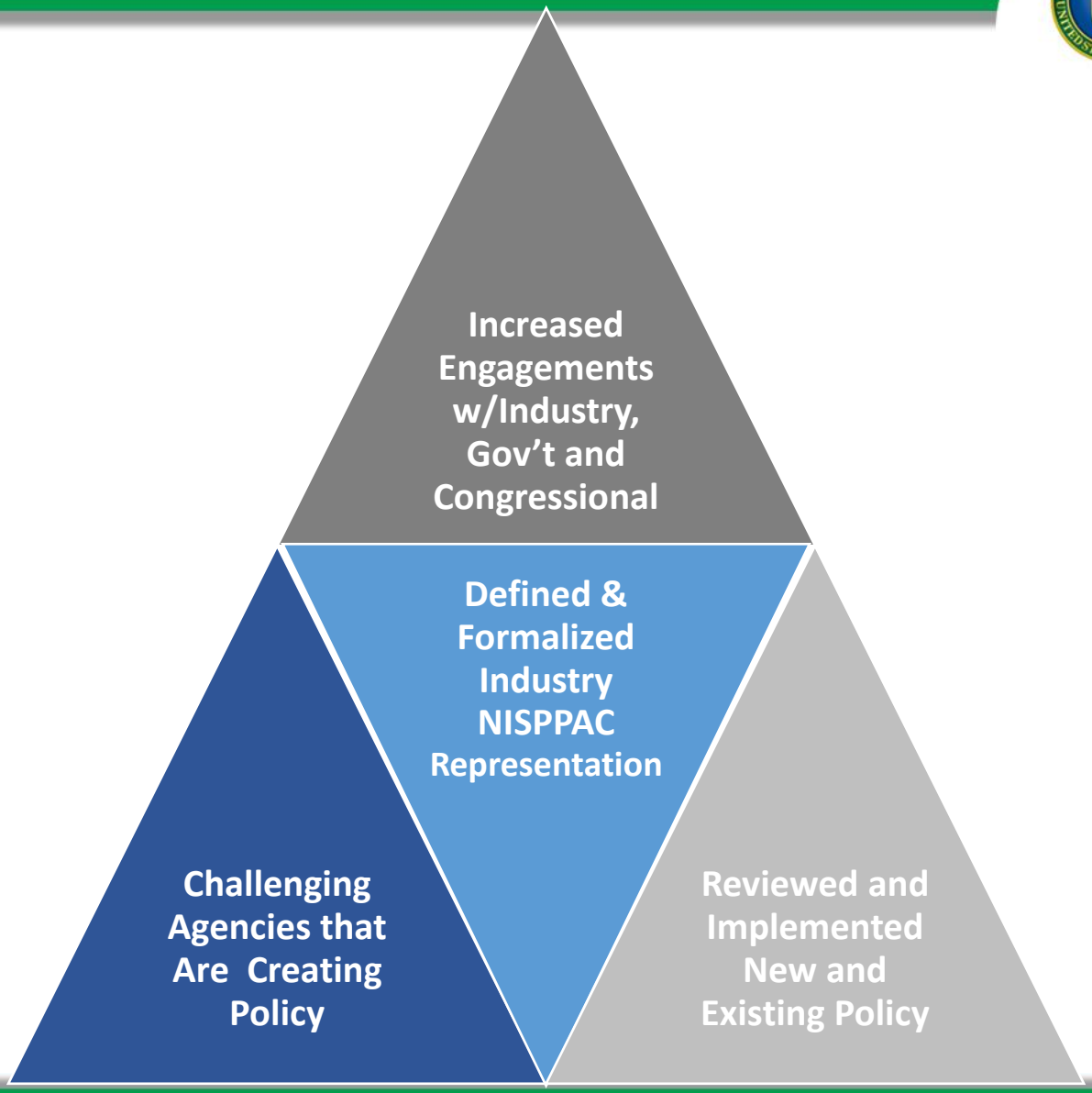
INDUSTRY	
Heather Sims, Spokesperson	L3Harris
Aprille Abbott	MITRE
Rosie Borrero	SASSI
Derek Jones	MIT Lincoln Labs
Dave Tender	ASRC Federal
Greg Sadler	GDIT
Tracy Durkin	Mantech
Cheryl Stone	RAND Corp

INDUSTRY MOU	
Kai Hanson	AIA
Jonathan Fitz-Enz	ASIS
Joe Kraus	CSSWG
Jordan Baxter	FFRDC/UARC
Kathy Pherson	INSA
Pending Elections	ISWG
Lynn Burns	NCMS
Michelle Sutphin	NDIA
Marc Ryan	PSC

For the most up to date member listing, refer to archieves.gov/isoo.oversight-groups/nisppac

The Last Two Years

Industry NISPPAC Efforts=2 Years



Strategic Industry NISPPAC Priorities

TWF 2.0

CUI/CMMC

RMF

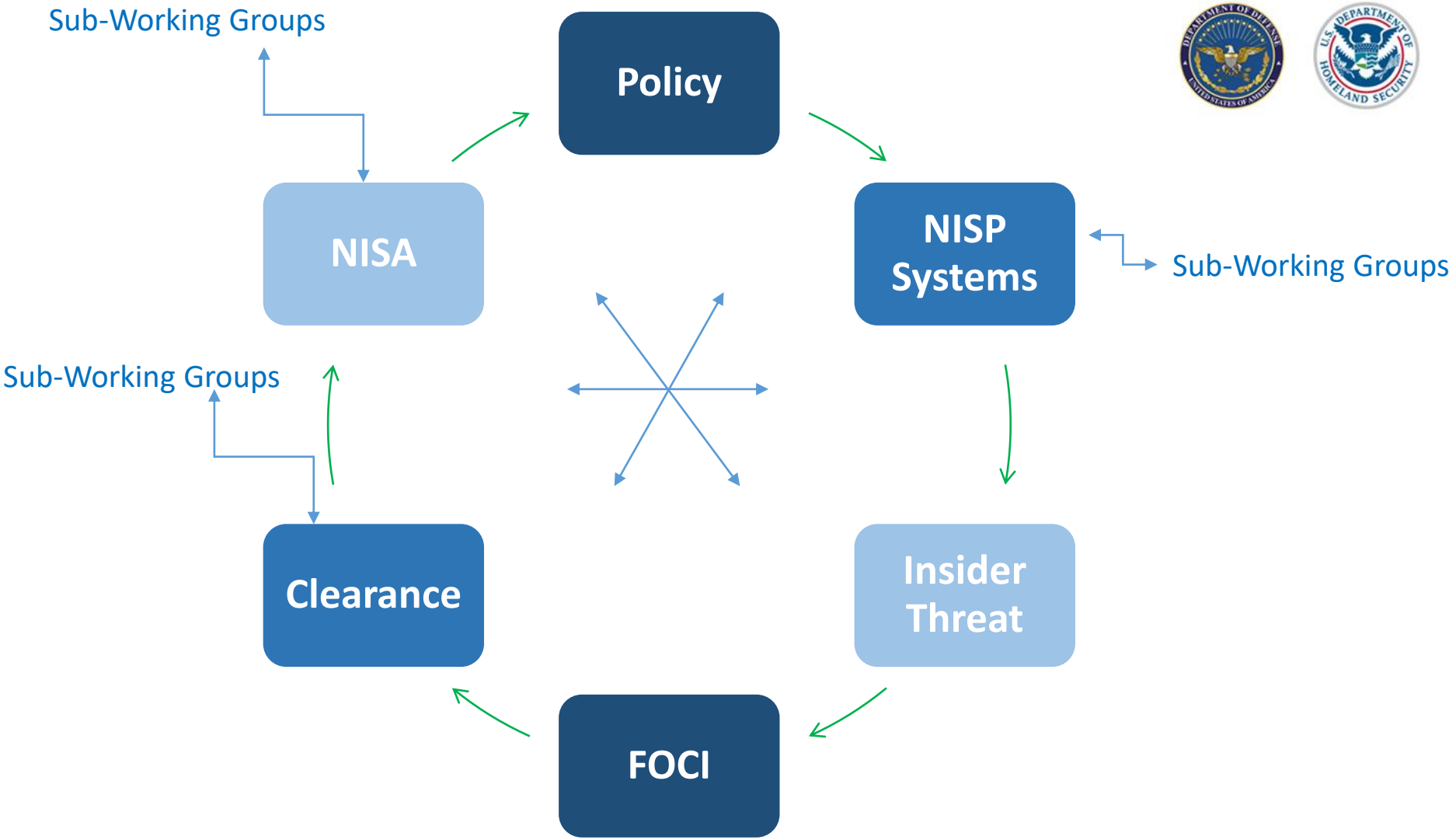
NISP Systems

CSA Processes/ Guidance

UNITING INDUSTRY'S VOICE

WORKING NISP ISSUES THROUGH FORMAL CHANNELS FOR IMPROVEMENT ACCOUNTABILITY

Current NISPPAC Working Groups



NISPOM Rule, 32 CFR, Part 117

- **Key Changes-How does it impact your company?**
  - SMO Duties-*applies to 100% of Cleared Companies*
  - Incorporation of SEAD 3 reporting requirements-*applies to 100%*
  - TS Accountability- *applies to less than 100 Cleared Companies*
  - IDS Installation- *applies to Cleared Companies that have IDS*
  - Safeguarding-*applies to less than 4000 of Cleared Companies*
  - Classified Information Retention-*applies to 100% Companies* that have safeguarding
  - Section 842 Public Law 115-232-Gov't-Foreign Companies w/Proscribed Information
  - Two Types of Limited FCLs-Gov't
  - Granting FCLs-Gov't
- **Tools**
  - List of major changes in the preamble of the Rule
  - Cross Reference Tool
  - CDSE Webinar and Other Engagements
  - DCSA updating tools, oversight guidance/rating system and NISP systems
  - CSAs provided their NISPOM implementation plans at the April Public NISPPAC Mtg
- **Recommendations for Industry**
  - ISL are not stand alone, READ and KNOW the POLICY
  - Make informed decisions
  - Use available tools
  - Ask for help/send in compliance interpretation concerns

National Level Policy Updates

- **SEADs-ODNI**
- **ISLs (not stand-alone documents)**
  - SEAD 3- Adverse Information Reporting
  - 32 CFR, Part 117
  - Usage of EPL List and Crosscut Shredders
  - Insider Threat
  - Top Secret Accountability
- **KMP Designation and SMO Training**
- **CUI/CMMC Implementation**
- **GSA Announcement of Black Label Phase Out (Black and silver label)**
  - Phase out of GSA approved security containers and Vault Doors manufactured prior to 1989
  - Phasing out from 1954-1989
  - Over a period of 4 years starting as of October 1, 2024

Clearance Working Group

- **Industry NISP Priorities/Watch List**
  - *NISPOM, 32 CFR, Part 117/SEAD 3*
    - Oversight-Compliance Updates from CSAs
    - What is reportable under SEAD 3?
    - SEAD 3 ISL-Foreign Travel
    - SMO training requirements
  - *TWF 1.5 and 2.0*
    - NBIS
      - Industry Requirements/Testing
      - Transition from DISS to NBIS
    - CV – 9/30 DNI Mandate
      - Current Process
      - Current Numbers Due to Be Compliant
  - FCL process and Timelines (Metrics)
  - New Self-Inspection Handbook
  - DCSA Org Chart and Leadership Roles

Insider Threat Working Group

1. Information Sharing
   - Items known by the Govt and sharing to Industry
   - All Security relevant information
   - May Cyber EO requires information sharing across Govt

2. DRAFT SEAD 9, Trusted Workforce, Whistleblower

3. SEAD 3 ISL Self Reporting
   - ✓ Consolidated Reporting for multiple agencies
   - ✓ Reporting to CISA and ISRs?
   - ✓ Adverse Information Reporting

4. Insider Threat Policy Implementation
   - How is the Govt measuring effectiveness?
   - Consistent Roll out

5. Mandatory COVID Immunization

NISP System Working Group

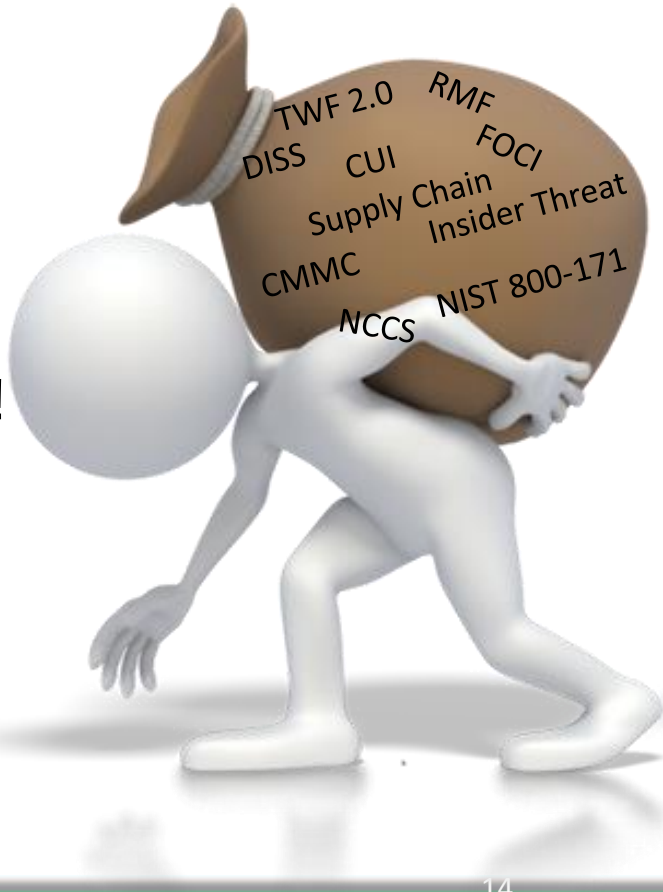
- Consists of 5 primary sub working groups
  - JPAS-DISS
    - Lead: Jeremy Wendell
  - NBIS/e-APP
    - Lead: Quinton Wilkes
  - NCCS
    - Lead: Gregory Sadler and Amber Elliott
  - NISS
    - Lead: Lisa Reidy
  - SWFT
    - Lead: Jonathan Fitz-Enz
  - Other CSA Systems
    - eMass: Scott Taylor has been providing a liaison between the NISA working group and DCSA
    - As the need arises for coordination of additional CSA systems

NISA Working Group

- Increased NAO/RAO Collaboration
- eMASS Package Workflow Enhancements (CY 22)
  - ✓ More transparent tracking of submissions/approval process
- RMF Package Approval Timelines
  - ✓ SCA Triage
- NISP Connection Process Guide
- Moving Forward.. Industry Priorities?

Evolving NISP
Understanding Impact to Industry

- Alignment/Unity of Industry on the Basics
- Read/Understand the Policies
- We don't have to ask DCSA permission for everything!
- Proactive Communication-Industry and Gov't
- What can we expect from our CSA?
- New/Bad Processes=New Industry Burden
- Engagement at all levels but at the right level!
- UTOPIA!!! Industry self ID issues & partner w/Gov't-Don't operate in Fear
- Approach when things are not working well!



Industry NISPPAC on the Web

https://classmgmt.com/nisppac.php

Industry NISPPAC by email

nisppacindustry@gmail.com

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QUESTIONS ???